

Persons / Bodies who made submissions within the statutory timeframe

Submission no	Submission received from
1.	Office of the Planning Regulator
2.	Department of Education and Skills
3.	Environmental Protection Agency
4.	Transport Infrastructure Ireland
5.	OPW
6.	Irish Water
7.	Gas Networks Ireland
8.	Clare County Council
9.	Padraig Broderick
10.	Bryan Smyth
11.	Plunkett Hayes & Co Solicitors
12.	Mary Hughes HRA on behalf of Michael Costello
13.	David Moloney
14.	Clever Clogs c/o Karen O' Rourke
15.	Mary Hughes HRA Planning on behalf of EI-SUB LTD
16.	Cllr Richard O' Donoghue
17.	Maria Lombard RPS on behalf of Toomey Construction Ltd
18.	Tom Shanahan
19.	Carmel Marchant
20.	Richard Rice C/O Healy Partners Architects on behalf of Nivon Healthcare t/a Zest Healthcare

Persons / Bodies who made submissions outside the statutory timeframe

Submission no	Received from:
1	Elaine O' Connor on behalf of Croom Enterprise Centre



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator



30th September 2019

Forward/Strategic Planning Section,
Economic Development Directorate,
Limerick City & County Council,
Merchants Quay,
Co. Limerick

RE: Draft Croom Local Area Plan 2019-25

A Chara

Thank you for your authority's work in preparing the local area plan for Croom.

The Office of the Planning Regulator has assessed the draft Local Area Plan (LAP) above under the relevant provisions of the Planning and Development (Amendment) Act 2018 and under which the Office of the Planning Regulator (OPR) was established on 3rd April last.

As your authority will be aware, one of the key functions of the OPR includes assessment of statutory plans and strategies to ensure consistency with legislative and policy requirements relating to planning.

1. Consistency with the Hierarchy of Statutory Plans

The Office notes that the proposed LAP was prepared prior to the making of the Regional Spatial and Economic Strategy (RSES) for the Southern Regional Assembly, which will further develop and apply the policies of the National Planning Framework (NPF) at regional level. Once adopted, the RSES for the Southern Regional Assembly area will provide strategic direction for the formulation of the subsequent Limerick City and County Development Plan and a further context for alignment of plans at national, regional and local level.

The Office acknowledges the Strategic Policy position as set out in Section 3.4 of the Draft Croom LAP 2019-25, and the objective to review the LAP following the publication of the regional and county statutory plans as set out in policy objectives S1 and S2. The Office welcomes these policy objectives. Once the city and county development plan review has been completed, the Office wishes to further engage with your authority in relation to the development of a timetabled program of reviews of relevant local area plans in the light of the new development plan.

2. Residential Development Land Zonings

Section 3.7 of the Draft Croom LAP details the population and zoning requirements and the assumptions. The Draft LAP estimates that the population of Croom will increase from 1,157 in 2016 by an additional 439 persons in 2026. This amounts to a population increase of 38% within a 6 to 7 year timeframe and based on average household sizes would require 176 additional housing units. The Implementation Roadmap for the NPF (2018) indicates a maximum headroom not exceeding 25%. This would provide for a total population increase of 549 persons and an increase in population of 47% over and above the 2016 level. The anticipated required housing is 220 units. Table 6, Chapter 3 of the Draft Croom LAP indicates a housing vacancy of 15 residential units which would therefore suggest overall housing requirement of 205 units.

Appendix 4 of the draft Croom LAP sets out a 'Serviced Lands Matrix and Map' which provides commentary on the infrastructure provision for undeveloped residential land. The total area of undeveloped serviced residential land is 14.28ha and density recommendations as set out in Chapter 6 of the Sustainable Residential Developments in Urban Areas, Guidelines for Planning Authorities (2009) is 15 – 20 dwellings per hectare for sites situated on the 'edge of small town / villages'. The sites identified no. 1 to no. 8 in the 'residential and service sites infrastructure assessment' having regard to densities recommended in the S. 28 guidelines, would have the potential to deliver approximately 250 housing units. This housing provision would accommodate an increase of 625 persons on average. An additional 625 persons in Croom would amount to a population increase of 54% from the 2016 census figure.

The planning authority has made assumptions on this target population growth in advance of the relevant RSES and City and County Development Plan being completed for the Limerick City and County. In addition, National Policy Objective (NPO) 37 of the NPF calls for the preparation of a Housing Need Demand Assessment (HNDA) to be undertaken for each local authority area in order to correlate and accurately align future housing requirements.

An oversupply of residentially zoned lands and their development outside the Limerick City area could potentially erode the compact growth model.

It is considered that the proposed residential zonings in the LAP may likely exceed the quantum of lands deemed appropriate in the context of the future adoption of the RSES and the subsequent CDP including its core strategy. Accepting the interim nature of this local area plan review, a phasing schedule should be applied. Accordingly, the Office recommends;

Recommendation 1: The Office recommends that your authority includes a phasing schedule for residentially zoned lands. The phasing must ensure that an appropriate level of new housing development is provided during the interim period pending future review of the Croom LAP (in accordance with Recommendation 1 above), which would appear to be an increase of 200 housing units over the initial phasing period.

3. Proposed Road Infrastructure

This Office notes a proposed distributor road, approximately 500m in length, located to the north and travelling through land zoned for 'agriculture'. The proposed road travels through lands that are subject to flooding. The function of this road and the proposed funding mechanisms as well as the delivery timescale are unclear, bearing in mind the nature of the surrounding land-use zoning objective. The Local Area Plans, Guidelines for Planning Authorities (2013) highlight the critical need to identify infrastructural delivery phasing and funding mechanisms where a significant new development is proposed in an LAP.

The transport rationale, funding mechanisms and planned timescale for the delivery of this new road infrastructure have therefore not been sufficiently set out in the LAP.

Recommendation 2: The Office recommends that the planning rationale for this substantial distributor road infrastructure is provided and a timescale for the anticipated delivery and funding mechanisms are clarified or that the inclusion of the objective be re-considered.

4. Education & Community Facilities - Land Zonings

There is significant land zoned 'Education and Community Facilities' located to the north and to the north east of a flood zone area. The draft plan is unclear in its rationale and basis for the significant extent of these zoned lands given the extent of other lands zoned for 'Education & Community Facilities' (both developed and undeveloped) which are centrally provided within Croom under the Draft LAP. The Development Plans, Guidelines for Planning Authorities (2007) and the Local Area Plans, Guidelines for Planning Authorities (2013) encourage sequential development requiring that undeveloped lands closest to the core are given preference, while also requiring a clear evidence base supporting the need for the specific zoning. The zoning of these lands would appear to be contrary to these requirements and excessive given the scale of development provided for in the Draft LAP for Croom.

Recommendation 3: The Office recommends that your authority reviews and examines the proposed zoning of lands 'Education & Community Facilities' at the northern periphery of Croom and provide a robust planning rationale for the need to zone these lands for such a purpose.

Summary

The Office requests that your authority addresses the three specific recommendations outlined above, which are made in the context of the provisions of Section 31AO(3)(a), in order to ensure that the LAP is consistent with relevant national policy obligations, guidelines and legislative requirements.

The report of the Chief Executive of your authority prepared for the elected members under Section 20 of the Act must summarise these recommendations and the manner in which they should be addressed.

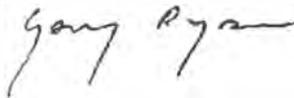
Your authority is required to notify this Office within 5 working days of the making of the local area plan and send a copy of the written statement and maps as made.

Where the planning authority decides not to comply with a recommendation of the Office, or otherwise makes the plan in such a manner as to be inconsistent with any recommendations made by the Office, then the Chief Executive shall inform the Office and give reasons for the decision of the planning authority.

Such notice requirements enable the Office to consider the matters further as regards the making of any recommendations to the Minister in relation to the provisions of Sections 31AO and 31AP of the Act.

Please feel free to contact the staff of the OPR in the context of your authority's responses to the above, which we would be happy to facilitate. Contact can be initiated through the undersigned or at plans@opr.ie.

Is mise le meas,



[Redacted]
[Redacted]

[Redacted]
[Redacted]



Forward/Strategic Planning
Economic Development Directorate
Limerick City & County Council
Merchants Quay
Limerick
V94 EH90

26th September 2019

Re: Draft Croom Local Area Plan 2019

To whom it may concern,

Dear Sir/Madam,

I wish to acknowledge receipt of the above draft plan. The Department of Education and Skills has examined the contents therein and wishes to make the following submission.

The Department notes with interest the Population Targets section (3.7.1 page 26) of the document, where the population growth figures over the lifetime of the plan (Table 5) are projected to increase by a potential 439 persons. If this projected population increase materialises, a requirement for further education provision at both primary and post-primary level may emerge over the lifetime of the proposed new Plan.

The Department wishes to state that lands adjacent to existing schools should be where possible protected for potential future educational use to allow for expansion of these schools, if required, subject to site suitability and agreement of the various stakeholders.

If you have any queries in relation to the above or require any additional information please do not hesitate to contact me.

Yours sincerely,

Alan Hanlon

[Redacted contact information]



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Inniscarra,
County Cork, Ireland
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[REDACTED]
Forward/Strategic Planning
Economic Development Directorate
Limerick City and County Council
Merchants Quay
Limerick

6th September 2019

[REDACTED]

Re. SEA Screening for the Proposed Croom Local Area Plan 2019-2025

Dear [REDACTED]

We acknowledge your notice, dated 16 August 2019, in relation to the Proposed Croom Local Area Plan 2019-2025 (the 'Plan') and associated Strategic Environmental Assessment (SEA) screening.

The EPA is one of five statutory environmental authorities under the SEA Regulations. In our role as an SEA environmental authority, we focus on promoting the full and transparent integration of the findings of the Environmental Assessment into the Plan and advocating that the key environmental challenges for Ireland are addressed as relevant and appropriate to the plan. Our functions as an SEA environmental authority do not include approving or enforcing SEAs or plans.

As a priority, we focus our efforts on reviewing and commenting on key sector plans. For land use plans at county and local level, we provide a 'self-service approach' via our guidance document '[SEA of Local Authority Land Use Plans – EPA Recommendations and Resources](#)'. This document is updated regularly and sets out our key recommendations for integrating environmental considerations into Local Authority land use plans. We recommend that you take the available guidance into account and incorporate the relevant recommendations as relevant and appropriate to the Plan. We refer you to our previous submission dated 1st April 2019, which is attached, and which should also be taken into account at this time.

Proposed SEA Determination

We note your proposed determination regarding the need for SEA of the Plan.

In proposing and in implementing the Plan, Limerick City and County Council should ensure that the Plan is consistent with the need for proper planning and sustainable development. You should ensure that the Plan is consistent with the aims of the National Planning Framework Ireland 2040 and the Draft Southern Regional Spatial and Economic Strategy. Appropriate critical service infrastructure should be in place, or required to be put in place, to service any development proposed and authorised during the lifetime of the Plan.

In considering the Plan, Limerick City and County Council should take into account the need to align with national commitments on climate change mitigation and adaptation, as well as incorporating any relevant recommendations in sectoral, regional and local climate adaptation plans.

State of the Environment Report – Ireland’s Environment 2016

In preparing the Plan, the recommendations, key issues and challenges described in our most recent State of the Environment Report Ireland’s Environment – An Assessment 2016 (EPA, 2016) should be considered, as relevant and appropriate to the Plan.

Available Guidance & Resources

Our website contains various SEA resources and guidance, including:

- SEA process guidance and checklists
- Inventory of spatial datasets relevant to SEA
- topic specific SEA guidance (including ‘Developing and Assessing Alternatives in SEA, ‘Integrating Climate Change into SEA’ and ‘Integrated Biodiversity Impact Assessment’)

You can access these resources at: www.epa.ie/monitoringassessment/assessment/sea/

EPA SEA WebGIS Tool

Our SEA WebGIS Tool, available through the EDEN portal (https://gis.epa.ie/EIS_SEA/), allows public authorities to produce an indicative report on key aspects of the environment in a specific geographic area. It is intended to assist in SEA screening and scoping exercises.

EPA WFD Application

Our WFD Application provides access to water quality and catchment data from the national WFD monitoring programme. The Application is accessed through EDEN <https://wfd.edenireland.ie/> and is available to public agencies. Publicly available data can be accessed via the www.catchments.ie website.

Future Amendments to the Plan

Where changes to the Plan are made prior to finalisation, or where modifications to the Plan are proposed following its adoption, these should be screened for potential for likely significant effects in accordance with the criteria set out in Schedule 2A of the SEA Regulations (S.I. No. 436 of 2004)

EPA AA GeoTool

Our AA GeoTool application has been developed in partnership with the NPWS. It allows users to select a location, specify a search area and gather available information for each European Site within the area. It is available at: <http://www.epa.ie/terminalfour/ApproAssess/index.jsp>

Environmental Authorities

Under the SEA Regulations, prior to making your SEA determination you should also consult with:

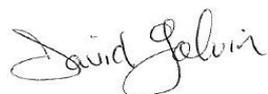
- The Minister for Housing, Planning and Local Government
- Minister for Agriculture, Food and the Marine, and the Minister for Communications, Climate Action and Environment, where it appears that the plan or programme, or modification of the plan or programme, might have significant effects on fisheries or the marine environment
- where it appears to the competent authority that the plan or programme, or amendment to a plan or programme, might have significant effects in relation to the architectural or archaeological heritage or to nature conservation, the Minister for Culture, Heritage and the Gaeltacht, and
- any adjoining planning authority whose area is contiguous to the area of a planning authority which prepared a draft plan, proposed variation or local area plan.

SEA Determination

As soon as practicable after making your determination as to whether SEA is required or not, you should make a copy of your decision, including, as appropriate, the reasons for not requiring an environmental assessment, available for public inspection in your offices and on your website. You should also send a copy of your determination to the relevant environmental authorities consulted.

If you have any queries or need further information in relation to this submission, please contact me directly. I would be grateful if you could send an email confirming receipt of this submission to: sea@epa.ie.

Yours sincerely,





██████████
Forward/Strategic Planning
Economic Development Directorate
Limerick City & County Council
Merchants Quay
Limerick

1st April 2019

██████████

Re. SEA Screening Review for the Croom Local Area Plan 2009-2015 (as amended)

Dear ██████████,

We acknowledge your notice, dated 8th March 2019, in relation to the SEA Screening Review for the Croom Local Area Plan 2009-2015 (as amended) (the 'Plan') and associated Strategic Environmental Assessment (SEA) screening.

The EPA is one of five statutory environmental authorities under the SEA Regulations. In our role as an SEA environmental authority, we focus on promoting the full and transparent integration of the findings of the Environmental Assessment into the Plan and advocating that the key environmental challenges for Ireland are addressed as relevant and appropriate to the plan. Our functions as an SEA environmental authority do not include approving or enforcing SEAs or plans.

As a priority, we focus our efforts on reviewing and commenting on key sector plans. For land use plans at county and local level, we provide a 'self-service approach' via our guidance document '[SEA of Local Authority Land Use Plans – EPA Recommendations and Resources](#)'. This document is updated regularly and sets out our key recommendations for integrating environmental considerations into Local Authority land use plans.

Proposed SEA Determination

We note your proposed determination regarding the need for SEA of the Plan.

Sustainable Development

In proposing and in implementing the Plan, Limerick City and County Council should ensure that the Plan is consistent with the need for proper planning and sustainable development. Adequate and appropriate critical service infrastructure should be in place, or required to be put in place, to service any development proposed and authorised during the lifetime of the Plan.

Limerick City and County Council should also ensure that the Plan is consistent with key relevant higher-level plans and programmes.

Specific Comments on the Plan

The following environmental considerations should be taken into account in implementing the Plan.

Climate Change Resilience

You should ensure that the Plan is aligned with national commitments on climate change mitigation and adaptation, as well as relevant sectoral, regional and local adaptation and mitigation plans. Specific climate-related actions or objectives should be included in the Plan.

Flood Risk

Where lands are proposed for rezoning/zoning or development, land use should be appropriate to the risk of flooding identified. The *Planning System and Flood Risk Management Guidelines* (DEHLG, 2009) and the relevant aspects of the Shannon CFRAMS (UoM24) should be fully integrated, as appropriate.

Environmental Effects

We note the various proposed projects within the Plan area, including a new distributor road crossing the River Laskiltagh, a new post primary school and various internal vehicular and pedestrian upgrades. You should ensure that the requirements of the Habitats and EIA Directives, are fully implemented, as appropriate, and relevant mitigation measures provided to avoid significant adverse effects on the environment.

Biodiversity

You should integrate, and where appropriate update, any available biodiversity mapping information available for the Plan area. Such mapping would be in the context of maximising opportunities to retain open space, and identify key ecological corridors, hedgerows, treelines, etc, when developing the Plan area.

State of the Environment Report – Ireland’s Environment 2016

The recommendations, key issues and challenges described in our State of the Environment Report [Ireland’s Environment – An Assessment 2016](#) (EPA, 2016) should be considered, as relevant and appropriate to the Plan.

Available Guidance & Resources

Our website contains SEA resources and guidance, including:

- SEA process guidance and checklists

- list of relevant spatial datasets
- topic specific SEA guidance, such as how to integrate climate change into SEA.

You can access these resources at: <http://www.epa.ie/pubs/advice/ea/>

EPA SEA Search and Reporting Tool

This tool allows public authorities to explore, interrogate and produce high level environmental summary reports. It is intended to assist in screening and scoping exercises. The tool is available through EDEN www.edenireland.ie

EPA WFD Application

Our WFD Application provides access to water quality and catchment data from the national WFD monitoring programme. The Application is accessed through EDEN <https://wfd.edenireland.ie/> and is available to public agencies. Publicly available data can be accessed via the www.catchments.ie website.

Future amendments to the Plan

Where changes to the Plan are made prior to finalisation, or where modifications to the Plan are proposed following its adoption, these should be screened for potential for likely significant effects in accordance with the criteria set out in Schedule 2A of the SEA Regulations (S.I. No. 436 of 2004)

Environmental Authorities

Under the SEA Regulations, you should also consult with:

- The Minister for Housing, Planning and Local Government
- Minister for Agriculture, Food and the Marine, and the Minister for Communications, Climate Action and Environment, where it appears that the plan or programme, or modification of the plan or programme, might have significant effects on fisheries or the marine environment
- where it appears to the competent authority that the plan or programme, or amendment to a plan or programme, might have significant effects in relation to the architectural or archaeological heritage or to nature conservation, the Minister for Culture, Heritage and the Gaeltacht, and
- any adjoining planning authority whose area is contiguous to the area of a planning authority which prepared a draft plan, proposed variation or local area plan.

As soon as practicable after making your determination as to whether SEA is required or not, you should make a copy of your decision, including, as appropriate, the reasons for not requiring an environmental assessment, available for public inspection in your offices and on your website. You should also send a copy of your determination to the relevant environmental authorities consulted.



If you have any queries or need further information in relation to this submission, please contact me directly. I would be grateful if you could send an email confirming receipt of this submission to: sea@epa.ie.

Yours sincerely,

A handwritten signature in black ink that reads "David Jelvin".

A series of three black rectangular redaction boxes covering contact information. The first box is small, the second is slightly larger, and the third is the largest, spanning the width of the signature area.

Forward/Strategic Planning Section
Economic Development Directorate
Limerick City and County Council
Merchants Quay
Limerick

Dáta | Date
23 September, 2019

Ár dTag | Our Ref.
[REDACTED]

Re: Draft Croom Local Area Plan, 2019 - 2025

Dear Sir/Madam,

Transport Infrastructure Ireland (TII) acknowledges receipt of referral of the Draft Croom Local Area Plan, 2019 – 2025, and outlines the following observations for the Councils consideration.

1. MANAGING EXCHEQUER INVESTMENT AND STATUTORY GUIDANCE

The Council will be aware that the Trans-European Transport Networks (TEN-T) are a planned set of transport networks across Europe. The TEN-T regulations target a gradual development of the transport network with the core network a priority (by 2030) followed by the remainder of the comprehensive network (by 2050). The TEN-T regulations define the objective of increasing the benefits for road users by ensuring safe, secure and high-quality standards for road users and freight transport in a co-ordinated fashion to achieve integrated and intermodal long-distance travel routes across Europe.

The N20, national primary route, adjoining the Local Area Plan area is part of the TEN-T Comprehensive Network which has repercussions and action requirements for policies and objectives to be included in the Local Area Plan. This route is a strategic national road and is an important inter-urban transport corridor linking strategic regional centres, giving access to regional and international markets, including through strategic airport and port locations as well as linking with other strategic national roads.

National Strategic Outcome 2 ‘Enhanced Regional Accessibility’ of the National Planning Framework includes the objective to maintain the strategic capacity and safety of the national roads network including planning for future capacity enhancements.

The critical need to manage national road assets in accordance with national policy is not only outlined in Project Ireland 2040 but also within the Strategic Investment Framework For Land Transport (DTTAS, 2014), Smarter Travel (DTTAS, 2009) and the provisions of the Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012).

Having regard to the foregoing, TII welcomes that the Draft Local Area Plan includes provision for national road scheme planning in the area in Section 6.1 and Objective T1., relating to the M20 Cork to Limerick Scheme. In accordance with the provisions of Section 2.9 of the DoECLG Spatial Planning and National Roads Guidelines (2012), TII would welcome an additional statement included in Objective T1 retaining lands required for the M20, national road scheme, free from development, for example;

Próiseálann BIÉ sonraí pearsanta a sholáthraítear dó i gcomhréir lena Fhógra ar Chosaint Sonraí atá ar fáil ag www.tii.ie.
TII processes personal data in accordance with its Data Protection Notice available at www.tii.ie.

Objective T1: M20

It is an objective of the Council to accommodate the proposed M20 route, where required, within the plan boundary *and to retain lands required for the scheme free from development.*

In addition, pending the provision of the M20 Cork to Limerick Scheme, TII would welcome the Draft Local Area Plan including the requirement to safeguard the strategic function, capacity and safety of the existing N20, national road, as a provision of Objective T2, in the interests of clarity.

2. SPECIFIC DEVELOPMENT OBJECTIVES

TII welcomes that environmental noise impacts are addressed in Section 6.3 of the Draft Local Area Plan.

a. Signage

With respect to the Draft Local Area Plan, the Planning Authority is also referred to Section 3.8 of the DoECLG Spatial Planning and National Roads Guidelines which indicates a requirement to control the proliferation of non-road traffic signage on and adjacent to national roads. The Authority would welcome the provisions of the DoECLG Guidelines incorporated into the new Local Area Plan prior to adoption.

b. Traffic and Transport Assessment (TTA)

The Draft Local Area Plan outlines that additional enterprise and employment designated lands are proposed and the location of the lands are chosen on the basis of a number of considerations, including access to the existing N20 and potential access to the proposed M20.

The Authority recommends that planning applications for significant development proposals should be accompanied with TTA to be carried out by suitably competent consultants, which are assessed in association with their cumulative impact with other relevant developments on the road network. Guidance in relation to TTA is given in the "Traffic Management Guidelines". To assist with TTA, the Authority has updated the Traffic and Transport Assessment Guidelines (2014), which are available at www.tii.ie and could be referenced in the Draft Plan as appropriate guidance. The Guidelines also include recommendations on the requirement for sub-threshold traffic and transport assessments.

The Council are requested to reference the TII Traffic & Transport Assessment Guidelines (2014) in the Local Area Plan, prior to adoption, relating to development proposals with implications for the national road network. Thresholds advised in the TII Traffic & Transport Assessment Guidelines (2014), including sub-threshold TTA requirements, relate specifically to development proposals affecting national roads.

c. Drainage

Having regard to the Local Area Plan lands adjoining the N20, national road, it is critical that surface water drainage proposals within the local area plan do not negatively impact on the N20 drainage regime. It is requested that the capacity and efficiency of the national road network drainage regime should be safeguarded in the local area plan prior to adoption.

Conclusion

The Authority respectfully requests that the foregoing observations are taken into consideration by the Council prior to the adoption of the Local Area Plan.

Yours sincerely,


Michael McGeary


No. 5



Oifig na
nOibreacha Poiblí
Office of Public Works



Dear Sir/Madam,

OPW welcomes the opportunity to comment on the Draft Croom Local Area Plan August 2019.

A National Preliminary Flood Risk Assessment (PFRA) was carried out in 2010 for the purpose of an initial assessment at a National level of areas of potentially significant flood risk. Croom was assessed during the PFRA and designated a Flood Risk Index (FRI) of 835; indicating a degree of risk in the area. Subsequently Croom was assessed as part of the Shannon Estuary Catchment Flood Risk Assessment and Management (CFRAM) Programme as an Area of Further Assessment (AFA), but no structural flood relief scheme is proposed at this time for the area.

Recommendations for further assessment and additional hydraulic modelling were made by OPW in 2015 on the previously proposed amendment to the Croom LAP 2009 – 2015 centering on the additional land zoned for Education and Community (*Site A – Figure 1*) and Industrial and Residential Zonings in the area. OPW acknowledge the decision by Limerick City and County Council to adopt the avoidance principle in returning some of these lands previously identified for Industrial and Residential development which are at flood risk to agricultural use.

An updated Flood Risk Assessment (FRA) has been provided by Mott MacDonald which has indicated that based on their recent analysis, remodelling with increased flows and based on 50% blockage at Caherass Bridge and other structures that there is increased flooding in the area in comparison to previously modelled (CFRAM and Hydro Env.) flood extents which would be expected. OPW note that guidance has been offered to consultants undertaking more detailed assessment regarding independent verification of the Q100 flow (particularly at Node O1CRB01105) in the area for use in further assessment and highlighting concerns that the flood extents provided in the latest flood risk assessment do not match the benefitting area from the Arterial Drainage Scheme Flood Extents on the north of the Laskiltagh Stream. OPW would also query to what extent an informal defense has been modelled along both the left and right bank of the Laskiltagh Stream in this most recent assessment compared to a previous FRA produced relating to the distributor road?

OPW note that the CFRAM flood extents were created in a free flowing scenario with zero blockage and that there have been a number of flood risk assessments carried out for the area in 2013/2016 by Hydro Environmental Ltd and in 2019 by Mott MacDonald and while each are demonstrating different results all consistently demonstrate flooding in the area proposed for Educational and Community development. It is a decision for Limerick City and County Council to carefully consider the latest modelling and further assessment results provided regarding any further considerations for the zoning or rezoning of lands in the Croom area.

OPW note as per Section 4.25 of the Planning System and Flood Risk Management Guidelines that *“Requirements for development proposals be accompanied by a detailed explanation of how the Development Management Justification Test has been met where vulnerable development is being considered in the flood risk zones”*. In the opinion of OPW this has not been demonstrated.

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15/08/2017 10:00 AM



As noted in previous OPW Submission on Planning Reference No. 17-8011. *"The Applicant will be required to obtain consent under Section 50 of the Arterial Drainage Act 1945 from the Commissioners of Public Works to construct any new bridge or alter, reconstruct, or restore any existing bridge over any watercourse or otherwise than in accordance with plans previously approved of by the Commissioners"*. OPW note that Section 50 consent has been sought for the distributor road bridge crossing the River Laskiltagh. This application has not been granted and a request for further information has been issued by OPW regarding the soffit level of this bridge and discrepancies between what has previously been modeled and what was applied for as part of the Section 50 application now being put forward. No Section 50 consent has been requested for other culverted sections of channel in the area.

