



Comhairle Cathrach
& Contae **Luimnigh**

Limerick City
& County Council

Stiúrthóireacht Forbartha Eacnamaíochta,
Comhairle Cathrach & Contae Luimnigh,
Cé na gCeannaithe,
Luimneach.

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17th December 2020

To the Cathaoirleach and each Member of the Metropolitan District of Limerick

**Re: Chief Executive Report to Elected Members on the Draft Southern Environs Local Area Plan
2021 – 2027**

A Comhairleoir, a chara,

I enclose herewith a copy of the Chief Executive's Report on the Draft Southern Environs Local Area Plan 2021 – 2027.

The Draft Local Area Plan was placed on public display from Saturday 10th October 2020 to Monday 23rd November 2020 inclusive.

A total of 33 no. submissions were received within the statutory timeframe, with one late submission received outside the statutory period. A report consisting of a summary of the submissions received together with the Chief Executive's responses and recommendations are attached as required by Section 20 of the Planning and Development Act (Amended). The submissions can be inspected online, or in the Forward/Strategic Planning Section of Limerick City & County Council during normal office hours and copies of the original submissions will be available for inspection at the January meeting of the Metropolitan District of Limerick.

The Members of the Metropolitan District of Limerick at their January meeting shall consider the Chief Executives Report and decide whether to make or amend the Draft Southern Environs Local Area Plan. If the Council decide to amend the Draft Local Area Plan, any material alterations will be put on public display for a further 4 weeks.

A briefing meeting on the Chief Executive's Report will be held online on the 11th January 2021 at 10.00 am, to brief the Elected Members on the contents of the Report. A link to the online briefing will issue closer to the date.

If you have any queries on the report please contact Karen Burke, Senior Executive Planner, on 061 557480.

Mise le meas,

Dr. Pat Daly
Chief Executive

Draft Southern Environs Local Area Plan 2021 – 2027

Section 20 (3)(c) Chief Executive's Report to Members on Submissions and Observations received during the Draft Plan Public Consultation

17th December 2020

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



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& Contae **Luimnigh**

Limerick City
& County Council

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1.0 INTRODUCTION

This Chief Executive's Report presents the submissions made following publication of the Draft Southern Environs Local Area Plan (LAP) 2021-2027. The report sets out the Chief Executive's responses to the issues raised and any amendments to the Draft LAP. The report is part of the statutory procedure for preparing a new Local Area Plan (LAP) as set out in Section 20 of the Planning and Development Act, 2000 (Amended).

The Draft Local Area Plan was placed on public display from during the period 10th October 2020 to 23rd November 2020 inclusive. A total of 33 no. written submissions were received within the statutory timeframe. One late submission was received outside the statutory period.

1.1 STRUCTURE OF THIS REPORT

Part A addresses each of the written submissions received within the statutory public display period. It includes the names of the individuals or bodies who made submissions, a summary of the issues raised, a response and the recommendations of the Chief Executive on each submission.

Part B outlines the proposed amendments recommended to the text of the proposed LAP in response to the Chief Executive's recommendations on the submissions received. Any paragraph, policy or objective to be amended in the draft LAP is reproduced in full with deleted text shown ~~struck through in green~~ and additional text shown underlined in red.

Part C is the Strategic Environmental Assessment Screening and Appropriate Assessment Screening of the amendments recommended to the draft Local Area Plan.

Appendix A is the Flood Risk Assessment considered in reaching the conclusions in relation to lands which are identified as been at risk of flooding within the plan boundary.

1.2 PROGRESS TO DATE AND NEXT STEPS

The steps in the process of preparation of the Plan for the Southern Environs are shown in the following table:

Date	Stage
15 th July 2020	Notification of official commencement of Local Area Plan
25 th July – 7 th September 2020	First issues stage: Pre-draft submissions were invited
10 th October 2020 to 23 rd November 2020	Draft Plan on public display: Public submissions invited during statutory period
The remaining stages of the Plan are as follows:	

18 th January 2020	Meeting of the Metropolitan District of Limerick, Elected Members of the area shall consider this report and to make, revoke or amend the Plan.
January 2021	Material Alterations on display for a further 4 weeks. Public submissions can only be made on the proposed alterations
March 2021	Chief Executive's Report on Material alterations to be prepared
April 2021	Final adoption of Plan
May 2021	Plan comes into force 6 weeks from the time of adoption

Following receipt of the Chief Executive's Report, the Members of the Metropolitan District of Limerick have up to 6 weeks in which to consider the contents of this report and the Draft LAP. Members may then accept the Draft LAP and adopt it. Should amendments be proposed which, would constitute material alterations to the Draft LAP, there is a further public display period (4 weeks) giving members of the public an opportunity to comment on the proposed amendments only. This is followed by the preparation of a second Chief Executive's Report to the Members on any submissions received on the proposed amendments.

Members may then decide to make the LAP with or without the proposed amendments or with modifications to the proposed amendments, subject to the provisions of the Planning and Development Act, 2000 (Amended). The formal making of the LAP is by resolution of the Metropolitan Area members. During the LAP process the Council must consider the proper planning and sustainable development of the area, statutory obligations and any relevant plans and policies of the Government or any Minister of the Government.

PART A

SUBMISSIONS, RESPONSES AND CHIEF EXECUTIVE'S RECOMMENDATION

2.0 PERSONS/ BODIES WHO MADE SUBMISSIONS WITHIN THE STATUTORY TIMEFRAME

Submission No.	Submission received from
1	Office of Planning Regulator (OPR)
2	Department of Education
3	Transport Infrastructure Ireland (TII)
4	Environmental Protection Agency (EPA)
5	Office of Public Works (OPW)
6	Irish Water
7	Kerry County Council
8	Cllr. Eddie Ryan
9	RPS on behalf of Tergnum Properties Ltd.
10	AK Planning on behalf of Prime Bay Ltd.
11	AK Planning on behalf of Seamus Hayes
12	AK Planning on behalf of Robert Long
13	Michael Begley
14	MKO Planning & Environmental Consultants on behalf of Dwellings Developments Ltd.
15	RW Nowlan & Associates on behalf of DW Raheen
16	Garland Concepts Realised on behalf of Laurence & Elizabeth Lahiff
17	Dr. Eamon Howard-Bowles
18	John Spain on behalf of Clancourt
19	Town & Country Resources on behalf of Charlie MacDonnell
20	Fehily Timoney & Company on behalf of Shannon Group PLC
21	HRA Planning on behalf of Hibernia Senior Living
22	John Hurley & Olivia Grimes
23	Jim Long
24	Coakley O'Neill Town Planning on behalf of Homeland Group
25	The Board of Management on behalf of St. Nessian's National School
26	John Spain Associates on behalf of Aldi Stores (Ireland) Ltd.
27	Avison Young on behalf of Tesco Ireland Ltd.
28	Jayne Power on behalf of The Power Family
29	Canon John O'Shea & Fr. Richard Davern on behalf of The Parish of Mungret & Crecora & Raheen
30	Liz Conway on behalf of St. Nessian's National School Parents Association
31	John Conway on behalf of Some Oakfield Residents
32	Sean O'Grady
33	John Philip Ryan on behalf of Teresa Ryan

2.1 PERSONS/ BODIES WHO MADE SUBMISSIONS OUTSIDE THE STATUTORY TIMEFRAME

Submission received from
National Transport Authority (NTA)

2.3 SUBMISSION SUMMARIES, CHIEF EXECUTIVE'S RESPONSE & RECOMMENDATIONS

1	Name/Group:	Office of Planning Regulator
	Submission:	Response
	<p>1. Regional Spatial and Economic Strategy: The Office notes that the Draft LAP will seek higher minimum densities and welcomes the inclusion of policy objective HO 4 and the greater emphasis on supporting compact and sustainable growth.</p> <p>The Office supports the proposed rezoning of the strategic IDA land at Raheen Business Park to high-tech/manufacturing.</p> <p>The office considers that the policies and development framework in the draft LAP are generally consistent with the relevant policy objectives in the RSES, in particular those relating to population growth and economic development.</p> <p>2. Development Plan and Core Strategy: Having regard to the quantum of undeveloped land and population growth forecasts, the Office considers that the LAP provides for sufficient and suitable residential and employment land and is consistent with the core strategy.</p> <p>3. Transport and Accessibility: The Office welcomes the transport section of the LAP, which strengthens the policies for national roads, sustainable transport and references policies/ initiatives in the draft Limerick Shannon Metropolitan Area Transport Strategy (LSMATS).</p> <p>Planning Authorities are required to have regard to the section 28 <i>Spatial Planning and National Roads Guidelines (2012)</i> (SPNRG) in the performance of their functions under the Planning Acts. Section 2.7 – 'Development at National Road Interchanges or Junctions' of the SPNRG is of particular relevance to the proposal to</p>	<p>1. Regional Spatial and Economic Strategy: Noted</p> <p>2. Development Plan and Core Strategy: Noted</p> <p>3. Transport and accessibility: Noted</p>

<p>rezone land at the M7/M20 interchange from Agriculture to Enterprise & Employment.</p> <p>The Office notes that the interchange has capacity constraints and is somewhat removed from the existing public transport network. The land has not been identified as being of national or strategic importance, which would support its rezoning consistent with the criteria set out in section 2.7.</p> <p>The proposed zoning is inconsistent with policy objective TM011 in the draft LAP which aims to <i>'Protect the capacity of the national road network, having regard to all relevant Government guidance including DoECLG "Spatial Planning and National Roads Guidelines"</i>.</p> <p>The M20 Cork to Limerick is a major National Infrastructure Project included in the National Development Plan and will feed into the current M7/M20 interchange (junction 30) which may require reconfiguration and upgrading of the interchange.</p> <p>MASP Policy Objective 8 for strategic road infrastructure and improved accessibility to Limerick Southside, includes the possible provision of a motorway interchange connection from the M20/M7 to Limerick Southside.</p> <p>The proposed zoning is inconsistent with section 2.9 of the SPNRG "Protection of Alignments for Future National Road Projects", and objective TM012 in the draft LAP which states <i>'Prevent inappropriate development on lands adjacent to the existing national road network, which would adversely affect the safety, current and future capacity and function of national roads and having regard to reservation corridors to cater for possible future</i></p>	
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<p><i>upgrades of the national roads and junctions...'</i></p> <p>The proposal to zone the land for Enterprise and Employment at the M7/M20 interchange would be premature and inconsistent with MASP Policy Objective 8 and sections 2.7 and 2.9 of the <i>Spatial Planning and National Roads Guidelines</i> (2012).</p> <p>The site also has issues in relation to the potential for adverse impacts on the national roads network and its current lack of sustainable mobility. The Planning Authority is advised to consider identifying the land as having potential for rezoning to a future strategic site subject to detailed analysis of transportation impacts and implications for the national road network and potential upgrades and other constraints such as flooding and noise, which would inform the determination of appropriate land uses. This may require a site-specific zoning objective, which addresses the strategic nature of the site but ensures consistency with national and regional policy.</p> <p>4. Recommendation 1: <i>The Planning Authority is required to delete the proposed rezoning of land from Agriculture to Enterprise and Employment at the M7/M20 intersection as it is considered premature and inconsistent with MASP Policy Objective 8 and Spatial Planning and National Roads Guidelines (January 2012), in particular sections 2.7 and 2.9, which provide national policy and guidance on Development at National Road Interchanges or Junctions and Protection of Alignments for Future National Road Projects respectively.</i></p> <p>Section 8.1 and policy HO 5 refer to <i>'The Design Manual for Urban Roads and Streets, DTTS and DECLG (2013)'</i> (DMURS) rather than the revised 2019 version.</p>	<p>4. Recommendation 1: The Planning Authority notes the concerns of the OPR in relation to the zoning of lands, national guidance, regional and local policy in relation to same at Junction 30 Rosbrien. The Planning Authority also notes the location of the lands with respect to Junction 30 within the M20 Cork to Limerick study area and the potential for intensive traffic movements associated with development of these lands for Enterprise and Employment uses. Pending completion of assessments in relation to the proposed M20 Cork to Limerick study in 2021 and issues of traffic movements, noise and flooding, it is considered that the zoning for Enterprise and Employment would be premature at this time.</p>
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<p>5. Climate Change and Flood Risk: The Office welcomes the climate change section and the climate change objectives, which support existing climate change frameworks/ strategies, sustainable travel, use of rainwater harvesting and other measures.</p> <p>The Office notes that the draft LAP is accompanied by a Stage 1 Flood Risk Assessment and flood map which is overlaid on the proposed land use zonings.</p> <p>6. Observation 1: <i>The Planning Authority is requested to consult with the Office of Public Works regarding the flood risk assessment prepared to inform the draft local area plan to determine whether further analysis is required regarding any proposed or anticipated future zoning changes.</i></p> <p>The LAP proposes to rezone land west of the Ballinacurra Creek from Open Space & Recreation and Semi-natural Open Space to Agriculture, which would permit one off housing subject to compliance with Objective HO15. This land is at risk of flooding and should be referenced and acknowledged that dwelling houses are categorised as ‘highly vulnerable development’ in the section 28 The Planning System and Flood Risk Management Guidelines for Planning Authorities (2010).</p> <p>7. Observation 2: <i>The Planning Authority is requested to amend the purpose statement for the Agriculture zoning objective and policy objective H O15 to acknowledge that some of the land zoned for Agriculture in the LAP is prone to flood risk and that this constraint will be taken into account in</i></p>	<p>References to “The Design Manual for Urban Roads and Streets, DTTS and DECLG” will be amended to include reference to the 2019 version.</p> <p>5. Climate Change and Flood Risk: Noted</p> <p>6. Observation 1: The Planning Authority has consulted with the Office of Public Works in relation to flood risk assessment. A submission from the OPW has been received in relation to the Draft LAP.</p> <p>7. Observation 2: Land west of the Ballinacurra Creek proposed to be zoned Agriculture reflecting their current use and location within flood zones. The fact that dwellings are categorised as ‘highly vulnerable development’ in the Section 28 ‘The Planning System and Flood Risk Management</p>
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<p><i>relation to applications for one off rural dwellings.</i></p> <p>8. Rural Housing: The Office notes that the policy objective for Agriculture and policy objective H O15 which supports applications for one off dwellings.</p> <p>National Policy Objective 19 (NPO 19) states the following for rural areas under urban influence such as the Southern Environs: <i>‘In rural areas under urban influence, facilitate the provision of single housing in the countryside based on the core consideration of demonstrable economic or social need to live in a rural area and siting and design criteria for rural housing in statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements;..’</i></p> <p>The Office advises that the Planning Authority’s policies for rural areas under urban influence like the Southern Environs will need to be reviewed and updated to ensure consistency with national policy objectives in the NPF in particular NPO 19.</p>	<p>Guidelines for Planning Authorities (2010)’ will be acknowledged in H O15.</p> <p>8. Rural Housing: It is the intention that the Southern Environs LAP will be incorporated into the proposed Limerick Development Plan and will form part of the overall city and environs zoning framework. Therefore the policies for rural areas under urban influence within the Southern Environs will be reviewed and updated to ensure consistency with national policy objectives in the NPF, in particular NPO 19, during the preparation of the proposed Limerick Development Plan.</p>
<p>Chief Executive’s Recommendations:</p>	
<p>1 – 3: No Change</p> <p>4: Revert the Enterprise and Employment zoning back to Agriculture as per the 2011 – 2017 (as extended) zoning at Junction 30 Rosbrien.</p> <p>Amend Section 6.3.2 Availability of zoned lands as follows:</p> <p>Given the high demand for employment type lands in the Metropolitan Area additional land has been included for Enterprise and Employment uses. In this regard, an area of 204ha. of “High Tech/ Manufacturing”, 110ha. <u>69.16ha.</u> of “Enterprise and Employment” and 340ha. of “Industrial” zoned land is available for development in the Southern Environs.</p> <p>Update references to the 2019 version of “The Design Manual for Urban Roads and Streets, DTTS and DECLG”.</p> <p>5 - 6: No Change</p> <p>7: Amend Objective H O15 as follows: <i>“Permit housing on agriculturally zoned land <u>outside of Flood Zones A and B</u> for the permanent habitation of farmers and the sons and/or daughters</i></p>	

	<p><i>of farmers only and subject to the terms and conditions of the rural housing policy as set out in the Limerick County Development Plan 2010 – 2016 (as extended). <u>Dwellings are categorised as ‘highly vulnerable development’ in the Section 28 The Planning System and Flood Risk Management Guidelines for Planning Authorities (2010) and will not be permitted in flood zones”.</u></i></p> <p>Amend the Purpose of the Agriculture Objective as follows: “One off dwellings will only be considered on agriculturally zoned land <u>outside of Flood Zones A and B</u> for the permanent habitation of farmers and the sons and/or daughters of farmers only and subject to the terms and conditions of the rural housing policy as set out in the Limerick County Development Plan 2010 – 2016 (as extended) and any replacement hereafter”.</p> <p>8: No Change</p>
	<p>SEA/AA Response:</p> <p>With respect to the zoning of lands at the Rosbrien Interchange, these lands are within the M20 Limerick to Cork study area. The Enterprise and Employment zoning is likely to contribute to additional traffic movements. There is also the possible issue of flood risk and potential noise issues, which would require further assessment. The intensification of use which enterprise zoning would allow, is regarded as premature pending the completion of such studies. The proposal to revert to Agricultural zoning is now proposed, the Agriculture zoning is also a less intensive land use than the Enterprise and Employment zoning and would have less potential environmental effects. It will also ensure that the area will remain permeable which would assist with surface water management.</p> <p>The amendments add clarity in Objective HO5, in that they refer to the most up to date guidance manuals. In the case of Objective HO15, it is drawn directly from The Planning System and Flood Risk Management Guidelines November 2009. Objective HO15 and the Agriculture Objective ensure clarity in plan content but also help to ensure compliance with higher tier guidance. The effects are considered to be positive from an SEA perspective, in that by ensuring that dwellings are located outside of flood vulnerable areas. This will minimise both risk to humans and lessens potential effects on flood plains with consequent environmental benefits.</p>

2	Name/Group:	Department of Education
	Submission:	Response
	<p>1. Population: The Department notes the projected population increase from 2016 to 2031 of 9,700 persons. This increase would require a significant education provision over the lifetime of the plan and beyond.</p> <p>2. School Place Demand: The population increase would require at least one new 24-classroom school at primary level.</p>	<p>1. Population: Noted</p> <p>2. School Place Demand: The provision of new, and futureproofing of existing education and community infrastructure, in tandem with</p>

<p>Depending on how the new population is distributed, there could also be a requirement to expand existing primary schools (where feasible).</p> <p>Potential increased need will be met by way of current expansion projects to existing post primary schools, plus the provision of the new post-primary school in Mungret, which is currently in the planning process.</p> <p>Further school place requirements could emerge over the lifetime of the plan and beyond. The Department notes and welcomes the statement on page 44 that <i>“given the projected population growth to 2031, the plan includes the zoning of land for new schools and expansion of existing educational facilities where necessary in accordance with the requirements of the Department. The requirement for additional primary and secondary educational facilities will be monitored having regard to the development of residential land during the lifetime of the Draft LAP”</i>.</p> <p>The Department also welcomes the inclusion of objectives CI03-CI06, CI10-CI11 and would further add that the Department always requests site reservations to be made as close as possible to community facilities such as sports facilities, libraries etc. so that these can be shared.</p> <p>The Department will continue to work closely with the Council in relation to the provision of new schools and the development of existing schools, as appropriate, and emphasises the critical importance of the ongoing work of the Council in ensuring sufficient land is zoned for this purpose.</p>	<p>residential development to serve the existing and substantial population growth envisaged in the Southern Environs is essential to achieve sustainable development and communities, in accordance with the objectives of the National Planning Framework and Regional Spatial and Economic Strategy. In this regard the Draft Plan proposed additional educational zoning next to St. Nessans primary school.</p> <p>The Planning Authority are committed to continue working with the Department of Education to ensure the provision of new schools and the development of existing schools and to ensure that sufficient land is zoned to cater for same.</p>
<p>Chief Executive’s Recommendations:</p>	
<p>No Change</p>	
<p>SEA/AA Response: N/A</p>	