OPW are concerned that this area remains at flood risk and that while a balanced view of land use and flood risk should be taken, it considers that this can be achieved in full compliance with the Guidelines. OPW welcomes Limerick City and County Council's commitment to adhere to these Guidelines. For further information please refer to the Planning System and Flood Risk Management Guidelines and/or contact OPW for further information.

Yours faithfully,



Karen Donovan

[Redacted text]



Figure 1 - Site A - Reference above



Limerick City & County Council
Merchants Quay, Limerick

19/09/2019

RE: Local Area Plan - Croom

Uisce Éireann
Bosca OP 6000
Baile Átha Cliath 1
Éire

Irish Water
PO Box 6000
Dublin 1
Ireland

T: +353 1 89 25000
F: +353 1 89 25001
www.water.ie

Dear Sir / Madam,

Irish Water acknowledges receipt of your email in relation to - Local Area Plan Croom and has the following comments to make:

Wastewater Treatment

Croom WWTP has a capacity of 2,000p.e. The collected load delivered to the plant was 1,659pe in 2018, Therefore, there is capacity available for 341pe. Upgrade works are planned which will increase the capacity of some elements of the plant to 2,200pe. It is anticipated these works will be completed by Q1 2021.

Water Supply

Irish Water is preparing for the future by developing the National Water Resources Plan (NWRP). The strategic plan for water services will outline how we move towards a sustainable, secure and reliable public drinking water supply over the next 25 years, whilst safeguarding our environment. The NWRP will outline how Irish Water intends to maintain the balance between our supply from water sources around the country and demand for drinking water over the short, medium and long-term. This will allow preparation for the future and ensure the provision of sufficient safe, clean drinking water to facilitate the social and economic growth of our country.

The project at the Bypass site is due to be completed in Q1 2020. The existing assets are unlikely to be able to accommodate the full target population increase however, the Full Options Assessment to be carried out as part of the National Water Resources Plan will inform future plans to supply Croom. It is anticipated that this assessment will be completed by the end of 2020.

Networks

In terms of the wastewater network, available information indicates the proposed residential sites can be serviced, although Site 1 of the Serviced Land Assessment may require a network extension. Similarly, available information on the water supply network

indicates the proposed residential sites can be serviced. Depending on the extent of development, network upgrades may also be required.

All new developments are to be assessed through Irish Water's New Connections process which will determine the exact requirements in relation to network and treatment capacity. Where network reinforcements such as upgrades or extensions are required, these shall be developer driven unless there are committed IW projects in place to progress such works.

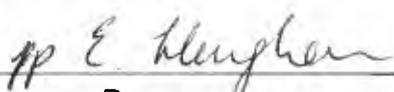
Trunk wastewater and water pipelines pass through Sites 2 and 4 (as per the Serviced Sites assessment) and the Enterprise zoned site to the north-west. Where a development is adjacent to, or crossing, existing water services infrastructure, the infrastructure is to be protected or diverted and access to the infrastructure maintained in accordance with Irish Water policy. There shall be no building over of water services. For information on the diversion process, please send a query to diversions@water.ie and include the details of the proposed development, as well as the approximate location of the Irish Water asset. For information on the location of Irish Water assets please send a query to datarequests@water.ie.

Early notification of planned road and public realm projects is requested to enable Irish Water to plan works accordingly and ultimately minimise disruption to the public. Irish Water is available for discussion in relation to the future sustainable development of the area and any other issues with respect to the provision of water services within our remit.

Irish Water has a suite of policies/ objectives which we would like to suggest to the Council for inclusion in the Local Area Plan in relation to protecting Irish Water assets and the environment for the benefit of current and future population served by public water services networks. We have attached these policies/ objectives to this submission.

Irish Water is available for discussion in relation to the future sustainable development of the area and any other issues with respect to the provision of water services within our remit.

Yours Sincerely,



Suzanne Dempsey


Menu of appropriate Objectives/Policies for Water Services in Development Plans

General Policies in relation to Water Services

- a) To work closely with Irish Water to identify and facilitate the timely delivery of the water services required to realize the development objectives of this plan;
- b) To consult with Irish Water in the development of Plans, SDZs, etc in order to ensure the proposed spatial strategy takes account of:
 - the available capacity of the public water services infrastructure;
 - the need to protect and optimise existing and planned public water services infrastructure;
 - the need for sequential and phased development;
 - the financial and environmental implications of development in sensitive areas.
- c) Prior to granting planning permission the Council will ensure that adequate water services will be available to service development and that existing water services are not negatively impacted. Council should require developers to provide evidence of consultation with Irish Water prior to applying for planning permission;
- d) To protect existing wayleaves and buffer zones around public water services infrastructure through appropriate zoning and to facilitate the provision of appropriate sites for required water services infrastructure as necessary;

Uisce Éireann
Bosca OP 6000
Baile Átha Cliath 1
Éire

Irish Water
PO Box 6000
Dublin 1
Ireland

T: +353 1 89 25000
F: +353 1 89 25001
www.water.ie

Water Supply

- e) To protect both ground and surface water resources including taking account of the impacts of climate change, and to support Irish Water in the development and implementation of Drinking Water Safety Plans and the National Water Resources Plan;
- f) To promote water conservation and demand management measures among all water users, and to support Irish Water in implementing water conservation measures such as leakage reduction and network improvements.

Wastewater Services

- g) To ensure that the Local Authority provides adequate storm water infrastructure in order to accommodate the planned levels of growth within the plan area and to ensure that appropriate flood management measures are implemented to protect property and infrastructure;
- h) To require all new development to provide a separate foul and surface water drainage system and to incorporate sustainable urban drainage systems where appropriate in new development and the public realm;
- i) To prohibit the discharge of additional surface water to combined (foul and surface water) sewers in order to maximise the capacity of existing collection systems for foul water;

- j) To support Irish Water in the promotion of effective management of trade discharges to sewers in order to maximise the capacity of existing sewer networks and minimise detrimental impacts on sewage treatment works;
- k) To ensure that all new developments connect to the public wastewater infrastructure, where available, and to encourage existing developments that are in close proximity to a public sewer to connect to that sewer. These will be subject to a connection agreement with Irish Water;
- l) To refuse residential development that requires the provision of private waste water treatment facilities (i.e. Developer Provided Infrastructure), other than single house systems;
- m) The provision of single house septic tanks and treatment plants in the Plan area will be strongly discouraged to minimise the risk of groundwater pollution. Where such facilities are permitted, full compliance with the prevailing regulations **and standards, including the EPA's Code of Practice Wastewater Treatment and Disposal Systems Serving Single Houses (PE. ≤10) (EPA 2009), as may be amended, will be required;**
- n) To ensure that private wastewater treatment facilities, where permitted, are operated in compliance with their wastewater discharge license, in order to protect water quality.

Note: As per Section 5.3 of the Draft Water Services Guidelines for Planning Authorities, *'Alternative solutions such as private wells or waste water treatment plants should not generally be considered by planning authorities. Irish Water will not retrospectively take over responsibility for developer provided treatment facilities or associated networks, unless agreed in advance.'* The opportunity may arise for the development to connect into the network in the future however, the developer provided treatment facility would not be taken over.

[Redacted]

From: Donncha O'Sullivan [Redacted]
Sent: Thursday, February 14, 2019 11:25 AM
To: Forward Planning <forwardplanning@limerick.ie>
[Redacted]
Subject: Croom Local Area Plan [Redacted]

Noreen,

We have reviewed the above referenced Plan. We are pleased to advise we have neither property nor infrastructure in the subject vicinity. As such have no comment to make in regard to the Local Area Plan as presented.

Regards,

Donncha

Donncha Ó Sullivan BE CEng MIEI MIGEM
Development Liaison Engineer

Gas Networks Ireland
P.O. Box 51, Gasworks Road, Cork, Ireland

[Redacted]

You are reminded that all work in the vicinity of Gas Networks Ireland Pipelines and Installations must be completed to comply fully with the relevant guidelines to be found in the current editions of the Health & Safety Authority publications, 'Code Of Practice For Avoiding Danger From Underground

No. 8



COMHAIRLE | CLARE
CONTAE AN CHLÁIR | COUNTY COUNCIL

9th September 2019

[REDACTED]
Acting Senior Executive Planner,
Forward/Strategic Planning Department,
Economic Development Directorate
Limerick City and County Council,
Merchants Quay,
Limerick

Our ref: ~~PL/09/09/19~~

Your Ref: Draft Local Area Plan for Croom

Re: Submission/Observations on Draft Local Area Plan for Croom

To whom it concerns,

I acknowledge receipt of your notification in relation to the Draft Croom Local Area Plan, and request for submissions/observations.

I acknowledge receipt of your correspondence on the 19th August, 2019 regarding the above.

Clare County Council does not have any submissions/observations to make at this stage in the process in relation to the Draft Plan Review.

Yours faithfully,

Sheila Downes

Sheila Downes

~~Environmental Assessment Officer~~

An Roinn Pleanála
An Stiúirthóireacht Forbairt Gheilleagrach
Áras Contae an Chláir, Bóthar Nua, Inis, Co. an Chláir, V95 DXP2

Planning Department
Economic Development Directorate
Áras Contae an Chláir, New Road, Ennis, Co. Clare, V95 DXP2



Forward Strategic Planning

Limerick County Council

26/8/19

Dear Sir/Madam

Feedback on The Draft Croom Plan 2019

Overall the plan has a good feel to it and will bring many benefits to Croom in the coming years. In relation to commercial activity, there seems to be a commitment from the Council to rejuvenate the town centre, obviously 22% of commercial properties in the town centre are unoccupied which is worrying and obviously makes trading for existing retailers very difficult coupled with our close proximity to Limerick city. There is a tone in the draft that retail in Croom is very much convenience, this is not the case, Spar employs 34 staff and is applying for planning next week to develop and extend into the Ulster Bank, which will open up the closed Ulster bank and employ a further ten staff. Plunketts Chemist employs 7-8 staff and between the butchery/bakery and other businesses over sixty people alone work on Main street, not bad considering the lack of parking and the 22% unoccupied retail units.

The plan doesn't solve the lack of parking and traffic management.

- There are opportunities at the rear of Main street on the Croom park side of up to 30 car spaces, there is a large derelict yard currently for sale. These spaces are at ground level and the entrance and exit already exists.
- On the opposite side, rear of Spar, several plots are for sale at ground level.
- Up to 50 spaces are available in the town centre at a reasonable cost which would solve wheelchair accessible spaces as well
- With the car spaces found, parking on one side would work but only with alternative parking provided first
- Option of 2 hr parking on the street and new car parks which would push out working and long term parkers towards the Church car park





Tel: 001-001-740 Fax: 001-001-277

Possible new Petrol station, the location near the Mill is the only suitable location , as it already has suitable planning , great vehicle access and would be considered to be within the town centre unlike alternative suggestions which put it off the beaten track and again suck trade out of the very town centre were trying to revive . Another reason for that is its location and its proximity to the bypass, its logic to have a filling station on the exit and entry route to Croom as opposed to the opposite end of town.

Zoning

The area outside the town on the old Limerick road has been zoned Enterprise& Employment, this area would be considered out of town , there is certainly a need for light industry to provide more employment

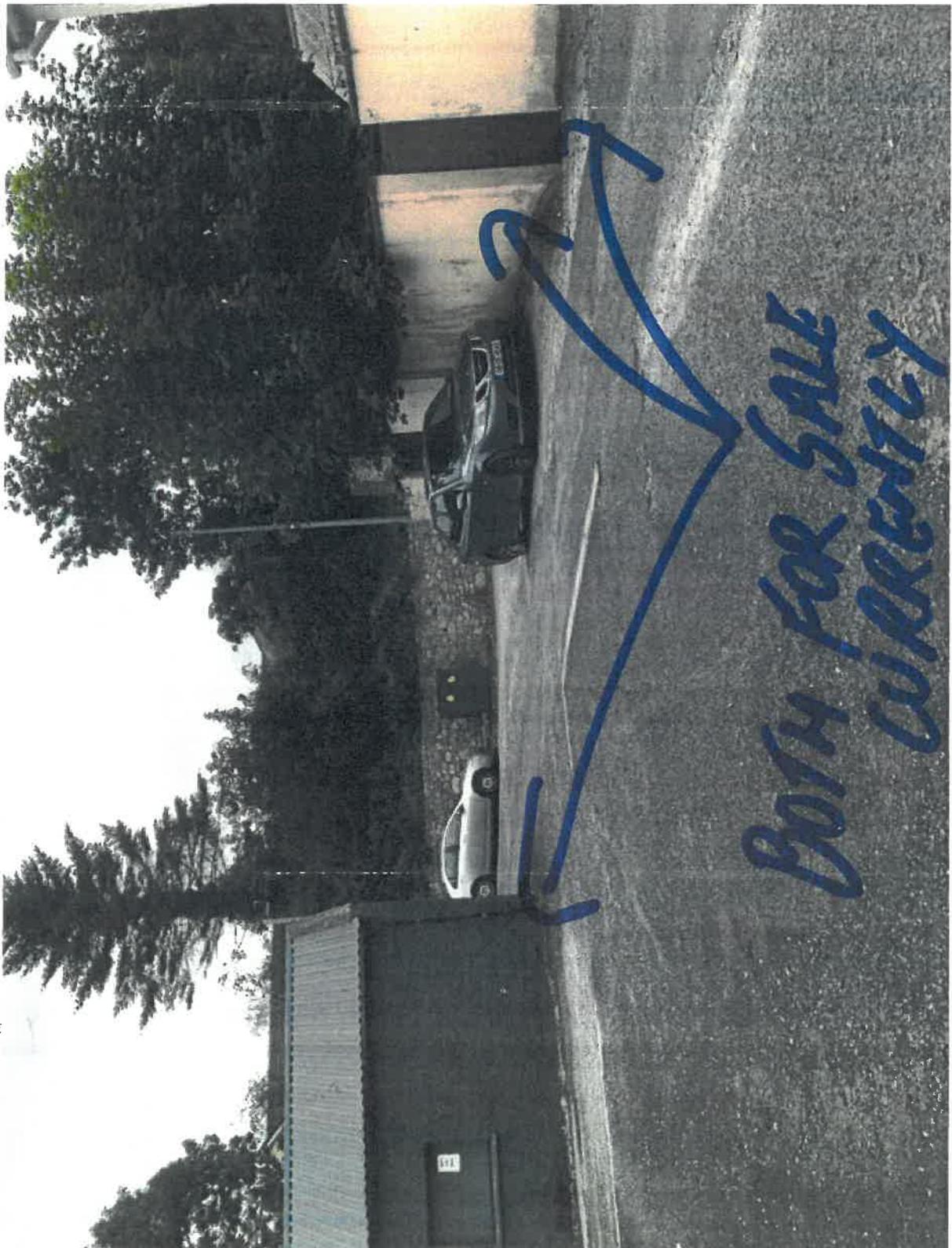
To finish up , if Limerick County Council can solve the car parking problem it will automatically solve the 22% unoccupied commercial units as well as the traffic management . Occupying the unused commercial buildings would return in the rates to the Council the investment made in solving the parking/traffic

Yours sincerely

A handwritten signature in black ink, appearing to be "P. Broderick", written over a horizontal line.

Padraig Broderick





REAR OF OLD VLSIER BANK



REAR OF MAIN STREET (CR00M PARK SIDE)

Considine, Joan

From: Bryan Smyth <[REDACTED]>
Sent: Friday 30 August 2019 12:19
To: Considine, Joan
Subject: Comments on Draft Croom Local Area Plan

CAUTION: This email originated from outside of the Organisation. Do not follow guidance, click links or open attachments unless you recognise the sender and know the content is safe.

Hi Joan

Many thanks for those links which I read with interest.

The issues of abandoned / derelict housing and traffic congestion on the streets we previously discussed are well addressed.

I felt that the objective of facilitating the M20 within the area of the LAP was however very weak. While it may be a reasonable objective for LCC as stated, it is very weak for the Croom LAP. The previous iteration of the M20 had the "Croom junction" displaced to around where Adare Machinery operate – say +/- 2km from the village. As a result, accessing Croom was going to be much more difficult than is currently the case given the current junction's "central location". It would also make Croom even more unattractive to public or private buses due to delays accessing the village (an issue you have already highlighted). I would encourage you to expand the objective to include the need for a junction to be considered in close proximity to the village making it equally accessible from both the Limerick and Cork directions.

Many thanks.

Regards

Bryan Smyth

Email : [REDACTED]

Mobile : +[REDACTED]
[REDACTED]

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From: Considine, Joan <joan.considine@limerick.ie>
Sent: 16 August 2019 15:18
To: [REDACTED]
Subject: FW: Draft Croom Local Area Plan

Bryan, Link to Site for the Croom LAP

Regards,
Joan

No. 11

Plunkett Hayes BCL

Limerick City & County Council

16 SEP 2019

Received

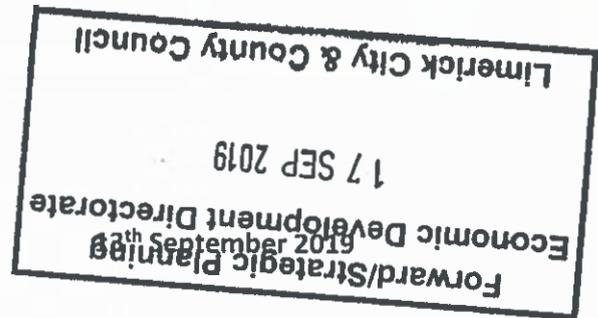


**PLUNKETT
HAYES & CO.**
SOLICITORS

Croom Mills, Croom, Co. Limerick t: 061 600 851

plunketthayessolicitor@eircom.net

██████████
Limerick City & County Council
County Hall
Dooradoyle
Limerick



RE: Proposed Local Area Plan for Croom

Dear Sirs,

Please note that I am the owner of lands at Skagh Croom consisting of 4.343 hectares. For identification purposes I enclose herewith Croom Land Use Zoning Map at appendix 1 in the Croom Local Area Plan 2009-2015 and I have delineated the property with a red verge line.

The lands are designated PH2 in the Local Area Plan 2009-2015.

I understand that Limerick County Council proposes to designate the lands "Enterprise".

As owner of the lands I submit that the proposed designation is not suitable for the lands in question having regard to a number of factors as follows.

I quote from the County Development Plan 1999 paragraph 13:7 which deals with **conservation and amenity policies**. Under the heading **general** it states:

- **Ensure that new developments respect their setting in terms of location, scale and design.**

To get a better understanding of the lands I enclose herewith a map prepared for the Earl of Dunraven when he sold his various property interests in Croom in 1910. The subject land was part of a holding described in the particulars and conditions of sale as "**part of the Lands of Skagh in the Barony of Coshma and County of Limerick containing 31 a. 3r. 32p. Statute Measure accommodation land in the town of Croom bounded by the Main Street on the East and the River Maigue on the West, with ornamental planting**".

The subject lands are populated by a large collection of mature trees upwards of 100 years old many of which are specimen trees. In the last 33 years I have planted a great many trees on the lands. The lands are bounded by an 8-foot stone wall dating from the 19th century on the northern section of the property; the River Maigue and the Well Meadow on the western section of the property and the old N20 on the eastern side of the property.

The Croom Local Area Plan 2009-2015 at paragraph 1.4.2 page 6 dealing with housing states as follows;

Housing

"As noted above, there has been limited development within the plan area since the adoption of the 2003 plan. A residential development to the south west of the town has been part completed along with a number of smaller schemes. This has helped increase the availability of private housing stock within the town, **and to some extent address the imbalance between private and public sector housing.** Croom Voluntary Housing Association has also constructed a number of residential units within the town".

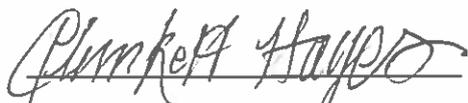
I was struck by the sentence in the above paragraph which acknowledges the imbalance between private and public sector housing. It is very evident that in spite of incremental private development in the intervening years this imbalance still exists and has the potential to escalate. It is my view that this imbalance needs to be addressed for a whole host of reasons.

In this context I refer to the Croom Local Area Plan 2009-2015 at page 39 paragraph 3.11 dealing with land use. The objectives in this section of the plan are well articulated and do not require re-stating. I draw your attention in particular to paragraph LUO3 dealing with residential serviced sites and the Council's policy to promote lower density residential development in outer settlement edge locations is something I fully agree with and my lands are eminently suitable for such development.

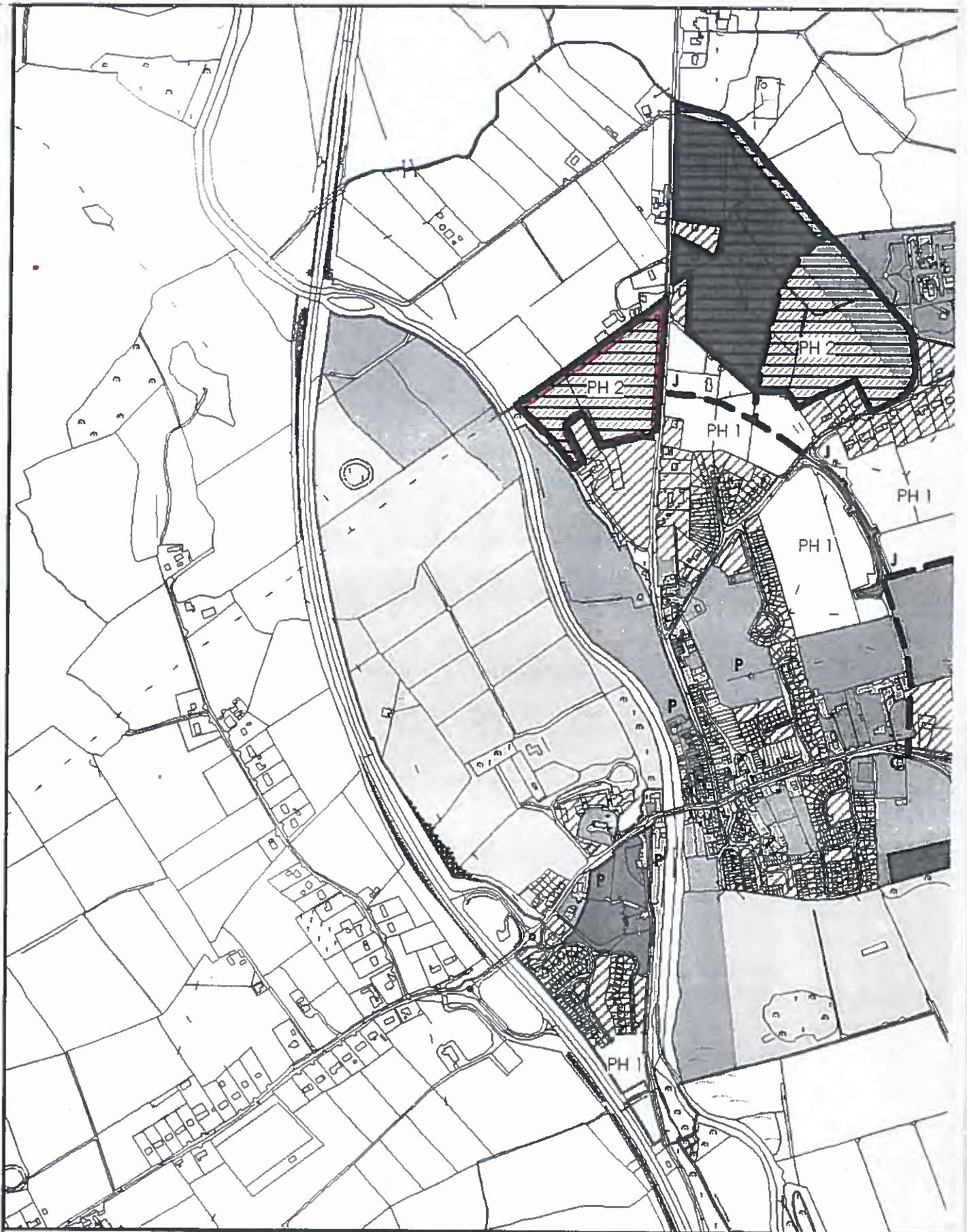
In conclusion I believe it is wholly undesirable for the reasons stated above that the lands in question should be designated as **Enterprise** in the new proposed Local Area Plan. As a native of Croom; as a resident of Croom and as a person who conducts a legal business in Croom for upwards of 40 years it is undeniable that I have a vested interest in the future development of Croom and its environs. I believe that my track record in that context speaks for itself illustrated in the care and management of my private residence and lands at Skagh; the re-instatement and development of Croom Mills and its environs and the fact that I facilitated and encouraged the purchase of the Well Meadow lands for the benefit of the community of Croom.

Having regard to the foregoing I respectfully request that the proposed designation of the lands in question as **Enterprise** be abandoned and that the designation should more properly be **residential serviced sites**.

Yours sincerely,



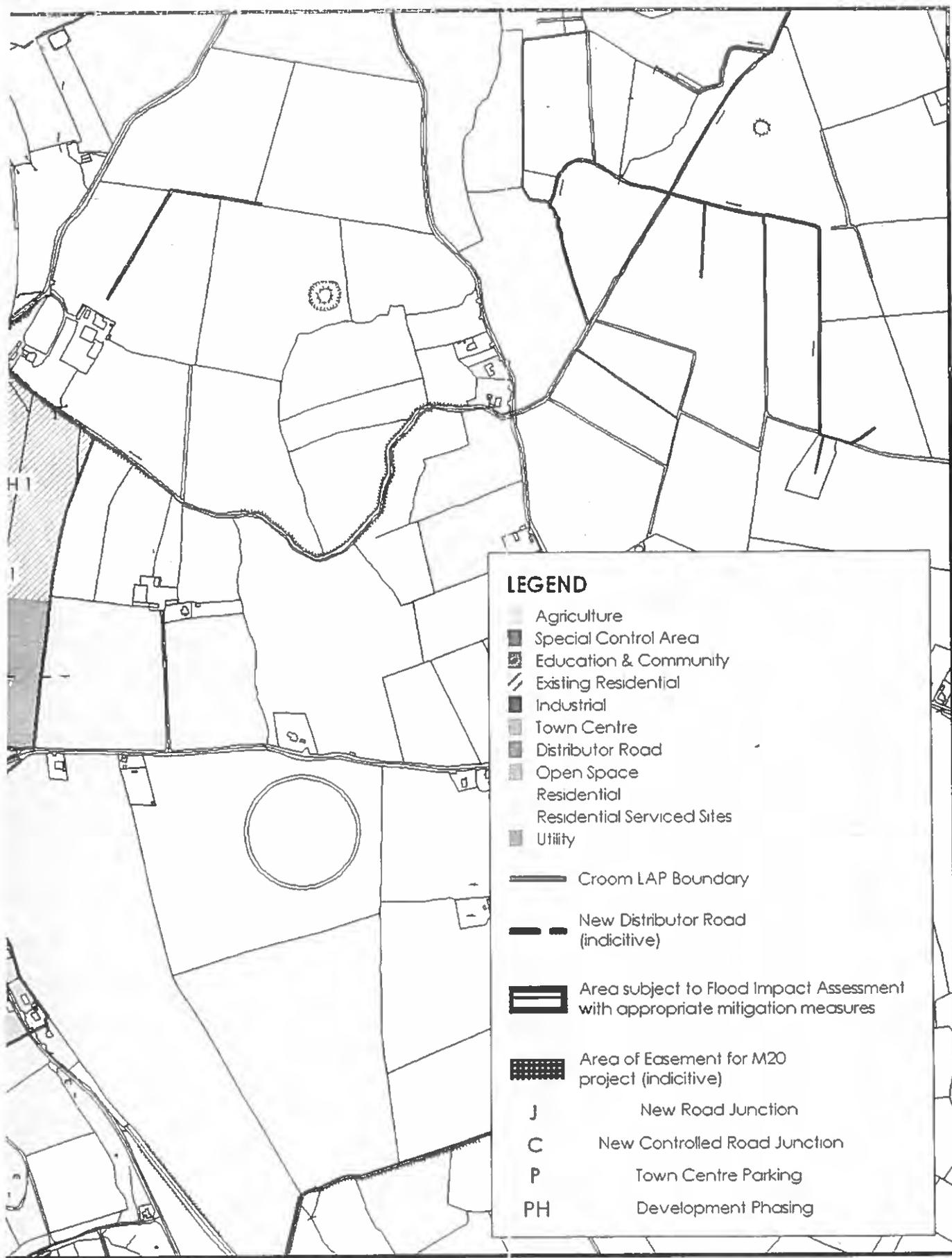
Plunkett Hayes & Co. Solicitors



Limerick County Council
Planning & Development Department

Croom Local Area

Ordnance Survey In
© Ordnance Survey Ireland



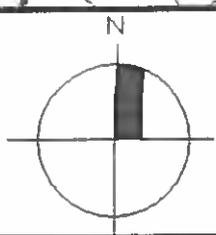
LEGEND

- Agriculture
- Special Control Area
- Education & Community
- Existing Residential
- Industrial
- Town Centre
- Distributor Road
- Open Space
- Residential
- Residential Serviced Sites
- Utility
- Croom LAP Boundary
- New Distributor Road (indicative)
- Area subject to Flood Impact Assessment with appropriate mitigation measures
- Area of Easement for M20 project (indicative)
- J New Road Junction
- C New Controlled Road Junction
- P Town Centre Parking
- PH Development Phasing

2009-2015

December 2009

Permit No. 8516
Department of the Environment and Heritage



Croom Landuse Zoning Map

Map 1

The Earl of Anmerden.

MAP N^o 1.

Sruhaunarra B.

Lodge

(LIMERICK)

S. & W. R.

AND CHA

III

G

A

K

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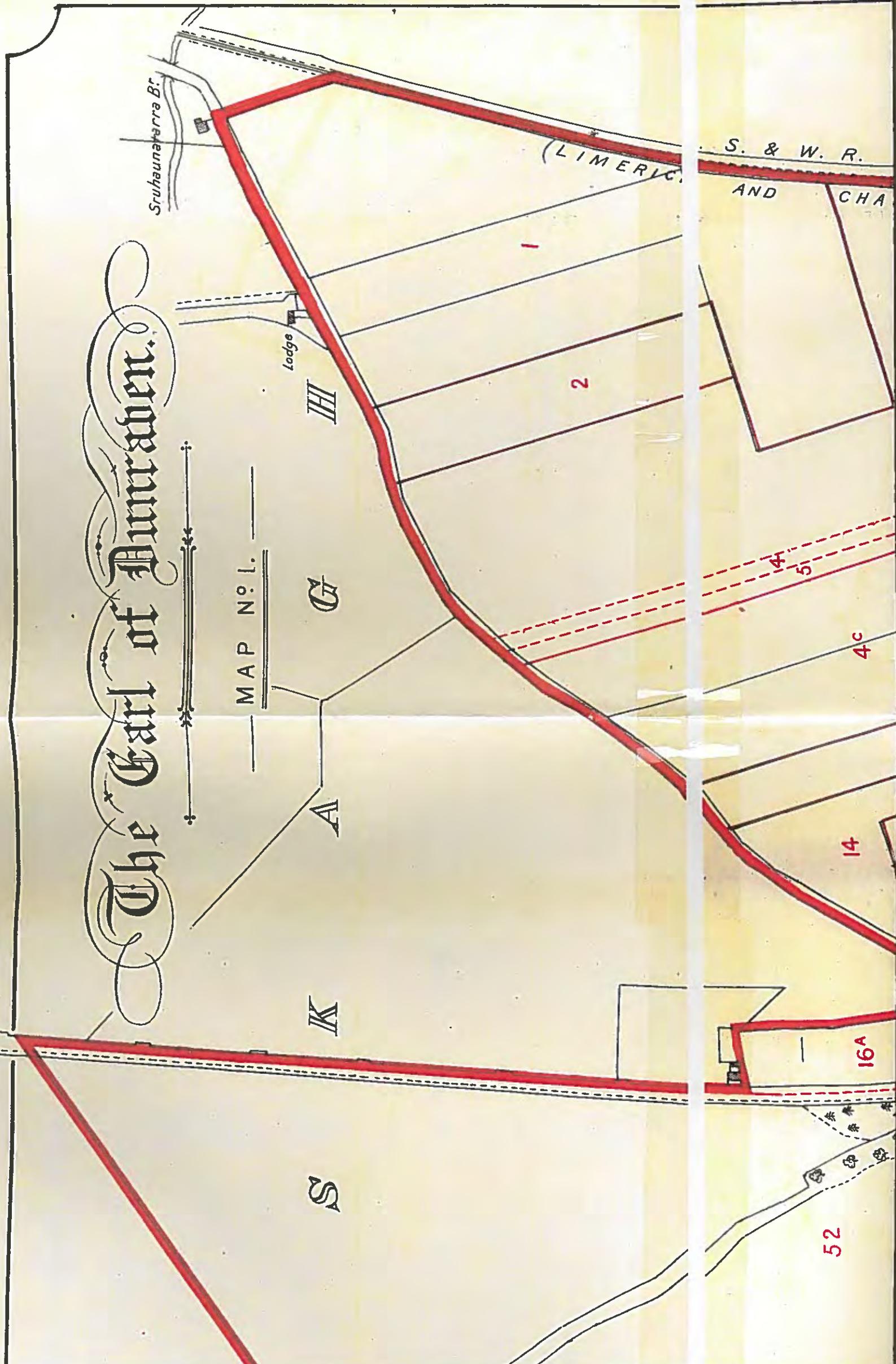
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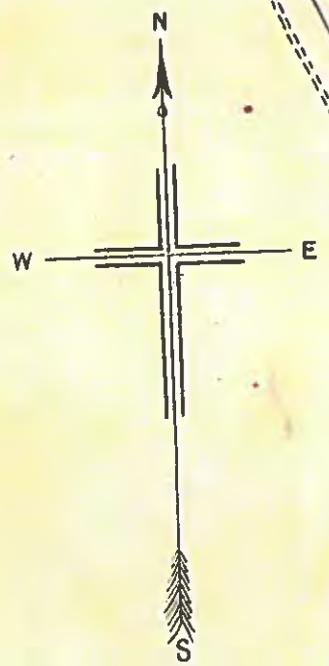
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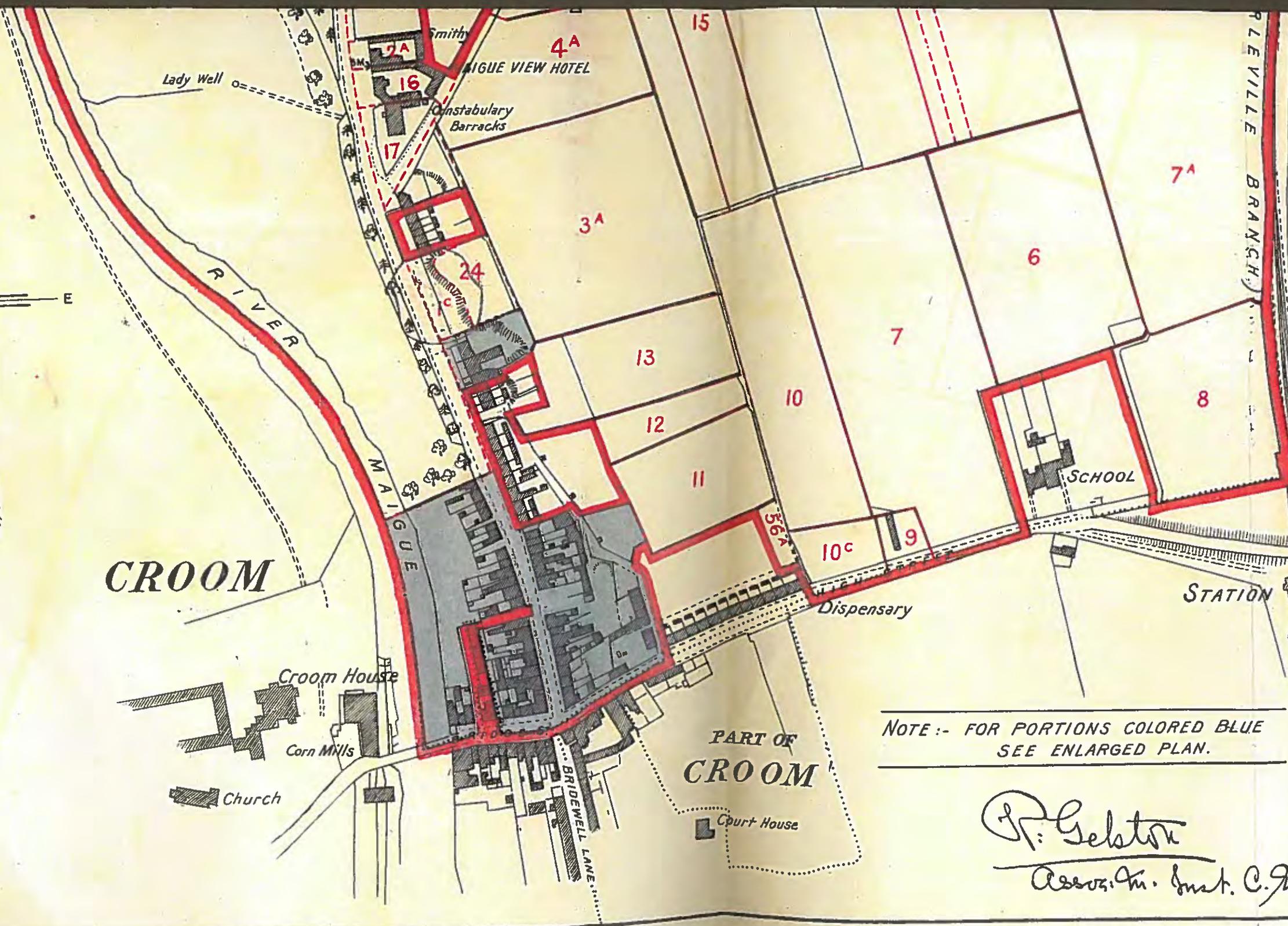
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52





CROOM



**PART OF
CROOM**

NOTE :- FOR PORTIONS COLORED BLUE
SEE ENLARGED PLAN.

P. Gelston
Assoc. M. Inst. C.E.

No. 12

HRA PLANNING
Chartered Town Planning Consultants

Submission to
Limerick City and County Council
on the
Draft Croom Local Area Plan 2019

On behalf of:
Michael Costelloe



HRA | PLANNING
chartered town planning consultants

DEVELOPMENT PLANNING | ENVIRONMENTAL PLANNING | MASTERPLANNING

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Title:	Submission on the Draft Croom Local Area Plan
Project:	19015 Croom Local Area Plan Submission
Prepared by:	■
Date:	September 2019
Issue:	Issue 1
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1.0 INTRODUCTION

HRA PLANNING Chartered Town Planning Consultants has been retained by Michael Costelloe (our client) to prepare this submission to Limerick City and County Council in respect of the Draft Croom Local Area Plan 2019 and its contents therein.

Our client welcomes the Draft Croom Local Area Plan (“the Draft LAP”) and considers it an opportune time to set out a practical and implementable, revised development framework for the town of Croom, responsive to current market conditions and future planned infrastructure in the town.

2.0 PURPOSE OF SUBMISSION

A pre-draft submission on the LAP was made on behalf of Michael Costelloe seeking a number of changes including a partial change in the current Special Control Area zoning to town centre use. This request was facilitated in the Draft LAP.

Upon consideration of the remainder of the Special Area of Control Zoning and having regard to the surrounding developments and associated landuse zonings, the applicant now requests that an additional area of the Special Control Area zoning is changed to residential use.

This submission therefore seeks an amendment to the existing landuse zoning provision such that an area of the Special Control zoning is changed to residential zoning. This submission is supported by a Archaeological Impact Assessment prepared by Aegis Archaeology in relation to the built heritage and environment surrounding Croom Castle.

3.0 THE SITE

3.1 Site Context

The subject site has an area of 0.39 hectares situated between the church and parochial house and Croom Castle. The area surrounding the site has been well developed including the church and its attendant car park, the relatively new residential development of Cois Sruthan and a small commercial development to the north east comprising an old petrol filling station. The subject site is clearly defined in Figure 1.0 Site Location & Context.

Like most of Croom town centre, the subject site is located within an area which has been entered on the Record of Monuments and Places (LI030-025). It is also located within the defined Architectural Conservation Area (ACA) that encompasses most of the town centre.



 Proposed Residential



Figure 1.0 Site Location & Context

3.2 Landuse Zoning & Policies

The subject site is currently zoned as a 'Special Control Area'. The zoning objectives as stated in the Draft LAP appears to suggest that only ancillary walkways may be considered at this location. The Draft LAP states that:

"The area within the curtilage of Croom Castle is designated as a Special Control Area. This area is located within the Recorded Monument, LI030-025001, classified as the historic town of Croom and the Castle located within this classification has been assigned a unique reference LI030-025005. It is also within the Architectural Conservation Area. Ancillary walkways may be considered at this location".

Objective EH 06 in the Draft LAP states that, *"it is an objective of the Council to maintain the integrity of the Special Control area within the plan boundary"*.

There is another objective in the Draft LAP related to safeguarding protected views. Objective EH 05 states that, *"it is the objective of the Council to safeguard the scenic views and prospects by controlling development proposed within the viewshed of Croom Castle. In particular, the Council will seek to maintain views from the roundabout on Bridge Street to the Castle. No development shall be provided within 20m of the exterior face of the Castle wall and no upright development shall be provided within 30m of this wall"*.

4.0 THE PROPOSAL

Whilst the subject site has an area of 0.39 hectares, residential zoning is only sought on 0.32 hectares thereby ensuring that adequate 'breathing space' is afforded to Croom Castle and its attendant grounds.

In accordance with Objective EH 05, the requested zoning ensures that no development will occur within 20m of the exterior face of the Castle wall and no upright development shall be facilitated within 30m of this wall.

The Draft LAP recognises that the town suffers from a number of constraints which impacts negatively on its ability to develop including amongst other things traffic congestion within the town and the dominance of local authority housing.

The Draft LAP recognises that the town of Croom has experienced limited house building activity over the years, particularly by the private sector. The Draft LAP seeks to develop a compact town with adequate zoned land to facilitate private housing thereby counteracting the dominance of public housing provision currently in the town.

The subject land is strategically located adjoining the town centre of Croom proximate to existing and proposed residential and commercial development. The provision of residential infill on this land will contribute to the provision of housing on the western side of the river, thereby balancing the extensive zoning of residential land that is proposed north east of the town centre.



Figure 2.0 Requested Zoning Change

5.0 MATERIAL CONSIDERATIONS

There are a number of material considerations which have informed the requested zoning change, including existing policies and objectives already provided for within the Draft LAP.

5.1 Protection of the Castle

The zoning objective for the Special Control Area does not clearly state its function or purpose. Instead it clarifies that the area falls within the curtilage of Croom Castle, that it is located within the Recorded Monument, LI030-025001, classified as the historic town of Croom and that it is also within the Architectural Conservation Area. The zoning objective does not clarify what the purpose of the zoning is. However, the landuse zoning matrix makes it clear that no use shall be permitted within the Special Control Area.

It is assumed that the Special Control Area zoning is provided to act as a buffer to Croom Castle and although not clearly stated under the zoning objectives in the Draft LAP, it is assumed that its purpose is to ensure that no development occurs within proximity to the castle.

Objective EH05 of the Draft LAP seeks to protect views in the town of Croom by controlling development proposed within the viewshed of Croom Castle. It clarifies that no development shall be provided within 20m of the exterior face of the Castle wall and no upright development shall be provided within 30m of this wall. Figure 3.0 illustrates the required distances in the context of both Croom Castle itself and its associated upstanding walls. The round white circle with grey hatched line and the blue dot (signifying Croom Castle) represents a 30m distance from Croom Castle itself. The other (figure of eight) shadings with the dotted light grey line (20m buffer) and the lighter shading with the black hatched line (30m buffer) represent the stated distances from the edge of the upstanding walls.

As can be seen from Figure 3.0, even with the 20m and 30m buffer distances from not only the castle itself but also its associated walls, there still remains circa 0.32 hectares of land that could be developed without impacting on the views of the castle. This graphic, portrayed in Figure 3.0, demonstrates how development could be facilitated on the subject lands, whilst at the same time maintaining the requisite distance from Croom Castle as provided for in the Draft LAP.

It is this area of land, outside of the 30m buffer area, where residential zoning is sought. Open space zoning is sought on the remainder of the land thereby ensuring that the amenities and setting of the castle continue to be protected.

5.2 Core Strategy

The area of land where residential zoning is sought is only 0.32 hectares. Using average densities of 22 units per hectare as provided in the Draft LAP, development on the subject land only has the potential to yield a maximum of 7 no. residential units.

Given the small area of land and its potential to accommodate a limited number of residential units, affording a residential zoning to the subject land will not distort the core strategy with the Draft LAP and the projected population growth for the town.



Proposed Residential Zoning
● Castle

30m of Castle
20m of Castle End Walls
30m of Castle End Walls



Figure 3.0 Buffer Distances as Provides in the Draft room LAP relating to Croom Castle

5.3 Built Heritage

An Archaeological Impact Assessment was undertaken by Aegis Archaeology on the subject site. The report examined the upstanding and potential subsurface archaeology of the site and the likely impacts arising from any future development on the site.

In relation to subsurface archaeology, the report recommends that a full archaeological assessment with test excavation is recommended in advance of development being permitted on the site.

With respect to upstanding archaeology, the report notes that impacts have already occurred with alterations and additions made to the castle complex and its curtilage over an extended period of time, when it was used as a residence. It further states that visual impact has not been considered, as it has already taken place with a number of modern structures in the vicinity and on the subject site.

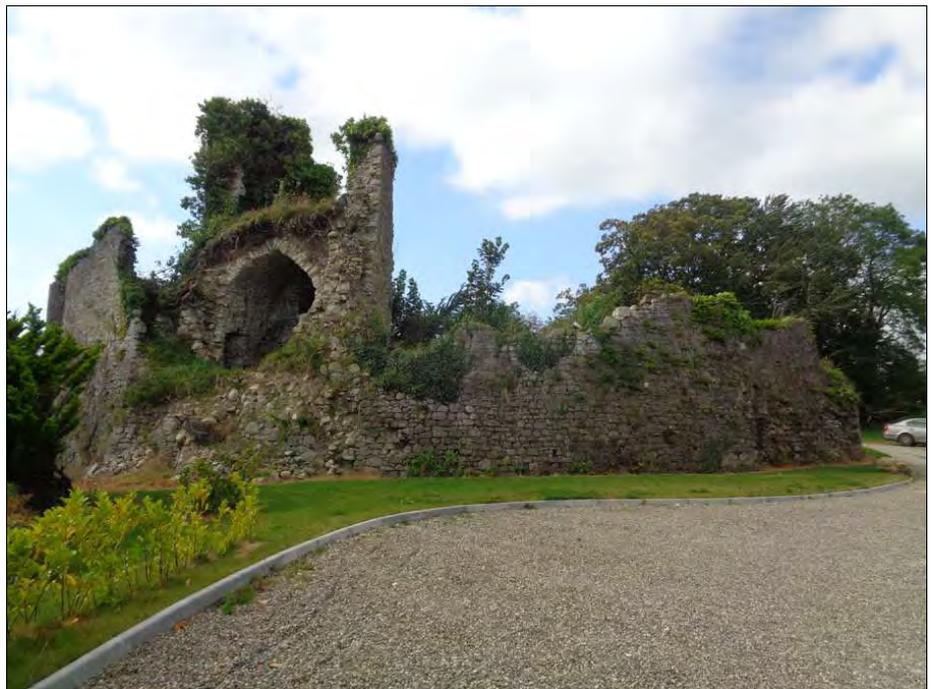
Having regard to the findings of the Archaeological Impact Assessment Report, it is noted that visual impacts in the vicinity of the castle have already occurred. Accordingly it is considered that further limited residential development, outside of the 30m buffer from the castle, subject to an appropriate design strategy, is unlikely to have any adverse visual impact on the setting of the castle.

6.0 THE REQUEST

It is requested that the 0.32 hectares site is zoned for residential use and that the 0.7 hectares which fall within the 30m buffer of the upstanding walls of the castle is zoned for open space as per Figure 2.0 of this submission

Planning Ref. No.: N/a
ITM: 551143, 640880
RMPs: LI030-025001- Historic town;
LI030-025005- Castle;
ÆGIS REF.: 456-04

Archaeological impact assessment at Croom Castle, Croom, Co. Limerick



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32 Nicholas Street King's Island
Limerick V94 V6F7
086 8293220
info@aegisarc.com
www.aegisarchaeology.com

Report Author: F. Coyne BA MIAI

Client: Mr Michael Costello
Croom Concrete,
Croom,
Co. Limerick

Report Status: Final

Date: September 2019

Copies of this report have been presented by ÆGIS to: Client—Mr Michael Costelloe, Croom Concrete, Croom, Co. Limerick

Please note... That the archaeological recommendations, mitigation proposals and suggested methodology followed in this report are similar to those used on previous similar projects approved by the Archaeological Planning and Licencing Unit National Monuments Service, Room G50, Custom House, Dublin 1 The National Monuments Acts 1930-2014, The Planning and Development Act 2002 (plus any amendments) and the most recent EPA guidelines were consulted. Guidelines and plans issued from time-to-time by the statutory and regulatory bodies have been consulted. These are listed in the reference section of this report (Dúchas 1999; 1999a; National Monuments Service 2006; EPA 2015; 2015a).

Every effort has been taken in the preparation and submission of this report to provide as complete an assessment as possible within the terms of the brief, and all statements and opinions are offered in good faith. However, ÆGIS cannot accept responsibility for errors of fact or opinion resulting from the data supplied by any third party, for any loss or other consequences arising from decisions made or actions taken on the basis of facts and opinions expressed in this report, (and any supplementary information), howsoever such facts and opinions may have been derived, or as the result of unknown and undiscovered sites or artefacts.

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Cover Image Croom Castle, from NE.

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II. Glossary of Terms

ASI	Archaeological Survey of Ireland, a division of the DCHG.
Barony, Parish, Townland	These terms refer to land divisions in Ireland. The barony is the largest land division in a county, which is formed from a number of parishes. These parishes are in turn made up of several townlands, which are the smallest land division in the country. The origins of these divisions are believed to be in the Early Medieval/Christian period (AD500-AD1000) or may date earlier in the Iron Age (500BC-AD500).
DCHG	Department of Culture, Heritage and the Gaeltacht.
E	East.
EIS	Environmental Impact Statement.
First Edition	This relates to editions of the OS 6-inch maps for each county. The first edition map completed for the area dates to the early 1840s and this is referred to in the text as the 'First Edition'.
ITM	Irish Transverse Mercator (grid reference type favoured by ASI).
KM	Kilometre.
LCCC	Limerick City and County Council.
M	Metres, all dimensions are given in metres or part of a metre, unless otherwise stated.
N	North.
NGR	National Grid Reference.
NIAH	National Inventory of Architectural Heritage.
NMI	National Museum of Ireland.
NMS	National Monuments Service. Regulatory body and division of the DCHG.
OPW	Office of Public Works.
OS	Ordnance Survey.
OSI	Ordnance Survey of Ireland.
RMP	Record of Monuments and Places. A paper record comprising a map and list on which archaeological sites are recorded. The sites marked afford legal protection under the National Monuments Acts 1930-2014. The record is based on the 6-inch map series for the country and is recorded on a county basis. Each archaeological monument on the RMP has a unique code known as the RMP number prefixed by LI for Limerick.
RMP Number	This code is the number of the site on the RMP constraint map. It begins with the county code, the 6-inch sheet number, followed by the number of the archaeological monument on that sheet.
RPS	Record of Protected Structures.
S	South.
Sheet	This relates to the 6-inch map for each county, which is divided into sheets.
SMR	Sites and Monuments Record. The precursor of the RMP, the SMR now commonly relates to the archive paper files of known archaeological monuments maintained by the Archaeological Survey of Ireland (ASI). These files are arranged according to SMR number. Much of this information is now available online at www.webgis.archaeology.ie/historicenvironment/ .
TB	Townland Boundary.
W	West, or when used with a dimension, width.
ZAN	Zone of archaeological notification (as shown on webgis.archaeology.ie/historicenvironment/mapping/).
ZAP	Zone of archaeological potential (used for historic towns).

1. Scope of Study

This report details an archaeological impact assessment carried out on the subject site at Croom Castle, Croom, County Limerick (desk based with site inspection). This report is not concerned with architectural heritage (wider cultural heritage). Croom Castle is in the barony of Coshma and the civil parish of Croom, Co. Limerick.

This archaeological report fulfils this requirement outlined above of an archaeological impact assessment. First, the methodology employed is outlined (**section 2**). Next, the report describes the existing environment and any proposed development (**section 3**). It provides historical and archaeological background to the subject site and its immediate environs in order to provide a context to the significance of the location (**section 4**). The report then identifies predicted impacts and assesses those potential direct and indirect impact(s), if any, on the potential archaeological environment of the subject site (**section 5**) and assessing the predicted impacts on the site's cultural heritage, of a proposed school development. **Section 6** concludes the report and offers mitigation measures to alleviate predicted negative impacts. These measures have been used previously in other similar projects and are outlined in national guidance documents (for example Dúchas 1999; 1999a). A non-technical summary is provided for a general readership (**section 7**). Resources used in the compilation of the report and supporting information is provided (**section 9** and **annexes**).

This report fulfils the usual criteria of an archaeological impact assessment and follows the most recent EPA guidelines on the compilation of an EIS (2015; 2015a; 2017). Pertinent guidelines published from time-to-time have also been consulted and are listed in the project references given at the back of this report. Statutory protection and policies are provided in Annex 1. The heritage policies of the Croom Local Area Plan (draft 2019, 59-65) have been considered in this report. The site inspection on which this report is based was carried out on **Friday 20 September 2019**.