3	Name/Group:	Michael McCormack on behalf of Transport Infrastructure Ireland (TII)
Submission:		Response
<p>1. Managing Exchequer Investment and Statutory Guidance: The Trans-European Transport Networks (TEN-T) are a planned set of transport networks across Europe. The TEN-T objective is to increase the benefits for road users by ensuring safe, secure and high-quality standards for road users and freight transport in a coordinated fashion, to achieve integrated and intermodal long distance travel routes across Europe.</p> <p>The M7 is part of the EU TEN-T Core Network and the N18 forms part of the TEN-T Comprehensive Network. These are strategic national roads with a clear policy emphasis on safeguarding the investment made to date and safeguarding the strategic function, capacity, safety, accessibility and connectivity provided.</p> <p>TII welcomes that the Draft Local Area Plan outlines in Section 11.1 that the Local Authority is committed to the protection of the capacity of the national road network and will have regard to the DoECLG “Spatial Planning and National Roads Guidelines” (DoECLG, 2012) in the carrying out of its functions. Local Area Plan Objective TM O11 also refers and is welcome.</p> <p>2. Specific Development Objectives: 2.1 National Development Plan National Road Investment Objectives: TII welcomes that Objective TM O11 and Objective TM O12 include provision for the Foynes to Limerick Road Scheme (including Adare Bypass). TII would welcome the Draft Local Area Plan to include support for the M20 Cork to Limerick Scheme in the relevant objectives.</p> <p>The M20 Cork to Limerick Scheme is an investment objective of the National</p>		<p>1. Noted</p> <p>2. Specific Development Objectives: 2.1 National Development Plan National Road Investment Objectives: Objective TM O11 and Objective TM O12 shall be amended to include the M20 Cork to Limerick Scheme.</p>

<p>Development Plan (NDP) and gives effect to National Strategic Outcome no. 2 “Enhanced Regional Accessibility” of the National Planning Framework (NPF). The Phase 2 Study Area (https://corklimerick.ie/) extends into the Southern Environs area.</p> <p>TII would welcome provision for the M20 Cork to Limerick Scheme included in the Draft Plan in Objective TM O11 and Objective TM O12.</p> <p>2.2 Zoning and Development Objectives: 2.2.1 M7/N18/M20 Junction 30 (Rosbrien): TII notes with concern the introduction of a new Enterprise and Employment zoning directly to the south west of Junction 30 (Rosbrien) at the junction of the M7/M20/N18.</p> <p>TII endeavours to support the Council in developing Limerick as the regional driver for growth in the Mid-West. The N21 Limerick to Foynes Scheme and the M20 Cork to Limerick Schemes are progressing.</p> <p>The proposed Enterprise and Employment zoning in the immediate vicinity of Junction 30 is contrary to the provisions of official policy and should be reviewed for the following reasons:</p> <ul style="list-style-type: none"> • Enterprise and Employment uses are likely to generate a considerable amount of traffic by both employees and service vehicles and it is inappropriate to have intensive trip generating development in the vicinity of the national road junction; • Based on the above, the proposal is contrary to the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities, the Regional Spatial and Economic Strategy for the Southern Region, the principles included in the emerging LSMATS and also the proposed 	<p>2.2 Zoning and Development Objectives 2.2.1 M7/N18/M20 Junction 30 (Rosbrien): The Planning Authority notes the concerns of TII in relation to the zoning of lands and national guidance in relation to same at Junction 30 Rosbrien. The Planning Authority also notes the location of the lands with respect to Junction 30 within the M20 Cork to Limerick study area and the potential for intensive traffic movements associated with development of these lands for Enterprise and Employment uses. Pending completion of assessments in relation to the proposed M20 Cork to Limerick study in 2021 and addressing issues of traffic movements, noise and flooding, it is considered that the zoning for Enterprise and Employment would be premature at this time.</p>
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<p>provisions to protect the strategic road network;</p> <ul style="list-style-type: none"> • The proposed zoning objective does not appear to be supported by any evidence base required by the Section 28 Ministerial Guidelines and is considered contrary to the provisions of the Guidelines; • The lands concerned are included in the Phase 2 Study Area for the M20 Cork to Limerick Scheme. Section 2.9 of the DoECLG “Spatial Planning and National Roads Guidelines for Planning Authorities” require that development objectives, including the zoning of land, must not compromise the route selection process. It is considered premature to zone the subject lands and not consistent with Section 2.9 of the Spatial Planning and National Roads Guidelines for Planning Authorities; • Finally, zoning to the immediate vicinity of the national road junction is not considered compatible with objectives for any necessary future upgrade of the junction. <p>Compromising the strategic function of the national road network in the area has the potential to inhibit growth, impact economic performance and reduce accessibility. TII strongly recommends that proposals to zone the subject lands are reviewed, TII is not supportive of the proposed zoning.</p> <p>2.2.2 N18/N69 Junction 2 (Dock Road): LSMATS recognises localised congestion on the grade separated junctions along the M7/N18 Limerick City Bypass, noting, in particular, Mackey (Newport) Roundabout, Ballysimon and Dock Road Interchanges. Ensuring that this localised junction congestion does not impact on the strategic function of the M7/N18 road is important.</p>	<p>2.2.2 N18/N69 Junction 2 (Dock Road): The Planning Authority notes the concerns of TII in relation to the zoning of lands and national guidance in relation to same at Junction 2 Dock Road. The subject lands were previously zoned under the 2011 Local Area Plan for the Southern Environs. The modification to the zoning designations reflect the existing uses of these lands. The Planning Authority also notes the issues of congestion in this area and proposals for a primary bus route and</p>
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<p>A significant extent of lands are zoned in the vicinity of the Dock Road Junction for Enterprise and Employment and Industry. TII is aware that the subject lands were previously zoned in the 2011 Southern Environs Local Area Plan. TII previously raised concern at the 2011 Draft Plan stage and in relation to subsequent amendments to the Local Area Plan.</p> <p>The proposal to zone additional lands adjoining the N7/N69 in 2011 was advanced in the absence of any quantified impact on the operation of the national road network. Zoning designations that extended to the line/boundary of the existing mainline national road network and associated junctions was not a practice consistent with objectives for providing for any future enhancements to the network that may be required.</p> <p>During the consultation for Proposed Amendment no. 2 to the Local Area Plan following publication of the DoECLG “Spatial Planning and National Roads Guidelines for Planning Authorities” (2012), an evidence based approach to planning policy is required, where a development plan or local area plan proposes development to take place on zoned lands adjacent to national roads, which could affect the operation and capacity of such roads.</p> <p>The Authority is not aware that the policies and zoning designations included in the LAP in relation to the zoning proposals in the vicinity of the Dock Road Junction, have been subject to an evidenced based approach in plan preparation, in accordance with the requirements of the DoECLG “Spatial Planning and National Roads Guidelines for Planning Authorities”.</p> <p>3 Traffic and Transport Assessment (TTA): TII welcomes the requirement for TTA</p>	<p>provision of cycle lanes on the Dock Road in accordance with LSMATS. The Planning Authority further notes the submission received from the NTA (late submission at end of Part A further below) in relation to this matter and the suggested specific objective for these lands to facilitate the alleviation of traffic associated with the development of these lands.</p> <p>On the basis of the proposed bus route and cycle lanes it is considered reasonable to retain the zoning of these lands subject to the inclusion of a specific objective that the land shall be developed for uses with low levels of traffic movements only. A combination of measures outlined in LSMATs and the low intensity land use will promote a modal shift.</p> <p>3. Traffic and Transport Assessment (TTA): Objective TM O10 shall be amended to</p>
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<p>included in Objective TM O10 of the Draft Local Area Plan.</p> <p>To assist with TTA, the Authority has updated the “Traffic and Transport Assessment Guidelines” (2014), which could be referenced as appropriate guidance. The Guidelines also include recommendations on the requirement for sub-threshold traffic and transport assessments.</p> <p>4 Noise: TII welcomes that environmental noise impacts are addressed in Objective TMO 19 and Objective H O16 of the Draft Local Area Plan.</p> <p>5 Signage: TII welcomes the inclusion of Objective TM O18 which seeks to prohibit advertising signage adjacent to the motorway, the national road networks and other major transport routes.</p> <p>6 Drainage: Having regard to the Local Area Plan lands adjoining the strategic national road network, it is critical that surface water drainage proposals within the LAP do not negatively impact on the national road drainage regimes. It is requested that an objective is included in the local area plan to safeguard the capacity and efficiency of the national road network drainage regimes.</p>	<p>reference “Traffic and Transport Assessment Guidelines” (2014).</p> <p>4. Noise: Noted</p> <p>5. Signage: Noted</p> <p>6. Drainage: An objective to safeguard the capacity and efficiency of the national road network drainage regimes shall be included.</p>
<p>Chief Executive’s Recommendations:</p>	
<p>1: No Change</p> <p>2: Amend Objective TM O11 to include M20 Cork to Limerick Scheme.</p> <p>Amend Objective TM O12 to include M20 Cork to Limerick Scheme.</p> <p>2.1: Revert the Enterprise and Employment zoning back to Agriculture as per the 2011 – 2017 (as extended) LAP zoning at Junction 30 Rosbrien.</p> <p>2.2: Retain the zoning of lands at Junction 2 Dock Road subject to the addition of the following specific objective: <u>TM O22:</u></p> <p><u>- Industrial and Enterprise and Employment lands adjacent to Junction 2 shall be developed for uses with low levels of traffic movements only;</u></p>	

	<ul style="list-style-type: none"> - <u>Car parking shall be provided at a rate below that provided for in the Development Plan and provided on an area-wide basis rather than according to the requirements of individual developments;</u> - <u>Cycle parking shall be provided in all developments at an appropriate level to encourage modal shift;</u> - <u>All developments shall include end-of-trip cycling facilities for employees such as showers and lockers;</u> -<u>All new roads shall incorporate segregated cycle tracks designed in accordance with the National Cycle Manual;</u> - <u>All new roads shall seek, in the first instance, to provide filtered permeability, in order to avoid creating additional capacity for car traffic; and</u> - <u>All development proposals shall include Mobility Management Plans, with clear targets and commitments to implementing measures to promote sustainable transport.</u> <p>3: Amend Objective TM O10 as follows:</p> <p><i><u>Require the submission of Mobility Management Plans and Traffic and Transport Assessments in accordance with the requirements of “Traffic and Transport Assessment Guidelines” (2014) for large scale employment related developments, including at the Strategic Employment Locations of Raheen Business Park and University Hospital Limerick.</u></i></p> <p>4 - 5: No Change</p> <p>6: Include Objective <u>TM O21</u> as follows:</p> <p><i><u>Ensure all developments protect and safeguard the capacity and efficiency of the drainage regimes of the national road network.</u></i></p>
	<p>SEA/AA Response:</p> <p>The purpose of changes to objectives is to safeguard the efficiency of what are both regionally and nationally important transport schemes in the case of both the M20 Cork to Limerick Scheme and Foynes to Limerick Scheme. Improved transport links lead to reduced travel times and greater transport efficiency. Properly managed, this can lead to less traffic emissions and greater economic linkages both nationally and regionally. It should also be noted that the Foynes to Limerick scheme enhances linkages with Foynes Port. Foynes Port is also part of the TEN-T European port network which will assume greater importance post Brexit.</p> <p>With respect to the zoning of lands at the Rosbrien Interchange, these lands are within the M20 Limerick to Cork study area. The Enterprise and Employment zoning is likely to contribute to additional traffic movements. There is also the possible issue of flooding and noise, which require further assessment, therefore it is regarded that the zoning may be premature pending the completion of such studies. The proposal to revert to Agriculture zoning is a less intensive land use than the Enterprise and Employment zoning and would have less potential environmental effects. It will also ensure that the area will remain permeable which would assist with surface water management.</p>

	The inclusion of objectives which seek to increase permeability and support low carbon transport modes, will have benefits for urban permeability and human health as well as environmental benefits as transport emission would fall as a result.
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4	Name/Group:	Cian O'Mahony on behalf of Environmental Protection Agency (EPA)
	Submission:	Response
	<p>1: The EPA promotes the full and transparent integration of the findings of the Environmental Assessment into the Plan and advocates that the key environmental challenges for Ireland are addressed.</p> <p>2: The EPA's guidance document "SEA of Local Authority Land Use Plans – EPA Recommendations and Resources", helps the Planning Authority include environmental factors in the plan.</p> <p>3: The Council should ensure that the Plan is consistent with proper planning and sustainable development. Adequate and appropriate critical service infrastructure should be in place, or required, to service any development proposed and permitted during the lifetime of the Plan.</p> <p>4: The Plan should help support and implement measures to protect and enhance biodiversity. The key relevant aspects in plans such as the All-Ireland Pollinator Plan and the National River Basin Management Plan etc. should be incorporated as appropriate.</p> <p>5: Mitigation Measures: Where the Planning Authority has identified the potential for likely significant effects, appropriate mitigation measures to avoid or minimise these should be provided.</p> <p>6: Monitoring: The Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts. It should consider and deal with the possibility of cumulative effects.</p>	<p>1: Noted</p> <p>2: "SEA of Local Authority Land Use Plans – EPA Recommendations and Resources" will be used to inform the SEA process.</p> <p>3: Noted, the provision of services is also in accordance with planning guidance.</p> <p>4: The All-Ireland Pollinator Plan, National River Basin Management Plan and the National Bio-diversity Action Plan have been referenced and given policy support in the LAP.</p> <p>5: Mitigation Measures: Noted</p> <p>6: Monitoring: The LAP will be incorporated into the proposed Limerick Development Plan 2022 – 2028 for the metropolitan area as a whole. It is suggested that monitoring should</p>

	<p>Monitoring of both positive and negative effects should be considered. The monitoring programme should set out the various data sources, monitoring frequencies and responsibilities.</p> <p>7: In finalising the Plan and integrating the findings of the SEA, the recommendations, key issues and challenges in the “EPA State of the Environment Report Ireland’s Environment – An Assessment 2016” (EPA, 2016) and later editions should be considered, as relevant and appropriate.</p> <p>8: Future Amendments to the Plan: Any future amendments to the Plan should be screened for likely significant effects, using the same method of assessment applied in the “Environmental Assessment” of the Plan.</p> <p>9: SEA Statement – “Information on the Decision”: Once the Plan is adopted, you should prepare an SEA Statement that summarises:</p> <ul style="list-style-type: none"> • How environmental considerations have been integrated into the Plan; • How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan; • The reasons for choosing the Plan adopted in light of other reasonable alternatives dealt with, and; • The measures decided upon to monitor the significant environmental effects of implementation of the Plan. 	<p>be part of the mid-term review of the Limerick Development Plan.</p> <p>7: Noted</p> <p>8: Future Amendments to the Plan: Any future alterations will be screened for SEA as part of the preparation process.</p> <p>9: SEA Statement – “Information on the Decision”: The SEA statement will be prepared when the plan is adopted and circulated to the Environmental Authorities.</p> <p>The sources outlined by the EPA will be used to inform the content and structure of the Environmental Report, including the use of mitigation measures and monitoring as appropriate. Any subsequent amendment to the Draft Plan will be screened for potential environmental effects. The final stage of the process will be the preparation of the SEA statement, which will be circulated to the Environmental Authorities on completion.</p>
	Chief Executive’s Recommendations:	
	No Change	
	SEA/AA Response: N/A	

5	Name/Group:	Office of Public Works (OPW)
	Submission:	Response
	<p>1. General: The acknowledgement of the Guidelines on the Planning System and Flood Risk Management, the proposed measures set out in the Flood Risk Management Plans based on the CFRAM Programme and the preparation of a Strategic Flood Risk Assessment is welcomed. In particular, the OPW welcomes:</p> <ul style="list-style-type: none"> -The commitment to address surface water flooding issues and the need for SuDS (Objectives KI07 & 08); - The recognition of the potential impacts of climate change on flood risk and the need to address these impacts (Section 14.2, Objectives CC01 & 09); - The commitments to managing flood risk in line with the Guidelines and the measures set out in the FRMPs (Section 14.4, Objectives FM01 – 07). <p>2. Flood Risk Management (FRM) – General Guidance: The Guidelines recommend a three Stage Flood Risk Assessment process:</p> <ul style="list-style-type: none"> -Stage 1 Flood Risk Identification; -Stage 2 Initial Flood Risk Assessment; -Stage 3 Detailed Flood Risk Assessment. <p>As potential flood risk issues have been identified, the OPW would recommend that the SFRA should be continued to the Stage 2 Initial Flood Risk Assessment.</p> <p>3. Flood Zones: The Flood Zones (Flood Zone A and B) are not clearly identified on the Flood Map provided. Using the mapping produced under the National CFRAM Programme and the Irish Coastal Protection Strategy Study (ICPSS) it should be possible to define indicative flood zones.</p>	<p>1. General: Noted</p> <p>2. Flood Risk Management (FRM) – General Guidance: Noted a Stage 1 Flood Assessment was carried out to inform the preparation of the Draft Plan. The Planning Authority have engaged the services of Consultants to consider flood risk in the Southern Environs and make comment on specific sites, which are identified as being at flood risk. Detailed Flood Risk Assessment will be carried out on specific planning applications, where deemed appropriate.</p> <p>3. Flood Zones: The ICPSS mapping represents the undefended situation. The Local Authority have considered the undefended scenario in the preparation of the Flood mapping to inform the preparation of Draft Local Area Plan.</p>