2. Method of Study

The following resources and methods of establishing the archaeological status of the site were used:

- The subject site was visited and inspected by a qualified archaeologist;
- A review of the planning history of the site was undertaken;
- The Record of Monuments and Places constraint maps and lists (RMP) and the sites and monuments record (SMR) were consulted;
- A wide range of local historical and archaeological records relevant to the study area were consulted, including the Ordnance Survey First Edition six-inch map (c.1840), the Ordnance Survey twenty-five-inch map and aerial views;
- All available published information was considered;
- National Inventory of Architectural Heritage and Record of Protected Structures;
- The Croom (draft) local area plan 2019, county development plan and other pertinent documents were consulted (listed in references section);
- A review of any archaeological investigations in the vicinity was also undertaken.

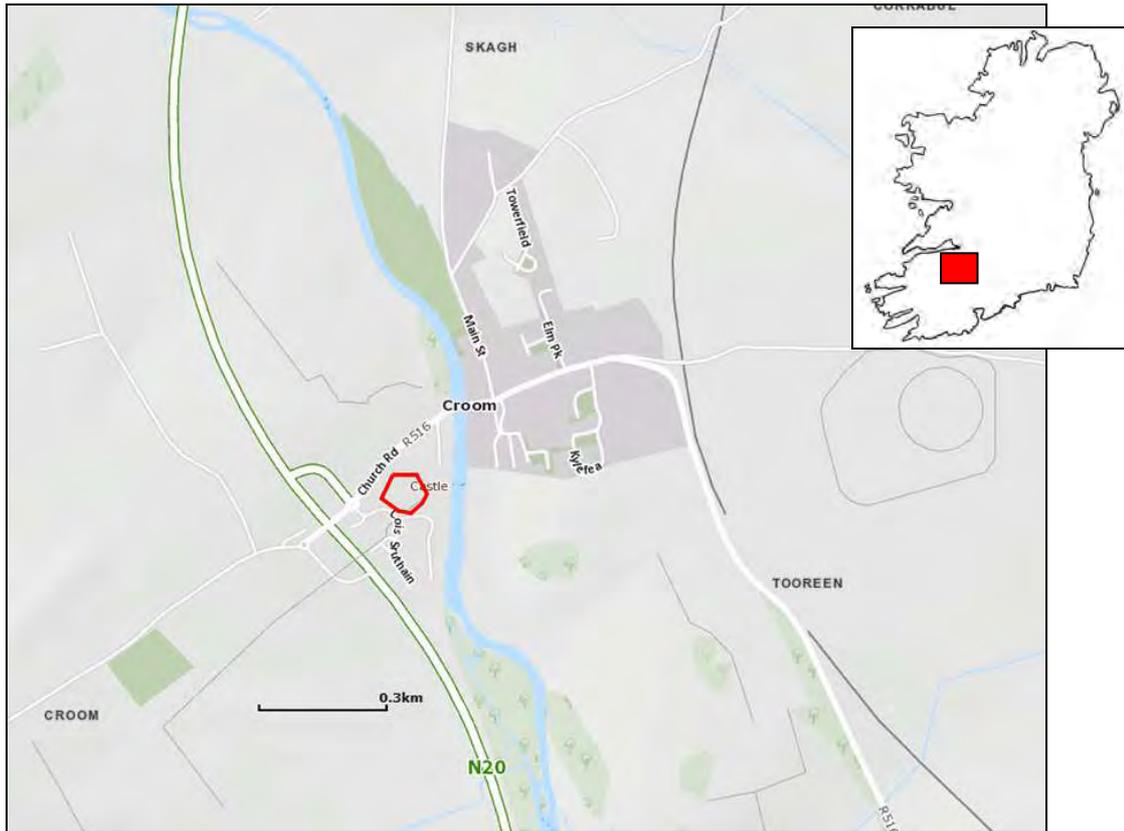


Figure 1. Site location (after www.archaeology.ie). North to top.



Figure 2. Site location detail (after www.archaeology.ie). North to top.

3. Existing Environment

The subject site is situated in the southwest of Croom town, Co. Limerick (ITM 551143, 640880). The area in question is currently an area located around Croom Castle. The archaeological remains on site consists of the following: Croom Castle. This is a keep castle with surviving curtain wall and towers and outer bawn wall (LI030-025005), the surviving portion of which extends around to the east and north of the central keep (curtain wall and towers). There is a recently constructed twenty-first century structure against the inner face of the outer bawn wall, to the north of the keep. A flat-topped mound was recorded as a possible motte (LI030-025004); this is now a redundant record (see Sutton for Aegis Archaeology Limited 2008 archaeological works 07E1060; 07R0264). There are also a number of eighteenth/nineteenth-century buildings, which were the subject of a previous architectural assessment (Humphreys 2008, 4 and 5).



Figure 3. Digital Globe aerial image of subjects site (North to top).

3.1 Any future proposed development

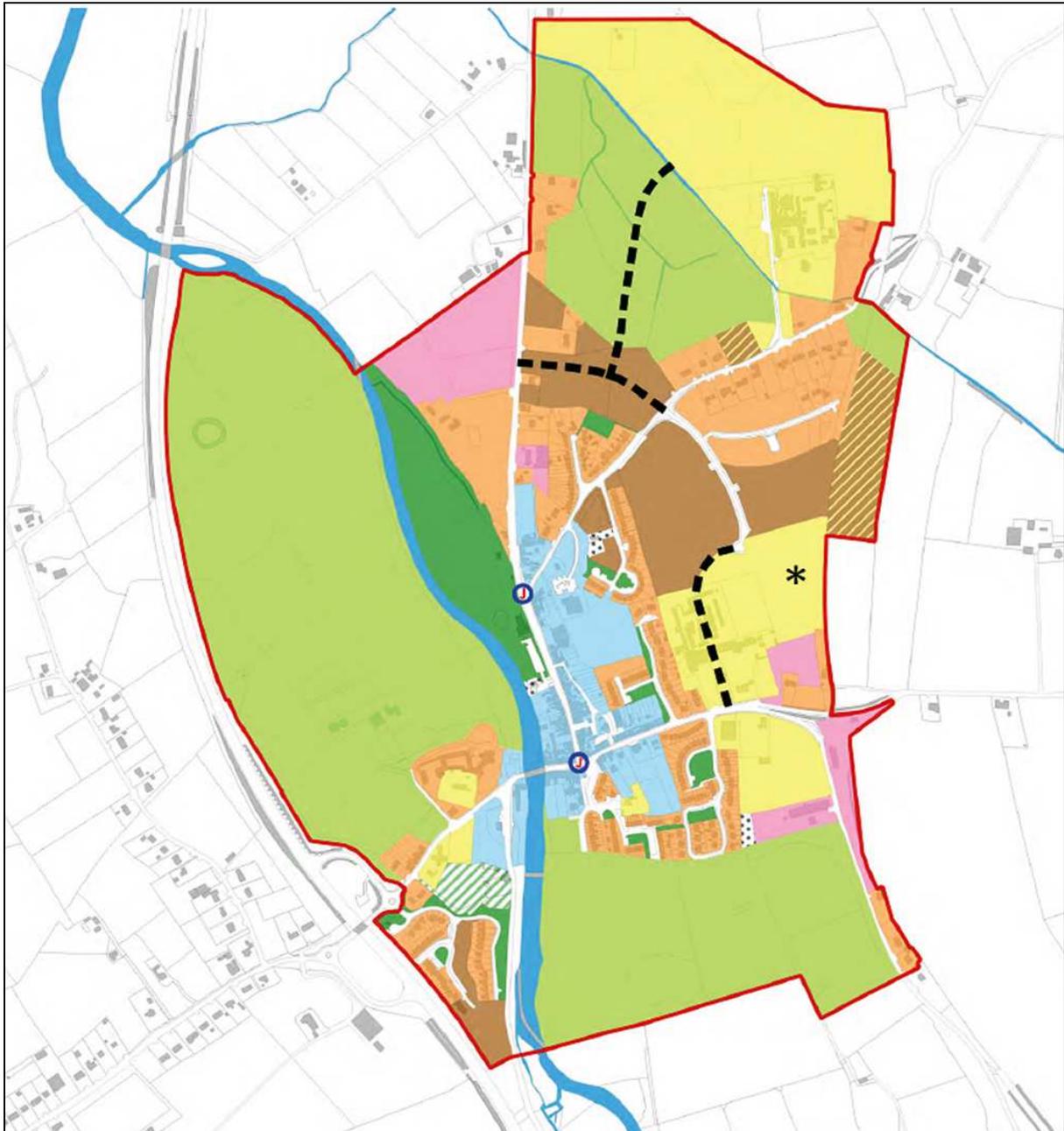


Figure 4. Proposed zoning in draft Croom Local Area Plan (LCCC draft 2019). Special control zone indicated by green and white hatching.

Any future development at the subject site has the potential to yield archaeological features of interest, due to its location within the zone of archaeological potential for the historic town of Croom and its proximity to Croom Castle. There is a framework document outlining national policy in regard to appropriate mitigation for recorded monuments and development (see Annex 1 for link to this document).

In the Croom Local Area Plan (LCCC draft 2019, section 8.3.2, 64-65), Croom Castle and its environs is proposed as a Special Control Area. 'The area within the curtilage of Croom Castle is designated as a Special Control Area. This area is located within the Recorded Monument, LI030-025001, classified as the historic town of Croom and the Castle located within this classification has been assigned a unique reference LI030-025005. It is also within an Architectural Conservation Area. Only proposals for the rehabilitation for re-use of short term tourist letting of the Coach House which support the setting and amenity of Croom Castle, will be considered in this area and will be assessed on an individual basis. Ancillary walkways may be considered at this location. This position is further proposed in Objective EH 06: Special Control Area. 'It is an objective of the Council to maintain the integrity of the Special Control area within the plan boundary'.

3.2 The site inspection (Plates 1-4)

The site was inspected by the writer on Friday 15th September 2019. The weather was sunny and dry, and visibility was good.

One block of the outbuildings at the E side of the site (as depicted on the OS 1st Edition map c. 1840, and later 25 inch map c. 1900) have been developed. The N gable wall of another block forms the boundary of the site and is undeveloped.

The N portion of the site (the N side of the existing gravel entrance to the N of the castle) is a lawn area under grass and mature trees. No above ground archaeological remains were noted in this area. Two structures are depicted in this area on the OS 1st edition map c. 1840. They are no longer extant, but traces may survive sub-surface.

No previously unrecorded archaeological features were noted during the walkover.



Plate 1. Croom Castle, from NE



Plate 2. Croom Castle across lawn area, from N



Plate 3. Existing development, from W



Plate 4. Remains of outbuilding, to N of existing development, from SE



Plate 5. Remains of outbuilding, to N of existing development, from SE



Plate 6. Lawn area with trees at N side of site, from S

4. History and Archaeology of the Site and Vicinity

4.1 Historical and archaeological background (figs 5-10)

The historic town of Croom is in the parish of Croom and the barony of Coshma. The townland name of Croom or Crom, is translated as meaning curved, crooked, or bent. It supposedly received its name from Crom O'Donovan (the stooped or bent O'Donovan), although O'Donovan in his letters notes that this story seems to be untrue. The antiquities of the area recorded by O'Donovan include Croom cottage in the north-east part of the townland, four forts, Croom Castle, the Roman Catholic chapel, Croom Village and Croom Bridge.

The subject site is partially located within the zone of potential for **LI030-025001-**, the historic town of Croom. Croom is located on the River Maigue to the southwest of Limerick on the former Limerick to Cork road. The Urban survey notes that it was clearly a settlement site before the coming of the Normans as there is a reference to its burning in AD1144 by *Toirdealbach Ua Conchobair*. The nature of this settlement remains unknown (Bradley *et al* 1989). The castle of Croom is situated on the west bank of the Maigue River on high ground overlooking the village to the northeast. The castle was founded by Dermot O' Donovan during the reign of King John (1197-1216) to protect the ford and the property taken by the O'Donovan's from the McEneiry's family (Lenihan 1866, 726; Spellissy 1989, 148). The O'Donovan's were driven out of Croom and fled to Cork (Lenihan 1866, 728) and the castle was granted to Maurice Fitzgerald, Earl of Kildare, as his principal home in 1215 (Lenihan 1866, 729; Westropp 1906, 166). The Fitzgerald's erected a castle surrounded by four circular towers before 1216 (Spellissy 1989, 148). In 1310 a grant was given by the Earl of Kildare to provide Adare and Croom with stone walls (Westropp 1906, 166; Thomas 1992, 225). The castle was repaired by John D'Arcy in 1334 and remained an important castle of the Earls of Kildare. The Castle was in the hands of the Fitzgeralds until it was confiscated after Silken Thomas' rebellion. In 1547 it was granted to the Earl of Desmond. In the reign of Elizabeth I (1558-1601), the English attacked the castle and the Geraldines were besieged three times (Lenihan 1866, 729). The remains now consist

of a semi-circular arc of curtain wall with a rectangular tower, probably of three floors, in the centre and another turret at the south end of the curtain wall. Lewis has recorded that the castle originally consisted of a central keep flanked by four circular towers (1837, 436). The Urban Survey notes that the modern house and farm buildings to the northeast and east of the castle probably preserve the line of an outer ward (Bradley *et al* 1989, 121).

Anglo-Norman stone-built castles date from c. 1190-1310. Croom castle dates to c. 1215 and is a keep castle. The term 'keep' is generally used to refer to an isolated tower that contained the essential castle rooms and was also often used as a place of final retreat should the outer defences be breached. If the principal tower was used as the chief living quarters for the Lord it is properly referred to as a donjon (Sweetman 1999, 63). These can be of 'tower' or 'hall' type castles, mostly square or rectangular in plan (Leask 1947, 67). In Ireland early towers are square, rectangular, polygonal and cylindrical in shape, and all are built at much the same time (Somerset Fry 1996, 92).

The foundation date of Croom as a borough (a small settlement with some of the attributes of a town proper), is unknown, though it is suggested that it was created early in the period of the Anglo-Norman influx into the country. The earliest references to Croom as a borough is in 1295, while a murage grant of 1310 suggests that it was already a settlement if it necessitated a wall. The development of the town probably began in earnest after the Hamo de Valognes granted a manor at Croom to Gerald Fitzmaurice in 1197-1200 (Killanin and Duignan 1962, 183).

Westropp (1906, 166) notes that in 1657 the town of Croom had a manor, castle, bawn, orchard, mill, two eel-weirs and a broken bridge. The extant remains of the castle are apparently of fifteenth-sixteenth century date. There is, however, no physical evidence of the town wall surviving (Tomas 1992, 224–25). The Urban Archaeology Survey (Bradley *et al* 1989-90, 117-24) has undertaken a survey of the historical and archaeological background of Croom Town. The Urban Survey notes that medieval borough was either centred on the site of the present village or on the west side of the River Maigue. The Urban Archaeological Survey lists the archaeological inventory of the town as follows: Site of Borough; Bridge; Borough Defences; Motte (now redundant); Castle; Parish Church; and Miscellaneous features. The Urban Survey recorded a possible motte in the vicinity of the castle at Croom. It is recorded as a flat-topped mound about 2m in height with fairly steep sides about 50m west of the castle remains. This was investigated and was found not to be an antiquity (Sutton for Aegis Archaeology 2008).

The mill and bridge are the closest archaeological elements outside the subject site, located within c.170m to the west. The bridge is described in the Urban Survey as having no date. There is a reference to a broken bridge in 1657 (Westropp in Bradley 1989). A mill is recorded in the seventeenth century and the Survey notes that this 'late medieval mill stood on the site of the mill which is still in use today on the west bank of the Maigue' (Bradley *et al* 1989, 119).

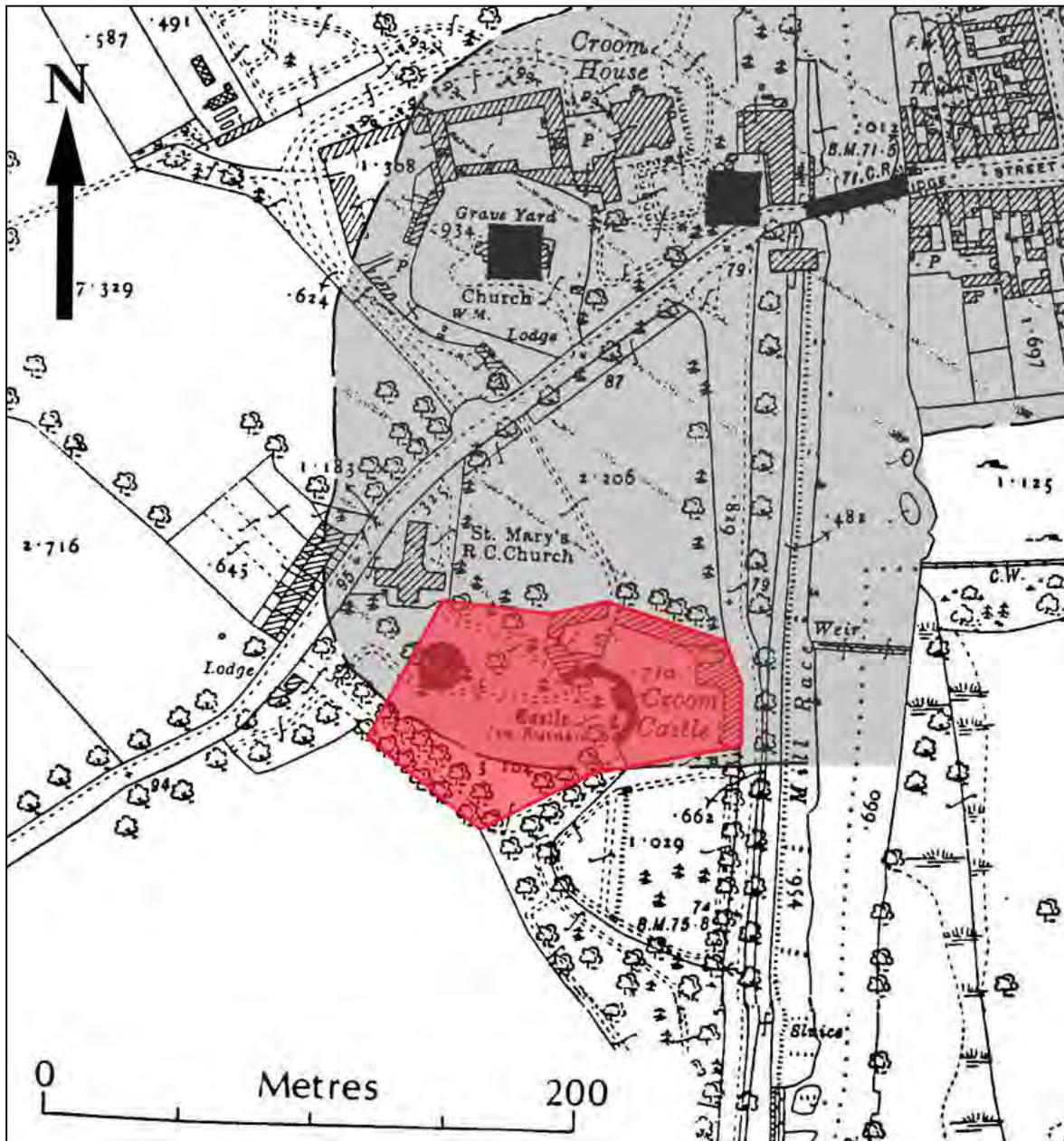


Figure 5. Extract of Urban Archaeology Survey constraint map indicating Croom Castle (Bradley *et al* 1989).

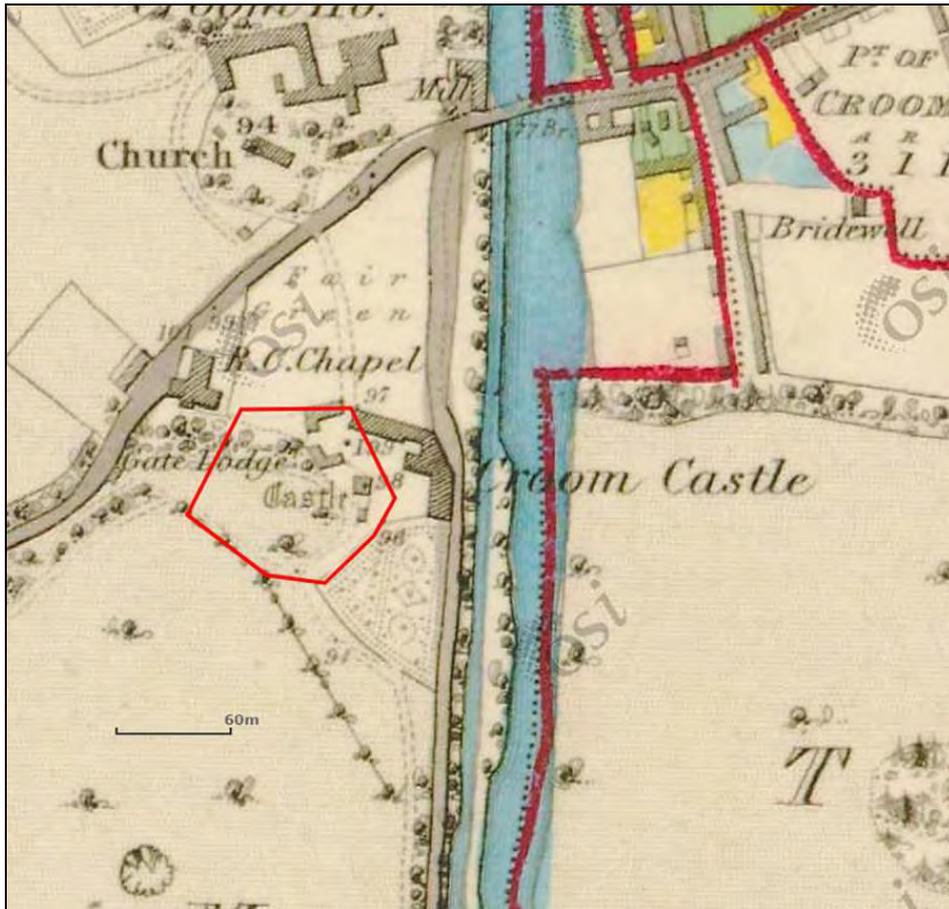


Figure 6. Site location in red on first edition OS six-inch map of Croom (c.1834-1842; for indication only).

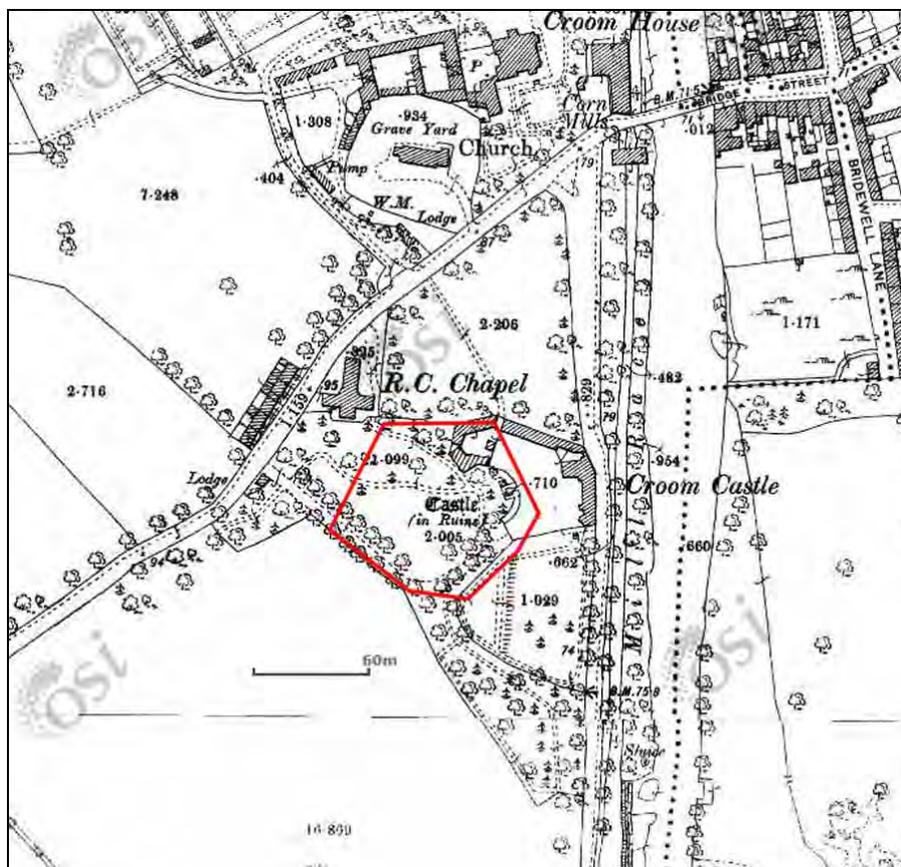


Figure 7. Site location in red on 2nd edition OS 25-inch map of Croom (c.1887-1913; for indication only).

Griffith's valuation or the 'primary valuation of Ireland' was a property tax survey carried out under the supervision of Sir Richard Griffith in 1847 to 1864. It was to determine liability to the 'poor rate' which supported the poor and destitute within each Poor Law Union district. A list of all people living in an area and their accommodation was kept and was accompanied by a map showing the ownership plots. As can be seen from the map extract, (figure 8) there was a single occupier at 6a named Samuel A. Dickson Esq. which leased/rented from John Croker Esq. (figure 9).



Figure 8. Griffith's Valuation 1847-'64 map extract showing Croom Castle and environs. Each number represents an ownership/tenant plot.

1	a	Richard Butler,	Jas. D. Lyons, Esq.	House, offices, & land,	87 0 38	40 0 0	2 0 0	22 0 0
	b	Timothy Lynch,	James D. Lyons, Esq.	House, offices, & land,	73 1 11	72 15 0	5 5 0	78 0 0
	c	James Costelloe,	James Costelloe,	House, offices, and land,	—	—	0 15 0	0 15 0
	d	Patrick Dwyer,	James Costelloe,	House,	—	—	0 10 0	0 10 0
	e	Bartholomew Vnughan,	James Costelloe,	House,	—	—	1 5 0	1 5 0
	f	Mary Heffernan,	James Costelloe,	House,	—	—	0 10 0	214 10 0
	g	James D. Lyons, Esq.	John Croker, Esq.	Office and land,	209 2 10	214 0 0	0 13 0	0 17 0
	h	James Dandon,	James D. Lyons, Esq.	House and garden,	0 0 27	0 4 0	1 10 0	1 15 0
	i	John Riordan,	James D. Lyons, Esq.	House and garden,	0 1 1	0 5 0	1 5 0	1 5 0
	j	Patrick Browne,	James D. Lyons, Esq.	House,	—	—	1 0 0	1 1 0
	k	John Mannix,	James D. Lyons, Esq.	House and garden,	0 0 5	0 1 0	1 0 0	1 1 0
4	a	James D. Lyons, Esq.	John Croker, Esq.	House, gate-ledge, offices, and land,	43 2 18	46 10 0	48 0 0	169 10 0
	b	Rev. Edward Croker,	John Croker, Esq.	Flour-mill,	0 2 24	0 10 0	12 5 0	12 15 0
	c	Rev. Lawrence Hartnett,	James D. Lyons, Esq.	R.C. Chapel and yard,	0 0 28	—	22 10 0	22 10 0
	d	Michael McCarthy,	James D. Lyons, Esq.	House,	—	—	2 0 0	2 0 0
	e	Al. McCarthy (miller),	James D. Lyons, Esq.	House,	—	—	2 0 0	2 0 0
	f	John Hastings,	James D. Lyons, Esq.	House,	—	—	3 5 0	3 5 0
	g	Yacant,	James D. Lyons, Esq.	House,	—	—	3 5 0	3 5 0
	h	John Flaherty,	James D. Lyons, Esq.	House,	—	—	—	18 0 0
6	a	James D. Lyons, Esq.	John Croker, Esq.	Tolls of fair-green,	2 3 12	—	—	—
	b	Samuel A. Dickson, Esq.	John Croker, Esq.	House; gate-ledge, offices, and land,	63 2 27	66 0 0	30 0 0	96 0 0
	c	Owen Bresnahan,	Saml. A. Dickson, Esq.	House and office,	—	—	1 15 0	1 15 0
	d	Reps. Bryan Connor,	Saml. A. Dickson, Esq.	House,	—	—	1 15 0	1 15 0
	e	Patrick Connell,	Limerick Club Hunt,	House and offices,	—	—	5 5 0	5 5 0
	f	John Morrissey,	William Croker, Esq.	House, office, and land,	30 3 25	18 10 0	0 15 0	19 5 0
	g	John Croker, Esq.	In fee,	Land,	35 0 24	34 0 0	—	34 0 0
	h	Owen Crimmins,	John Croker, Esq.	House,	—	—	0 7 0	0 7 0
	i	Thomas Herlehy,	John Croker, Esq.	House,	—	—	0 10 0	0 10 0
	j	Timothy Crimmins,	John Croker, Esq.	House,	—	—	0 8 0	0 8 0
	k	Denis Cronin,	John Croker, Esq.	House,	—	—	0 15 0	0 15 0
	l	Michael Malone,	John Croker, Esq.	House,	—	—	1 0 0	1 0 0
	m	William Blake,	John Croker, Esq.	House,	—	—	0 6 0	0 6 0
9	a	James Mulcahy,	John Croker, Esq.	Office and land,	19 1 21	18 10 0	0 10 0	19 0 0
	b	Patrick Scollard,	James Mulcahy,	House,	—	—	0 12 0	0 12 0
	c	Catherine Burns,	John Croker, Esq.	House,	—	—	0 10 0	0 10 0
	d	John Griffin,	John Croker, Esq.	House and land,	18 3 3	14 7 0	0 8 0	14 15 0
	e	Mary Noonan,	John Croker, Esq.	House and garden,	0 0 28	0 3 0	0 10 0	0 13 0
	f	Patrick Connell,	John Croker, Esq.	House, offices, and land,	35 0 37	27 5 0	2 10 0	29 15 0
	g	James Dea,	Patrick Connell,	House and garden,	0 0 15	0 2 0	0 10 0	0 12 0
12	a	John Roote,	John Croker, Esq.	House, offices, and land,	84 3 35	46 10 0	3 10 0	50 0 0

Figure 9. Griffith's Valuation 1847-'64 record extract.

A search of the **national folklore database** as presented in www.duchas.ie, for Croom Castle yielded four substantial results. They are:

Near Croom castle is a gate known as the 'Lacrosse gate' and it leads into a field known as the 'Lacrosse field' (Locally known as the 'Lacrosse field'). Once a man was riding round this field and his horse bolted. The man was taken by surprise and lost his seat on the horse, but one foot became entangled in the stirrup and the poor man was dragged along the field and killed near the gate. He has often since been seen near the Lacrosse gate and riding around the field in which he met his death. (Details: Collector, Mary O' Donnell; Gender female; Address Croom, Co. Limerick; Language English; ARCHIVAL REFERENCE the Schools' [folklore] Collection, school Cromadh (C.) roll number 9307, Volume 0507, Page 483).

Once a number of men, who were very fond of card-playing, sat playing cards in the big drawing room of Croom castle. They played all Saturday night and well into the day the following Sunday, eating a bite at the card table but never breaking up the card party. Towards evening as one of the men dealt the cards some fell on the floor. The man who stooped to pick it up noticed that under the table there were five sets of legs, though there were only four players. Looking up to the table again he found that the extra pair belonged to the "Old boy" who had appeared at the table just then. The men fled from the room, but the black man remained there at the table, with the scattered cards before him and looked as if he meant to remain. The Priest was brought and after a good deal of trouble he succeeded in throwing the unwelcome visitor out one of the windows which overlooks the Castle road. The space of the window was then built up and it is to be seen so to this day. But so many people came to see this space that the owners of the castle hit on a plan for confusing in people's minds the place of the Devil's window. They got built up another similar window. near the first window and were careful not to tell which was which to strangers, while locals were none too anxious to speak of it at all. The two built up spaces with the projecting window sills still face the road but by now no one remembers which is the "Devil's window". This happened when Croker of Ballinagarde lived there. (Details COLLECTOR Nancy Kirby; Gender female; Address Croom, Co. Limerick; INFORMANT (name not given); Relation parent; Gender male; Age 50; LANGUAGE English; ARCHIVAL REFERENCE; The Schools' Collection, Volume 0507, Page 485; School: Cromadh (C.) roll number 9307).

I remember the bridge at Clohandhuv to be built. (1840 is the date on the stone), I remember the man to be laying out the new-line (which connects with the bridge above mentioned) but I can't recall them making the road. My father and mother had Irish, everybody had Irish, when I was growing. I had it myself but tis gone. We used to grow flax, we used to send it to the tucking mill in Bruree, it was a better mill than they had in Croom.

I remember them to drive the pigs to Cork. Do you know that they drove the pigs from Limerick (city) to Cork? There would be a drove of them going together from here and Drumbeg (an adjoining townland) They used have a load

of praties with them, and they would throw the praties on the road, here and there to the pigs to keep them from getting hungry and weak. The pigs would be over a year old and would be as big as asses. They used send the butter to Cork too. I never went myself with either pigs or butter, but there was a carman in Croom and another in Bruff who used to go every week with firkins of butter and they loaded up as high as a load of hay. They'd have the firkins tied up with ropes. They tried to rob them once when they were going with the butter but they beat them back (Read: Some people attempted to rob the people bringing the butter to Cork, but the latter beat them off)Many poor people lost their money over the butter too. I had a little money to get and when I went to the bank all he (apparently the bank official) had for me was a pound. Twas the people from Croom who bought the butter and were the bankers. (See Ref to Croom Castle.) The famine was an awful time. I recall a woman dying of the hunger between here and the Cross. (of Ballintaw(?))
(Details: INFORMANT Liam O Riain; Gender male; Age 102; Address Ballintaw, Co. Limerick; LANGUAGE English; ARCHIVAL REFERENCE The Schools' Collection, Volume 0507, Page 137 School: Cromadh (B.).

'Croom and its Castle' *manuscript only* (Details: ARCHIVAL REFERENCE The Schools' Collection, Volume 0525, Page 089; School Ballymartin, Croom; (roll number 4466) Location: Ballymartin, Co. Limerick).

4.4.1 Archaeological monuments

The subject site is situated within the zone of archaeological potential for the historic town of Croom, and there are a number of specific recorded archaeological monuments on the subject site. These have been listed and described in Table 1. This information has been gathered from www.archaeology.ie and the Archaeological Survey of Ireland database. The location of each archaeological monument in respect of the subject site can be seen on figure 10. Figure 11 is an extract of the paper RMP map (1997) showing zone of archaeological potential for the town. This information has been provided as context to the archaeological background of the subject site. The town defences (i.e. town wall and associated features such as gates, fosses *etc*) have been allocated a recorded monument number, but as their precise location is currently unknown; as such, they have not been marked on the figure (figure 10).

Table 1. List of recorded archaeological monuments on or adjacent to the subject site (after the ASI).

RMP/SMR No.	Class	Townland	ASI Description
LI030-025001-	Historic Town	Croom; Skagh	The historic town of Croom was described in the Urban Survey of Limerick as following; 'Croom is located on the Maigue river to the south west of Limerick on the Limerick to Cork road. It was clearly a settlement site before the coming of the Normans because there is a reference to the burning of Cromadh in 1144 by Toirdealbach Ua Conchobair (AFM). The nature of this early settlement is unknown, however. In 1215 it was granted to Maurice FitzGerald (Sweetman 1875-86, i) and it became one of the principal manors of the FitzGeralds, lending its name to their war cry 'Crom-a-Boo'. It remained in the hands of the FitzGerald earls of Kildare until it was confiscated in the aftermath of Silken Thomas'

			<p>rebellion. In 1547, however, it was granted to the earl of Desmond (Westropp 1905-6, 166). The foundation date of the borough is unknown but it is likely, following Empey's analysis of the process of Anglo-Norman sub-infeudation, that it was established at an early date, probably at much the same time as the manor was granted to the Fitzgeralds. The earliest reference to the presence to burgesses occurs in the justiciary rolls for 1295 (Westropp 1905-6, 166), while the murage grant of 1310 suggests that it was not an inconsequential settlement (Ir Rec Comm 1829, 42). The rent paid by the burgesses in 1331 "for the two parts of their borough" was 11s. 9. 5d. (Red Bk Kildare, 111), but whether this is a total rent or a partial rent is unclear. The subsequent history of the borough is unknown. The medieval borough may have been located on the east bank of the Maigue river centred on the present village whose street plan appears to be of relatively recent origin. Alternatively, because of "the location of the castle and church on the west side of the river, it may well be that the medieval borough was situated on the west bank. In the absence of clear information, however, it is impossible to be certain" (Bradley et. al. 1989, 117-8). (C. O'Brien 2019).</p>
LI030-025004-	Redundant Record (possible motte no antiquity)	Croom	<p>Archaeological investigation by Bruce Sutton (07E1060) found that 'the motte [...] was of modern construction with inclusions of tile and concrete'. This has therefore been made a Redundant record. (D. Power 2014).</p>
LI030-025005-	Anglo-Norman Masonry Castle		<p>Local tradition asserts that Croom Castle or a fortification at Croom was first built by the O'Donovan's before passing into the hands of the Fitzgerald family in the 13th century. However John O'Donovan was doubtful about this O'Donovan claim and in the appendix of the Annals of the Four Masters, O'Donovan recorded his doubts when he stated that the O'Donovan's of Castle Donovan and Bawnlahan were descended from Crom O'Donovan who resided at Croom Castle until he 'was driven thence by Maurice Fitzgerald, second Baron of Offaly who was Lord Justice of Ireland in the year 1299; but this has not been proved' (O'Donovan 1856 vi, 2437). A branch of the family descended from Crom O'Donovan who was killed in 1254, claim that this family were originally 'in possession of the great Castle of Crom or Croom, on the River Maigue, in the present county of Limerick, and this was the tradition in the country in 1686, when the manuscript called Carbraie Notitia was written' (O'Donovan 1856 vol. 6, 2437). It is possible that there was a pre-Norman fortification at Croom which was the residence of the O'Donovan clan. In 1151 the Annals of the Four Masters recorded that a 'great predatory excursion was made by Ruaidhri, son of Toirdhealbhadh Ua Conchobhair, into Thomond; and he carried away many cows, and burned Cromadh [Croom]' (O'Donovan 1856, 1101). Whatever about the origins of the castle we can be certain that during the late 12th or early 13th century this castle was in the possession of the FitzGerald family who became the Earls of Kildare and remained in their hands until the early 18th century. Croom Castle appears to have been built by Gerald FitzMaurice in the late 12th or early 13th century, his death is recorded in the year 1203 (Cal. doc. Ire., 30) suggesting that this castle may have been built before this date. The first reference to Croom Castle dates from 1215 when 'Maurice FitzGerald made a fine with the King of 60 marks, to have the lands of Gerald his father in Ireland with the castles of Crumech [Croom] and Dungarvan in Oglassin, which belong to Maurice by right of inheritance. Mandate to the justiciary of Ireland, that having received security for the 60 marks he cause seisin to be given to Maurice' (Cal. doc. Ire., 91, 94). The lands of Croom came into the possession of the FitzGerald family as early as 1197 when the Anglo-Normans acquired lands in County Limerick. Around this time Thomas FitzGerald son of Maurice FitzGerald, founder of the House of Desmond was granted the cantred of Shanid which resulted in the construction of Shanid Castle (LI019-081001-) (Orpen 1911-20, ii, 165). The type of castle constructed at Shanid was a shell keep which was built encircling the summit of an earlier motte castle. According to Orpen it was probably around this time that the lands of Croom were granted to Gerald brother of Thomas Fitzgerald who had been granted the cantred of Shanid (ibid., 165). Between the years c. 1200 – 1220 Anglo-Norman castles were constructed in Limerick City, Kilmallock, Caherconlish, Ardpatrick and elsewhere (Westropp 1907, 31). Croom Castle was probably constructed during this period by the</p>

		<p>FitzGerald's in order to secure their newly acquired lands. The shell keep castle may have been built on the site of a pre-Norman fortification which was associated with the O'Donovan family. This pre-Norman fortification may have been built beside the fording point on the River Maigue. According to Westropp (1906-07, 65) the castle at Croom had been built at the 'old fort of Cromadh or Croom, on the river Maigue by about 1216, and was given to Maurice FitzGerald'. By the late 13th century the manor of Croom was in the possession of Juliana de Cogan [nee FitzGerald] (Mac Niocaill 1964, 31-2) who was the granddaughter of Maurice FitzGerald 2nd Lord of Offaly, and great granddaughter of Gerald FitzMaurice, 1st Lord of Offaly and founder of the FitzGerald dynasty and later the Earls of Kildare. Juliana FitzGerald was the daughter of Gerald who was married to a daughter of Hamo de Valognes of nearby Askeaton Castle (Orpen 1911-20, 165). In 1329 the lands of Kildare, Maynooth, Croom, Adare, and Estgrene were granted by Edward III to Sir John Darcy, Lord Justiciar and stepfather to Maurice FitzGerald during his minority (Wyndham-Quin & Wyndham-Quin 1865, 139). In 1357 Maurice FitzGerald 4th Earl of Kildare was appointed Lord Justiciar of Ireland and was ordered to strengthen his castles on pain of forfeiture.</p> <p>During the middle of the 16th century the Earl of Desmond took possession of this castle for a short period of time. In 1534 Silken Thomas FitzGerald rebelled against Henry VIII and during this rebellion, Sir John the 13th Earl of Desmond took possession of Croom and placed a garrison in the castle (McCormack 1997, 510). In 1541, his son James, 14th Earl of Desmond wrote a submission to King Henry VIII requesting 'the preferment to have the lease of Crom [Croom] and Adar [Adare], and other the late Erle of Kyldares landes, in the countie of Lymerike' (Anon. 1834, 286). This land grant was confirmed in 1546 when Henry VIII granted 'James earl of Desmond of the manors and dominions of Crome [Croom] and Adare, co. Limerick, for life, by fealty at 4d. rent' (Gairdner & Brodie 1910, 476).</p> <p>By the late 16th century the castle was back in the possession of the Earls of Kildare. In 1600 there is a reference to the strategic location of the castle and to the presence of thatched houses standing inside the bawn of Croom Castle. In this year Sir George Carew wrote to the Privy Council that when he came to 'the castle of Cromme [Croom], which was held by Piers Lacy, being now part of the Countess of Kildare's jointure, upon sight of the enemy, the ward, which Lacy had left in it, quitted the place, where some spoil fell unto the soldiers, and by mischance the house was burnt; but the loss not great, being old thatched houses, and the walls thereof standing good and firm, as they did before. This place gave great annoyance unto the subject being seated at the entry into Connello, which is the chief receptacle for all the rebels' (Cal. S.P. Ire., 316-17).</p> <p>The castle is described in the 1654-56 Civil Survey of Limerick (Simington 1938, 135) as 'consisting of a 'Castle a Bawne, an orchard & a Mill out of repaire and two Eele weares. There is a broaken bridge uppon ye river of Maige near the Castle'. The owner of the castle in 1640 is listed as George Earle of Kildare' (ibid., 135). In 1683 Thady Quin of Adare purchased a long lease of Croom Castle and its lands from the Earl of Kildare (Wyndham-Quin & Wyndham-Quin 1865, 180). In 1707 John Fitzgerald the 18th Earl of Kildare died and his lands including Croom passed into the hands of the Duke of Richmond who was the principal creditor to the Earl of Kildare. In 1711 the Duke of Richmond sold the lands of Croom to the Croker family of Ballyneguard / Ballynagarde (Lewis 1837, 436). In 1837 Lewis's Topographical Dictionary of Ireland recorded that the castle was abandoned and left in a ruinous condition after 1691 and 'remained unoccupied till recently rebuilt by John Croker Esq., its present proprietor' (ibid., 436). In 1837 the castle appears to have been incorrectly described by Lewis in his Topographical Dictionary of Ireland as he records that 'the castle originally consisted of a central keep flanked by four circular towers' (ibid., 436). This description of four circular towers does not match up with the depiction of the castle on the 1840 edition of the Ordnance Survey six-inch map, and does not match the upstanding remains of the castle on the ground today.</p> <p>Croom Castle is situated on the west bank of the River Maigue on high ground over-looking the village of Croom. This castle is a multi-period monument the extent of which encompasses the footprint of the 19th century Croom Castle</p>
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		<p>House and its courtyard walls which are depicted on the Ordnance Survey 25-inch map. At least five different building phases have been identified in the upstanding fabric at Croom Castle. The dating and phasing of the late medieval fabric is speculative and is based on surviving architectural features. The first phase dates from c. 1200 and is represented by the construction of a shell keep measuring internally c. 22m in diameter of which only two sections of the enclosing wall survives upstanding. A second building phase dates from the 15th century when a tower house or mural tower was inserted into east wall of the shell keep and a bawn wall was constructed in order to enclose a larger space surrounding the 13th century shell keep. The late medieval bawn wall survives today as the demesne or courtyard wall of the 18th/19th century house known today as Croom Castle House. The bawn wall survives upstanding in a clockwise direction from the northwest angle through north through east to south where it ends. There are no surface remains visible of this bawn wall from south through west to northwest. The third building phase possibly dates from the 16th century when a garderobe tower was inserted into the south-south-east section of the shell keep wall. The dating of this phase is uncertain and it is possible that the garderobe tower may be contemporaneous with the tower house. A different date has been assigned to the garderobe tower as the style of masonry differs between the fabric of the tower house and the masonry of the garderobe tower. This garderobe tower may date from the 1540s when the ownership of the castle changed hands between the Earl of Kildare and the Earl of Desmond. The fourth building phase dates from the 18th/19th century when the castle and bawn became the residence of the Croker family and a new castellated style house was constructed in the northeast corner of the bawn and outbuildings were constructed up against the inner face of the north wall of the bawn. The tower house and bawn wall was also altered during this period and the grounds around the castle were landscaped. During the 20th century the top of the bawn wall was heightened and buttresses were built up against the internal southern face of the northern wall of the bawn located to the northwest of Croom Castle House. The irregular-shaped ground plan of Croom Castle House would suggest that this building is a multi-period structure however the dating of these phases is uncertain as the house is covered in render and few details are visible which enable a more precise chronology of the buildings development.</p> <p>Today the 13th century castle consists of a roughly circular or irregular polygonal-shaped 13th century shell keep of which only the eastern half survives upstanding to a maximum height of c. 6m. The wall of the shell keep survives upstanding in a clockwise direction from north through east to south-southeast. A recessed section of the external face of the shell keep wall on the northern side facing a 19th century gateway looking onto the fair green may be related to an original entrance into the shell keep or could be the remains of a second mural tower although this is uncertain. A number of putlog holes are the only other architectural features visible in the 13th century fabric of the shell keep wall. The internal face of the shell keep wall has been mainly robbed out and no architectural features could be identified in the upstanding remains although most of the walls were obscured by vegetation. The surface of the interior of the shell keep is mainly covered by a dense cover of trees, briars and scrub vegetation along with collapsed rubble from the northwest angle of the late medieval tower house. During the 15th - 16th century a vaulted tower house type building or mural tower was inserted into the east wall of the shell keep and a garderobe tower was built into the south-south-east wall of the shell keep. A straight joint can be seen where the late medieval tower house was inserted into the 13th century wall of the shell keep. A break in the masonry style along the southeast face of the shell keep wall clearly indicates where the garderobe tower was inserted into the 13th century wall. The western half of the 13th century shell keep no longer survives above ground and there are no surface remains indicating the line of the shell keep wall. This area is covered in vegetation and collapsed rubble from the late medieval tower house.</p> <p>The tower house measuring externally 7.4m by 7.3m stands at least four storeys high the walls of which are c. 10m high above the surrounding land. The ground floor entrance of the tower house was located in the centre of the east wall which is now covered by rubble due to the recent collapse of the east wall of the tower house. An earlier photograph of the tower before collapse of the east wall</p>
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		<p>shows that this doorway was rebuilt as a flat-headed doorway with cut stone voussoirs in the 18th/19th century. Immediately above this doorway was a similar flat-headed window with cut stone voussoirs which had been blocked up. The tower house is not a typical tower house as there appear to be no windows visible in the ground or first floor levels. The internal floor plan consists of a very small rectangular area measuring 3.1m by 3.4m which at ground floor level has no windows or slit opes present. The doorway measuring 1.1m wide opens directly into the ground floor. Unusually there is no evidence for a stairs connecting the ground floor to the first floor level. The lack of window openings at ground and first floor level are not typically found on late medieval tower houses. The east wall of the mural tower measures 2.6m thick and is 0.5m thicker than the other three walls of the tower. The lack of windows at ground and first floor level along with the 2.6m thick east wall suggests that this tower house may have reused the fabric of the east wall of the shell keep. It is possible that there may have been an earlier two storey high mural tower on the east wall of the shell keep which was heightened to create the present four storey high tower in the 15th/16th century. The quoins on the east face of the tower change from the ground floor to the second floor level are roughly shaped and differ from the well cut quoins from second floor level upwards. At this point the walls of the tower slope inwards which suggests that the tower was heightened from this level upwards in the 15th/16th century. The sloping inwards of the tower roughly corresponds to the height of the shell keep wall which suggests that the lower part of the east wall of the tower house may be contemporaneous with the shell keep wall. The masonry on the lower face of the east wall around the rebuilt ground floor doorway and first floor window of the tower differs from the masonry of the upper floors suggest that there may have been a lot of rebuild or refacing of the external face of the east wall when the doorway and window was rebuilt in the 18th/19th century. Prior to the collapse of the tower there was a cavity in the east wall at first floor level measuring 1.7m wide, this section of wall no longer survives upstanding.</p> <p>A doorway embrasure can be seen at second floor level located off centre to the east in the south wall which may have given access to a mural stairs recorded by the Urban Survey. A flat-headed wall cupboard or aumbry can be seen located off centre to north in the west wall of the second floor level. There may have been a simple slit ope in the centre of the west wall at first floor level. This appears to be the only window opening visible in the main floors of the tower beneath the stone vault. A stone vault is located over the loft or entresol of the second floor and there was at least one floor above the stone vault. The loft or entresol was lit by a window located in the centre of the west wall. Vertical slots in can be seen in the internal face of the north and south walls just below the springing of the stone vault. These vertical slots supported the timber centring of the stone vault. The original mud floor of the hall of the castle can be seen in the exposed east facing section of the stone vault. This mud floor has become colonised by vegetation including an alder tree which is precariously standing on the remaining southeast corner of the stone vault. The collapsed rubble has fallen into the ground floor of the tower house and has formed a large pile of rubble on the external face of the east wall of the tower house.</p> <p>A large section of the northwest angle of the tower house collapsed in a previous event which would appear to have happened quite a long time ago. The garderobe tower located to the south of the tower house has been inserted into the 13th century wall of the shell keep and has not been damaged by the recent storms. When the tower house was built or heightened a new multi-angular bawn wall was constructed in order to enclose a larger area around the shell keep and the tower house. This bawn wall dating from the 15th - 16th century now forms the enclosing courtyard wall along the northern and eastern sides of Croom Castle House. A low garden wall running along the southern side of Croom Castle House preserves the line of the southern bawn wall. There are no surface remains visible of the bawn wall along the western side of the castle. It may be possible that the tower house, garderobe tower and bawn were constructed c. 1534 when the Earls of Desmond acquired the lands of Adare and Croom. In this year Thomas FitzGerald rebelled against Henry VIII and during this rebellion Sir John, 13th earl of Desmond took possession of these lands and placed a garrison in the castles (McCormack 1997, 510). In 1541, his son James,</p>
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		<p>14th earl of Desmond wrote a submission to King Henry VIII requesting 'the preferment to have the lease of Crom [Croom] and Adar [Adare], and other the late Erle of Kyldares landes, in the countie of Lymerike' (Anon. 1834, 286). This land grant was confirmed in 1546 when Henry VIII granted 'James earl of Desmond of the manors and dominions of Crome [Croom] and Adare, co. Limerick, for life, by fealty at 4d. rent' (Gairdner & Brodie 1910, 476). It is possible that this change in ownership resulted in the construction of a new tower house and bawn at Croom Castle.</p> <p>The tower house and shell keep were described in the Urban Survey of Limerick in 1989 as the 'remains now consist of a semi-circular arc of curtain wall with a rectangular tower, probably of three floors, in the centre and another turret at the south end. The tower is c. 10m high and c. 7.3m north/south by 6.5m east/west externally, and built of uncoursed rubble limestone with roughly dressed limestone quoins. The external east face is battered to a height of 6m (the other walls to 3m) and there is a modern flat arched doorway, now blocked, at ground level. There is no access to the interior at present but it seems that there is an intact vault over the first floor. At second floor level is a chimney-flue in the south-west corner and a mural stairs rising to the third floor/parapet in the north and south walls.</p> <p>The curtain wall south of the tower is c.6m high (heavily covered in ivy) and seems to be battered throughout. At the south end of this stretch of wall is a turret which seems to be of more recent date than the tower or the curtain wall, as it is built of coursed roughly dressed limestone with dressed limestone quoins. It is c. 6m high and c. 3.4m north/south by 5.25m east-west and probably of three floors originally although the ground and first floors were later merged into one in a modern re-use of the building. Above second floor level are traces of a vaulted ceiling. The first and second floors have small flat-lintelled loops in the south wall and the second floor has another in the west wall. On the east side is a garderobe chute rising from below present ground level to second floor level and in the angle between this and the curtain wall further east there are two rectangular loops, at first and second floor levels. At the external south west angle of the turret is a gap in the curtain wall which seems to have run south from here. The curtain wall north of the central tower is 3.5m high with batter c. 2.5m high; built of uncoursed rubble limestone. Immediately north of the tower is an opening c. 1.5m wide with dressed limestone jambs lacking its arch but with a very large bar-hole internally. It is set c. 2.25m above external ground level. The wall is c. 2m thick at this point. This stretch of wall is c. 16m long. 4m north/ west of this is another fragmentary stretch of wall c. 3.5 m long but no more than 1.5m high after which the wall disappears. The farm buildings and the house of modern Croom Castle probably preserve the line of an outer ward if not retaining some original features. At the north/east corner is what seems to be a small turret which has twin-light rectangular windows with chamfered limestone jambs on both east and west faces' (Bradley et. al. 1989, 119-20).</p> <p>During the late 18th or early 19th century after the Croker family took up residence at Croom Castle and built Croom Castle House which is now located to the east of the shell keep and tower house. In 1826 Croom Castle and house were described as following : 'within the walls enclosing the castle, and directly over the Maig, is the fine residence of John Croker, Esq. which he has fitted up and furnished in the castellated style, with great taste and judgment. The gardens, shrubberies, and gravel walks are kept in the neatest order, and from the house is a very fine view up the river Maig (Fitzgerald & McGregor 1826, 331). During this period the entrance into tower was rebuilt, a building appears to have been built up against the external face of the northwest angle of the tower house and new outbuildings were built up against the internal face of the northern bawn wall. A new gateway with red brick archway was inserted into the northern wall of the late medieval bawn located off centre to the west. This gateway may have replaced an earlier gate as the opening faces onto the Fair green and a pathway leads to the C of I church which was built on the site of the medieval church (LI030-025006-). During the 20th century the top of the bawn wall at the eastern end of the north wall was heightened, a change in masonry style is visible in the external face of this wall. The remains of a 20th century dairy house built up against the external face of the northern section of bawn wall can still be seen located immediately to the west of the 19th century</p>
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			gateway. Buttresses have been built along the internal face of the bawn wall located off centre to the east located close to Croom Castle House. (C. O'Brien 2014).
LI030-025008-	Font (present location)	Croom	The medieval font belonging to the parish church of Croom was described in the Urban Survey of Limerick as following; 'A rectangular deeply chamfered sandstone font of medieval date is placed in the rockery at the rear of the modern St Mary's R.C. church. It is damaged on three sides where iron bars have been affixed and because it is filled with clay it is unknown whether a drainage hole is present. The rim is also damaged and the pedestal is modern. It is decorated with two rows of moulding one of which is beaded. Dims: H. 45cm W. 65cm' (Bradley et. al. 1989, 121-2). (no compiler noted).
LI030-025009-	Town Defences	Croom	A murage grant is recorded as having been awarded to Croom in 1310 (Ir. Rec. Comm. 1829, 42). It is not known if any defences were constructed and there are no known surviving traces of such. (Bradley et.al. 1989, 119) (P. Walsh 2015).