<p>4. Existing Flood Defences: Flood defences are in the ownership of various parties, of varying standards of protection and were built to protect agricultural lands and hence may be prone to failure in flood conditions. The benefitting areas cannot be considered as defended and cannot be relied on as providing protection to the benefitting areas.</p> <p>5. Flood Extents: Comparing the Flood Map and Irish Coastal Protection Strategy Study (ICPSS) mapping, it would appear that flood risk for some lands at risk of coastal flooding (Flood Zone A) has been omitted. Areas with a low probability of coastal flooding are also not shown on the Flood Map (Flood Zone B).</p> <p>6. Preliminary Flood Risk Assessment (PFRA): The PFRA was not a detailed assessment of flood risk, “the (PFRA) maps provide only an indication of areas that may be prone to flooding. They are not necessarily locally accurate and should not be used as the sole basis for defining Flood Zones, or for making decisions on planning applications”.</p> <p>7. National Coastal Protection Strategy Study flood and coastal maps: There is little commentary provided on the Irish Coastal Protection Strategy Study (ICPSS).</p> <p>8. Groundwater: While flood zones are indicative of river and coastal flooding only, they do not suggest that areas are free from flood risk, such as from groundwater. Monteen Turlough and Loughmore Common Turlough, may be connected, lands between the two turloughs have been zoned “New Residential”. As Groundwater is an issue in the area, site-specific flood risk assessments are recommended.</p> <p>9. Surface Water: The storage capacity of the internal drainage channels and back-drains to embankments are of limited</p>	<p>4. Existing Flood Defences: Noted.</p> <p>5. Flood Extents: The Flood Map shall be updated to take account of all lands at risk of flooding, including the Irish Coastal Protection Strategy Study (ICPSS) mapping.</p> <p>6. Preliminary Flood Risk Assessment (PFRA): Limerick City and County Council have commissioned consultants to prepare a Strategic Flood Risk Assessment, this work is currently being progressed, the existing flood mapping is used as a basis for flood consideration, and this is supplemented by site visits and modelling as appropriate.</p> <p>7. National Coastal Protection Strategy Study: Additional text on ICPSS will be included in the Flood Risk Assessment.</p> <p>8. Groundwater: Limerick City and County Council have carried out detailed flood risk assessment and hydrological assessment in the lands in their ownership in Mungret and have considered the issue of groundwater in detail, site specific flood risk assessments will be required as appropriate, at Planning Application stage.</p> <p>9. Surface Water: Consideration will be given to an increased level of attenuation from any</p>
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<p>capacity, and outfalls are limited to a number of sluices, whereby the discharge is limited and will not function during times of high tide/ surge. As part of the SFRA, a comprehensive drainage strategy for surface water runoff should be developed and/ or specific objectives included that set maximum runoff limits taking account of a range of possible storm intensities and durations (including future changes) and tide conditions.</p> <p>10. Consideration of Climate Change Impacts: Potential impacts of climate change include increased rainfall intensities, fluvial flood flows and rising sea levels. Flood Zones are defined on the basis of current flood risk, Planning Authorities need to consider such impacts in the preparation of plans, such as by avoiding development in areas potentially prone to flooding in the future, providing space for future flood defences, specifying minimum floor levels and setting specific development management objectives. Objective FM01 might reference consideration of the potential impacts of climate change as part of the application of the Guidelines. The flood maps prepared under the CFRAM Programme and ICPSS include maps for two potential future climate change scenarios.</p> <p>11. Justification Tests: It is welcomed that highly vulnerable land uses are not designated within Flood Zone A. Less vulnerable land uses are not considered to be appropriate in Flood Zone A. The SELAP designates substantial areas in Flood Zone A for less vulnerable land uses for High Tech / Manufacturing. This designation/zoning should be reviewed to ensure avoidance is not possible and all steps of the Justification Test are fully addressed. The SFRA should set out how the risk will be managed. Any development in this area may be deemed premature prior to the completion of any measures necessary to adequately manage</p>	<p>proposed development a detailed application stage.</p> <p>10. Consideration of Climate Change Impacts: Reference will be made under Objective FM01 to the consideration of the potential impacts of climate change as part of the application of the Guidelines.</p> <p>11. Justification Tests: Any proposed lands use within Flood Zone A, is identified for less vulnerable development and the Local Authority has applied the sequential approach and Justification Test as appropriate. These lands zoned High Tech / Manufacturing comprise the Raheen Business Park. The lands are currently undeveloped, however subject to a site specific flood risk assessment for less vulnerable uses ancillary to the existing business park development maybe considered on this site. Insert specific policy to address concerns highlighted to carry out a site specific flood risk assessment including modelling for the lands identified.</p>
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<p>the risk in this area unless a polder or an independent sub-polder can be dealt with in its entirety by the developer.</p> <p>12. Lands to the rear of the Crescent Shopping Centre: When considering the zoning of the semi natural open space lands to the rear of the Shopping Centre, flood protection structures should be ignored, as flood defences can only reduce the risk of flooding and cannot eliminate it. Areas protected by a flood relief scheme still carry a residual risk of flooding from overtopping or breach of defences, as well as the defences not being maintained in perpetuity. The likelihood and extent of this residual risk needs to be considered in determining the appropriateness of particular land uses. As this area is at risk of flooding a Plan-making Justification Test is recommended if it is foreseen that these lands are to be rezoned for development. In addition, it is recommended that a flood risk assessment demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere.</p> <p>13. Zoning Responses to Flood Risk: Two sites, C1 and C8, which are listed in Table 1 “Zoning Responses to Flood Risk” are not shown on Figure 11 and their locations cannot be determined. It is unclear from the zoning map what development sites 6 and 19 are zoned for. The SFRA notes that for site 6 the lands have been rezoned from “Residential” to “Enterprise & Employment” as it is a lesser vulnerable land use. However, as the lands are situated in Flood Zone A, a Plan-making Justification Test is still recommended.</p> <p>14. Other Specific Comments: -SELAP Pg. 68, Section 14.1, Para. 3: Note that Sectoral Adaptation Plans, that include</p>	<p>12. Lands to the rear of the Crescent Shopping Centre: In relation to the lands to the rear of Crescent Shopping Centre it is noted that flood defences were constructed for agricultural purposes and cannot be considered for defence purposes for development as per item 4 above. The proposed LAP does not include the re-zoning of these lands.</p> <p>13. Zoning Responses to Flood Risk: The zoning responses to flood risk in the area, will be addressed with a specific policy.</p> <p>14. Other Specific Comments: These elements will be incorporated into both plan and SFRA</p>
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<p>objectives and actions, have previously been prepared and were approved by Government in October 2019.</p> <p>-SELAP Pg. 71, Section 14.3, Para. 2: Note that the strategies and measures developed through the CFRAM Programme are set out in 29 FRMPs covering a number 'Units of Measures' (as defined in the EU 'Floods' Directive), rather than a single national River Basin District.</p> <p>-SFRA Pg. 5, Source 1, Para. 1 and Figure 1: Note that the indicative fluvial flood maps referred to in this Section were developed through the PFRA.</p>	<p>particularly references to units of measures rather than national level River Basin Districts.</p>
<p>Chief Executive's Recommendations:</p>	
<p>1: No Change</p> <p>2: No Change</p> <p>3: Update the Flood Maps to include Flood Zones A, B and C.</p> <p>4 - 7: No Change</p> <p>8: Amend Objective FM O4 as follows:</p> <p>Ensure development proposals within the areas outlined on the Flood Risk Map are subject to Site Specific Flood Risk Assessment as outlined in "The Planning System and Flood Risk Management Guidelines", DECLG and OPW (2009). <u>A Site Specific Flood Risk Assessment will be required for developments proposed on sites in areas at risk of flooding from groundwater, in particular in the vicinity of Monteen and Loughmore Commons Turloughs.</u></p> <p>9: No Change</p> <p>10: Amend Objective FM O1 as follows: Manage flood risk in accordance with the requirements of "The Planning System and Flood Risk Management Guidelines for Planning Authorities", DECLG and OPW (2009) and any revisions thereof <u>and consider the potential impacts of climate change in the application of these guidelines.</u></p> <p>11: Include Objective <u>FM 08</u> as follows:</p> <p><u>It is an objective of the Council to "ensure that no development shall commence on the lands identified as being at flood risk adjacent to the Raheen Business Park in the townlands of Ballycummin/Rootiagh, zoned for High Tech/Manufacturing until a site-specific flood risk assessment, including a hydraulic model has been prepared for the lands, which demonstrates that the flood risk for the lands can be mitigated or that a less vulnerable use can be accommodated on site".</u></p>	

	<p>12: No Change</p> <p>13: Include Objective <u>FM 09</u> as follows:</p> <p><u>It is an objective of the Council to “ensure that no development shall commence on the lands identified as being at flood risk, off Blackberry Lane in the townland of Ballykeeffe, zoned for Enterprise and Employment, until a site-specific flood risk assessment, including a hydraulic model has been prepared for the lands, which demonstrates that the flood risk for the lands can be mitigated or that a less vulnerable use can be accommodated on site”.</u></p> <p>14: Amend LAP text as follows: Climate Change: Context: “Implementation of the LAP will take into account relevant targets and actions arising from sectoral adaptation plans <u>approved in 2019</u> that will be prepared to comply with the requirements of the Climate Action and Low Carbon Development Act 2015”.</p> <p>Flood Management: Context: “This Flood Scheme follows the Catchment Flood Risk Assessment and Management (CFRAM) programme, which is a medium to long-term strategy for the reduction and management of flood risk in Ireland covering a <u>number of Units of Measures (as defined in the EU Floods Directive)</u> single National River Basin District”.</p> <p>Amend Strategic Flood Risk Assessment as follows: OPW Preliminary Flood Risk Assessment Indicative fluvial flood map: “These maps have been produced under the <u>PFRA</u> CFRAMS programme”.</p>
	<p>SEA/AA Response:</p> <p>The text changes acknowledge the sectoral climate adaptation plans which were published in 2019 and also refer to the OPW unit of measures, which is the basis for much of OPW’s work. The final text amendment refers to the PFRA maps, which predated the CFRAM maps and clarifies from where these maps originate. The text changes are for clarification purposes and have no environmental or ecological implications.</p> <p>The amendment to Objective FM04 recognises the risk of ground water flooding in what is an area close to Loughmore Common Turlough. The assessment of such flooding patterns should have environmental benefits in that it will prevent development within the flooding boundaries of the Turlough and its environs, which are designated a pNHA.</p>

6	Name/Group:	Irish Water
	Submission:	Response
	1. Capital Investment Plan 2020-2024: The CIP has been approved by the Commission of the Regulation of Utilities (CRU). Work will commence to review and align with Irish Water’s Strategic	1. Capital Investment Plan 2020-2024: Noted

<p>Funding Plan, work plans and programmes.</p> <p>2. The National Water Resources Plan: The NWRP will outline how Irish Water intends to maintain the balance between supply from water sources and demand for drinking water over the short, medium and long-term and is due to be published for public consultation later this year.</p> <p>3. Water Supply: The Southern Environs is supplied by Limerick City Environs Public Water Supply. The Clareville Water Treatment Plant has a capacity of 87Ml/d. The plant currently produces approximately 45Ml/d, supplying approximately 115,000 people. It is envisaged that there will be sufficient spare capacity to accommodate the projected growth over the lifetime of the LAP.</p> <p>4. Wastewater Treatment Plant (WWTP): The Southern Environs is served by the Bunlicky WWTP, which had headroom of approximately 80,000 population equivalents (pe) in 2019. A project is underway to increase the capacity of the treatment plant to 285,000pe. It is envisaged that with the proposed upgrade there will be sufficient spare capacity to accommodate the projected growth over the lifetime of the Local Area Plan. The draft LAP states the WWTP capacity is 130,000pe however, the current capacity of Bunlicky WWTP is approximately 186,000pe.</p> <p>5. Networks: Approximately 1.5km of watermain rehabilitation is underway at Saint Nesson’s Road as part of the Leakage Reduction Programme. A Drainage Area Plan (DAP) is underway and due to be completed in 2024 for the Limerick city agglomeration. A Wastewater Network Development Plan is currently being prepared for the Limerick city agglomeration and will be completed in 2020. This is a high-level study that will help</p>	<p>2. The National Water Resources Plan: Noted</p> <p>3. Water Supply: Noted</p> <p>4. Wastewater Treatment Plant (WWTP): Noted. The reference to the capacity of the Bunlicky Waste Water Treatment Plant will be amended to 186,000PE.</p> <p>5. Networks: Noted</p>
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	<p>inform how undeveloped zoned sites could be serviced.</p> <p>As part of the Mungret Local Infrastructure Housing Activation Fund (LIHAF) project, Irish Water is working with Limerick City and County Council to provide water and wastewater infrastructure, with Phase 1 comprising c. 300m water and wastewater network completed in 2019 and Phase 2 comprising 2.5km watermain and 1.5km wastewater network, expected to commence construction in 2021/ 2022. A review of the serviced land assessment matrix has been carried out and no major constraints were identified.</p> <p>6. Planned road and public realm projects: 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.</p> <p>7. Sustainable Drainage and Green-Blue Infrastructure: Irish Water welcome the inclusion of objectives supporting the implementation of Sustainable Urban Drainage Systems (SuDS). Use of SuDS and Green-Blue Infrastructure in new developments including the public realm and retrofitting in existing developed areas is encouraged.</p>	<p>6. Planned road and public realm projects: Noted</p> <p>7. Sustainable Drainage and Green-Blue Infrastructure: Noted.</p>
Chief Executive's Recommendations:		
<p>1 - 3: No Change</p> <p>4: Amend reference to the capacity of the Bunlicky Waste Water Treatment Plant to 186,000PE.</p>		
<p>SEA/AA Response: This amendment clarifies the capacity of the Bunlicky Waste Water Treatment Plant, and draws attention to the fact that it is greater than the previous figure had indicated.</p>		

7	Name/Group:	Kerry County Council
	Submission:	Response
	No observations to make	Noted

	Chief Executive's Recommendations:
	No Change
	SEA/AA Response: N/A

8	Name/Group:	Cllr. Eddie Ryan on behalf of Dr. Eamon Howard-Bowles
	Submission:	Response
	<p>This observation supports the submission by Dr. Eamon Howard-Bowles in relation to lands at Gleneagle, No. 1 Dooradoyle Road which requests the following:</p> <p>1. Zoning: A change of zoning from “Existing Residential” to “Enterprise and Employment”.</p> <p>2. Zoning Matrix: An amendment of the zoning matrix to identify Health Practitioner and Health Centre as being Generally Permitted in the Enterprise and Employment Zone.</p>	<p>The submission received is noted.</p> <p>1. Zoning: Following consultation with the relevant stakeholders in the Local Authority, it is considered that the change of zoning from “Existing Residential” to “Enterprise and Employment” at this location is not appropriate, having regard to the potential intensification of use at an existing junction, which has limited capacity. Accordingly, it is proposed to retain the use on site as “Existing Residential”.</p> <p>2. Zoning Matrix: Health Practitioner and Health Centres are uses which are “Open for Consideration” in the Enterprise and Employment zone. A use open for consideration is one which the Council may permit where it is satisfied that the suggested form of development will be compatible with the policies and objectives for the zone, will not conflict with existing uses or the proper planning and sustainable development of the area. The Open for Consideration designation allows individual planning applications to be assessed on their merits and on a case by case basis having regard to all relevant planning criteria.</p>
	Chief Executive's Recommendations:	
	1: No Change	
	2: No Change	
	SEA/AA Response: N/A	

9	Name/Group:	RPS on behalf of Tergnum Properties Ltd.
Submission:		Response
<p>1. Zoning: Requesting a change of zoning of 4.6ha. of lands including the Westward Ho Bar and Restaurant, Mungret from Enterprise and Employment to Residential and Local Centre.</p> <p>An Urban Design and Development Strategy has been prepared. The Local Centre zoning of the south-eastern corner of the site would allow some local level retail services, commercial or community facilities adjacent to existing businesses and services within the village core. Mungret village currently has no local convenience retail offering.</p> <p>The proposed rezoning would integrate the outlying northern residential elements of the village into a consolidated urban form. The N69 Foynes to Limerick Road Scheme will significantly alter the traffic regime. Mungret is a gateway to Limerick city and the achievement of an attractive village character should be a strategic objective of the Local Area Plan, having benefits for the wider Mungret-Loughmore area.</p> <p>Residential uses would be compatible with existing residential properties. Development of these lands would fill an existing gap within the existing built up area of Mungret village. With the traffic calming benefits from the Foynes to Limerick Road Scheme the site will be safely connected to the village. This provides an opportunity to consolidate the development of Mungret village and enable a development strategy that will strengthen its character built on an established historic settlement, which is harmonious with the development of the Mungret-Loughmore Masterplan. Development will also enhance connectivity to the existing residential area to the north and north west.</p>		<p>1. Zoning: The National Planning Framework (NPF), the Regional Spatial and Economic Strategy for the Southern Region (RSES) and the Limerick Shannon Metropolitan Area Strategic Plan (MASP) set out targets for population growth for Limerick City and Environs. The NPF supports ambitious growth targets to enable Limerick City to grow by at least 50% to 2040 and to achieve its potential to become a city of scale.</p> <p>The NPF sets out a targeted projection of population growth of 47,000 – 56,000 persons for Limerick City and Suburbs to 2040. The assumed Southern Environs population growth allocation is an additional 7,420 persons over the plan period to 2027. This equates to a projected requirement for an additional 2,968 residential units over the period up to 2027, based on 2.5 persons per household.</p> <p>The Draft LAP identifies approximately 90ha. of zoned land suitable for residential development. In this respect, the undeveloped lands already identified for Local Centres have been included as part of the 90ha. of lands identified as suitable for residential development. The residential capacity of the lands identified is approximately 3,430 units. The lands for residential development have been identified with cognisance to the necessity for future proofing of this suburb beyond the plan period, in order to facilitate the role of Limerick City as a Regional City in accordance with the objectives of the NPF and MASP. Therefore, there is sufficient land zoned over and above that required for the lifetime of the plan. In this regard, the Office of the Planning Regulator is satisfied that sufficient lands have been zoned to cater for projected population growth.</p>

	<p>Development would deliver on the objectives for compact growth which seeks to provide new development on infill and under utilised urban sites.</p> <p>The site does not fall within the existing LK2030 Masterplan boundary, but forms a natural extension of same, in particular following the delivery of the Foynes to Limerick Road scheme. The location of the site within the context of the existing built-up area of Mungret village aligns with the overarching strategic vision for the Limerick Shannon Metropolitan Area to consolidate growth in a coherent spatial manner.</p>	<p>In order to ensure compliance with the higher tier national and regional plans no additional lands can be considered for residential zoning including additional Local Centres during the lifetime of the Draft Southern Environs Local Area Plan 2021 - 2027. The zoning of additional lands would require the de-zoning of other residential lands elsewhere in the Southern Environs.</p>
Chief Executive's Recommendations:		
No Change		
SEA/AA Response N/A		

10	Name/Group:	AK Planning on behalf of Prime Bay Ltd.
	Submission:	Response
	<p>1. Zoning: Requesting the Residential zoning of 0.2ha. at Rathmale, Mungret.</p>	<p>1. Zoning: The National Planning Framework (NPF), the Regional Spatial and Economic Strategy for the Southern Region (RSES) and the Limerick Shannon Metropolitan Area Strategic Plan (MASP) set out targets for population growth for Limerick City and Environs. The NPF supports ambitious growth targets to enable Limerick City to grow by at least 50% to 2040 and to achieve its potential to become a city of scale.</p> <p>The NPF sets out a targeted projection of population growth of 47,000 – 56,000 persons for Limerick City and Suburbs to 2040. The assumed Southern Environs population growth allocation is an additional 7,420 persons over the plan period to 2027. This equates to a projected requirement for an additional 2,968 residential units over the period up to 2027, based on 2.5 persons per household.</p>

	<p>2. Infrastructure: The submission outlines that the lands are serviced by an extension to the municipal foul and stormwater network, are located within a 50km/hr speed zone, served by public lighting, within the existing settlement plan, adjoining lands subject to planning permission for 20 units, 400m from Mungret Village and associated services/amenities, close proximity to Mungret Park, motorway, Raheen, schools, UHL, city centre and sports clubs.</p>	<p>The Draft LAP identifies approximately 90ha. of zoned land suitable for residential development. The residential capacity of the lands identified is approximately 3,430 units. The lands for residential development have been identified with cognisance to the necessity for future proofing of this suburb beyond the plan period, in order to facilitate the role of Limerick City as a Regional City in accordance with the objectives of the NPF and MASP. Therefore, there is sufficient land zoned over and above that required for the lifetime of the plan. In this regard, the Office of the Planning Regulator is satisfied that sufficient lands have been zoned to cater for projected population growth. In order to ensure compliance with the higher tier national and regional plans no additional lands can be considered for residential zoning during the lifetime of the Draft Southern Environs Local Area Plan 2021 - 2027. The zoning of additional lands would require the de-zoning of other residential lands elsewhere in the Southern Environs.</p> <p>2. Infrastructure: Following consultation with the relevant stakeholders in the Local Authority concerns have been highlighted in relation to the capacity of existing services and infrastructure to serve additional development on the L1402. In this respect, the existing road network does not have capacity to cater for the free flow of traffic movements associated with any further development. There are no proposals for the upgrade of the carrying capacity of this local road. In addition, the local road is also lacking in pedestrian and cycle connections to Mungret village. In the absence of existing or planned services over the lifetime of this plan, these lands are unsuitable for residential development. The zoning of these lands would therefore be contrary to Objective 72c of the NPF which states “When considering zoning land for development purposes that cannot be</p>
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		serviced within the life of the relevant plan, such lands should not be zoned for development”.
	Chief Executive’s Recommendations:	
	No Change	
	SEA/AA Response N/A	