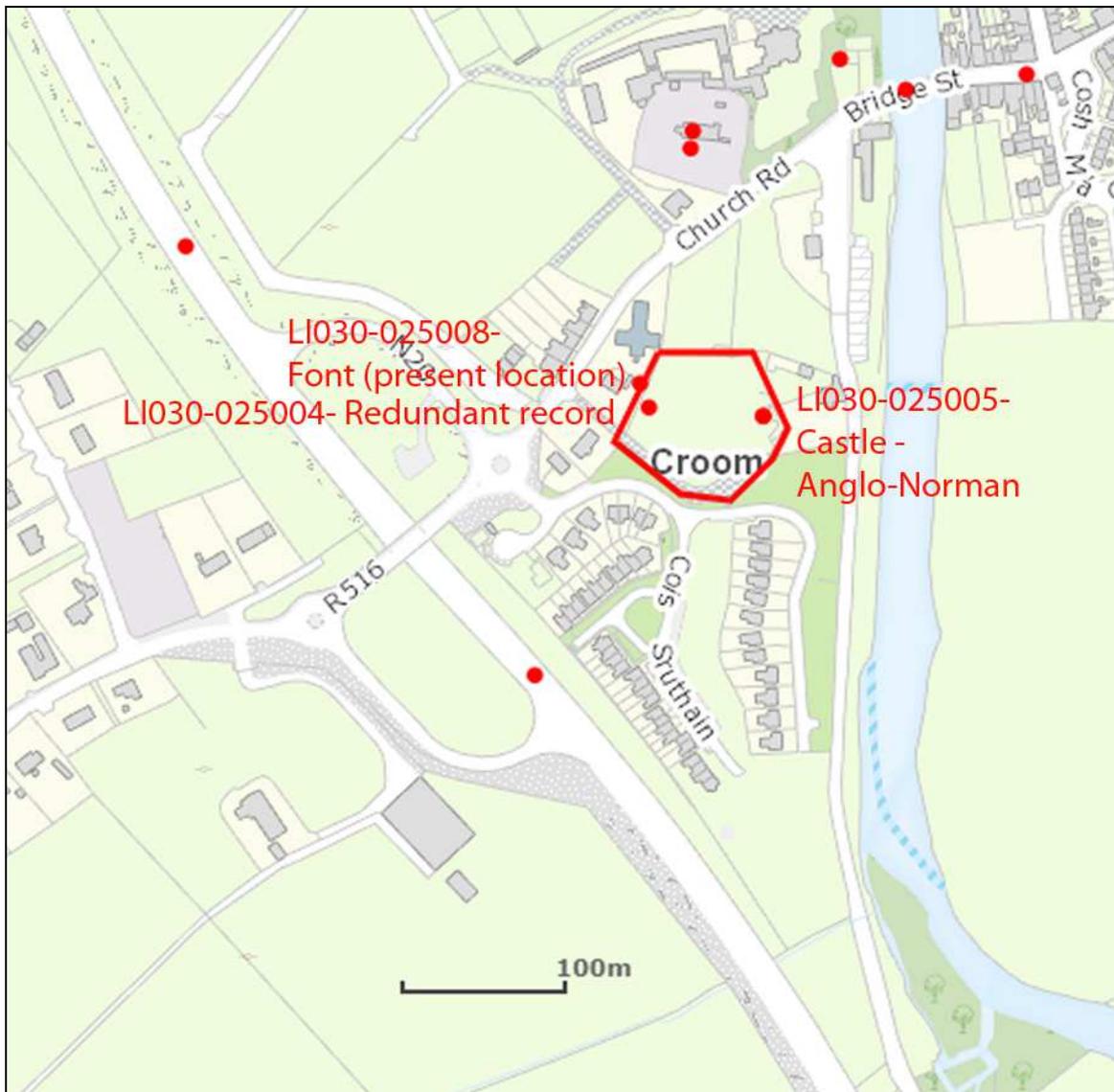


Figure 10. Locations of recorded archaeological monuments in vicinity of subject site (after www.archaeology.ie with additions).

4.3 Protected structures

Croom Castle is listed as a protected structure (ref no.: 1145) as per the draft Croom Local Area Plan (LCCC 2019). It is located within a Special Control Area for development.

4.4 Archaeological artefacts

There are a number of finds from the historic town of Croom. None is directly related to the subject site.

4.5 Cartographic images of the subject site (figs 5-6; 12-13)

The earliest depiction available of the location of the study area dates to the seventeenth century, as it is shown on the Down Survey maps. The Down Survey was a national land survey, and as previously mentioned was managed by Sir William Petty then surgeon-general of the English army. Its purpose was to measure the land that was to be forfeited by Irish Catholics, so that it could be redistributed by the Crown as payment to adventurers and soldiers of the Protestant faith for services rendered. The survey was undertaken in 1656–1658. The Down Survey generated an all island map and a set of terriers (lists to accompany the maps). More detailed maps on a county, barony, and parish basis were also created; although not all maps are available for every region.

Both the first edition six-inch map and 25-inch map show structures on the subject site (see figs 5-6).

5. Impact of Any Proposed Development

At the time of writing there are no definite plans for development within the subject site; though it may be planned for the future.

The subject site lies within the zone of archaeological potential for the historic town of Croom and specifically its castle. No previously unrecorded archaeological features were discovered during the inspection.

It is predicted that any development on or in the vicinity of the Castle may negatively impact on the upstanding and potential subsurface archaeology of the site.

However, impacts have already occurred with alterations and additions made to the castle complex and its curtilage over an extended period of time, when it was used as a residence. Visual impact has not been considered here, as it has already taken place with a number of modern structures in the vicinity and on the subject site. The development of residential units on the subject land, providing for a 30m buffer between development and castle, will have minimal impact on the setting and character of Croom Castle.

Suitable mitigation to alleviate any predicted negative impact of development on the upstanding and potential archaeology of the subject site has been provided in section 6.

6. Conclusions & Suggested Mitigation

No previously unrecorded archaeological features were noted on the subject site. The subject site of Croom Castle is a protected structure. It also lies within the zone of archaeological potential for the historic town of Croom and as such it is predicted to have the potential to yield archaeological features and/or artefacts subsurface.

Therefore, the following mitigation is suggested, should any development take place at the subject site in the future;

Full archaeological assessment with test excavation (i.e. testing) be undertaken in advance of any development being permitted at the subject site (as per best practice guidance Dúchas 1999).

Should archaeology be discovered during any assessment *The Framework and Principles for the Protection of the Archaeological Heritage* document (Dúchas 1999, 24–25) states that, ‘When considering requests for authorisation or approval to undertake development which would involve the removal of archaeological sites and monuments (or portions of such) or before proposing to carry out such development, relevant bodies and authorities should satisfy themselves that the development (i) cannot be relocated; (ii) cannot be re-designed to avoid removal of the site or monument (or portions of such); (iii) is really necessary’, and it is on this basis that further mitigation may be required.

It is very important to note that it is the National Monuments Service (details below section 7) in consultation with the local authority, who will formulate and ratify any archaeological mitigation, should it be required, and this document can only make suggestions and report on the desk-top assessment and site inspection carried out. Archaeological mitigation may be recommended by the NMS and/or the local authority, which has not been suggested above.

While this impact assessment and previous investigation on the site has reduced the likelihood of encountering subsurface unrecorded archaeological remains it cannot totally eliminate that risk and mitigation has been suggested to further reduce this risk. Therefore, the attention of the client, client agents and the developer is drawn to the relevant portions of the National Monuments Acts (1930–2014) which describes the responsibility of the site owners and procedures to report the finding of archaeological items, if any should be discovered during construction works, to the National Museum of Ireland and the National Monuments Service of the Department of Culture, Heritage, and the Gaeltacht. This legislation also outlines the developer’s obligation to facilitate and fund all archaeological works that may be considered necessary by the National Monuments Service and/or the National Museum of Ireland in respect of development proposals.

7. Non-Technical Summary

7.1 Scope of study

This is a desktop study to assess the potential impact of a proposed development on the potential archaeological significance of the subject site of Croom Castle, Croom, County Limerick.

7.2 Method of study

The site was visited by a qualified archaeologist and recorded in the proper fashion on **Friday 20 September 2019**. A desktop study was undertaken which consulted all immediately available material relating to the site as listed in the project references.

7.3 Existing environment

The subject site is currently a recorded monument and a protected structure.

7.4 Impacts of any proposed development

Any proposed development on the subject site may have a potential negative impact on the potential subsurface archaeology of the site.

7.5 Conclusions and suggested mitigation

Mitigation measures have been suggested (section 6). It is the remit of the National Monuments Service, however, to legally recommend any one or a combination of these mitigation measures and perhaps to make recommendations that have not been suggested above. These recommendations may be sent directly to the applicant or more usually through the local authority in question.

7.6 Further information and inquiries

Any enquiries in relation to archaeological mitigation on the proposed development, should it be required, may be directed to:

The Planning and Licensing Unit can be contacted by e-mailing nationalmonuments@chg.gov.ie and put 'Planning and Licensing Unit' in the subject line.

If you have a specific query with regard to the licensing of archaeological activities you can contact:

Archaeological Licensing Unit,
National Monuments Service,
Department of Culture, Heritage and the Gaeltacht
Room G50
Custom House
Dublin 1
Tel: 01 888 2178
Email: licensingsection@chg.gov.ie

Or through the local authority's archaeologist, where one is employed.

8. Signing-Off Statement

Archaeological Firm: ÆGIS ARCHAEOLOGY LIMITED

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King's Island,
Limerick. V94 V6F7

Client: Mr Michael Costello

Signed:



for ÆGIS ARCHAEOLOGY LIMITED

Report Status: Final

Dated: 23 September 2019

9. Project References

This is a list of references which were consulted for the project. As such, they may not all be cited in the report text.

1962 *Geological Map of Ireland*. Dublin: Geological Survey of Ireland.

1861 *Index to the Townlands and Towns, Parishes and Baronies of Ireland, from the census of 1851*. Baltimore: Genealogical Publishing Company. [reprint 1992].

Anon. 1834 *State papers: King Henry the Eighth, vol. 3, part 3, 1538-1546*. London. HMSO.

Aalen, F.H.A. Whelan, K & Stout, M. 1997 *Atlas of the Irish Rural Landscape*. Cork University Press.

Aegis Archaeology Limited 2018/19 Aegis Quality Manual. Unpublished manual.

Archaeological Survey of Ireland 1997 RMP *constraint maps and Inventory for County Limerick*. Dublin: The Stationery Office.

Archaeological Survey of Ireland *Record of Monuments and Places Files*. Unpublished.

Cal. doc. Ire. - *Calendar of documents relating to Ireland 1171-1307*, ed. H.S. Sweetman (5 vols., London, 1875-86).

Cal. S.P. Ire. - *Calendar of the state papers relating to Ireland, 1509-1670 [etc.]* (24 vols., London 1860-1911).

Bennett, I. Various dates *Excavations*. Bray: Wordwell [see www.excavations.ie]

Bradley, J. Halpin, A. and King, H. 1989 Limerick: Urban Archaeology Survey: Limerick 3 volumes. Dublin: OPW commissioned unpublished report.

Department of Arts, Heritage and the Gaeltacht 2011 *Architectural Heritage Protection Guidelines for Planning Authorities*. Dublin: The Stationery Office Government of Ireland.

Department of the Environment, Heritage and Local Government 2010 *World Heritage – Ireland, A country of rich heritage and culture*. Dublin: Environment, heritage and local government.

Dept of Housing, Planning and Local Government 2018 *Guidelines for planning authorities and An Bord Pleanála on carrying out Environmental Impact Assessment*. Dublin: Government of Ireland.

Dúchas 1999 *Framework and Principles for the Protection of the Archaeological Heritage*. Dublin: Department of Arts, Heritage, Gaeltacht and the Islands.

Dúchas 1999a *Guidelines for Archaeological Excavation*. Dublin: Department of Arts, Heritage, Gaeltacht and the Islands.

Duffy, S. (ed.) *Atlas of Irish History*. Dublin: Gill and Macmillian.

Eirgird 2015 *Cultural heritage guidelines for electricity transmission projects*. Dublin: Eirgird.

English Heritage 2000 *Power of Place: the future of the historic environment*. London: English Heritage. [now Historic England]

English Heritage 1998 [2007] *Conservation Principles, Policies and Guidance*. London: English Heritage. [now Historic England]

Environmental Protection Agency 2015 *Draft guidelines on the information to be contained in Environmental Impact Statements*. Dublin: Environmental Publications.

Environmental Protection Agency 2015a *Advice Notes on current practice*. Dublin: Environmental Publications.

Fitzgerald, P & McGregor, J. J 1826 *The History, Topography, and Antiquities of the county & City of Limerick; with a preliminary view*

- of the history & antiquities of Ireland.*
Dublin.
- Gairdner, J. & Brodie, R. H. (eds.) 1910** *Letters and Papers, Foreign and Domestic, Henry VIII, Volume 21 Part 2: September 1546-January 1547.* London. HMSO.
- Griffith, R. 1853** *General Valuation of Rateable Property in Ireland.* Dublin: Alexander Thom.
- Harbison, P. 1970 (Reprint 1992)** *Guide to the national monuments in the Republic of Ireland.* Dublin. Gill and Macmillan.
- Humphreys, D. 2008** Building Conservation and Survey Report at Croom Castle. Unpublished report for client.
- Killanin, M.M. and Duignan, M.V. 1967** (2nd ed.) *The Shell guide to Ireland.* London. The Ebury Press.
- Leask, H.G. 1946** *Irish Castles and Castellated Houses.* Dundalk: Dundalgan.
- Lenihan, M. 1866** *History of Limerick.* Cork. The Mercier Press.
- Lewis, S. 1837,** *Topographical Dictionary of Ireland, vol. 1.* London: S. Lewis & Co.
- Limerick City and County Council (LCCC) 2019** *Draft Croom Local Area Plan.* LCCC: Public consultation document.
- Mac Niocaill, G. 1964** *The red book of the earls of Kildare.* Dublin. Irish Manuscripts Commission.
- MacCotter, P. 2008** *Medieval Ireland: territorial, political and economic divisions.* Dublin: Four Courts Press.
- McNeill, T. 1997.** *Castles in Ireland.* London. Routledge.
- National Monuments Service (NMS) 2006** *Excavation reports guidelines for authors.* Dublin: stationery office.
- NRA [now TII] 2005** *Guidelines for the assessment of archaeological heritage impacts.* Dublin: NRA.
- NRA [Now TII] 2005a** *Guidelines for the assessment of architectural heritage impacts.* Dublin: NRA.
- O'Donovan, J. 1839-40** Field Name Books of the County and City of Limerick. Vol III. Ordnance Survey, Dublin: RIA manuscript.
- O'Donovan, J. (ed. and trans.) 1856** *Annals of the kingdom of Ireland, by the four masters, from the earliest period to the year 1616*
Dublin: Hodges, Smith and Co.
- Ordnance Survey 2001** *Discovery Series map for county Limerick, number 65.* Dublin: Ordnance Survey.
- Orpen, G.H. 1911-20** *Ireland under the Normans (1169-1216), 5 Vols.* Oxford: Clarendon.
- Salter, M. 2004.** *The Castles of North Munster.* Worcester. Folly Publications.
- Simington, R.C. (ed.) 1938** *The civil survey, AD 1654-1656. Vol. IV: county of Limerick, with a section of Clanmaurice barony Co. Kerry.* Dublin. Irish Manuscripts Commission.
- Somerset Fry, P. 1996.** *Castles of Britain and Ireland.* London: David & Charles.
- Spellissy, S. 1989.** *Limerick The Rich Land* Limerick: O'Brien Press.
- Sutton, B. 2008** Archaeological post-damage impact assessment as a result of development at Croom Castle, Croom, Co. Limerick. Unpublished Aegis Archaeology report.
- Sweetman, D. 1995** *Irish Castles and Fortified Houses.* Dublin: Betaprint.
- Sweetman, D. 1999** *The Medieval Castles of Ireland.* Cork: Collins Press.
- Swift, M. 1999** *Historical Maps of Ireland.* London: Parkgate Books Ltd.
- Thomas, A. 1992** *The Walled Towns of Ireland 2 volumes.* Dublin: IAP.
- Westropp, T.J. 1905-06** A Survey of the Ancient Churches of the County of Limerick, *Proceedings of the Royal Irish Academy*, **25**, 50-254.
- Westropp, T.J. 1906-7** The ancient castles of the county of Limerick, *Proceedings of the Royal Irish Academy* **26**, 54-264.
- Wyndham-Quin, C. & Wyndham-Quin, E. 1865** *Memorials of Adare manor. With historical notices of Adare, by the earl of Dunraven* [E.R.W. Wyndham-Quin]. Oxford: Oxford University.

www.archaeology.ie
www.buildingsofireland.ie [NIAH]
www.excavations.ie
www.myplan.ie
www.osi.ie
www.iai.ie
www.limerick.ie

www.logainm.ie

www.myplan.ie

www.nli.ie

www.osi.ie

www.swilson.info/tands1777.php [Taylor and Skinner map 1778].

www.downsurvey.tcd.ie

www.digitalcollections.tcd.ie

All last accessed September 2019.

Annex

1. Legislation and regulation protecting the archaeological heritage resource

PROTECTION OF CULTURAL HERITAGE

The cultural heritage in Ireland is safeguarded through national and international policy designed to secure the protection of the cultural heritage resource to the fullest possible extent (Department of Arts, Heritage, Gaeltacht and the Islands 1999, 35). This is undertaken in accordance with the provisions of the European Convention on the Protection of the Archaeological Heritage (Valletta Convention), ratified by Ireland in 1997.

THE ARCHAEOLOGICAL RESOURCE

The National Monuments Act 1930 to 2014 (as amended) and relevant provisions of the National Cultural Institutions Act 1997 are the primary means of ensuring the satisfactory protection of archaeological remains, which includes all man-made structures of whatever form or date except buildings habitually used for ecclesiastical purposes. A National Monument is described as ‘a monument or the remains of a monument the preservation of which is a matter of national importance by reason of the historical, architectural, traditional, artistic or archaeological interest attaching thereto’ (National Monuments Act 1930 Section 2). A number of mechanisms under the National Monuments Act are applied to secure the protection of archaeological monuments. These include the Register of Historic Monuments, the Record of Monuments and Places, and the placing of Preservation Orders and Temporary Preservation Orders on endangered sites.

OWNERSHIP AND GUARDIANSHIP OF NATIONAL MONUMENTS

The Minister may acquire national monuments by agreement or by compulsory order. The state or local authority may assume guardianship of any national monument (other than dwellings). The owners of national monuments (other than dwellings) may also appoint the Minister or the local authority as guardian of that monument if the state or local authority agrees. Once the site is in ownership or guardianship of the state, it may not be interfered with without the written consent of the Minister.

REGISTER OF HISTORIC MONUMENTS

Section 5 of the 1987 Act requires the Minister to establish and maintain a Register of Historic

Monuments. Historic monuments and archaeological areas present on the register are afforded statutory protection under the 1987 Act. Any interference with sites recorded on the register is illegal without the permission of the Minister. Two months notice in writing is required prior to any work being undertaken on or in the vicinity of a registered monument. The register also includes sites under Preservation Orders and Temporary Preservation Orders. All registered monuments are included in the Record of Monuments and Places.

PRESERVATION ORDERS AND TEMPORARY PRESERVATION ORDERS

Sites deemed to be in danger of injury or destruction can be allocated Preservation Orders under the 1930 Act. Preservation Orders make any interference with the site illegal. Temporary Preservation Orders can be attached under the 1954 Act. These perform the same function as a Preservation Order but have a time limit of six months, after which the situation must be reviewed. Work may only be undertaken on or in the vicinity of sites under Preservation Orders with the written consent, and at the discretion, of the Minister.

RECORD OF MONUMENTS AND PLACES

Section 12(1) of the 1994 Act requires the Minister for Arts, Heritage, Gaeltacht and the Islands (now the Minister for the Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs) to establish and maintain a record of monuments and places where the Minister believes that such monuments exist. The record comprises a list of monuments and relevant places and a map/s showing each monument and relevant place in respect of each county in the state. All sites recorded on the Record of Monuments and Places receive statutory protection under the National Monuments Act 1994. All recorded monuments on the proposed development site are represented on the accompanying maps. Section 12(3) of the 1994 Act provides that ‘where the owner or occupier (other than the Minister for Arts, Heritage, Gaeltacht and the Islands) of a monument or place included in the Record, or any other person, proposes to carry out, or to cause or permit the carrying out of, any work at or in relation to such a monument or place, he or she shall give notice in writing to the Minister of Arts, Heritage, Gaeltacht and the Islands to carry out work and shall not, except in the case of urgent necessity and with the consent of the Minister, commence the work until two months after the giving of notice’. Under the National Monuments

(Amendment) Act 2004, anyone who demolishes or in any way interferes with a recorded site is liable to a fine not exceeding €3,000 or imprisonment for up to 6 months. On summary conviction and on conviction of indictment, a fine not exceeding €10,000 or imprisonment for up to 5 years is the penalty. In addition, they are liable for costs for the repair of the damage caused. In addition to this, under the European Communities (Environmental Impact Assessment) Regulations 1989, Environmental Impact Statements (EIS) are required for various classes and sizes of development project to assess the impact the proposed development will have on the existing environment, which includes the cultural, archaeological and built heritage resources. These document's recommendations are typically incorporated into the conditions under which the proposed development must proceed, and thus offer an additional layer of protection for monuments which have not been listed on the RMP.

THE PLANNING AND DEVELOPMENT ACT 2000

Under planning legislation, each local authority is obliged to draw up a Development Plan setting out their aims and policies with regard to the growth of the area over a five-year period. They cover a range of issues including archaeology and built heritage, setting out their policies and objectives with regard to the protection and enhancement of both. These policies can vary from county to county. The Planning and Development Act 2000 recognises that proper planning and sustainable development includes the protection of the archaeological heritage. Conditions relating to archaeology may be attached to individual planning permissions. Specific objectives are also outlined within the County Development Plans of counties and more specific local area plans which are published from time to time.

The Department's current archaeology policy document can be viewed at

<https://www.archaeology.ie/sites/default/files/media/publications/framework-and-principles-for-protection-of-archaeological-heritage.pdf>



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Draft Croom Local Area Plan 2020 - 2026 COMMENTS SHEET

Name

DAVID MOLONEY

Address

[REDACTED ADDRESS]

We would like your views on the Draft Croom Local Area Plan 2020 - 2026. Write your comments in the space provided or on a separate sheet and return to the address below by close of business on **Monday 30 September 2019**.

Please send to: Strategic/Forward Planning Section, Economic Development Directorate, Merchants Quay, Limerick V94 EH90 or email to forwardplanning@limerick.ie

E. MAIL

[REDACTED EMAIL ADDRESS]

GDPR note: Please note that by giving your contact details you agree to the Council contacting you further regarding the Croom Plan. Also, your name will be printed in the Chief Executives Report which will issue to the Elected Members and will be in the public domain.

Dear Sir/Madam,

I, David Moloney own the property coloured in green on attached Map No. 1.

Through the years both my field and the adjoining field to the west (shown in yellow) have been utilised for agricultural purposes. In previous and recent Local Area Plans (LAPs) the two fields have been considered as a unit and included within the LAP boundary. There was sound and sensible reasoning for same in that, in treating the two fields as a single entity it afforded potential for well apportioned site layouts, thus facilitating efficient and enhanced arrangement of infrastructure in accordance with proper planning principles. Additionally both land plots are situated away from their individual owners' primary land holdings located north of the Croom to Crecora - (Hospital Road).

I contend that the LAP now being prepared should continue to include both fields in their entirety within the development boundary.

I wish to propose that the southern half of my field be considered for Enterprise and Employment zoning – see Map 2. Such a designation would be potentially advantageous from a Planning and development perspective in that there is direct road access onto the Croom to Manister road. Furthermore the provision of such development would serve to augment and complement the existing and proposed Enterprise and Employment zoned lands in that south east corner of the LAP.

I also propose that inclusion of my field within the LAP boundary may facilitate (subject to agreement) the provision of a walking/cycleway amenity route running north-south inside the eastern bounds as indicated on Map 2. Delivery of such a leisure amenity would serve to provide an outer corridor along the perimeter of the LAP connecting two approach roads to the village and affording the opportunity to supply a link to complete an overall 2.5km circuit. This amenity corridor could also tie in with the Hospital campus at the northern end and thus potentially serve to provide enhanced recuperation facilities. In this regard I ask that consideration be given to zoning such a strip as indicated for amenity purposes.

I trust you will take the foregoing comments, observations and proposals into account in your deliberations on the LAP. If you have any queries and or seek clarification please do not hesitate to contact me.

Yours sincerely,

David Moloney 24 Sept 2019

[Redacted signature line]

[Redacted contact information]



**Draft Croom
Local Area Plan**

Recorded Monuments Map

MAP 1

Legend

-  National Monuments
-  LAP Boundary
-  Zone of Notification

Forward Planning
Economic Development Directorate

A Senior Planner Mafo Woods	Merchamly Quay, Limerick Tel: (047) 556409 E-mail: lan@forplanning@limerick.ie
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SCALE NA	DATE Cr-19/25-05
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DRAWN BY C. O'Keeffe	CHECKED BY N. O'Connell	DATE August 19
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Draft Croom Local Area Plan

Zoning Map

MAP 2

-  Proposed extent of LAP boundary
-  Proposed Walkway
-  Proposed Cycleway

Legend

-  Agriculture
-  Existing Residential
-  Residential Development Area
-  Residential Serviced Sites
-  Town Centre
-  Education & Community Facilities
-  Enterprise & Employment
-  Open Space & Recreation
-  Special Control Area
-  Utility
-  Indicative Distributor Roads
-  LAP Boundary
-  Proposed Junction Improvements
-  Refer to Objective C5

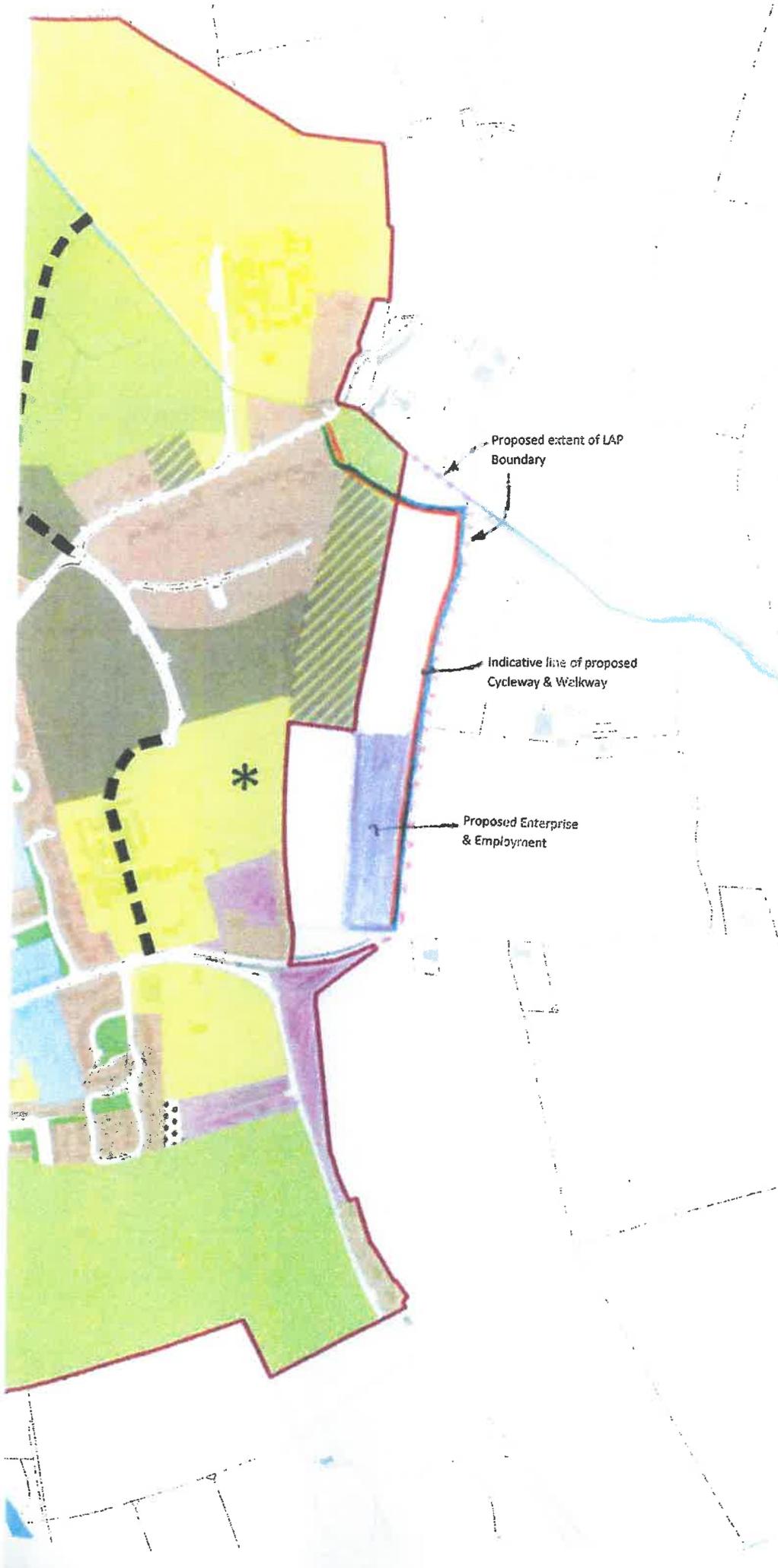
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SCALE	NA	DATE	Cr-19/25-01
DRAWN BY	C.O'Keefe	APPROVED BY	N. O'Connell
		DATE	August 19
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 Corinnarle Cathrach
& Contae Luimnigh
Limerick City
& County Council





CLEVER CLOGS COMMUNITY PRE-SCHOOL AFTER SCHOOL

Forward/Strategic Planning
Economic Development Directorate

25 SEP 2019

Limerick City & County Council

Forward/Strategic Planning

Clever Clogs Preschool and After School services are community based services which are managed by Croom Family Resource Centre and funded by POBAL.

The Pre School has been servicing the community of Croom since 1997 and in 2009 the Family Resource Centre took over the management of same as the committee who were running the Pre School at the time no longer wanted to do so and dispersed. If the Family Resource Centre had not stepped in there would have been no service to the community.

Since taking over the project the Pre School has increased its service to the community and now runs at full capacity with 22 children attending and in 2016 we introduced an After School service which now accommodates 50 children. These children not only live in Croom but from parishes as far away as Bruff and Bruree.

The Pre School currently has a waiting list and indeed all places for terms 2020/2021 and 2021/2022 are now filled. There is also a waiting list for the After School service. All this is testament to the great service we are providing and is badly needed to the community and the surrounding areas.

The Preschool and part of the After School service is run from a Prefab on the grounds of St Marys National School and has done so since inception. We have always had a very good working relationship with the Principals and Board of Management of the National School and work in collaboration with same. The Pre School leader and her team prepare the children well for the transition to Junior Infants and this has been noted on many occasions. Over the years we have also secured funding for a Sensory Garden and a Play Area which amounted to €20k which the National School use. We have also maintained and upgraded the Prefab over the years replacing windows, upgrading plumbing and this has amounted to excess of €20k

We were recently notified by the current principal and Board of Management of the National School that due to their having secured funding for development of their school that in June 2020 we would have to vacate the prefab as the ground it currently occupies is needed for development purposes.

We are currently trying to locate alternative premises that we can operate the Pre and After School services from however this is proving difficult.



CLEVER CLOGS COMMUNITY PRE-SCHOOL AND AFTER SCHOOL

The option we are now considering has come to our attention after viewing the Croom Local Area Plan.

On this plan we note there is an area highlighted in yellow dedicated to Education and Community Facilities. We are seeking securement of a plot of land to the rear of the National School, by the new road, which we have marked with an 'x' on the attached plan. However we would accept any plot that you would deem fit to ward us.

Our intention would be to place one or preferably two Prefabs on this plot so we can run the Preschool and Afterschool from this location. This would mean we can continue to provide a service to the community in a similar location without disruption. We would of course need to plumb and wire the amenities of the Prefabs into the National School grid and we would enter into an agreement with them to cover the costs.

We have been in communication with Mr Eamon Murphy for the LCETB who will look into accommodating us with Prefabs once the Secondary school has moved into its new premises, however our main area of concern is to secure the land on which the classrooms will stand.

As you can imagine this upheaval is a cause of consternation to both the Pre and After School team and the parents in both Croom and its surrounds who rely on this service.

We respectfully request that this proposal be considered and perhaps a meeting arranged between all relevant parties so that the matter can be discussed at length and in detail.

We await your response by return.

Kindest Regards

Karen O Rourke

[Redacted signature block]



No. 15

HRA PLANNING
Chartered Town Planning Consultants

Submission to
Limerick City and County Council
on the
Draft Croom Local Area Plan 2019

On behalf of:

EI-SUB LTD



HRA | PLANNING
chartered town planning consultants

DEVELOPMENT PLANNING | ENVIRONMENTAL PLANNING | MASTERPLANNING

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Title:	Submission on the Draft Croom Local Area Plan
Project:	19006 Croom Local Area Plan Submission
Prepared by:	██████
Date:	September 2019
Issue:	Issue 1
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1.0 INTRODUCTION

HRA PLANNING Chartered Town Planning Consultants has been retained by EI-SUB LTD (our client) to prepare this submission to Limerick City and County Council in respect of the Draft Croom Local Area Plan 2019 and its contents therein.

EI-SUB LTD welcomes the Draft Croom Local Area Plan ("the Draft LAP") and considers it an opportune time to set out a practical and implementable, revised development framework for the town of Croom, responsive to current market conditions and future planned infrastructure in the town.

2.0 PURPOSE OF SUBMISSION

A pre-draft submission on the LAP was made on behalf of EI-SUB LTD seeking two changes, namely

1. An amendment to the existing land use zoning matrix within the Croom Local Area Plan to ensure that nursing homes & associated retirement units are 'open for consideration' on community & education zoned land; and
2. A change to the landuse zoning relating to 0.87 hectares of residential zoned land on the Crecora Road. A change in zoning to mixed use was requested to facilitate the provision of a petrol filling station and associated retail units.

Whilst the Draft LAP does specifically permit a nursing home on the subject land, the Draft LAP does not presently facilitate or accommodate a petrol filling station on the subject lands. Instead the Draft LAP (Objective ED4) provides that a petrol filling station with ancillary retail will be facilitated on town centre zoned lands.

This submission therefore seeks an amendment to the existing policies and objectives in the LAP such that a petrol filling station with an ancillary shop of not more than 100sqm of net retail floor area can be facilitated on the subject lands.

3.0 A DIFFERENT APPROACH

Whereas the previous pre-draft submission on the LAP sought a change in land use zoning (mixed use zoning) to facilitate a petrol filling station and multiple retail units, the proposed development has significantly changed in concept and approach.

The proposed development now seeks the provision of a petrol filling station with an ancillary shop of not more than 100sqm of net retail floor area. It no longer seeks to provide / accommodate multiple retail units in proximity to the filling station.

Further, the development does not seek a change in zoning but rather seeks an amendment to existing policies and objectives in the LAP such that a petrol filling station can be facilitated on appropriate residential zoned lands and in particular the subject lands only. This approach is similar to that proposed by the planning authority in facilitating a nursing home on community & education zoned lands at a particular location only within the Draft LAP.

As the owner of 11.53 hectares of land in the centre of Croom (refer to Figure 1.0), our client submits that the Draft LAP must be responsive to the changing nature and character of development in the area. The subject site must be future proofed, particularly having regard to the evolving and changing nature of the surrounding built environment, including the Croom Distributor Road, a permitted primary care centre, an expanding Orthopedic Hospital and a new 750 no. pupil post primary school.

All these developments are positive advancements for the town of Croom and seek to further enhance the town as an attractive place in which to reside and do business. It is considered that additional services and facilities are now required in the town of Croom to support these infrastructural advancements.

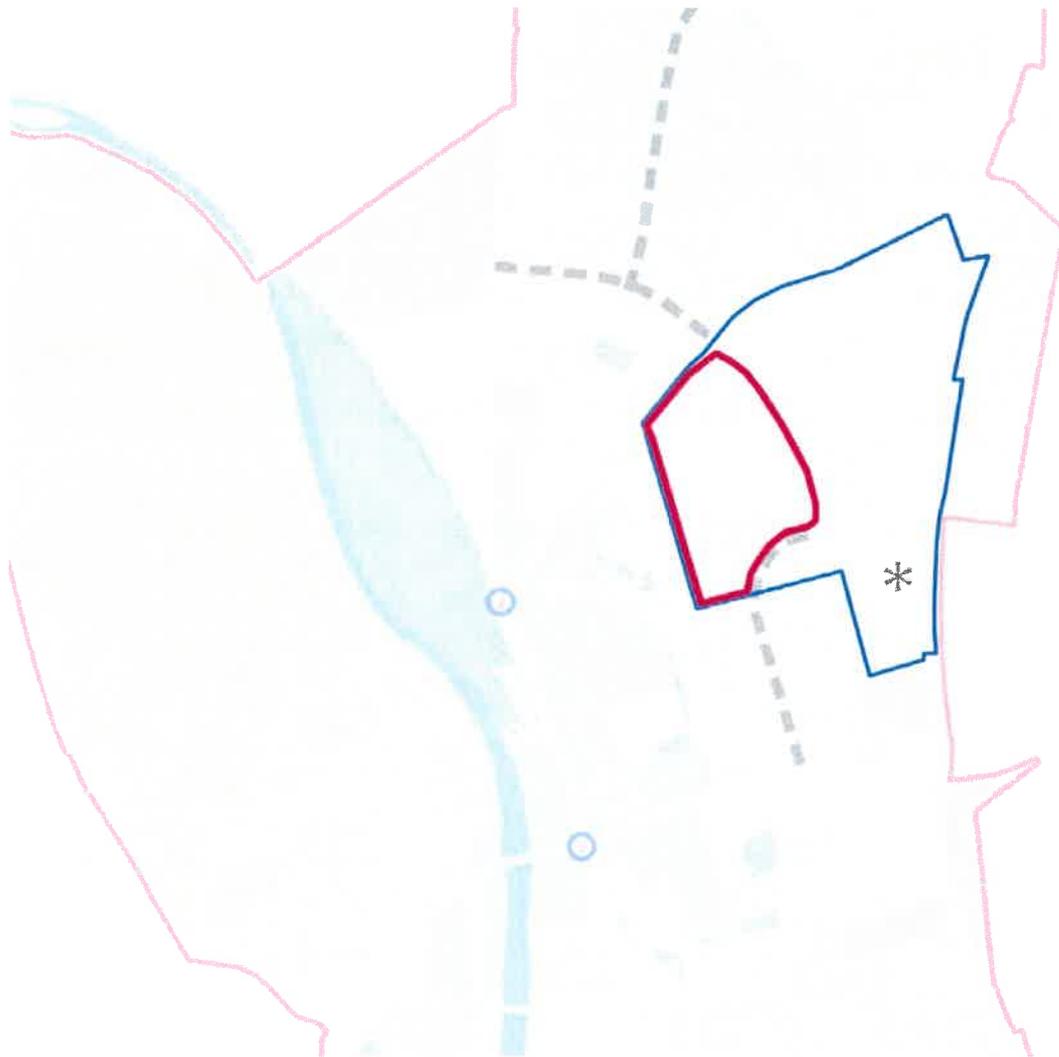


Figure 1.0: Site Location Outlined in Red Shown on Draft Croom Landuse Zoning Map

4.0 THE SITE

The site is located adjoining the town centre, with the western site boundary adjoining predominantly existing residential units of single and two storey character. The site is relatively flat and is accessed by

a partially constructed distributor road and cycle path with existing spurs providing direct access into distinct parcels of land. The distributor road has been partially constructed and is intended to connect directly with the proposed distributor road under construction by Limerick City & County Council to the northwest of the site.

The subject land is zoned as a 'residential development area' in the Draft Croom Local Area Plan. The zoning objective for the site states that:

This zoning provides for new residential development and other services associated with residential development. While housing is the primary use in this zone, recreation, education, crèche/playschool, sheltered housing and small corner shops are also acceptable, subject to the preservation of neighbouring residential amenity. Permission may also be granted for home based economic activity within this zone, subject to the preservation of residential amenity, traffic considerations and compliance with Section 5.3 in Chapter 5 of this Plan.

Significant development has been permitted / is under construction in the immediate surrounding area including:

- A Part 8 consent secured by Limerick City & County Council for the construction of a new Distributor Road north west of the subject land under P178011.
- Planning permission for a 1,280sqm primary care centre on education & community zoned land in proximity to Croom Hospital north west of the site, P171150.
- Planning permission for a 2 storey primary school, with capacity for 900 no. students in 2016 on land north of the site, under planning reference P1650.

The area surrounding the subject site has been identified for growth, with most new residential development in the town planned to grow on and around the subject site. The Draft Plan anticipates growth of an additional 439 no. persons by 2026. This equates to 43.9 persons per annum over ten years (2016 – 2026) resulting in an overall population in the town of 1,596 persons by 2026.

5.0 THE PROPOSAL

The proposal is to provide a petrol filling station with an ancillary convenience unit of not more than 100sqm net retail floorspace. Consideration of detailed design is a matter for determination at planning application stage, whereby the application will be assessed in accordance with circumstance prevailing at the time of assessment.

It is important at this stage to acknowledge that national guidelines, namely the 'Retail Planning Guidelines for Planning Authorities' 2012, acknowledges and accepts that convenience shops are part of the normal ancillary services provided within motor fuel stations. They do however advise that such shops should remain on a scale appropriate to the location and recommend that the floorspace of the shop should not exceed 100sqm net. The Guidelines acknowledge that motor fuel facilities ancillary to convenience goods stores located in or adjacent to town centres often provide healthy competition in this sector of the market without adversely affecting town centres.

In accordance with the Retail Planning Guidelines for Planning Authorities 2012, the proposed development restricts convenience retailing to 100sqm net floorspace and proposes the development on land adjacent to the town centre, thereby providing healthy competition without adversely affecting the town centre.

6.0 MATERIAL CONSIDERATIONS

6.1 Traffic & Town Centre

Objective ED4 of the Draft LAP states that,

"it is an objective of the Council: (a) On town centre zoned lands, to consider new petrol stations with an ancillary shop with a maximum net retail floor area of 100sqm; (b) In relation to Out of Centre locations, not to permit any more retail floor space".

This objective of promoting a petrol filling station on town centre zoned lands appears to be at significant odds with existing traffic congestion in the town and the objective of the Croom Distributor road to remove traffic from the town centre.

Traffic congestion within the town centre and unmanaged congestion on the Main Street are identified as Threats and Weaknesses facing the town of Croom (Section 3.6 of the Draft LAP). Section 5.1 of the Draft LAP goes on to state that, *"given the existing traffic congestion problems within the town centre, it is considered necessary to avoid channelling further potentially heavy goods vehicles through the town centre"*.

Having regard to these statements in the Draft LAP, it is submitted to the planning authority that the promotion of a petrol filling station in the town centre, which by its very nature is a car borne activity, is completely at odds with the existing congested situation in the town but also is at odds with the future ambition to de-congest and remove traffic from the town centre.

Petrol filling stations by their very nature, generally tend to locate on edge of centre or out of centre locations, in proximity to or on internal distributor roads or ring roads. They are positioned at locations that are easily accessible by vehicles. Locating a petrol filling station on town centre zoned land will 'pull' traffic into the town.

It is the intent and function of the Croom Distributor Road that traffic will be diverted from the town centre away from the Main Street. The location for the proposed petrol filling station is at a roundabout on the proposed Croom Distributor Road on the edge of the town centre. The intention is to serve passing traffic using the Croom Distributor Road in an efficient and timely manner. Locating a petrol filling station within the town centre will negate the benefits of the Distributor Road by diverting traffic who need to use the petrol filling station into the town centre.

Accordingly, promoting a petrol filling station within the town centre does not make planning sense, when the objective of the distributor road is to divert traffic away from the town centre and a petrol filling station will pull traffic into the centre.

6.2 Supporting Existing Retail & Commercial Policy

The Draft LAP provides for policy supportive of the provision of residential development with local retail services on residential zoned land. It is submitted that the proposed development of a petrol filling station with a small ancillary unit of 100sqm net retail floorspace is generally supportive of existing policy in the Draft LAP.

The 'Residential Development Area' zoning provides for new residential development and other services incidental to residential development. While housing is the primary use in this zone, small corner shops are also envisaged, subject to the preservation of neighbouring residential amenity. Objective ED2b of the Draft LAP seeks to permit non-residential uses in established and proposed residential areas, where they are of an appropriate nature and scale for the location proposed. In general, such uses will only be considered, where they serve the needs of the neighbourhood within which they are situated.

The primary purpose of the proposed development is to provide for a petrol filling station to serve local and passing trade. Ancillary to such provision is the intention to provide a small convenience retail unit intended to support existing and future residential development in an integrated and coordinated manner.

It is submitted to the planning authority that having regard to the future road network provision in the area, the proposed development of a petrol filling station can and will operate in harmony with residential use. Accordingly, provision could be made for such use within the overall context of the existing residential zoning on the land, by means of alteration to existing policy in the Draft LAP.

6.3 Town Centre Designations

Section 8.3 of the Draft LAP confirms that the town of Croom is designated as an Historic Town and is entered on the Record of Monument and Places (LI030-025). As a Recorded Monument, it is protected under the National Monuments Acts (1930-2004).

Given the strong built heritage value and the Architectural Conservation Area designation of part of the streetscape, the Draft LAP states that the Council will require proposals to demonstrate adequate consideration is given in the design of new buildings to conservation, restoration and suitable reconstruction if required, whilst respecting the integrity of traditional plots and street frontage including quality traditional signage.

Having regard to the historic designations afforded to the town and the need for development to respect traditional plot sizes and street frontage development, it is submitted to the planning authority that a petrol filling station by reason of its functional design and appearance may not contribute to the aesthetics of the town centre and could impact on its vitality by reason of inappropriate use and design.

7.0 THE REQUEST

It is requested that Objective ED4 of the Draft LAP is modified to provide for additional wording as inserted in blue italics below:

Objective ED4: Town Centre/Out of Centre Locations

It is an objective of the Council:

- a) On town centre zoned lands, to consider new petrol stations with an ancillary shop with a maximum net retail floor area of 100sqm;
- b) In relation to Out of Centre locations, not to permit any more retail floor space;
- c) Allow for the provision of a petrol filling station with an ancillary shop with a maximum net retail floor area of 100sqm on the lands identified on the land use zoning map marked with ** on Map Cr-19/25-01. This shall not apply to other lands zoned Residential Developmen



Figure 5.0: Proposed Minor Change to Zoning Map (insertion of symbols **)

O'Connell, Noreen

From: O'Donoghue, Richard
Sent: 30 September 2019 13:56
To: Customer Services
Cc: [REDACTED]; richardedonoghue@limerickcityandcounty.ie; [REDACTED]
Subject: Submission Croom Draft Local Area Plan
Attachments: 20190930_134801.jpg

A chara,
Please accept my submission in relation to the Croom Draft Local Area Plan.
Please see attached map.

1. Change Enterprise and Employment to Residential serviced sites
2. Agricultural area marked out to be put into Enterprise and Employment
3. As marked on drawing to Agricultural
4. Extension of walkways from railway bridge to railway bridge
5. Extension of the lap boundary on the proposed map to include the walkway from bridge to bridge

Is mise le meas,
Councillor Richard O'Donoghue

[REDACTED]

**Forward/Strategic Planning
Economic Development Directorate**
30 SEP 2019
Limerick City & County Council

**Draft Croom
Local Area Plan**

Zoning Map

Legend

-  Agriculture
-  Existing Residential
-  Residential Development Area
-  Residential Serviced Sites
-  Town Centre
-  Education & Community Facilities
-  Enterprise & Employment
-  Open Space & Recreation
-  Special Control Area
-  Utility
-  Indicative Distributor Roads
-  LAP Boundary
-  Proposed Junction Improvements
-  Refer to Objective CS

Forward Planning
Economic Development Directorate

Author: NA
Date: Cr-19/25-01

Checked by: C. O'Keefe
Date: August 19

Approved by: [Signature]
Date: [Date]

Comhairle Leitreach
to Conrad Linnigh
Uimhéalach
B. County Council



Our ref: [REDACTED]

09.19 **Forward/Strategic Planning
Economic Development Directorate**

30 SEP 2019

Limerick City & County Council

Innishmore, Ballincollig
Co. Cork P31 KR68
T +353 21 466 5900

Date: 30th September 2019

Forward / Strategic Planning,
Limerick City and County Council,
Merchant's Quay,
Limerick V94 EH90

RE: Draft Croom Local Area Plan 2019

Dear Sir / Madam,

RPS is instructed by Toomey Construction Ltd., Knockanes, Adare, Co. Limerick to lodge this submission on its behalf in respect of lands at Croom, Co. Limerick.

Toomey Construction Ltd. is the owner of land on the northern side of the town. The location of these lands is encircled in red in **Figure 1** below which is an extract from the existing Croom Local Area Plan 2009 – 2015 Map No. 1, 'Croom Zoning Map' as updated in August 2015. There are a number of zoning objectives currently attached to different parts of the site. The northwestern half of the lands are zoned 'industrial'. The majority of the southeastern portion of the lands is zoned 'residential serviced sites', with part zoned 'education and community'. There is a provision attached to these lands that the area shall be subject to Flood Impact Assessment with appropriate mitigation measures. There is an objective through our client's lands and the adjoining residential zoned lands to the southwest for a new distributor road. This distributor road would also provide access to the education and community zoned lands to the northeast.

Under the current draft Croom Local Area Plan 2019 it is now proposed to zone the Toomey Construction Ltd. lands for 'Agriculture'. The basis presented in the draft LAP for rezoning these lands is due to flood risk. While we acknowledge that there is flood risk associated with parts of the lands, it is submitted in the first instance that the flood risk does not extend to the full extent of the lands which are now proposed to be rezoned to agricultural and that secondly that there is uncertainty with respect to the extent of lands which are subject of flood risk. For these reasons we respectfully submit that the current zonings should be retained on parts of our clients.

As noted by the Planning Authority in the SEA prepared for the draft LAP this area of Croom has been subject of a number of previous flood risk studies. These include the Shannon CFRAMS, various Flood Risk Assessment reports prepared for planning applications within the lands and most recently a Flood Risk Assessment prepared to inform the Draft LAP.

Aecom, on behalf of our client, has prepared a report reviewing these various Flood Risk Assessments and notes how the assessments have reported different outcomes on the extent of flood risk identified. The report includes a review of the latest FRA undertaken by Mott MacDonald to inform the draft LAP and concludes that they "believe the methodology used to derive these flows is flawed". They also "note that that the report doesn't adequately set out the assumptions, limitations and uncertainties of the modelling. It also fails to explain why the previously modelled results shows the updated model has a larger flood extent."

Our ref: CP99001.LCCC.30.09.19

On the basis of the Aecom FRA review then we respectfully submit that the flood risk reporting prepared to inform the LAP cannot be relied upon to justify the rezoning of all of our clients lands to 'Agriculture'.

As noted above there are parts of the northern portion of our client's lands which are currently zoned 'industry' and which are not identified as at risk in any of the FRAs undertaken for the area to date. The CFRAM mapping (as identified on the Flood Map of the Draft LAP) covers only approximately half of the industrial zoned lands. Given the nature of industrial development, as the planning authority will be aware, much of the ancillary aspects of industrial development which take up significant areas of land are non-vulnerable uses – in particular car parking and roads. In this regard we request that industrial zoning be retained on all or part of our client's lands as per the current zoning under the 2009 LAP shown on **Figure 1** above. This will allow for flexibility and innovation in layout for future planning applications on the land such that that vulnerable elements of any such future development can be kept out of the flood risk area. An objective could also be attached to those parts of the industrial zoned lands which fall within the CFRAM flood risk area that any elements of development proposed within this area be water-compatible and that a justification test be undertaken and provided with any application. Any future industrial applications would need to be subject of a site and development specific flood risk assessment which would consider the specific layout and location of vulnerable / non-vulnerable elements at that time and allow only water-compatible elements within the flood risk area subject of a justification test.