11	Name/Group:	AK Planning on behalf of Seamus Hayes
	Submission:	Response
	<p>1. Zoning: Requesting the Residential zoning of 0.74ha. at Rathmale, Mungret.</p>	<p>1. Zoning: The National Planning Framework (NPF), the Regional Spatial and Economic Strategy for the Southern Region (RSES) and the Limerick Shannon Metropolitan Area Strategic Plan (MASP) set out targets for population growth for Limerick City and Environs. The NPF supports ambitious growth targets to enable Limerick City to grow by at least 50% to 2040 and to achieve its potential to become a city of scale.</p> <p>The NPF sets out a targeted projection of population growth of 47,000 – 56,000 persons for Limerick City and Suburbs to 2040. The assumed Southern Environs population growth allocation is an additional 7,420 persons over the plan period to 2027. This equates to a projected requirement for an additional 2,968 residential units over the period up to 2027, based on 2.5 persons per household.</p> <p>The Draft LAP identifies approximately 90ha. of zoned land suitable for residential development. The residential capacity of the lands identified is approximately 3,430 units. The lands for residential development have been identified with cognisance to the necessity for future proofing of this suburb beyond the plan period, in order to facilitate the role of Limerick City as a Regional City in accordance with the objectives of the NPF and MASP. Therefore, there is sufficient land zoned over and above that required for the lifetime of the plan. In this regard, the Office of the Planning Regulator is satisfied that sufficient</p>

	<p>2. Infrastructure: The submission outlines that the lands are serviced by an extension to the municipal foul and stormwater network, are located within a 50km/hr speed zone, served by public lighting, within the existing settlement plan, adjoining lands subject to planning permission for 20 units, 400m from Mungret Village and associated services/amenities, close proximity to Mungret Park, motorway, Raheen, schools, UHL, city centre and sports clubs.</p>	<p>lands have been zoned to cater for projected population growth. In order to ensure compliance with the higher tier national and regional plans no additional lands can be considered for residential zoning during the lifetime of the Draft Southern Environs Local Area Plan 2021 - 2027. The zoning of additional lands would require the de-zoning of other residential lands elsewhere in the Southern Environs.</p> <p>2. Infrastructure: Following consultation with the relevant stakeholders within the Local Authority concerns have been highlighted in relation to the capacity of existing services and infrastructure to serve additional development on the L1402. In this respect, the existing road network does not have capacity to cater for the free flow of traffic movements associated with any further development. There are no proposals for the upgrade of the carrying capacity of this local road. In addition, the local road is also lacking in pedestrian and cycle connections to Mungret village. In the absence of existing or planned services over the lifetime of this plan, these lands are unsuitable for residential development. The zoning of these lands would therefore be contrary to Objective 72c of the NPF which states “When considering zoning land for development purposes that cannot be serviced within the life of the relevant plan, such lands should not be zoned for development”.</p>
	Chief Executive’s Recommendations:	
	No Change	
	SEA/AA Response: N/A	

12	Name/Group:	AK Planning on behalf of Robert Long
	Submission:	Response
	1. Zoning: Requesting the Residential zoning of lands at Rathmale, Mungret.	1. Zoning: The National Planning Framework (NPF), the Regional Spatial and Economic Strategy for the Southern Region (RSES) and

	<p>2. Infrastructure: The submission outlines that the lands are serviced by an extension to the municipal foul and stormwater</p>	<p>the Limerick Shannon Metropolitan Area Strategic Plan (MASP) set out targets for population growth for Limerick City and Environs. The NPF supports ambitious growth targets to enable Limerick City to grow by at least 50% to 2040 and to achieve its potential to become a city of scale.</p> <p>The NPF sets out a targeted projection of population growth of 47,000 – 56,000 persons for Limerick City and Suburbs to 2040. The assumed Southern Environs population growth allocation is an additional 7,420 persons over the plan period to 2027. This equates to a projected requirement for an additional 2,968 residential units over the period up to 2027, based on 2.5 persons per household.</p> <p>The Draft LAP identifies approximately 90ha. of zoned land suitable for residential development. The residential capacity of the lands identified is approximately 3,430 units. The lands for residential development have been identified with cognisance to the necessity for future proofing of this suburb beyond the plan period, in order to facilitate the role of Limerick City as a Regional City in accordance with the objectives of the NPF and MASP. Therefore, there is sufficient land zoned over and above that required for the lifetime of the plan. In this regard, the Office of the Planning Regulator is satisfied that sufficient lands have been zoned to cater for projected population growth. In order to ensure compliance with the higher tier national and regional plans no additional lands can be considered for residential zoning during the lifetime of the Draft Southern Environs Local Area Plan 2021 - 2027. The zoning of additional lands would require the de-zoning of other residential lands elsewhere in the Southern Environs.</p> <p>2. Infrastructure: Following consultation with the relevant stakeholders within the Local Authority concerns have been highlighted in</p>
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	<p>network, are located within a 50km/hr speed zone, served by public lighting, within the existing settlement plan, adjoining lands subject to planning permission for 20 units, 400m from Mungret Village and associated services/amenities, close proximity to Mungret Park, motorway, Raheen, schools, UHL, city centre and sports clubs.</p>	<p>relation to the capacity of existing services and infrastructure to serve additional development on the L1402. In this respect, the existing road network does not have capacity to cater for the free flow of traffic movements associated with any further development. There are no proposals for the upgrade of the carrying capacity of this local road. In addition, the local road is also lacking in pedestrian and cycle connections to Mungret village. In the absence of existing or planned services over the lifetime of this plan, these lands are unsuitable for residential development. The zoning of these lands would therefore be contrary to Objective 72c of the NPF which states “When considering zoning land for development purposes that cannot be serviced within the life of the relevant plan, such lands should not be zoned for development”.</p>
	<p>Chief Executive’s Recommendations:</p>	
	<p>No Change</p>	
	<p>SEA/AA Response: N/A</p>	

<p>13</p>	<p>Name/Group:</p>	<p>Michael Begley</p>
	<p>Submission:</p>	<p>Response</p>
	<p>1. Zoning: Requests the zoning of 3.9ha. for Low Density Residential at the Caher Road, south of Mungret Village.</p> <p>The lands which are presently zoned Agriculture have the benefit of public water and sewerage services. Low density residential would be sympathetic to existing developments to the north and west. Dwellings fronting Caher Road would be single storey to preserve existing amenity.</p> <p>Considering the future development of Mungret under education, sports and recreation, commercial and light industry, the observer understands some lands currently zoned residential may have to be</p>	<p>1. Zoning: The National Planning Framework (NPF), the Regional Spatial and Economic Strategy for the Southern Region (RSES) and the Limerick Shannon Metropolitan Area Strategic Plan (MASP) set out targets for population growth for Limerick City and Environs. The NPF supports ambitious growth targets to enable Limerick City to grow by at least 50% to 2040 and to achieve its potential to become a city of scale.</p> <p>The NPF sets out a targeted projection of population growth of 47,000 – 56,000 persons for Limerick City and Suburbs to 2040. The assumed Southern Environs population growth allocation is an additional 7,420 persons over the plan period to 2027. This equates to a projected requirement for an</p>

<p>rezoned to reduce residential zoning below the Core Strategy guidelines.</p> <p>In view of the projected employment growth of Limerick City and Environs over the next 10 years and with proposed projects such as the expansion of UL, Opera Site, Uber, N69 upgrade, expansion of University Hospital, Regeneron etc. estate agents are seeing a steady growth in demand for sites outside but close to the city.</p>	<p>additional 2,968 residential units over the period up to 2027, based on 2.5 persons per household.</p> <p>The Draft LAP identifies approximately 90ha. of zoned land suitable for residential development. The residential capacity of the lands identified is approximately 3,430 units. The lands for residential development have been identified with cognisance to the necessity for future proofing of this suburb beyond the plan period, in order to facilitate the role of Limerick City as a Regional City in accordance with the objectives of the NPF and MASP. Therefore, there is sufficient land zoned over and above that required for the lifetime of the plan. In this regard, the Office of the Planning Regulator is satisfied that sufficient lands have been zoned to cater for projected population growth. In order to ensure compliance with the higher tier national and regional plans no additional lands can be considered for residential zoning during the lifetime of the Draft Southern Environs Local Area Plan 2021 - 2027. The zoning of additional lands would require the de-zoning of other residential lands elsewhere in the Southern Environs.</p> <p>Infrastructure: Following consultation with the relevant stakeholders within the Local Authority concerns have been highlighted in relation to the capacity of existing services and infrastructure to serve additional development on the L1402. In this respect, the existing road network does not have capacity to cater for the free flow of traffic movements associated with any further development. There are no proposals for the upgrade of the carrying capacity of this local road. In addition, the local road is also lacking in pedestrian and cycle connections to Mungret village. In the absence of existing or planned services over the lifetime of this plan, these lands are unsuitable for residential development. The zoning of these lands would therefore be contrary to Objective 72c of the NPF which</p>
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		states “When considering zoning land for development purposes that cannot be serviced within the life of the relevant plan, such lands should not be zoned for development”.
	Chief Executive’s Recommendations:	
	No Change	
	SEA/AA Response: N/A	

14	Name/Group:	MKO Planning and Environmental Consultants on behalf of Dwellings Development Ltd.
	Submission:	Response
	<p>1. General: Requesting the zoning of lands at Cois na Cille, Mungret and alterations to the LAP as follows:</p> <p>A Masterplan has been prepared to provide a high-quality mixed-use (residential and community) development. Following discussions with Limerick City and County Council planning applications have been lodged for 96 units (20/1114), 96 units (20/1115) and 7 units (20/1188).</p> <p>The designation of lands for Industrial development immediately adjacent to residentially zoned lands is not a compatible land use, with issues in respect of residential amenity (noise, dust, odour etc.). Encroachment of industrial land on two parcels of residential lands makes delivering high quality pedestrian, cycle and vehicular connectivity challenging. The Industrial zoning in the current SELAP and the encroachment of Industrial and Open Space & Recreation land use zoning (Draft SELAP) on the site make it challenging to secure orderly and progressive development. An existing 750mm/800mm surface water sewer and a 375mm foul water sewer traverse the lands. The zoning undermines the strategic infrastructure investment.</p>	<p>1. General: Noted. The issue in relation to the zoning of this lands relates to flooding:</p> <p>The lands have been recommended for de-zoning on the basis of the location of the lands within Flood Zones A, B and C. The submission has been reviewed by JBA Consulting Engineers, who have been engaged by the Local Authority to carry out a Strategic Flood Risk Assessment for to inform the proposed zoning.</p>

<p>Some of the areas which are referred to in the amendments will require some degree of infilling in order to raise existing ground levels. 3D representations of the development have been submitted.</p> <p>2. Amendment No.1a: Seeking a change from Open Space & Recreation to New Residential zoning and Amendment No.1b: Seeking a change from Industrial to New Residential zoning.</p> <p>The zoning correlates to the Stage 1 Strategic Flood Risk Assessment (SFRA). This area forms part of planning applications for residential development. The Site-Specific Flood Risk Assessment (SSFRA) concludes that this location is suitable for residential development. These lands are serviced by infrastructure and have passed the Justification Test of the Flood Risk Guidelines.</p> <p>3. Amendment No. 1c: Seeking a change from Industrial to Education and Community Infrastructure zoning. The planning applications lodged identify this area for the provision of a crèche. The Draft Local Area Plan represents an opportunity to zone these lands in accordance with the proposal outlined in the live planning applications.</p> <p>4. Amendment No. 2: Seeking a change from Industrial to New Residential zoning. Industrial zoning does not represent the optimum land use. The Supplementary Specific Flood Risk Assessment and associated Justification Test demonstrate that these lands are suitable for residential development.</p> <p>5. Amendment No.3: Seeking a change from Industrial to Education and Community Infrastructure zoning. This would facilitate a community facility/ nursing home as well as associated assisted living units. The designation of lands for Industrial</p>	<p>2. Amendment No. 1: Lands are entirely within Flood Zone A. These lands would not pass the justification test for vulnerable uses including residential (see further below).</p> <p>3. Amendment 1c: Lands are entirely within Flood Zone A. These lands would not pass the justification test for vulnerable uses including a crèche (see further below).</p> <p>4. Amendment No. 2: Lands are entirely within Flood Zone A. These lands would not pass the justification test for vulnerable uses including residential, community facilities/nursing homes (see further below).</p> <p>5. Amendment No. 3: Lands are entirely within Flood Zone A. These lands would not pass the justification test for vulnerable uses including community facilities/ nursing homes (see further below).</p>
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<p>development immediately adjacent to residentially zoned lands is not a compatible land use and does not accord with proper planning and sustainable development. These lands have been subject to an Abridged Supplementary Strategic Flood Risk Assessment and associated Justification Test which demonstrates that they are suitable for the 'Education and Amenity Infrastructure' zoning. A large area of open space as part of any future development proposal will be provided on this site.</p> <p>6. Amendment No.4: Seeking a change from Industrial to New Residential zoning. These lands are not at risk from the flood extents identified in the Stage 1 Strategic Flood Risk Assessment. Development of these lands would facilitate the natural extension of the residential area subject of the live planning application.</p> <p>7. Site Specific Flood Risk Assessment: by Langan Consulting Engineers</p> <p>The majority of the proposed development is located in Flood Zone C. A portion of the proposed development is located in Flood Zone A and B. However, Flood Zone A and B are in an area defended against coastal flooding from the River Shannon.</p> <p>A Justification Test for the development outside Flood Zone C is deemed to meet the requirements of the OPW "Planning System and Flood Risk Management Guidelines". Therefore, the proposed use of the site classified as Flood Zones A and B for development is deemed acceptable.</p> <p>Existing low-lying areas of the development shall be raised to levels above the safe design flood level (coastal). Given the location of the development in an area defended against coastal flooding from the River Shannon and the interruption of the historic link to the River Shannon by infilling</p>	<p>6. Amendment No.4: – Largely within Flood Zone A. These lands would not pass the justification test for vulnerable uses including residential (see further below)</p> <p>7. Site Specific Flood Risk Assessment: The submission includes a site specific flood risk assessment (SSFRA) which relates to two residential land parcels within the subject site. The SSFRA does not address some of the fundamental points in relation to development of the site, such as:</p> <ul style="list-style-type: none"> • The site is defended, and breach of the agricultural embankments should be considered; • The site is located on the margins of the defended extent so does not provide conveyance and only marginal storage; • Filling the site will not impact on neighbouring lands. The SSFRA notes impacts will be marginal, but in fact impacts are limited by the risk being from coastal flooding and the fact the site and neighbouring lands are defended. <p>Notwithstanding the omissions in the SSFRA, the following is considered:</p>
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<p>and development downstream, it is unlikely the development or the development lands is at a significant risk of coastal flooding. There is no record of any flood history at the site. Therefore, the proposed development, including infilling, is likely to have negligible impact on the flood storage in the area.</p> <p>Abridged Supplementary Strategic Flood Risk Assessment by Langan Consulting Engineers:</p> <p>Existing low-lying areas of the site will be raised to levels above the safe design flood level (coastal) as outlined in the SSFRA1. Given the location of the site in an area defended against coastal flooding from the River Shannon and the interruption of the historic link to the River Shannon by infilling and development downstream, it is unlikely the site is at risk of coastal flooding.</p> <p>The site is at the downstream end of the defended area, i.e. infilling will not impact upstream flooding and the site is the last area that River Shannon flooding will reach in the event the defences fail. Minimal infilling would be required to move the lands out of Flood Zone A and Flood Zone B and the infilling would have negligible impact on flood storage in the area.</p> <p>The Masterplan site will include the following measures to remove or reduce the risk of flooding:</p> <ul style="list-style-type: none"> • All buildings and access/ egress will be provided at or greater than the design flood levels proposed within the SSFRA1. • The site drainage system will include appropriate storm water attenuation prior to discharge during extreme events. • The drainage system will be designed to minimise flood risk and will include sustainable flood risk measures such as SuDS where suitable. 	<p>The OPW CFRAM produced a number of outputs, including defended (current scenario) flood extents and depths, defended areas (which are those areas which would flood in a 0.5% AEP event if the defences were completely removed, and is comparable with Flood Zone A) and breach outlines (which are the extents resulting from a localised failure of the defences).</p> <p>Under the Shannon CFRAM Study outputs, the subject site is shown to be within the defended area, behind the Shannon embankments, which were constructed for agricultural purposes. However, it is within the Flood Zones as follows:</p> <ul style="list-style-type: none"> • Area 4 – Largely within Flood Zone A. Flood Zone B is undefined on the CFRAM mapping • Area 1c, 2 and 3 – Entirely within Flood Zone A. <p>It should also be noted that parts of Plot 1a and 1b are also within Flood Zone A, with Flood Zone B undefined.</p> <p>While the submission outlines that the requested changes meets the justification test the Planning Authority considers that the delivery of a residential and community development on this site, is not essential to achieve compact urban growth. Furthermore, suitable alternative lands are already zoned for development within and adjoining the core of the city, including a range of infill and brownfield lands such as Cleaves, Opera Centre, LDA Lands, Limerick Waterfront, Pa Healy Road, Punches Cross, Eircom site etc. Substantial residential zoned lands are also located in the Southern Environs & Castletroy LAP areas outside of flood zones.</p> <p>Having regard to the above the zoning of these greenfield lands located within Flood Zone A and B does not pass the Justification Test.</p>
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<p>The following are key components in the management of residual risk for this area:</p> <ul style="list-style-type: none"> • All buildings and access/ egress will be provided at or greater than the design flood levels proposed within the SSFRA1. • Emergency access from all buildings will be safe guarded through the site layout configuration. • The site drainage system for the subject development will include appropriate stormwater attenuation prior to discharge during extreme events. • The landscaped areas within the site will be optimised to ensure infilling is minimised and to maintain existing flood storage where possible. • Existing drains, culverts, gullies and drainage systems will be maintained. <p>The site is deemed to meet the requirements of the Justification Test as outlined in the OPW “Planning System and Flood Risk Management Guidelines”. Therefore, the use of the site classified as Flood Zones A and B for the proposed land-use zoning is acceptable.</p> <p>8. Roads: An indicative link road traverses the north-western corner of the lands. Requests the route alignment be relocated to the west of the site. This will facilitate the public transport, pedestrian and bicycle linkages in Objective TM 013, servicing the lands and lands further west, but will avoid sterilising serviced residential lands.</p> <p>9. Zoning Matrix: The provision of Childcare Facilities on ‘Industrial’ zoned lands should be permitted in the zoning matrix.</p>	<p>An SFRA for the lands has been forwarded to JBA Engineers. Several omissions have been identified in the SFRA. The extents of Flood Zone A and B for this location will be defined more precisely using the CFRAM Flood Zone Mapping and the second generation PFRA mapping.</p> <p>The zoning of these greenfield lands located within Flood Zone A and B for residential and education and community infrastructure is not acceptable. The zoning of these lands for highly vulnerable uses does not pass the Justification Test. The proposed zoning for less vulnerable uses should be retained.</p> <p>8. Roads: An indicative proposal for a link road traversing part of these lands has been outlined on the Transport Map. The line of the proposed indicative link road can be amended.</p> <p>9. Zoning Matrix: The observer has requested the amendment of the zoning matrix to permit childcare facilities in Industrial zoned areas. The proposed Zoning Matrix states that Childcare Facilities are Not Permitted in Industrial zones. While it is acknowledged that childcare facilities should be available for working populations in the vicinity of the workplace, the provision of childcare facilities in industrial zones is considered contrary to proper planning. In this regard, the objective</p>
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		for Industrial zones is as follows: “To provide for specialised and heavy industrial development and associated employment creation”, and purpose “To provide employment locations specifically for heavy and specialised industry associated with environmental emissions including noise, dust and odour (e.g. waste processing, aggregate processing etc.) and with intensive or hazardous processing (e.g. Seveso) which may give rise to land use conflict if located within other land use zones”. These areas are therefore not considered appropriate for the provision of childcare facilities in the interests of health and safety.
	Chief Executive’s Recommendations:	
	<p>1-7: No Change</p> <p>8: Amend Transport Map to realign the indicative link road in this area outside of the observer’s landholding.</p> <p>9: No Change</p>	
	SEA/AA Response:	The routes lie within zoned areas of the plan and the alterations are minor, there are no environmental effects as the areas are already developed.