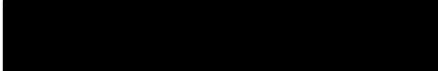
With reference to the current residential zoned lands on the southern side of our client's landholding, the uncertainty around the extent of flood risk zone is also evident from the FRA review report prepared by Aecom. It is noted that under the more recent FRAs undertaken there are some lands not identified as at risk to the rear of the existing housing and the proposed serviced site zoning. In this regard it is requested that the Planning Authority retain some of the residential zoning area here. Again, for any residential zoned lands overlapping with flood risk area an objective could be included to allow only water compatible ancillary residential development (such as open space, roads, parking etc) within this area and that it should be subject of a justification test.

We trust that you will give due consideration to this submission and retain the existing zoning provisions on parts of our clients lands as identified.

Yours sincerely,
for RPS Group Limited



Maria Lombard



Encl/..

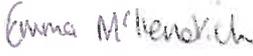
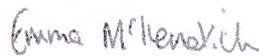
Review of Flood Risk Assessment within the
Limerick City & County Council “Strategic
Environmental Assessment Screening,
Habitats Directive Assessment Screening
Report and Flood Risk Assessment Stage 1”
report dated August 2019

Toomey construction Ltd

Project number: 60563348

30th September 2019

Quality information

<u>Prepared by</u>	<u>Checked by</u>	<u>Verified by</u>	<u>Approved by</u>
			
Emma McKendrick Associate Director	Aileen Prendergast Senior Engineer	Daniel Roberson Senior Engineer	Emma McKendrick Associate Director

Revision History

<u>Revision</u>	<u>Revision date</u>	<u>Details</u>	<u>Authorized</u>	<u>Name</u>	<u>Position</u>

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1. Introduction

AECOM have been retained by Toomey Construction to review the Flood Risk Assessment contained within the Limerick City & County Council "Strategic Environmental Assessment Screening, Habitats Directive Assessment Screening Report and Flood Risk Assessment Stage 1" report dated August 2019. The report was prepared by Mott MacDonald.

A variety of flood risk assessments have been undertaken on the subject lands in the past 4 years, notably including the Shannon CFRAM study commissioned by the OPW and a Flood Risk Assessment for the Croom Distributor Road which was produced by Mott MacDonald in November 2017.

The flow rates used in the reports vary widely. The flow rates used in the Strategic Environmental Assessment Screening, Habitats Directive Assessment Screening Report and Flood Risk Assessment Stage 1 report are more than double those used in the CFRAM Study and the 2016 flood risk assessment prepared by Mott MacDonald for the Croom Distributor Road.

Even when the flow rates used have been similar the flood extents don't appear comparable.

Section 2 below includes a review of the flows used in each of the hydraulic models, the resultant flood mapping along with our observations.

We believe the methodology used to derive the flows in the Strategic Environmental Assessment Screening, Habitats Directive Assessment Screening Report and Flood Risk Assessment Stage 1 report are flawed. We also note that that the report doesn't adequately set out the assumptions, limitations and uncertainties of the modelling. It also fails to explain why the previously modelled results shows the updated model has a larger flood extent.

The proposed Croom Distributor Road traverse our clients' lands and it is unclear if the flood risk assessment includes for compensatory flood storage, required to ensure that the flood risk to the lands does not increase.

2. Review of available Flood Risk Information

2.1 Croom Post Primary School SSFRA – Hydro Environmental Ltd (January 2016)

2.1.1 Hydraulic Model

This assessment used the FSU 1% AEP (6.02 m³/s) and 0.1%AEP (7.84 m³/s) flow rates in the hydraulic model developed to assess the risk to the proposed school [1% AEP +20% c/c flow of 7.22 m³/s and 0.1% AEP + 20% c/c flow of 9.41 m³/s].

The predicted water levels associated with these flow rates were provided as follows: 1% AEP water level: 21.95 m OD Malin (1% AEP +20%c/c water level: 22.28 m OD Malin), 0.1% AEP Water level: 22.39 m OD Malin (0.1% AEP + 20% c/c water level: 22.68 m OD Malin).

2.1.2 Flood Extents Proposed School Site

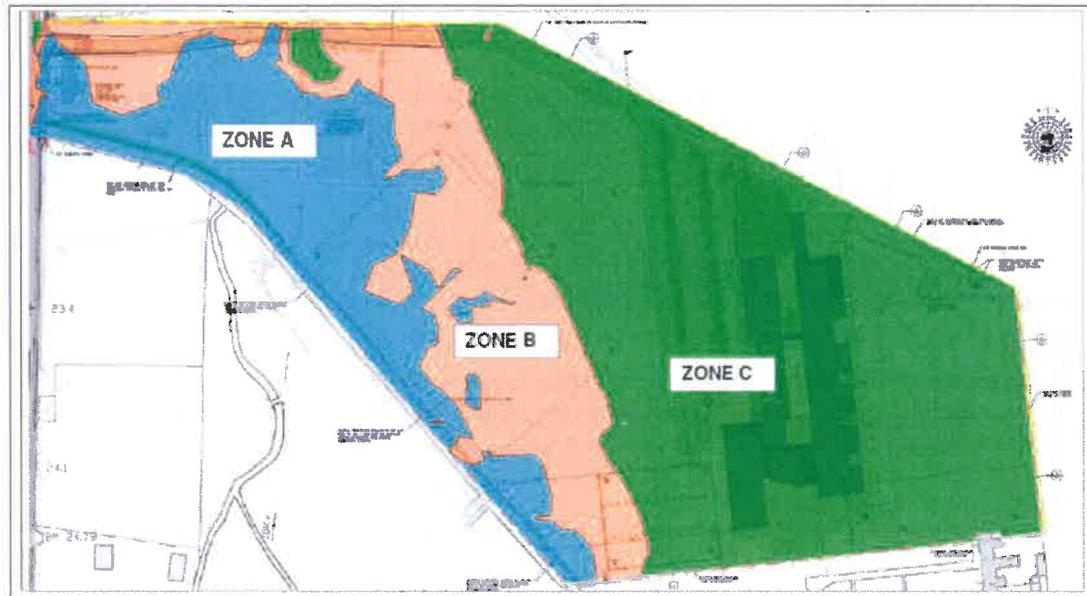


Figure 15 Flood Risk Mapping of Proposed School Site

Figure 1 Extract from "Site Specific Flood Risk Assessment prepared by Hydro Environmental, Report No. HEL99401_v1.1 dated September 2013 as part of planning application number 13/680

Flood Zone A indicates where the probability of flooding from rivers is highest (greater than 1% or 1 in 100 for river flooding)

Flood Zone B indicates where the probability of flooding from rivers is moderate (between 0.1% or 1 in 1000 and 1% or 1 in 100 for river flooding)

Flood Zone C indicates where the probability of flooding from rivers is low (less than 0.1% or 1 in 1000 for river flooding).

2.1.3 Observations

Section 3.5 of the Hydro Environmental report noted approximately 5.8% of the school site to be in Flood Zone A, 10.4% in Flood Zone B and the remainder of the site (83.8%) is in Flood Zone C.

2.2 Croom Distributor Road Flood Risk Assessment (November 2017)

2.2.1 Hydraulic Model

The flood model was initially carried out on the basis of the peak design inflows and hydrograph shape provided for model node '01CRB02417' of the 'Shannon Catchment-based Flood Risk Assessment and Management (CFRAM) Study Hydrology Report Unit of Management 24 Final Report' (OPW, 2016).

The flows used were Flow of 1% AEP + CC (MRFS) Flow 6.05 m³/s & 0.1% AEP + CC (MRFS) Flow of 7.51 m³/s.

The report includes a section on assumption & uncertainties as outlined below:

- Hydrological Uncertainty - no detailed hydrological analysis was undertaken.
- DTM Uncertainty
- Hydraulic Uncertainty

Assumptions

- All culverts and bridge structures would be blockage free for the design event scenarios.
- The existing masonry wall present along the left bank of the river near the hospital has not been included in the simulation in accordance with current accepted practices.
- No attempts have been made to identify areas that are affected from urban drainage systems or other small watercourses and this is not represented on the flood maps.
- There are limitations associated with the input data and modelling techniques. These limitations should be taken into account when interpreting the model results.

The OPW made on submission on the Part 8 planning application for the distributor road (reference 17/8011). Included in the submission is an email stating that Jacobs have underestimated the flow for this channel in the CFRAM and consequently implies that the flood extent cannot be considered precise. The email also suggests that the flow used in the Maigue Scheme should be used for a Section 50 consent for the required bridge structure. This flow is noted as 235ft³/s for Q2.5.

Following the OPW submission on the planning Mott MacDonald reran the model using the Maigue Scheme flows. The Q2.5 figure of 235 ft³/s was scaled using standard methods to Q100. This gave a Q100 flow of 14.69m³/s.

2.2.2 Flood Extents Mapping

Figure 2 was produced by Aecom using flood extents information provided by Mott MacDonald to demonstrate the extent of flooding in the 100yr event.



Figure 2 - 100 year extents mapping based on CFRAM flows

Figure 3 shows the Mott MacDonald's Predicted Maximum Modelled Flood Extents Post-Scheme Scenario for Croom Distributor Road with increased flow rate.

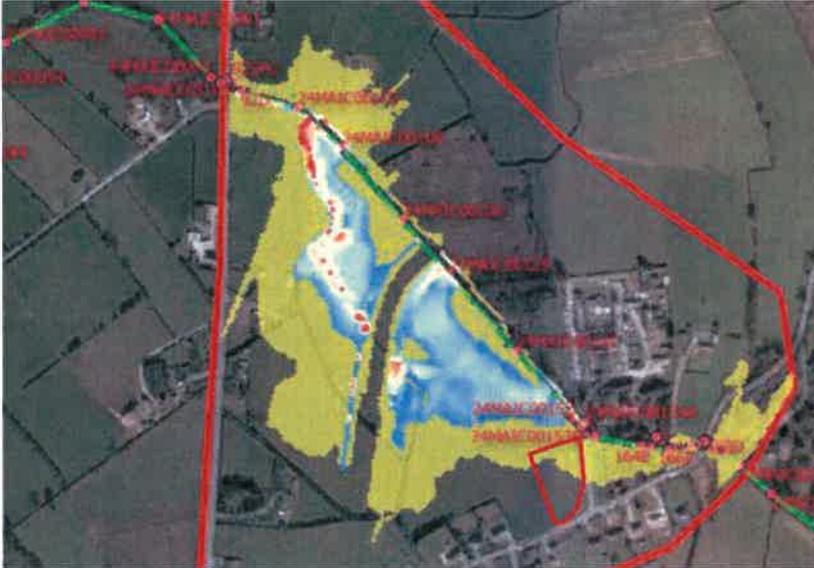


Figure 3 Mott MacDonald's Predicted Maximum Modelled Flood Extents Post-Scheme Scenario for Croom Distributor Road with increased flow rate

2.2.3 Observations

Two of the key findings of the study were:

- The integrated 1d/2d model produced narrower flood extents compared to the Shannon CFRAM Study, which applied the same design flows and channel survey data but modelled the study area in 1d-only.
- The model results are shown to be sensitive to the chosen channel roughness values. The specified values were based on standard literature and experience with comparable modelling studies. In the absence of more detailed information for model calibration, there is no justification for further amending this model parameter.

The initial flows used were slightly lower than those used in the Hydro Environmental Report. However, the flow rates ultimately modelled were more than double those used in the initial model.

It is unclear from the supplementary report submitted by Mott MacDonald if the assessment for compensatory storage was recalculated using the higher flows.

2.3 PUNCH Consulting Engineers SSFRA (171-142-SSFRA-R0)

PUNCH Consulting Engineers were appointed by Thomond Healthcare Holding Ltd. to carry out a Stage 3 Site Specific Flood Risk Assessment (SSFRA) for a proposed Primary Care Centre (PCC) development on the subject lands at Skagh (under application 17/1150).

2.3.1 Hydraulic Model

This assessment used the flow rates derived using IH124 – 1% AEP flow of 11.42 m³/s and 0.1% AEP flow of 15.14 m³/s [1% AEP +20% c/c flow of 13.7 m³/s and 0.1% AEP + 20% c/c flow of 16.78 m³/s]. These flows are greater than both the School SSFRA and the Distributor Road FRA.

This assessment predicted a 1%AEP event water level of approx. 22.5 m OD Malin and a 0.1%AEP event water level of approx. 22.65 m OD Malin.

2.4 Flood Mapping

Figure 4 shows the extent of flooding with the dark blue depicting Flood Zone A and the lighter blue depicting Flood Zone B.



Figure 4 PUNCH Predicted Maximum Modelled Flood Extents Post-Scheme Scenario

2.4.1 Observations

The 2D domain of the hydraulic model includes the school site and some flooding within the school site is shown. The flood extent shown appears to be a similar extent to that shown in the Hydro environmental report.

2.5 Croom Local Area Plan Flood Risk Assessment (August 2019)

2.5.1 Hydraulic Model

This assessment used flow rates partially derived using FSU, supplemented with additional AMAX data from the Hydro-Data website.

The previous hydraulic models simulated the 1%AEP and 0.1%AEP flows with an uplift of 20% to account for the potential impact of climate change. This assessment applied the factor associated with the 95% confidence interval, which results in flows which are double those used in the initial study carried out by Motts and Hydro Environmental Ltd (1%AEP flow of 13.5 m³/s and 0.1%AEP flow of 17.395 m³/s).

2.5.2 Flood Mapping

Figure 5 shows the extent of flooding with the dark blue depicting Flood Zone A and the lighter blue depicting Flood Zone B.



Figure 5 Mott MacDonald Predicted Maximum Modelled Flood Extents

2.5.3 Observations

The pivotal (gauged) catchment selected in the FSU portal is Castleroberts (on the Maigne downstream of Croom). FSU has 29 years of AMAX data (1975 – 2005) and has an Amber A2 quality rating. Further AMAX data, 13 years (2005 – 2017), for the Castleroberts gauges was used to extend the records available. This was taken from the OPW Hydro-Data website (<https://waterlevel.ie/hydro-data/search.html?rbd=SHANNON%20RBD#>). The information available on this website (on the AMAX tab) notes that the 'reliable limit' is 120 m³/s. Of the 13 years of additional data used to extend the record, 6 of the AMAX records exceed 120 m³/s (2007, 2008, 2009, 2010, 2013 and 2015). Considering the gauge has an Amber rating, we would question if it is appropriate to add 13 years of AMAX data from a different source, particularly where almost half of the record exceeds the reliability limit. This data is used at the stage where Q_{med} is estimated so has an effect on the extreme flow rates estimated.

Despite this dramatic increase in flow rates, there is only a very minor area within the school site predicted to be at risk of flooding.

The initial assessment carried out by Motts recommended that 1604 m³ of compensatory storage be provided to offset the volume occupied by the proposed road embankment. The latest report does not state if the 2D domain DTM used to represent the flood plain included this compensatory storage area. In addition, if the flow rates used to assess the flood risk have been increased, has the compensatory storage volume also increased.

Section 4.3.3 of the 2019 report notes that three culverts were included in the model (within the proposed road embankment) – culverts D, E and F. No details are provided (diameter or height/ width) to demonstrate that the three culverts provide the required hydraulic capacity.

The conclusion of the report notes that comparison to previously modelled results shows the updated model has a larger flood extent. It states that this is due to the changes made in the hydraulic model

from the previously modelled scenario along with changes applied through updating the hydrology. Though doesn't explain what these changes are.

The report doesn't include the assumptions & uncertainties referenced in their earlier report.

3. Summary of Findings

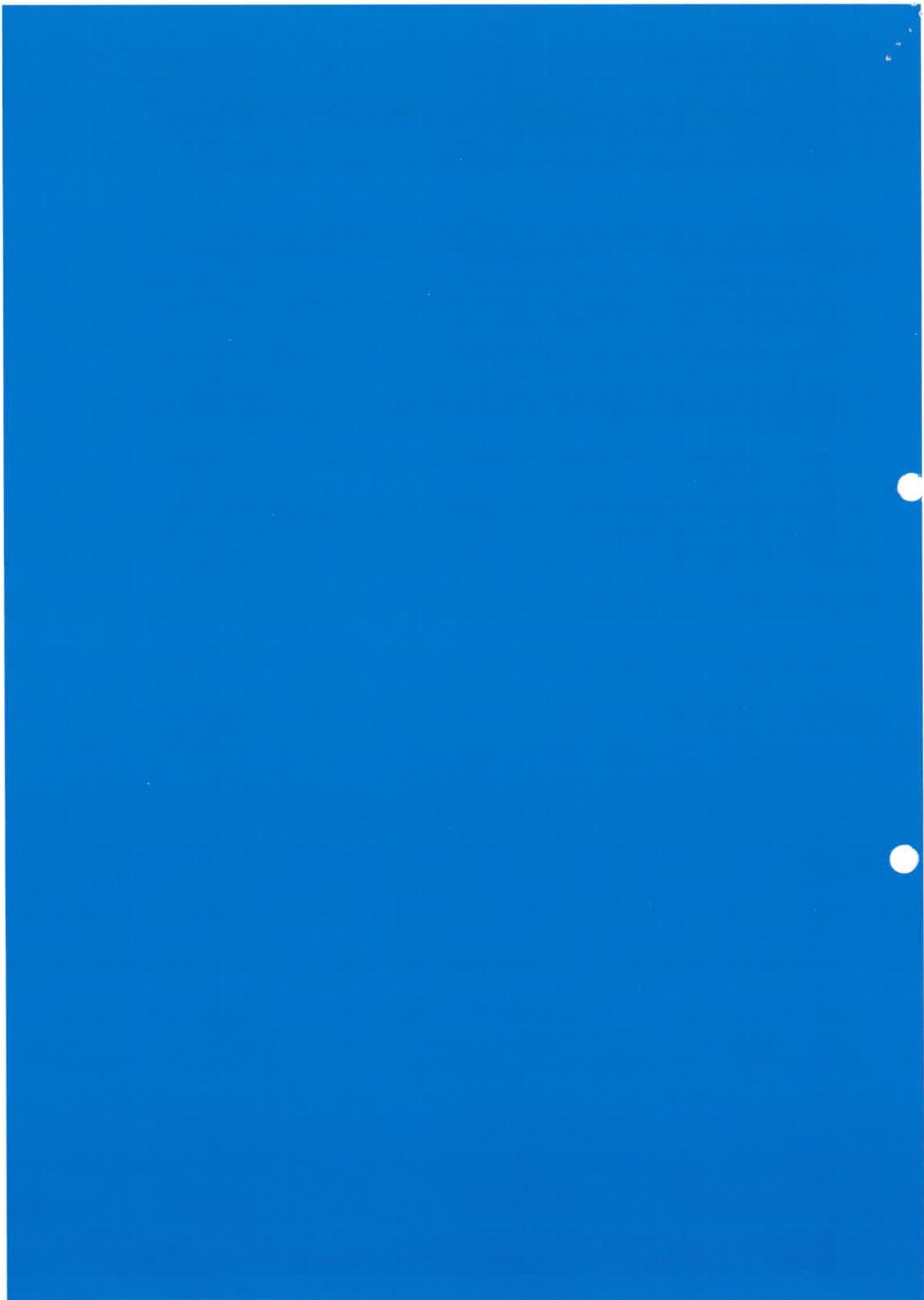
A variety of flood risk assessments have been undertaken on the subject lands in the past 4 years, including the Shannon CFRAM study. Each assessment has reported very different outcomes.

Mott MacDonald prepared a flood risk assessment for the Croom Distributor road in November 2017 which adopted the Shannon CFRAM Flows determined by Jacobs of 1% AEP + CC (MRFS) Flow 6.05 m³/s & 0.1% AEP + CC (MRFS) Flow of 7.51 m³/s.

The most recent Mott MacDonald report adopts a 1%AEP flow of 13.5 m³/s and 0.1%AEP flow of 17.395 m³/s). We believe the methodology used to derive these flows is flawed. We also note that that the report doesn't adequately set out the assumptions, limitations and uncertainties of the modelling. It also fails to explain why the previously modelled results shows the updated model has a larger flood extent.

Each of the flood risk assessments show very different flood extents at the location of the school under construction.

The proposed Croom Distributor Road traverse our clients' lands and it is unclear if the flood risk assessment includes for compensatory flood storage, required to ensure that the flood risk to the lands does not increase.



No. 18



Forward Strategic Planning Section,
Limerick County Council.

September 26th, 2019.

Dear Sir/ Madame

Croom Local Area Plan Submission

There are a few points I would like to raise in relation to the Local Area Plan. As we run a Retail Pharmacy employing 10 Full-time and 4 Part time and having invested a lot of money since 2001 extending and renovating an old listed building in 2009 on the Main Street, Parking and the Lack of parking on the Main Street or close by is a major concern for us as some of our Customers are elderly and may not be able to walk the long distance to their car at Civic Centre or The Mill/ Church Car Park. There is a derelict yard at the back of The Old Chipper on Main Street which is for sale which could be Purchased at a reasonable cost and transformed into Short term Car Park to serve the Retail Customers of the Pharmacy/Spar/Bakery/ Butchers/ Hair Dressers / Beauticians. There is an option to enter from Main Street and Exit to High Street beside the Credit Union. If this Car park of 30/40 spaces was provided, parking on one side of the Street would work and a wheel chair space might be an option as well.

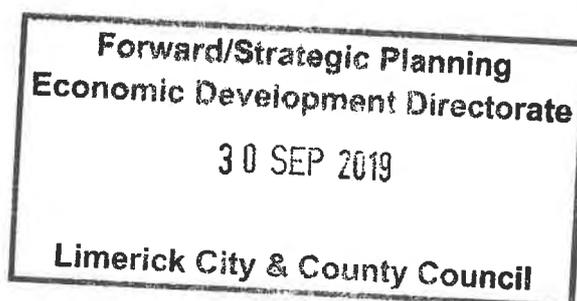
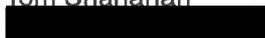
I would be very concerned that any extra land would be zoned Retail/ Commercial beside the new Primary Care Centre as this would suck business out of the Town Centre and lead to more dereliction on Main Street/ Bridge Street and High Street which as you can see has plenty dereliction and vacant properties. The Town Centre needs all the Commercial activity it can get to be sustainable and vibrant and hopefully attract new retail / artisan /craft enterprises in the Future.

The Laneway to rear of the Main Street along the River if that could be tidied up with tarmac and night lighting provided like in the Well Meadow it would enhance that area.

The Draft is very positive for us here in Croom especially with a New Secondary opening in the next year or so.

Yours Sincerely

Tom Shanahan



O'Connell, Noreen

From: Forward Planning
Sent: 02 October 2019 09:45
To: O'Connell, Noreen
Subject: FW: Draft Croom Local Area Plan 2019 - 2025

-----Original Message-----

From: [REDACTED]
Sent: Monday, September 30, 2019 4:49 PM
To: Forward Planning <forwardplanning@limerick.ie>
Subject: Draft Croom Local Area Plan 2019 - 2025

CAUTION: This email originated from outside of the Organisation. Do not follow guidance, click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sirs

My name: Carmel Marchant
Address: [REDACTED]

I am the owner of lands zoned for residential serviced sites on the draft Croom plan.

The Land is designated number 7 in appendix 4 2.66 hectares phase 1.

The serviced land assessment states that this land has road and footpath access.

However, the new part of the distributor road has been omitted from the latest draft plan and the land would therefore have no access.

The distributor road was intended to provide access to the land designated "Serviced Sites". There is no access without the distributor road which is shown on the previous LAP.

At Chapter 3.7.2 of the draft plan it is stated that "The lands zoned for residential development have been zoned on the basis that adequate services are available to facilitate the development of each of the sites". This is not the case without an access road.

Please extend the partly constructed distributor road to the serviced sites as shown on the previous Croom LAP 2009-15 extended to November 2019.

Yours sincerely,
Carmel Marchant

Sent from my iPhone

**Forward/Strategic Planning
Economic Development Directorate**
30 SEP 2019
Limerick City & County Council



CROOM LOCAL AREA PLAN SUBMISSION

30th September 2019

Forward/Strategic Planning,
Limerick City and County Council,
Merchant's Quay,
Limerick
V94 EH90f

To Whom it concerns,

We wish to make the following comment/ submission in relation to the above Local Area Plan currently being developed for Croom, County Limerick.

Our client, Nivon Healthcare t/a Zest Healthcare are currently on site and developing a two storey Primary Care Facility as granted planning permission under references 17/1150 and 19/667. It is our clients intention to consider future development and expansion of this Primary Care Facility on lands (Circa 4 Acres) to the North and North West of the lands currently being developed and adjacent to Croom Hospital facility.

It is requested that Forward Planning consider both the project currently being developed and our clients future intentions in a manner that does not impact on these developments.

If we can be of further assistance, please feel free to contact the undersigned.

Yours sincerely

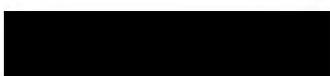
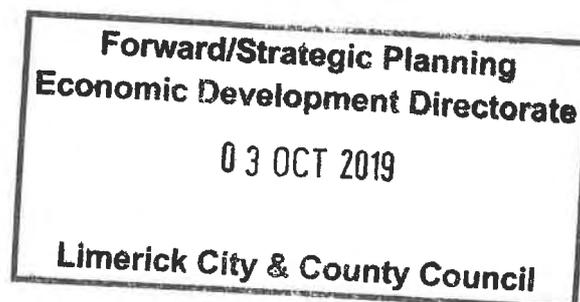
Richard Nicol



Forward / Strategic Planning Section
Economic Development Directorate
Corporate Buildings
Limerick City & County Council
Merchants Quay
Limerick

30th September 2019

Re Croom Local Area Plan,



On behalf of Croom Community Enterprise Centre we would like to make a submission in regards to the Draft Local Area Plan for Croom in particular to zoning for future Enterprise and Employment needs of the Town.

Croom Enterprise Centre is located in an area zoned for Town Centre. This area needs to be enhanced, supported and developed for the commercial, retail, enterprise and employment needs of the Town. There is ample land/sites/areas zoned for residential use in the plan and we are of the opinion that no further land in the Town Centre zoning should be allocated for residential or housing purposes. The design for the houses/residential development area to the front of the water tower that is in the course of a Part 8 planning process is not in keeping with the area, and should be redesigned and remodelled to fit in with the existing houses in St. Senans Terrace and Towerfield.

The remainder of land on this site needs to be earmarked for Enterprise and Employment and future expansion opportunities for Croom Community Enterprise Centre and commercial ventures. It is also worth noting that should future expansion opportunities arise on this site, Croom Enterprise Centre will need to take suitable measures to safeguard and protect its property and car parking facilities. It would not be considered suitable to have all of this area open to general community and or residential area access.

To complement this suitable and available land needs to be allocated for Enterprise & Employment. The land on the current draft plan at the end of Main Street, will not and does not afford any opportunity for the future economic development needs to the town. Realistic alternatives that have a viable chance of being developed need to be sought and zoned. Any such land needs to be easily accessible for transport links and is able to support a range of enterprises.

We hope that consideration will be given to these items and that the next draft will contain realistic opportunities for Enterprise & Employment Development.

Kind Regards



Elaine Butler
Company Secretary