15	Name/Group:	RW Nowlan & Associates on behalf of DW Raheen
	Submission:	Response
	<p>1. Zoning: Requests a change in zoning from “Open Space & Recreation” to “New Residential” at Ballykeeffe, to the south of the N18 Limerick Southern Ring Road.</p> <p>The objective for Open Space and Recreation has not been achieved, the lands are not accessible to the public and are in agricultural use. A neighbourhood park has been provided in Mungret and adequately provides for the needs of residents at a neighbourhood level.</p> <p>A pre-application consultation has been lodged with An Bord Pleanala for Strategic Housing Development (ABP-307185-20).</p>	<p>1. Zoning: The National Planning Framework (NPF), the Regional Spatial and Economic Strategy for the Southern Region (RSES) and the Limerick Shannon Metropolitan Area Strategic Plan (MASP) set out targets for population growth for Limerick City and Environs. The NPF supports ambitious growth targets to enable Limerick City to grow by at least 50% to 2040 and to achieve its potential to become a city of scale.</p> <p>The NPF sets out a targeted projection of population growth of 47,000 – 56,000 persons for Limerick City and Suburbs to 2040. The assumed Southern Environs population growth allocation is an additional 7,420</p>

<p>The proposed layout has made provision for future development on the subject lands.</p> <p>The ‘infill development’ lands provide an opportunity to achieve compact growth within the overall footprint of the city and suburbs. Development on the site is in accordance with the sequential principle as the lands are enclosed to the south and south east by established housing development.</p> <p>New residential development can be integrated with proposed residential development on the adjoining site to the west if planning permission is granted.</p> <p>A linear area of public open space along the northern boundary of the lands can ensure quality provision of green infrastructure, as this area will be connected to areas of open space as well as to the disused railway line, a potential greenway route.</p> <p>Residential development on the subject site can enhance the implementation of green infrastructure and achieve proximity of future residents to such infrastructure.</p> <p>Compact growth with increased densities can address the challenges of climate change, reducing energy consumption in terms of embodied energy in building materials, reduced space heating requirements and reduced transport energy use. New residential development can address climate change challenges by setting minimum finished floor levels, and provide adequate capacity for sustainable urban drainage.</p>	<p>persons over the plan period to 2027. This equates to a projected requirement for an additional 2,968 residential units over the period up to 2027, based on 2.5 persons per household.</p> <p>The Draft LAP identifies approximately 90ha. of zoned land suitable for residential development. The residential capacity of the lands identified is approximately 3,430 units. The lands for residential development have been identified with cognisance to the necessity for future proofing of this suburb beyond the plan period, in order to facilitate the role of Limerick City as a Regional City in accordance with the objectives of the NPF and MASP. Therefore, there is sufficient land zoned over and above that required for the lifetime of the plan. In this regard, the Office of the Planning Regulator is satisfied that sufficient lands have been zoned to cater for projected population growth. In order to ensure compliance with the higher tier national and regional plans no additional lands can be considered for residential zoning during the lifetime of the Draft Southern Environs Local Area Plan 2021 - 2027. The zoning of additional lands would require the de-zoning of other residential lands elsewhere in the Southern Environs.</p>
<p>Chief Executive’s Recommendations:</p>	
<p>No Change</p>	
<p>SEA/AA Response: N/A</p>	

16	Name/Group:	Garland Concepts Realised on behalf of Laurence & Elizabeth Lahiff
	Submission:	Response
	<p>1. Zoning: Requests the zoning of lands at Ballykeeffe as follows:</p> <p>a: Retain at least 2ha. of residential zoned lands within Flood Zone A;</p> <p>b: Rezone lands from Agricultural to Residential or Mixed Use.</p> <p>Under the Draft LAP the area of new residential has been reduced from 2ha. to 0.4ha. The zoning has changed from Residential to Enterprise & Employment and the Agriculture zoning has been retained.</p> <p>The lands are serviceable with foul and surface water sewers, located 200m from a bus route, within walking/ cycling distance to Raheen, UHL, Crescent and the City Centre and close to amenities and schools. This makes these lands suitable for infill development adjoining the city boundary. The agricultural landholding is too small to sustain modern farming. Farming activities will be discontinued within the lifetime of the LAP.</p>	<p>1. Zoning: The National Planning Framework (NPF), the Regional Spatial and Economic Strategy for the Southern Region (RSES) and the Limerick Shannon Metropolitan Area Strategic Plan (MASP) set out targets for population growth for Limerick City and Environs. The NPF supports ambitious growth targets to enable Limerick City to grow by at least 50% to 2040 and to achieve its potential to become a city of scale.</p> <p>The NPF sets out a targeted projection of population growth of 47,000 – 56,000 persons for Limerick City and Suburbs to 2040. The assumed Southern Environs population growth allocation is an additional 7,420 persons over the plan period to 2027. This equates to a projected requirement for an additional 2,968 residential units over the period up to 2027, based on 2.5 persons per household.</p> <p>The Draft LAP identifies approximately 90ha. of zoned land suitable for residential development. The residential capacity of the lands identified is approximately 3,430 units. The lands for residential development have been identified with cognisance to the necessity for future proofing of this suburb beyond the plan period, in order to facilitate the role of Limerick City as a Regional City in accordance with the objectives of the NPF and MASP. Therefore, there is sufficient land zoned over and above that required for the lifetime of the plan. In this regard, the Office of the Planning Regulator is satisfied that sufficient lands have been zoned to cater for projected population growth. In order to ensure compliance with the higher tier national and regional plans no additional lands can be considered for residential zoning during the lifetime of the Draft Southern Environs Local Area Plan 2021 - 2027. The zoning of additional lands would require the de-zoning of other</p>

<p>2. Flooding: CFRAMS maps indicate that the lands are in a “defended area” up to the 1/200 year event. These existing defences (embankments and sluices) protect hundreds of existing houses in Ballykeeffe. These defences are comprehensively maintained by the OPW under the Arterial Drainage Act. Given the extent of defended lands, there can be no question of them being allowed to fall into disrepair.</p> <p>The defences were constructed when the housing development at Ballykeeffe Estate was either completed or under construction. The embankments were constructed in the knowledge that they were not solely protecting agricultural lands. Since the construction of the embankments the lands have not flooded. The parts of the lands which are protected by these flood defences should be zoned for development.</p> <p>These lands meet the requirements for sustainable development under the Flood Risk Management Guidelines. The use of the Justification Test when assessing flood risk is appropriate. The lands adjacent to the city boundary and established residential and industrial developments contribute to the compact development of the City and avoid urban sprawl.</p> <p>A detailed Flood Risk Assessment would accompany any future planning application. This Flood Risk Assessment would include a justification test for the proposed development outlining in detail how the proposals would achieve full compliance with the Flood Risk Management Guidelines 2009.</p>	<p>residential lands elsewhere in the Southern Environs.</p> <p>2. Flooding: The subject lands are located within designated Flood Zones. The OPW submission welcomes that “highly vulnerable” land uses such as dwellings have not been designated within Flood Zone A in the Draft LAP.</p> <p>The OPW submission outlines that the flood defences are in the ownership of various parties, of varying standards of protection and were built to protect agricultural lands and hence may be prone to failure in flood conditions. The OPW state that the benefitting areas cannot be considered as defended and cannot be relied as providing protection to the benefitting areas. This is compounded in the guidelines which state “the presence of flood defence structures should be ignored in determining flood zones” as defended areas still carry a residual risk of flooding from overtopping, failure of the defences and deterioration due to lack of maintenance.</p> <p>The flood defence protects a flood cell which is larger than just the site in question, so any works to provide a greater standard of protection, or reduction in residual risk, would need to focus on the whole length of defence and not just that within the subject lands and control of the applicant. For planning purposes it is recommended that all sites be considered as undefended as per the Guidelines. Loss of flood storage or blockage of flow paths within existing defended areas on the floodplain can exacerbate flooding to other properties within the defences in the event that such defences are overtopped. It is therefore considered that decisions to rezone land behind the defences is premature until such a time as the Limerick Flood Relief Scheme has been concluded.</p> <p>The subject lands would not pass the Development Plan Justification Test in</p>
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		<p>accordance with the Section 28 Flood Risk Management Guidelines (2009). The lands are defended by embankments for agricultural lands and not for development lands. Development of these lands would not be “essential to facilitate regeneration and or expansion of the centre of the urban settlement”, or “essential in achieving compact or sustainable urban growth” and “suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement” are available (2009 Guidelines).</p> <p>3. Noise: Road traffic noise levels are expected to be excessive across these lands, based on the strategic noise mapping being between 55-75 dB Lden (a 24 hour average indicator) (60-75 dB Lden within approx. 120 metres of the N18) and 45-65 dB Lnight (an 8 hr night-time indicator) (50-65 dB Lden within approx. 150 metres of the N18). This issue has already resulted in the de-zoning of lands elsewhere in Castletroy and the Southern Environs.</p>
	Chief Executive’s Recommendations:	
	No Change	
	SEA/AA Response: N/A	

17	Name/Group:	Dr. Eamon Howard-Bowles
	Submission:	Response
	<p>1. Zoning: A change of zoning at Gleneagle, No. 1 Dooradoyle Road from “Existing Residential” to “Enterprise and Employment”.</p> <p>The existing residential property has been vacant since 2015 and is in a state of disrepair. The observer wishes to convert/rebuild the property as an Orthodontic Clinic. The proposal would improve the vitality and visual amenity of the streetscape at this location</p>	<p>1. Zoning: Following consultation with the relevant stakeholders in the Local Authority, It is considered that the change of zoning from “Existing Residential” to “Enterprise and Employment” at this location is not appropriate, having regard to the potential intensification of use at an existing junction, which has limited capacity. Accordingly, it is proposed to retain the use on site as “Existing Residential”.</p>

	<p>Lands zoned Enterprise and Employment, Local Centre, Residential and Education and Community Infrastructure adjoin the site. The proposal represents a logical and natural extension of the immediately adjoining Enterprise and Employment zone and allows integration with the established uses. The proposed use is not in conflict with the surrounding uses.</p> <p>The Orthodontic Clinic would be served by on site car parking in accordance with Development Plan Standards and is well served by bus links, pedestrian and cycle links</p> <p>2. Zoning Matrix: The zoning of the lands for Enterprise and Employment would facilitate a Health Clinic/ Health Practitioner Clinic. These uses are “Open for Consideration” in the Enterprise and Employment Zone. An amendment to allow these uses to be “Generally Permitted” is required. An amendment of the zoning matrix to identify Health Practitioner and Health Centre as being Generally Permitted in the Enterprise and Employment Zone.</p>	<p>2. Zoning Matrix: Health Practitioner and Health Centres are uses which are “Open for Consideration” in the Enterprise and Employment zone. A use open for consideration is one which the Council may permit where it is satisfied that the suggested form of development will be compatible with the policies and objectives for the zone, will not conflict with existing uses or the proper planning and sustainable development of the area.</p> <p>The Open for Consideration designation allows individual planning applications to be assessed on their merits and on a case by case basis having regard to all relevant planning criteria.</p>
	Chief Executive’s Recommendations:	
	No Change	
	SEA/AA Response: N/A	

18	Name/Group:	John Spain on behalf of Clancourt
	Submission:	Response
	<p>1. General: Clancourt is the owner of 30.8 ha. at Dooradoyle, which includes the Crescent Shopping Centre.</p> <p>The NPF, Apartment Guidelines and Urban Development & Building Height Guidelines, emphasis sustainable compact urban</p>	<p>1. General: The Draft Southern Environs LAP has been prepared having regard to the higher level national, regional and local policy documents, in addition to Guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended). The Office of the Planning Regulator has assessed</p>

<p>growth, and the need to significantly grow the population of cities. This must be reflected in the structure and content of the LAP. The Southern Region RSES and Metropolitan Area Strategic Plan (MASP) for Limerick sets out a requirement that at least 50% of all housing be located within the footprint of the existing built-up area of the city and suburbs. The LAP is being prepared in advance of the proposed new Limerick Development Plan 2022-2028. The LAP policies and objectives must be consistent with the RSES and NPF, as well as the current Limerick County Development Plan 2010-2016, as extended.</p> <p>The Southern Environs is proximate to the city centre and Dooradoyle is part of the built up area of the city and suburbs. The Dooradoyle District Centre should be recognised and designated as a Strategic Employment Location given its potential to accommodate in the region of 3,000 additional jobs, with 1,500 already employed in the Shopping Centre and 300-400 within the Council offices and library. The development policies and objectives fail to maximise the potential to achieve National Strategic Objectives and do not adequately cater for the potential of strategic employment and housing locations on major public transport corridors which could promote sustainable compact growth.</p> <p>2. Economic Development: Given the existing employment numbers and potential for primarily office based employment, the Crescent Shopping Centre should be designated as a Strategic Employment Location with the following objectives:</p> <p>Phase 1A:</p> <ul style="list-style-type: none"> • New Office building for 450 staff • Minor convenience retail expansion for existing occupier • Reconfigurations of existing retail space 	<p>the draft LAP against the policy objectives, goals, guiding principles and national enablers for the Limerick Shannon MASP, and relevant regional policy objectives. The Office’s assessment considers <i>“that the policies and development framework in the draft LAP are generally consistent with the relevant policy objectives in the RSES, in particular those relating to population growth and economic development for the Limerick-Shannon MASP area”</i>.</p> <p>This LAP is an interim plan, pending the adoption of the proposed Limerick Development Plan in 2022. The area covered by the Southern Environs LAP, in conjunction with the area covered by the Castletroy LAP 2019 – 2025 will then be incorporated into the proposed Limerick Development Plan. The two aforementioned LAPs will then be revoked.</p> <p>2. Economic Development: In accordance with the Regional Spatial and Economic Strategy, the Metropolitan Area has capacity for economic expansion of scale at Strategic Employment Locations outside of the City Centre. In the Southern Environs, Raheen Business Park and the University Hospital Limerick have been identified in the RSES as Strategic Employment Locations.</p> <p>The LAP supports opportunities for employment creation, business and technology development in the Southern</p>
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<p>Phase 1B:</p> <ul style="list-style-type: none"> • New Office building for 450 staff • New restaurants • Modest retail expansion of c. 500sq.m <p>Phase 2A:</p> <ul style="list-style-type: none"> • Two New Office buildings to accommodate 700 staff • Restaurant/ café space, <p>Phase 2B:</p> <ul style="list-style-type: none"> • c. 250 residential units <p>Phase 2C:</p> <ul style="list-style-type: none"> • Two New Office buildings to accommodate 700 staff • Outdoor activity hub <p>Phase 2D:</p> <ul style="list-style-type: none"> • c. 85 residential units <p>Phase 3:</p> <ul style="list-style-type: none"> • New public street and plaza with “on street” retail and retail services units (c. 4,300sq.m) • Local retail units around a public plaza (c. 1,600sq.m) • Medical/ own door office units, (c. 1300sq.m) • Two New Office buildings to accommodate 700 staff • Restaurant/café space • Multi storey car park. <p>This development would be realised on undeveloped lands to the north of the Crescent and through the development of the existing extensive surface car parking. Development objectives that may assist in realising the potential of the Dooradoyle District Centre and Dooradoyle Urban Quarter lands includes the following:</p> <ul style="list-style-type: none"> • To promote the continued development of the lands as a Strategic Employment Location through the delivery of employment uses (primarily office) in a phased manner in conjunction with retail, 	<p>Environs to facilitate economic growth of the Metropolitan Area outside of the RSES identified Strategic Employment Locations on appropriately zoned lands, including the existing District Centre zone. This is substantiated through the Strategic Policy for Economic Development, which states that it is an objective <i>“To promote, facilitate and enable economic development and employment generating activities in Strategic Employment Locations and other appropriately zoned locations in a sustainable manner”</i>.</p>
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<p>retail services and residential development;</p> <ul style="list-style-type: none"> • To promote improvements to connectivity and permeability with the wider area including pedestrian and cycle facilities and provide for the link road from Dooradoyle Road to Rosbrien Road; • To promote the re-investment, upgrade and expansion of the retail and services provision at the Dooradoyle District Centre; • Any application on lands at risk of flooding to be accompanied by a Site Specific Flood Risk Assessment. <p>3. Retail: The draft LAP prohibits retail developments until such time as a new retail strategy for the Limerick Shannon Metropolitan Area is completed. The LAP identifies the Crescent Shopping Centre without naming any other centre. This policy is discriminatory against the Crescent Centre and retail operators in the Southern Environs. This is inconsistent with the policies in the County Development Plan, which requires the sequential approach, compliance with the Joint Retail Strategy for the Mid-West Region and permits some limited expansion to District Centres. If the improvement opportunities are to be realised, this will need investment which cannot be done if there is a ban on additional floorspace. The proposed retail policy should be replaced with the current retail policies in the County Development Plan.</p> <p>4. Housing: The draft LAP does not support and facilitate sustainable intensification and consolidation of the existing built environment to promote compact growth. Residential development is not focused at appropriate infill, brownfield and regeneration sites. Key sites, including the</p>	<p>3. Retail: The Planning Authority are required to comply with the higher tier plans of the National Planning Framework and Regional Spatial and Economic Strategy for the Southern Region, which identify Limerick City Centre at the top of the retail hierarchy, and require completion of a new Joint Retail Strategy. The existing Joint Retail Strategy remains in effect until such time as the new Retail Strategy is completed. Therefore, it is considered reasonable that support can be given to the re-investment, upgrade and limited expansion of the retail and services provision at the Dooradoyle District Centre.</p> <p>Limerick City and County Council have engaged consultants to prepare a joint Retail Strategy for the Limerick – Shannon Metropolitan Area in conjunction with Clare County Council. On completion any proposed retail development shall comply with the proposed Strategy.</p> <p>4. Housing: The National Planning Framework (NPF), the Regional Spatial and Economic Strategy for the Southern Region (RSES) and the Limerick Shannon Metropolitan Area Strategic Plan (MASP) set out targets for population growth for Limerick City and Environs. The NPF supports ambitious growth</p>
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<p>Dooradoyle District Centre lands, with significant infill opportunity and sites along transport corridors and employment centres have not been included.</p> <p>5. Transport: The policies and objectives set out in the Limerick Shannon Metropolitan</p>	<p>targets to enable Limerick City to grow by at least 50% to 2040 and to achieve its potential to become a city of scale.</p> <p>The NPF sets out a targeted projection of population growth of 47,000 – 56,000 persons for Limerick City and Suburbs to 2040. The assumed Southern Environs population growth allocation is an additional 7,420 persons over the plan period to 2027. This equates to a projected requirement for an additional 2,968 residential units over the period up to 2027, based on 2.5 persons per household.</p> <p>The Draft LAP identifies approximately 90ha. of zoned land suitable for residential development. The residential capacity of the lands identified is approximately 3,430 units. The lands for residential development have been identified with cognisance to the necessity for future proofing of this suburb beyond the plan period, in order to facilitate the role of Limerick City as a Regional City in accordance with the objectives of the NPF and MASP. Therefore, there is sufficient land zoned over and above that required for the lifetime of the plan. In this regard, the Office of the Planning Regulator is satisfied that sufficient lands have been zoned to cater for projected population growth. In order to ensure compliance with the higher tier national and regional plans no additional lands can be considered for residential zoning during the lifetime of the Draft Southern Environs Local Area Plan 2021 - 2027. The zoning of additional lands would require the de-zoning of other residential lands elsewhere in the Southern Environs. However, it should be noted that there is potential for the redevelopment of the existing Crescent Shopping Centre site for sustainable intensification and consolidation of the built environment.</p> <p>5. Transport: As set out under the Metropolitan Area Strategic Plan (MASP), the transport investment requirements in the</p>
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<p>Transport Strategy (LSMATS) will have to be reflected in the LAP.</p> <p>In accordance with ‘Transport Orientated Development’ (TOD), development at ‘Dooradoyle Urban Quarter’ would remove the need to deliver houses at the edge of the city which cannot be supported by sustainable travel. The site is well served by bus services and a number of proposed high priority bus routes and cycle routes in LSMATS. Development would facilitate critical mass to support public transport, the Rosbrien public transport corridor and reduce car use. The wider area would benefit from a link between the Dooradoyle Road and Rosbrien Road. The framework plan for the Clancourt and Portland Park lands will significantly enhance cycling and pedestrian infrastructure and connections with the city centre. The proposed Mungret Greenway over the N18 will connect Ballincurra Gardens with Dooradoyle via Portland Park. Alternatively, reuse of the Mungret rail line as a commuter train line, will require densification and consolidation along the route and the lands provide an ideal location for a train station. If proposals for the railway line progress, an appropriate railway crossing will be provided.</p> <p>Enhancement of the bus services within and between the suburbs and the city centre is required in the LAP, including bus lanes along the Dooradoyle transport corridor. The site layout focusses access towards the proposed bus priority routes on St Nesson’s Road and Rosbrien Road. Local access connecting the Rosbrien Road with the Dooradoyle Road through the new urban quarter would be beneficial. Provision of this link should be reinstated as a roads objective in the LAP.</p> <p>6. Flooding: Strategic Flood Risk Assessment Report: Clancourt commissioned ARUP to carry out a Strategic Flood Risk Assessment</p>	<p>Limerick Shannon Metropolitan Area will be identified and prioritised through the Limerick Shannon Metropolitan Area Strategic Transport Strategy (L-SMATS). In accordance with the Draft L-SMATS, in order to achieve more sustainable travel patterns, a significant focus on reducing car dependency and increasing permeability is required. In this respect, no new link road has been identified between Rosbrien and Dooradoyle Roads under L-SMATS. However, the draft LAP includes policy objectives to support sustainable modes of transport, permeability and connectivity throughout the Environs for bus, pedestrian and cyclist movements in accordance with L-SMATS.</p> <p>6. Flooding: Clancourt has requested the zoning of additional lands at The Crescent for residential, office and leisure development to</p>
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<p>and John Spain Associates to prepare a Development Plan Making Flood Risk Justification Test. The development is appropriate and the lands are sequentially favourable.</p> <p>With modest interventions to improve and extend the existing flood defences, it is possible, taking an integrated approach (on lands in the control of Clancourt and Limerick City and County Council) to solve the current flooding issues for the lands bordering the Ballinacurra Creek in the Rosbrien Road area. Alternatively, works on lands within the control of Clancourt would provide a solution to the flood risk on Clancourt’s lands, be compliant with the Development Management Justification Test, would not be reliant on works on other lands or wider flood relief schemes, would not cause risk to other lands and is deliverable in the short term.</p> <p>The Development Plan SFRA identifies and zones areas necessary and appropriate for sustainable development where the risks can be adequately mitigated. The SFRA will inform the prioritisation of any flood relief scheme works. Zoning should not be contingent on a possible Limerick Flood Relief Scheme being first designed or detailed, but rather should identify and prioritise aspects of flood defence that would need to be delivered in advance of developments. If Clancourt is advancing proposals ahead of wider flood relief scheme improvements, then Clancourt may have to look to part investing in the improvement works on their lands to advance them quicker if required. Flood risk assessment should not be delayed until after the potential flood relief scheme.</p> <p>It would be inappropriate to defer Plan-making Justification and decisions on the basis that a Flood Relief Scheme may be designed and/or delivered in the coming</p>	<p>enable construction of the “Dooradoyle Urban Quarter”. The lands are located within Flood Zone A, B and C. The “Flood Risk Management Guidelines for Planning Authorities (2009)” requires a justification test to be carried out when zoning lands within Flood zones A and B.</p> <p>Part 2 of the Justification Test requires the Local Authority to consider if there are no suitable alternative lands, for the particular use or development type, in areas at lower risk of flooding, within or adjoining the core of the urban settlement. The draft LAP has currently zoned sufficient alternative residential lands that are not at risk of flooding.</p> <p>Development within Flood Zone C, such as the carpark around the Crescent Shopping Centre, would not be subject to the Justification Test and there is significant capacity to accommodate growth within this area.</p> <p>The Limerick City Flood Relief Scheme is currently being progressed. The subject lands will be considered as part of this scheme.</p>
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	<p>years. This cannot be guaranteed, and should not unnecessarily prevent strategic land banks from being zoned. Flood defence works set out in the Arup report should be included as a specific objective.</p> <p>A comprehensive review of all zoned and un-zoned undeveloped or under-utilised land banks within the Southern Environs, particularly those located on existing or planned transport corridors, in order to identify sufficient capacity to accommodate the quantum of land required in the right locations to meet the housing and employment needs is required. Clancourt have lands located near to the city centre within the built up area and on a public transport corridor, and if appropriately zoned would contribute significantly to helping to meet the challenging population growth target and accommodate a significant employment cluster.</p>	<p>7. Noise: Road traffic noise levels are expected to be excessive across these lands, based on the strategic noise mapping being between 55-75 dB Lden (a 24 hour average indicator) (60-75 dB Lden within approx. 120 metres of the N18) and 45-65 dB Lnight (an 8 hr night-time indicator) (50-65 dB Lden within approx. 150 metres of the N18). This issue has already resulted in the de-zoning of lands elsewhere in Castletroy and the Southern Environs.</p>
<p>Chief Executive’s Recommendations:</p>		
	<p>1 – 4: No Change</p> <p>5: Amend Section 6.7 District Centre text as follows: Limited no additional retail floor space <u>and services</u> will be permitted <u>and re-investment and upgrade works supported</u> at the Crescent. <u>Any proposed retail development shall comply with the new Limerick Shannon Metropolitan Retail Strategy on completion.</u></p> <p>6: No Change</p>	
	<p>SEA/AA Response: The proposed change is the wording of the retail policy set out in the 2011 – 2017 (as extended) Local Area Plan under review and as such does not have significant environmental effects.</p>	

19	Name/Group:	Town & Country Resources Ltd. on behalf of Charlie MacDonnell
	Submission:	Response
	<p>1. Zoning: Requests the rezoning of 0.6ha. of land at Sluggary, Rosbrien Road from Agriculture to Enterprise and Employment.</p> <p>The greenfield and infill site is at a prominent location on the Rosbrien Road, 250m from the M20 Junction 2 Interchange. An objective for Enterprise and Employment zoning complies with national and regional strategic planning policy given the situation of the lands within the suburbs of the Limerick Metropolitan Area. The land can provide new employment generation within or adjacent to the existing built up footprint of the urban area in accordance with Objective ED 05, which states that it is an objective to <i>“Encourage the redevelopment of vacant commercial units, brownfield, derelict and infill sites for enterprise and industry creation”</i>.</p> <p>There is a continued need for a diverse range of employment opportunities on a smaller scale such as at appropriate infill sites for light industrial activities. The subject lands comprise an appropriate site in this context. The employment zoning of these lands will ensure that sufficient lands continue to be available for employment generation.</p>	<p>1. Zoning: As per the Office of Planning Regulator, TII and NTA submissions regarding the zoning of lands adjoining Junction 20 Rosbrien, the proposal to zone these lands for development has similar issues. In this regard, the proposed zoning would be contrary to the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities, the Regional Spatial and Economic Strategy for the Southern Region, the principles included in the emerging LSMATS and the proposed objectives to protect the strategic road network set out in the draft LAP.</p> <p>Zoning in the immediate vicinity of the national road junction is not considered compatible with objectives for any necessary future upgrade of the junction.</p> <p>The M20 Cork to Limerick is a major National Infrastructure Project included in the National Development Plan and will feed into the current M7/M20 interchange (junction 30) which may require reconfiguration and upgrading of the interchange. The subject lands form part of the study area for the M20 project.</p> <p>Planning authorities are required to have regard to the Section 28 Spatial Planning and National Roads Guidelines (2012) (SPNRG) in the performance of their functions under the Planning Acts. Section 2.7 – “Development at National Road Interchanges or Junctions” of the SPNRG is of particular relevance. The proposed zoning is also inconsistent with section 2.9 of the SPNRG “Protection of Alignments for Future National Road Projects”.</p> <p>The proposed zoning is inconsistent with policy objectives in the draft LAP. Objective TM011 aims to “Protect the capacity of the national road network, having regard to all relevant Government guidance including DoECLG</p>

	<p>2. Flooding: The western portion of the site is within Flood Zone C and the eastern extent is within Flood Zone B. Buildings used for warehousing, commercial, industrial and non-residential purposes are “less vulnerable development” by reference to the “Planning System and Flood Risk Management Guidelines” (2009). Lands designated Flood Zone B “Less Vulnerable Development” is deemed “Appropriate”, the land meets the requirements for sustainable development under the Flood Risk Management Guidelines. The site can be developed within Flood Zone C. In the area subject to Flood Zone B engineering methods can be implemented to demonstrate that flood risk can be adequately managed. Notwithstanding, a detailed Flood Risk Assessment would accompany any planning application, including a Justification Test for development outlining the achievement of</p>	<p>“Spatial Planning and National Roads Guidelines””, and objective TM012 which aims to “Prevent inappropriate development on lands adjacent to the existing national road network, which would adversely affect the safety, current and future capacity and function of national roads and having regard to reservation corridors to cater for possible future upgrades of the national roads and junctions...”.</p> <p>Safeguarding the strategic function of the existing national road network so that it continues to support economic development in the region and provide access to markets and international gateways is critical to ensuring Limerick continues to perform and enhance its regional role. Compromising the strategic function of the national road network in the area has the potential to inhibit growth, impact economic performance and reduce accessibility.</p> <p>2. Flooding: The submission is accompanied by an Engineering Report which includes a Stage 2 Flood Risk Assessment. The FRA identifies that the CRFRAM Study places the site in Flood Zone B, and notes that the Justification Test is not required for less vulnerable development, which could include 'enterprise and employment' within Flood Zone B. The FRA does not include any details on the management of the flooding or proposals to mitigate flood risk.</p> <p>While the flood risk to the site could be managed any application for development on site would need to be accompanied by a detailed flood risk assessment, including hydraulic modelling, and would need to consider the implications of filling the site on overall flow routes and to look at climate change impacts.</p>
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	<p>full compliance with all the requirements of the Guidelines.</p> <p>3. Infrastructure: Appendix A: Engineering Desktop Study: The availability of infrastructural services has been assessed by Punch Consulting Engineers.</p>	<p>3. Infrastructure: Noted</p>
	Chief Executive's Recommendations:	
	No Change	
	SEA/AA Response N/A	

20	Name/Group:	Fehily Timoney & Company Ltd. on behalf of Shannon Group Plc.
	Submission:	Response
	<p>1. Zoning: The change from Agriculture to Enterprise and Employment zoning of c.20ha. of lands at Rosbrien is greatly welcomed.</p> <p>The zoning will facilitate the future development of the lands for commercial purposes, will aid in providing additional employment opportunities and facilities for population growth, and will be an integral factor of the economic growth and development of the Southern Environs. Given its edge of centre location, these lands have the potential to accommodate a notable proportion of the employment growth anticipated for the Limerick-Shannon Metropolitan Area, in an area that is strategically located and widely accessible. This is key to successful economic development, enabling the Mid-West region to compete at both national and international levels. By realising the full potential of strategically located sites, the Limerick-Shannon Metropolitan Area can strengthen and provide for sustainable regional development.</p> <p>Development of these lands for enterprise and employment is supported as a key growth enabler for Limerick and consistent with Objective 11 of the NPF as it would</p>	<p>1. Zoning: The LAP supports opportunities for employment creation, business and technology development in the Southern Environs to facilitate economic growth of the Metropolitan Area on appropriately zoned lands. This is substantiated through the Strategic Policy for Economic Development, which states that it is an objective <i>“To promote, facilitate and enable economic development and employment generating activities in Strategic Employment Locations and other appropriately zoned locations in a sustainable manner”</i>. However, there are serious issues in relation to the location of these lands with respect to the Rosbrien Interchange as set out further below.</p> <p>The Planning Authority notes the concerns of the Office of the Planning Regulator, National Transport Authority and Transport Infrastructure Ireland in relation to the proposed change of zoning of these lands from Agriculture to Enterprise and Employment. In this regard, the proposed zoning would be contrary to the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities, the Regional Spatial and Economic Strategy for the Southern Region, the principles included in the emerging L-SMATS and also the proposed objectives of the Draft LAP to protect the strategic road network.</p>

<p>generate additional jobs within close proximity to key centres including Limerick City, Raheen, University of Limerick, Limerick Institute of Technology with good accessibility to the surrounding road network.</p> <p>The Limerick-Shannon MASP envisages additional jobs in the order of 19,000 to 2026 and 28,200 to 2031. There will be an increasingly high demand for employment type lands within the Metropolitan Area to cater for this anticipated growth. The proposed Enterprise and Employment zone will aid in providing an attractive and competitive environment to live and work in which is an important factor in potentially securing foreign direct investors. Other important factors typically include the proximity of the lands to other international locations, access to amenities and more specifically affordable housing and quality of life. These lands should have a Strategic Employment Location designation.</p> <p>Compact growth, enhanced regional accessibility, sustainable mobility and high-quality international connectivity are key to realising the full potential of the Mid-West and Southern Region.</p> <p>The lands are located within a comfortable walking/ cycling distance from key centres, with access easily provided to the motorway network. It's location alone would suggest that the Rosbrien site is optimally located to provide for enterprise and employment associated land-uses, being strategically located within proximity to existing areas of population, existing and established employment centres, the national and regional road network and third-level institutions and meeting the key criteria as a business location of choice.</p>	<p>Zoning in the immediate vicinity of the national road junction is not considered compatible with objectives for any necessary future upgrade of the junction.</p> <p>The M20 Cork to Limerick road scheme is a major National Infrastructure Project included in the National Development Plan and will feed into the current M7/M20 interchange (junction 30) which may require reconfiguration and upgrading of the interchange. The subject lands form part of the study area for the M20 project.</p> <p>Planning authorities are required to have regard to the Section 28 Spatial Planning and National Roads Guidelines (2012) (SPNRG) in the performance of their functions under the Planning Acts. Section 2.7 – “Development at National Road Interchanges or Junctions” of the SPNRG is of particular relevance. The proposed zoning is also inconsistent with section 2.9 of the SPNRG “Protection of Alignments for Future National Road Projects”.</p> <p>The proposed zoning is inconsistent with policy objectives in the draft LAP. Objective TM011 aims to “Protect the capacity of the national road network, having regard to all relevant Government guidance including DoECLG “Spatial Planning and National Roads Guidelines””, and objective TM012 which aims to “Prevent inappropriate development on lands adjacent to the existing national road network, which would adversely affect the safety, current and future capacity and function of national roads and having regard to reservation corridors to cater for possible future upgrades of the national roads and junctions...”.</p> <p>Pending completion of assessments in relation to the proposed M20 Cork to Limerick study in 2021 and issues of traffic movements, noise and flooding, it is considered that the zoning</p>
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		for Enterprise and Employment would be premature at this time.
	Chief Executive's Recommendations:	
	1: Amend the proposed zoning from Enterprise and Employment to Agriculture.	
	<p>SEA/AA Response:</p> <p>These lands are within the M20 Limerick to Cork study area. The Enterprise and Employment zoning is likely to contribute to additional traffic movements, which would complicate issues for what is a strategic and national transport project and which might compromise development of the project in this location. There is also the possible issue of flood and noise issues and in this regard further assessments would need to be carried out, as such the zoning is considered as premature pending the completion of such studies. The Agriculture zoning is also a less intensive land use than the Enterprise and Employment zoning and would have less potential environmental effects. It will also ensure that the area will remain permeable which would assist with surface water management.</p>	

21	Name/Group:	HRA Planning on behalf of Hibernia Senior Living
	Submission:	Response
	<p>1. Zoning: Requests a change of zoning from Open Space & Recreation to Education & Community Infrastructure of 0.75ha. of lands at the junction of Rosbrien Road and Dooradoyle Link Road.</p> <p>The rezoning will allow for a Nursing Home and Independent Living Units – Dooradoyle Lodge/ Dooradoyle Place and enable funding to redevelop club facilities including clubhouse and pitch upgrades at Old Crescent RFC. Development would include a 90 no. bed three-storey nursing home and a four-storey block of 20 no. independent living units.</p> <p>A DKM report indicates a supply gap of over 18,000 beds will arise by 2036. A review of existing nursing home and retirement facilities in the Limerick area demonstrates a shortage of existing provision.</p> <p>The Southern Environs demographic profile indicates an ageing population with Dooradoyle having a significant aging population. A review of existing education and community zoned lands demonstrates</p>	<p>1. Zoning: As per the Office of Planning Regulator, TII and NTA submissions regarding the zoning of lands adjoining Junction 20 Rosbrien, the proposal to zone these lands for development has similar issues. In this regard, the proposed zoning would be contrary to the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities, the Regional Spatial and Economic Strategy for the Southern Region, the principles included in the emerging LSMATS and the proposed objectives to protect the strategic road network set out in the draft LAP.</p> <p>Zoning in the immediate vicinity of the national road junction is not considered compatible with objectives for any necessary future upgrade of the junction.</p> <p>The M20 Cork to Limerick is a major National Infrastructure Project included in the National Development Plan and will feed into the current M7/M20 interchange (junction 30) which may require reconfiguration and upgrading of the interchange. The subject lands form part of the study area for the M20 project.</p>

<p>that none are suitable or available to accommodate nursing/ retirement homes and independent living developments.</p> <p>2. Suitability: The lands are located close to existing services, facilities and infrastructure (M20, BusConnects, Rosedale Neighbourhood Centre) and there is established residential development in close proximity. Development would represent a</p>	<p>Planning authorities are required to have regard to the Section 28 Spatial Planning and National Roads Guidelines (2012) (SPNRG) in the performance of their functions under the Planning Acts. Section 2.7 – “Development at National Road Interchanges or Junctions” of the SPNRG is of particular relevance. The proposed zoning is also inconsistent with section 2.9 of the SPNRG “Protection of Alignments for Future National Road Projects”.</p> <p>The proposed zoning is inconsistent with policy objectives in the draft LAP. Objective TM011 aims to “Protect the capacity of the national road network, having regard to all relevant Government guidance including DoECLG “Spatial Planning and National Roads Guidelines””, and objective TM012 which aims to “Prevent inappropriate development on lands adjacent to the existing national road network, which would adversely affect the safety, current and future capacity and function of national roads and having regard to reservation corridors to cater for possible future upgrades of the national roads and junctions...”.</p> <p>Safeguarding the strategic function of the existing national road network so that it continues to support economic development in the region and provide access to markets and international gateways is critical to ensuring Limerick continues to perform and enhance its regional role. Compromising the strategic function of the national road network in the area has the potential to inhibit growth, impact economic performance and reduce accessibility.</p> <p>2. Suitability: The Department of Housing, Planning and Local Government and the Department of Health issued a Policy Statement on “Housing Options for Our Ageing Population” in 2019. The statement sets out six principles for housing an ageing population</p>
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<p>sustainable extension to the existing built envelope without any adverse visual impacts.</p> <p>The NPF, RSES and existing Limerick Development Plans support the delivery of housing and services for an aging population.</p> <p>3. LAP: Consideration needs to be given to the provision of housing for the elderly and the differing demands of an aging population. Nursing homes are an ineffective use of valuable residential zoned land such that residential units generate greater returns. It is impossible for nursing home providers to compete for residentially zoned land. There is a clear need to identify specific locations for nursing/ retirement homes and independent living developments.</p> <p>Given the specific characteristics and age profile of the Southern Environs and the identified deficiency in capacity of existing provision, the subject lands represent an opportunity to provide a nursing home to cater for anticipated demand.</p>	<p>including Ageing in Place, Supporting Urban Renewal, Promoting Sustainable Lifetime Housing, Using Assistive Technology, Staying Socially Connected and Working Together. In relation to the location of housing the document states “to best facilitate social interaction and to provide appropriate support for our older people, housing should be located close to amenities and services to enhance their general independence” and “ensure that developments (and specifically those for older people) are constructed in areas that are close to essential services, promoting the use of brownfield sites and explore the optimum locations that would lend themselves to becoming “age friendly neighbourhoods””.</p> <p>The site proposed for rezoning is removed from the existing and proposed public transport network and existing services and facilities such as churches, medical services and shops. The lands are physically separated from surrounding neighbourhoods by the road and rail networks creating an isolated and noisy environment.</p> <p>3. LAP: The need for older persons’ dwellings, supported housing, Nursing Homes and residential care homes in the Southern Environs is acknowledged in the draft Local Area Plan. The demand for such facilities is anticipated to grow into the future, by reason of a general aging of the population and the need to cater for those wishing to downsize and reside in proximity to services and amenities. However, these facilities should be integrated wherever possible into the established or planned residential areas, based on the principles of universal design and an age friendly public realm with seating, lighting, landscaping etc. Such facilities should be located within walking distance of shopping and other services, public transport and open space.</p>
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<p>4. Existing Facilities: Within the city and environs there are 259 no. bed spaces in nursing homes. Two nursing homes operating in the Southern Environs include the Good Counsel Nursing Home on the Kilmallock Road and St. Paul’s Nursing Home in Dooradoyle, which provide 84 no. beds and are operating at capacity. Planning permission was granted for a nursing home facility in Raheen in 2019.</p> <p>Some 9.4 per cent (1,793 persons) of the overall existing population in the Southern Environs falls within the 65+ age cohort. Dooradoyle has the largest aging population with 45 per cent of the population aged 65 years and over. Presently, there is only one nursing home bed per 22 persons over the age of 65 years in the Southern Environs, below the national average of 20.23.</p> <p>5. Existing Zoning: A Nursing Home/ Residential Care/ Retirement Village is ‘open for consideration’ on lands zoned for education and community infrastructure. There are no other alternative or available sites in the general area to support the proposed development.</p> <p>6. Policy Support: There is significant support in statutory documents and guidelines at national, regional and local level to justify the zoning of the site for education & community use with specific provision for a Nursing Home/ Retirement Facility/ Independent Living Units.</p> <p>7. Electricity Lines: The 110kv line traverses the rugby club and necessitates a maximum 23m separation distance from the proposed line. The railway track functions to sever the subject site from adjoining built development and creates a barrier to development.</p>	<p>4. Existing Facilities: Noted. This issue will be considered during the preparation of the Limerick Development Plan 2022 – 2028.</p> <p>5. Existing Zoning: Noted. These lands are not considered suitable for use as a Nursing Home as outlined under Suitability above.</p> <p>6. Policy Support: Noted. The need for older persons’ dwellings, supported housing, Nursing Homes and residential care homes in the Southern Environs is acknowledged in the draft Local Area Plan.</p> <p>7. Electricity Lines: Noted</p>
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	<p>8. Noise: Proximity to a busy motorway junction means that there are high baseline noise levels affecting most of the site, influencing the siting and location of buildings to enable the creation of external 'quiet zones' and the provision of public open space within acceptable noise levels. The buildings will need to be designed to ensure natural noise attenuation mitigation measures.</p> <p>Other: Letter of support from Old Crescent RFC.</p>	<p>8. Noise: Road traffic noise levels are expected to be excessive at this location, based on the strategic noise mapping being between 60-64 dB Lden (a 24 hour average indicator) and 55-59 dB Lnight (an 8 hr night-time indicator). This issue has already resulted in the de-zoning of lands elsewhere in Castletroy and the Southern Environs.</p> <p>Other: Noted</p>
Chief Executive's Recommendations:		
No Change		
SEA/AA Response: N/A		

22	Name/Group:	John Hurley & Olivia Grimes
	Submission:	Response
	<p>1. Crossagalla: Crossagalla has not been addressed in the Draft LAP. A number of improvements are required including: - Improve or replace the Bohercoyle Road; - Improve the access roads to Donoughmore School (footpaths & cycle lanes); -More neighbourhood services; -Improved amenities sports playing fields/ retail services/ education/ recreation.</p> <p>2. Density: An assumed density of 35-45uph is acceptable within the city but in the suburbs this should be a lot lower. With Covid-19 more people will be working from home and require more space per household. The density should be reduced in certain areas and not just a standard nationally.</p>	<p>1. Crossagalla: Proposals for the provision of transport infrastructure, pedestrian and cycle lane facilities are set out in the Draft Limerick Shannon Metropolitan Area Transport Strategy (LSMATS). This strategy has been prepared by the NTA, TII and Limerick City and County Council. The Draft LAP has been prepared in accordance with the proposals set out under the draft LSMATS.</p> <p>Lands have been identified throughout the Environs for services, recreation and education. A Local Centre zoning adjoins the lands subject of this submission.</p> <p>2. Density: Density policies in the draft LAP have been prepared in accordance with current Section 28 Guidelines in relation to higher density developments. Such Section 28 Guidelines include "Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities", May 2009, "Sustainable Urban Housing, Design Standards for new Apartments – Guidelines for Planning Authorities", March 2018 and "Urban</p>

<p>3. Zoning: Requesting the rezoning of 17ha. of lands or part thereof from Agriculture to Mixed Use at Crossagalla. Arnold Leahy Architects and PHM Consulting Engineers have prepared a development framework. The lands can facilitate a mix of uses to reflect the residential use in the vicinity and provide ancillary services lacking in Crosagalla. The framework demonstrates the potential of the lands given the site location and context, and the creation of linkages and permeability with established residential communities at Ros Mor and includes provision for a public park, crèche, retail and the continuation of a road link from Ballysimon to Southill.</p> <p>The Mixed Use zoning complies with national and regional strategic planning policy objectives including Re-Building Ireland, National Planning Framework (NPO 3b, NPO 68), and the Regional Spatial and Economic Strategy for the Southern Region. The majority of national and regional planning guidance specifies that Local Authorities must set out direct and targeted policies and land use objectives that provide for new residential development occurring within or adjacent to the existing built-up footprint of urban areas.</p>	<p>Development and Building Height Guidelines”, December 2018.</p> <p>An increase in residential densities in particular, is vital in order to achieve the projected population growth targets for Limerick City and Environs. The provision of higher densities enables sustainable and compact development, which maximises the use of scarce lands and the viability of public investment in infrastructure. Such an approach is necessary to comply with the objectives of the National Planning Framework and Regional and Spatial and Economic Strategy for the Southern Region.</p> <p>3. Zoning: The National Planning Framework (NPF), the Regional Spatial and Economic Strategy for the Southern Region (RSES) and the Limerick Shannon Metropolitan Area Strategic Plan (MASP) set out targets for population growth for Limerick City and Environs. The NPF supports ambitious growth targets to enable Limerick City to grow by at least 50% to 2040 and to achieve its potential to become a city of scale.</p> <p>The NPF sets out a targeted projection of population growth of 47,000 – 56,000 persons for Limerick City and Suburbs to 2040. The assumed Southern Environs population growth allocation is an additional 7,420 persons over the plan period to 2027. This equates to a projected requirement for an additional 2,968 residential units over the period up to 2027, based on 2.5 persons per household.</p> <p>The Draft LAP identifies approximately 90ha. of zoned land suitable for residential development. The residential capacity of the lands identified is approximately 3,430 units. The lands for residential development have been identified with cognisance to the necessity for future proofing of this suburb beyond the plan period, in order to facilitate the role of Limerick City as a Regional City in</p>
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<p>The Mixed Use zoning can be considered in the context of the principles of national guidance and the MASP. Sites with immediate development potential should not be the absolute focus, in such a way as would create an unreasonable dependency on specific sites being brought forward to the detriment of other suitable lands with better prospects for delivery in the short term. Active land management is required to ensure that a reserve of residential zoned lands is maintained within the Metropolitan Area to safeguard housing delivery targets.</p> <p>Taking into consideration the proximity of the land to an established residential area and the current housing crisis, the proposal to have this site rezoned from 'Agriculture' to 'Mixed Use' development area, would facilitate an appropriate use of the lands and encourage housing and other developments. This would provide an effective means of utilising existing services and infrastructure on adjoining lands.</p> <p>4. Services: Appendix A: Preliminary Services Report: This report outlines the availability of infrastructure for the proposed development of lands at Crossagalla, located off the R512. Development at Ros Mor to the west would provide a connection for surface and foul water through the drainage network on the adjoining lands.</p> <p>5. Noise: Appendix B: Inward Noise Impact Assessment: The M7 to the south and the Limerick to Limerick Junction railway line to the north have the potential to impart noise impact on development of these lands. CLV Consulting Ltd. has undertaken a noise survey and assessment of the potential impact on development and includes mitigation recommendations to minimise noise impacts. Some of the mitigation measures include minimum performance specification wall and roof construction, sound insulation glazing/ doors/ facades,</p>	<p>accordance with the objectives of the NPF and MASP. Therefore, there is sufficient land zoned over and above that required for the lifetime of the plan. In this regard, the Office of the Planning Regulator is satisfied that sufficient lands have been zoned to cater for projected population growth. In order to ensure compliance with the higher tier national and regional plans no additional lands can be considered for residential zoning during the lifetime of the Draft Southern Environs Local Area Plan 2021 - 2027. The zoning of additional lands would require the de-zoning of other residential lands elsewhere in the Southern Environs.</p> <p>4. Services: Noted.</p> <p>5. Noise: Road traffic noise levels are expected to be excessive at this location, based on the strategic noise mapping being between 55-75 dB Lden (a 24 hour average indicator) (60-75 dB Lden within approx. 120 metres of the N18) and 45-65 dB Lnight (an 8 hr night-time indicator) (50-65 dB Lden within approx. 150 metres of the N18). This issue has already resulted in the de-zoning of lands elsewhere in Castletroy and the Southern Environs.</p>
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	<p>consideration to the location of balconies and ventilation openings and doors, 2.0m high boundary walls in some gardens closest to the M7 and an abundance of landscaping features.</p> <p>6. Roads: Requesting the inclusion of an objective on the subject lands for a “New Road from PJ Matthews on Old Ballysimon Road to Southill”.The Castletroy LAP 2019 - 2025 includes an objective for a “new road from PJ Matthews on Old Ballysimon Road to Southill” i.e. from the Old Ballysimon Road to the railway line to the north of the subject lands. This route should be continued across the lands offering an alternative to Bohercoyle Road.</p> <p>7. Other: Appendix C: Supporting Letter: Letter of support from Jana Developments Ltd. indicating strong demand for 3 and 4-bed semi-detached and some 4-bed homes in the first time buyer and affordable market not catered for in the affluent areas of Castletroy or Mungret.</p>	<p>6. Roads: There are no proposals for the provision of a link road across these lands. Given the existing surplus of residential zoned lands, additional lands cannot be zoned for residential development therefore the continuation of a new roads objective across the railway line is not considered prudent at this time.</p> <p>7. Other: Noted</p>
Chief Executive’s Recommendations:		
No Change		
SEA/AA Response: N/A		

23	Name/Group:	Jim Long
	Submission:	Response
	<p>1. Zoning: Requests that lands proposed for Education & Community Infrastructure at Mungret Gate be zoned for Residential.</p>	<p>1. Zoning: The submission received is noted. The submission refers to lands adjoining St. Nessian’s Primary School proposed to be zoned for Education and Community Infrastructure.</p> <p>As set out under the Limerick Shannon Metropolitan Area Strategic Plan (MASP), the Regional and Spatial Economic Strategy for the Southern Region (RSES) supports the development of Mungret for the sustainable phased development of housing and supporting public transport and infrastructure. The provision of new, and futureproofing of</p>

	<p>existing education and community infrastructure, in tandem with development to serve the existing and substantial population growth envisaged in Mungret is essential to achieve sustainable development and communities, in accordance with the objectives of the National Planning Framework.</p> <p>The Planning Authority notes the presence of existing schools in Mungret and the wider area including recently constructed and proposed campuses. However, the Department of Education in consultations with the Planning Authority and in their submission to this draft Local Area Plan, have acknowledged that the projected population growth in the Southern Environs will require new schools and expansion of existing schools in the area.</p> <p>St. Nessian's Primary School is currently operating at capacity with a waiting list for places. The school is under serious pressure with new housing coming on stream in the immediate vicinity and has major concerns regarding future capacity pending the development of adjoining lands, including the Masterplan at Mungret. As outlined in the submission received from St. Nessian's Board of Management, the National Council for Special Education (NCSE) have identified a strong present and future need for special classes. The school has received a notification of sanction for a special class (16/10/2020) which could require two new classrooms, toilet and showering facilities, a sensory room and enclosed recreational space.</p> <p>The restricted nature of the site would require future development to take place on the playing pitches, hence the most recent two classroom development (Planning Ref. 17/983) occurred to the front of the school building. The school also has severely restricted drop off/ collection facilities, causing issues of traffic congestion on the public road during drop off/ collection times. The new special class will</p>
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		<p>require additional staff members with associated parking requirements.</p> <p>St. Nesson’s Primary School is located on a landlocked site. The inclusion of these lands directly adjoining St. Nesson’s Primary School for Education & Community Infrastructure zoning is the only option available to enable sustainable expansion of the school. Inclusion of this zoning is essential to ensure the future proofing of St. Nesson’s Primary School to cater for school place demand arising from the substantial population growth already occurring and envisaged for Mungret over the lifetime of the Local Area Plan.</p>
	Chief Executive’s Recommendations:	
	No Change	
	SEA/AA Response: N/A	

24	Name/Group:	Coakley O’Neill on behalf of Homeland Group
	Submission:	Response
	<p>1. Zoning: Requests the change of zoning of 1.03ha. of lands at Raven Hill, Buanalocka, Mungret from Education & Community Infrastructure to New Residential.</p> <p>The Guidelines for Planning Authorities on Development Plans 2007 propose that where new school provision is agreed to be a significant issue by both the Local Authority and the DoES, appropriate sites for schools should be considered, having regard to accessibility, complementary usage of facilities and DoES specifications. Following the identification of potential sites, submissions for the zoning of land should be considered in light of the pre-identified sites. Planning Authorities following the identification/ reservation of suitable sites, initiate contact with the Department to clarify the suitability and the timeframe for acquisition.</p>	<p>1. Zoning: As set out under the Limerick Shannon Metropolitan Area Strategic Plan (MASP), the Regional and Spatial Economic Strategy for the Southern Region (RSES) supports the development of Mungret for the sustainable phased development of housing and supporting public transport and infrastructure. The provision of new, and futureproofing of existing education and community infrastructure, in tandem with development to serve the existing and substantial population growth envisaged in Mungret is essential to achieve sustainable development and communities, in accordance with the objectives of the National Planning Framework.</p> <p>The Planning Authority notes the presence of existing schools in Mungret and the wider area including recently constructed and proposed campuses. However, the Department of Education in consultations with the Planning Authority and in their submission to this draft</p>

<p>Local Area Plans Guidelines for Planning Authorities state that a local area plan must be fundamentally guided and shaped by, inter alia the capacity of existing essential social (schools, community facilities) and physical (transport, water services, communications) infrastructure, including the realistic prospects for addressing capacity constraints. It is especially important to engage with the Department in relation to forecasts for demand for future school places and the adequacy, or otherwise, of existing school facilities.</p> <p>Technical Guidance Document TGD-025 Identification and Suitability Assessment of Sites for Primary Schools, advises that a site presenting issues that may give rise to significant abnormal development costs should be avoided.</p> <p>The observer expects that the outcome of the plan making process will not unduly or unfairly impinge upon private property rights. The proposed rezoning will have the effect of reducing the land's value. The need to link the provision of educational facilities to the spatial planning of specific areas, particularly large urban expansion areas is acknowledged and supported.</p> <p>A submission was made by the observer advising of their intentions to develop their lands within the Mungret area for residential uses. The Planning Authority were aware of these intentions through pre-planning meetings held on 30th January 2020 and a second request on 3rd July 2020. At a meeting on the 23rd September, the observer was informed that the proposal for residential development would be premature as the lands were to be rezoned for educational use under the Draft LAP.</p> <p>The observer had discussions with St. Nesson's school in December 2018 and offered to facilitate the future expansion of</p>	<p>Local Area Plan, have acknowledged that the projected population growth in the Southern Environs will require new schools and expansion of existing schools in the area.</p> <p>St. Nesson's Primary School is currently operating at capacity with a waiting list for places. The school is under serious pressure with new housing coming on stream in the immediate vicinity and has major concerns regarding future capacity pending the development of adjoining lands, including the Masterplan at Mungret. St. Nesson's school in their submission to this draft LAP have outlined that the National Council for Special Education (NCSE) have identified a strong present and future need for special classes. The school has received a notification of sanction for a special class (16/10/2020) which could require two new classrooms, toilet and showering facilities, a sensory room and enclosed recreational space.</p> <p>The restricted nature of the site would require future development to take place on the playing pitches, hence the most recent two classroom development (17/983) occurred to the front of the school building. The school has severely restricted drop off/ collection facilities, causing issues of traffic congestion on the public road during drop off/ collection times. The new special class will require additional staff members with associated parking requirements.</p> <p>St. Nesson's Primary School is located on a landlocked site. The inclusion of these lands directly adjoining St. Nesson's Primary School for Education & Community Infrastructure zoning is the only option available to enable sustainable expansion of the school. Inclusion of this zoning is essential to ensure the future proofing of St. Nesson's Primary School to cater for school place demand arising from the substantial population growth already occurring and envisaged for Mungret over the lifetime of the Local Area Plan.</p>
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the school. At that time, the school advised that they did not have any interest in acquiring additional land and it was not something they were in a position to pursue. The Department of Education did not request the proposed rezoning.

The provision of any new schools should be driven by and emerge from an integrated approach between the planning authorities and the Department. The Department's role is also clear in providing the evidential basis upon which such rezoning decisions are made.

There is more than sufficient land zoned for educational uses within the Mungret area to fully accommodate the school population proposed. Two new primary schools have recently been built, with capacity for 960 pupils, far beyond their current enrolment figures. There is also a planning application for a new secondary school, room for expansion has been included in the design and layout. There are also several primary and secondary schools within the wider catchment, many with scope to physically expand or with existing capacity to take more students.

Expanding school facilities and accommodation on existing school sites is more cost effective and a better use of public money than the acquisition of zoned third party lands.

The current zoning of the site 'Existing Residential' already permits the development of educational facilities and uses within the Local Area Plan zoning matrix. Therefore, there is no zoning impediment to the development of a school or other education or community facility on the site. There is thus nothing to stop the school negotiating to secure land for the future expansion.

	<p>The lands are on the R510, where there is already significant traffic congestion. The observer was advised that access would not be allowed onto the R510. This makes the lands landlocked with the only access through the observer’s lands to the west, currently under construction as residential estates, or through other third party lands to the west earmarked for residential development.</p> <p>The school is already constrained by virtue of its location on the public road and its current parking and access arrangements. The subject lands make no contribution to resolving this issue.</p> <p>There may be scope to allow for the expansion of the school into these lands while also allowing for some residential use. This is a matter for the observer and the school authorities and does not require a proposed rezoning.</p> <p>If an agreement can be reached between the Department of Education, the school authorities and the observer, both school expansion and residential development can be accommodated on the lands under the current zoning objective.</p>	
	Chief Executive’s Recommendations:	
	No Change	
	SEA/AA Response: N/A	

25	Name/Group:	The Board of Management on behalf of St. Nesson’s National School
	Submission:	Response
	<p>1. Zoning: The Board welcomes (a) the zoning of the land adjacent to the school for Education and Community Infrastructure purposes (this could be used for New build, drop off zones, staff parking, additional yard space and recreational facilities).</p>	<p>1. Zoning: St. Nesson’s Primary School is located on a landlocked site. The inclusion of these lands directly adjoining St. Nesson’s Primary School for Education & Community Infrastructure zoning is the only option available to enable sustainable expansion of the school. Inclusion of this zoning is essential to ensure the future proofing of St. Nesson’s</p>

<p>St Nesson's National School caters for 700+ Primary School children. Fifty-five staff are employed at the school.</p> <p>The National Council for Special Education (NCSE) have identified a strong present and future need for special classes. The school has received a notification of sanction for a special class (16/10/2020). This could include two new classrooms, toilet and showering facilities, a sensory room and enclosed recreational space. Provision of any special class will involve additional staff allocation who will require parking spaces.</p> <p>Four classrooms have been prioritised as in need of extensive upgrading. Such renovations would also need upgraded toilet facilities. Yard space is very limited at present necessitating staggered break times.</p> <p>2. Transport: Many staff travel long distances to work, some from Kerry, Cork, Clare and Tipperary. Other teachers transport their children to other primary schools and secondary schools in the area. The current car park space available to the staff is inadequate and some have no option but to park on the road. Parents of children attending the school also transport children by car, many on route to their own places of work. Several dedicated school buses, some minibuses, convey pupils to and from school and from local crèches. Presently, school operates from 9 a.m. to 2.40 p.m. for pupils while staff in many cases are in school between 8.40 a.m. and up to 5p.m.</p> <p>The Board welcomes (b) The proposed Link Roads as indicated on Map shown at Page 112 of Draft Plan.</p> <p>The school has been approached with proposals for cycle lanes and widened footpaths on both sides of the road. The school are happy to encourage families and staff to walk and cycle to school and</p>	<p>Primary School to cater for school place demand arising from the substantial population growth already occurring and envisaged for Mungret over the lifetime of the Local Area Plan.</p> <p>2. Transport: The provision of sustainable modes of transport is essential in accordance with the Climate Action Plan, National Development Plan and Regional Spatial and Economic Strategy. Limerick City and County Council is committed to developing sustainable modes of transport including the provision of pedestrian and cycling infrastructure as a priority and subject to funding.</p> <p>The draft LSMATS sets out proposals for a Cycle Network for Limerick City and Environs. The provision of this network is supported through the land use policies set out under the Draft Southern Environs Local Area Plan.</p> <p>Concerns in relation to the proposed cycling infrastructure are noted. Proposals for the provision of cycling infrastructure on the R510 between Raheen Roundabout and Quins Cross are under preparation by the Physical Development Directorate of Limerick City and County Council, who have responsibility for the design and construction of the cycle network. Draft design proposals for this cycling</p>
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<p>continue to promote active travel. However, the school has serious reservations about the availability of parking space at the school drop off and collection times. The proposed set down areas will be inadequate and potentially cause serious traffic management issues in the area. The school is already a pinch point for traffic congestion at these times.</p> <p>The Board of Management submits that element (b) occurs firstly so that traffic flow in the school is reduced, limiting the congestion and dangers especially at peak times of school activity.</p> <p>The Board of Management also submits that element (a) is delivered early so that the school can plan strategically for the future to meet likely increased enrolment demands.</p>	<p>infrastructure will go through a Section 38 public consultation process, which will allow members of the public an opportunity to consult and engage with Physical Development on any issues in relation to the proposed design of this infrastructure.</p> <p>The Local Authority support delivery of new and improved link roads and junctions accommodating public transport, cycle and pedestrian connections, including the Mungret Loughmore Area Link Road/ Mungret Link Streets project and indicative proposals outlined on Map No. 4.</p>
Chief Executive's Recommendations:	
No Change	
SEA/AA Response: N/A	

26	Name/Group:	John Spain Associates on behalf of Aldi Stores (Ireland) Ltd.
	Submission:	Response
	<p>1. General: Aldi is seeking to provide additional stores within the city centre and Dooradoyle/ Southern Environs to help meet the convenience retail needs in these areas, where there is an identified shortfall in provision and lack of consumer choice.</p> <p>2. Retail: Concerns are raised in relation to retail objectives which state "All new retail development in the Southern Environs will be considered premature pending the completion of the Limerick Shannon Metropolitan Retail Strategy, in order to protect the vitality of the City Centre in accordance with the objectives of the NPF and RSES". There is no justification for such a prohibition within national or regional planning policy. This is not appropriate and</p>	<p>1. General: Noted</p> <p>2. Retail: The Planning Authority are required to comply with the higher tier plans of the National Planning Framework and Regional Spatial and Economic Strategy for the Southern Region, which identify Limerick City Centre at the top of the retail hierarchy, and require completion of a new Joint Retail Strategy. The existing Joint Retail Strategy remains in effect until such time as the new Retail Strategy is completed.</p>

	<p>the sector needs to be supported and carefully considered at this time.</p> <p>Adherence to the policies of the current Retail Strategy for the Mid-West Region until such a time that the new Limerick-Shannon Metropolitan Retail Strategy is adopted would be more appropriate. A variation to the LAP would allow compliance with the new strategy.</p> <p>The Local Centre objective of the LAP is generally supported. Discount food stores/ small supermarkets are complementary to local scale convenience stores. An Aldi store at a local centre would bring significant benefits to existing shops and services, serving as popular retail anchors. It is well established that small supermarkets/ discount foodstores are appropriate in local centres in large urban areas throughout the country.</p> <p>The subject draft LAP presents an opportunity to provide for a new Aldi store with the right policies. The LAP provides a flexible approach to convenience retail provision providing the planning controls needed to encourage convenience retailing to grow.</p>	<p>Limerick City and County Council have engaged consultants to prepare a joint Retail Strategy for the Limerick – Shannon Metropolitan Area in conjunction with Clare County Council. On completion any proposed retail development shall comply with the proposed Strategy.</p>
Chief Executive's Recommendations:		
No Change		
SEA/AA Response: N/A		

27	Name/Group:	Avison Young on behalf of Tesco Ireland Limited
Submission:		Response
<p>1. Crescent Shopping Centre: Tesco Ireland support the range of civic amenity improvements which could be accommodated at the Crescent Shopping Centre, which include the provision of a civic square, hard and soft landscaping, enhanced pedestrian and public transport connections and traffic calming measures within and on</p>		<p>1. Crescent Shopping Centre: Noted. Any proposals for the improvement of access to service areas would be supported in the interest of public health and safety.</p>

<p>access roads to the Centre. Proposals for improvements for service and delivery vehicles such as enhanced access/ egress to dedicated service areas, should also be promoted, contributing to a safer environment within the car parking areas and reducing opportunities for conflicts between customer and delivery vehicles.</p> <p>2. Retail: Tesco welcomes the preparation of a Retail Strategy for the Limerick Shannon Metropolitan area and the objectives set out under the LAP that promote the enhanced role of Limerick City Centre as the primary retail centre. The Draft LAP states that “no additional retail floor space will be permitted at the Crescent” pending completion of the Limerick Shannon Metropolitan Retail Strategy. This is generally considered acceptable, however it is requested that proposals to support improvements, alterations and extensions to the Crescent Shopping Centre, where no significant new additional retail floorspace is proposed, prior to the completion of the Retail Strategy.</p> <p>It is critical that any proposals to improve the offer at the Shopping Centre are supported, particularly at a time when the retail sector faces a period of uncertainty.</p>	<p>2. Retail: The Planning Authority are required to comply with the higher tier plans of the National Planning Framework and Regional Spatial and Economic Strategy for the Southern Region, which identify Limerick City Centre at the top of the retail hierarchy, and require completion of a new Joint Retail Strategy. The existing Joint Retail Strategy remains in effect until such time as the new Retail Strategy is completed. Therefore, it is considered reasonable that support can be given to the re-investment, upgrade and limited expansion of the retail and services provision at the Dooradoyle District Centre.</p> <p>Limerick City and County Council have engaged consultants to prepare a joint Retail Strategy for the Limerick – Shannon Metropolitan Area in conjunction with Clare County Council. On completion any proposed retail development shall comply with the proposed Strategy.</p>
<p>Chief Executive’s Recommendations:</p>	
<p>1: No Change</p> <p>2: Amend Section 6.7 District Centre text as follows: <u>Limited no additional retail floor space and services will be permitted and re-investment and upgrade works supported at the Crescent. Any proposed retail development shall comply with the new Limerick Shannon Metropolitan Retail Strategy on completion.</u></p>	
<p>SEA/AA Response: The proposed change is the wording of the retail policy set out in the 2011 – 2017 (as extended) Local Area Plan under review and as such does not have significant environmental effects.</p>	

28	Name/Group:	Jayne Power on behalf of The Power Family
	Submission:	Response
	<p>1. Cycle Lanes: Limerick City and County Council is considering proposals to install cycle lanes on both sides of the R510. Any proposals to install cycle lanes outside of the observer's family home will be met with opposition from the family and neighbouring residences. The set back to the front of the properties was created to achieve sightlines. A cycle lane would compromise sight distance exiting the properties. Dangerous right turning manoeuvres would be created with having to wait in the oncoming carriageway if cyclists are obstructing the entrance. Installation of a cycle lane on this side of the road would be the least safe option for cyclists and residents. No residences would be effected on the opposite side of the road.</p> <p>2. Map: Map 4 Transport Map shows an existing cycle lane on the R510 in front of the family dwelling, this is incorrect.</p> <p>3. Infrastructure: Permission was granted for development of Mungret Woods Housing Estate to the rear of the family dwelling. The observer's family and other families were significantly impacted by this development and have yet to be connected to the public sewerage systems.</p>	<p>1. Cycle Lanes: The provision of sustainable modes of transport is essential in accordance with the Climate Action Plan, National Development Plan and Regional Spatial and Economic Strategy. Limerick City and County Council is committed to developing sustainable modes of transport including the provision of pedestrian and cycling infrastructure as a priority and subject to funding.</p> <p>The draft LSMATS sets out proposals for a Cycle Network for Limerick City and Environs. The provision of this network is supported through the land use policies set out under the Draft Southern Environs Local Area Plan.</p> <p>Proposals for the provision of cycling infrastructure on the R510 between Raheen Roundabout and Quins Cross are under preparation by the Physical Development Directorate of Limerick City and County Council, who have responsibility for the design and construction of the cycle network. Draft design proposals for this cycling infrastructure will go through a Section 38 public consultation process, which will allow members of the public an opportunity to consult and engage with Physical Development on any issues in relation to the proposed design of this infrastructure.</p> <p>2. Map: Transport Map 4 will be amended to show the existing and proposed cycle lane on the R510.</p> <p>3. Infrastructure: Having regard to the planning permission granted under Planning Ref. 16/1196 it is noted that there is no condition requiring connection of the original dwellings along the R510 to the foul sewer. In this respect, this is therefore not an enforcement issue for the Planning Authority.</p>

	It is noted that this matter relates to an agreement between the developer and the dwelling owners.
Chief Executive's Recommendations:	
<p>1: No Change</p> <p>2: Amend Transport Map 4 to show the existing and proposed cycle lane on the R510.</p> <p>3: No Change</p>	
SEA/AA Response:	
The routes lie within zoned areas of the plan and the alterations are minor, there are no environmental effects as the areas are already developed.	

29	Name/Group:	Canon John O'Shea & Fr. Richard Davern on behalf of Mungret & Crecora & Raheen Parish
	Submission:	Response
	<p>1. Cycle Lanes: Submission in relation to the proposal to develop cycle lane(s) on Ballycummin Road beside St. Nessian's Church.</p> <p>Perpendicular car parking on both sides of Ballycummin Road at the side of the church is a much appreciated facility. This parking includes four disabled spaces beside the entrance to the church.</p> <p>Parishioners avail of parking for regular church services (masses, funerals, weddings, confirmation, first communions etc.) and for various events in the Parish Millennium Centre to the rear. Various groups such as Parents & Toddlers, Breastfeeding Mothers and Babies, Active Retired, Bridge Club, Frontline, Limerick Lace, Lady Birds, Girl Guides, Brownies, Arthritis Group, Bereavement, Parish Development, Area Meeting of Priests, Baptismal Meeting, Prayer Groups use this centre.</p> <p>An existing cycle lane on St. Nessian's Road is located at the front of the church so there is no car parking in that area.</p>	<p>1. Cycle Lanes: The provision of sustainable modes of transport is essential in accordance with the Climate Action Plan, National Development Plan and Regional Spatial and Economic Strategy. Limerick City and County Council is committed to developing sustainable modes of transport including the provision of pedestrian and cycling infrastructure as a priority and subject to funding.</p> <p>The draft LSMATS sets out proposals for a Cycle Network for Limerick City and Environs. The provision of this network is supported through the land use policies set out under the Draft Southern Environs Local Area Plan.</p> <p>The concerns raised in relation to the impact of the proposed cycle lanes on St. Nessian's Church and associated car parking is noted. Proposals for the provision of cycling infrastructure on the R510 between Raheen Roundabout and Quins Cross are under preparation by the Physical Development Directorate of Limerick City and County Council, who have responsibility for the design and construction of the cycle network. Draft design proposals for this cycling infrastructure</p>

	<p>Concerns are raised regarding the potential impact of the proposed cycle lane(s) on people using the church and Millennium Centre with respect to safety and parking.</p> <p>No details are provided as to whether cycle lane(s) are proposed on one or both sides of Ballycummin Road, beside the footpath(s) or outside of the existing parking. In either case, there is a safety issue for parishioners with a risk of collision when crossing the cycle lane(s) on foot and when parking and driving away.</p> <p>Potential adverse effect on the availability of parking spaces by creation of the cycle lane(s). This is particularly relevant for the disabled parking spaces beside the church entrance. The parish does not want to lose any parking spaces, as all are required on many occasions.</p> <p>In the event that the proposed cycle lane(s) are to be developed, the detailed design should take into account the above issues of concern, take appropriate mitigation measures regarding safety and avoid reducing existing parking.</p>	<p>will go through a Section 38 public consultation process, which will allow the Parish and members of the public an opportunity to consult and engage with Physical Development on any issues in relation to the proposed design of this infrastructure.</p>
Chief Executive's Recommendations:		
No Change		
SEA/AA Response: N/A		

30	Name/Group:	Liz Conway on behalf of St. Nessian's National School Parents Association
	Submission:	Response
	<p>1. School: St. Nessian's School adjoins the R510 and caters for over 700 students. The availability of on street set down areas, which allow access to the school, particularly for children with additional needs, is essential.</p> <p>2. Cycle Lanes: Cycle lanes are proposed on the R510 from the roundabout on Father Russell Road to the roundabout at the South Court Hotel, running straight past St.</p>	<p>1. School: Noted.</p> <p>2. Cycle Lanes: The provision of sustainable modes of transport is essential in accordance with the Climate Action Plan, National Development Plan and Regional Spatial and</p>

	<p>Nessan's School. Development of proposed cycle lanes are welcomed and supported and the school will continue to promote walking and cycling to school. The Parents Association have had no formal discussions and request input to the planning stage of the proposed cycle lane.</p> <p>The current car park is inadequate for the number of staff, requiring staff to park outside the school. The car park also caters for private buses transporting children to/ from local crèches. Serious concerns are raised regarding any proposal to remove the set down areas located outside the school, as this will lead to increased traffic within the school car park, which is already over capacity, which in turn will adversely affect children's safety. Proposed removal of the set down areas will lead to increased traffic management issues in the surrounding housing estates, will negatively affect the quality of life of residents and could lead to issues of dispute with the school.</p> <p>Main objective is to ensure that all children who attend the school can travel in safety.</p>	<p>Economic Strategy. Limerick City and County Council is committed to developing sustainable modes of transport including the provision of pedestrian and cycling infrastructure as a priority and subject to funding.</p> <p>The draft LSMATS sets out proposals for a Cycle Network for Limerick City and Environs. The provision of this network is supported through the land use policies set out under the Draft Southern Environs Local Area Plan.</p> <p>Concerns in relation to the proposed cycling infrastructure is noted. Proposals for the provision of cycling infrastructure on the R510 between Raheen Roundabout and Quins Cross are under preparation by the Physical Development Directorate of Limerick City and County Council, who have responsibility for the design and construction of the cycle network. Draft design proposals for this cycling infrastructure will go through a Section 38 public consultation process, which will allow the school and members of the public an opportunity to consult and engage with Physical Development on any issues in relation to the proposed design of this infrastructure.</p>
	Chief Executive's Recommendations:	
	No Change	
	SEA/AA Response: N/A	

31	Name/Group:	John Conway on behalf of some Oakfield Residents
	Submission:	Response
	<p>1. General: Oakfield residential estate adjoins the R510. In 2018 huge restructuring to the front of the estate affected 6 houses and causes stress and concerns for the safety of children.</p> <p>2. Cycle Lanes: The proposed cycle lanes from Quins Roundabout to the South Court Hotel will run directly past Oakfield. The community welcomes and supports the</p>	<p>1. General: Noted</p> <p>2. Cycle Lanes: The provision of sustainable modes of transport is essential in accordance with the Climate Action Plan, National Development Plan and Regional Spatial and</p>

	<p>development of cycle lanes. The community requests the opportunity to input into the planning stage of the proposed cycle lanes.</p> <p>Serious concerns are raised regarding any more restructuring of the road and footpath on the Oakfield side as so much ground has already been lost. This would raise huge safety concerns should any more of the footpath or green areas outside of dwellings be lost.</p>	<p>Economic Strategy. Limerick City and County Council is committed to developing sustainable modes of transport including the provision of pedestrian and cycling infrastructure as a priority and subject to funding.</p> <p>The draft LSMATS sets out proposals for a Cycle Network for Limerick City and Environs. The provision of this network is supported through the land use policies set out under the Draft Southern Environs Local Area Plan.</p> <p>Concerns in relation to the proposed cycling infrastructure is noted. Proposals for the provision of cycling infrastructure on the R510 between Raheen Roundabout and Quins Cross are under preparation by the Physical Development Directorate of Limerick City and County Council, who have responsibility for the design and construction of the cycle network. Draft design proposals for this cycling infrastructure will go through a Section 38 public consultation process, which will allow members of the public an opportunity to consult and engage with Physical Development on any issues in relation to the proposed design of this infrastructure.</p>
Chief Executive's Recommendations:		
No Change		
SEA/AA Response: N/A		

32	Name/Group:	Sean O'Grady
	Submission:	Response
	<p>1. Cycle Lanes: Submission regarding the proposal to construct cycle lanes on the R510.</p> <p>The observer is 80 years old with limited mobility, has lived at this location for over 50 years and has been advised to avoid public transport during Covid 19.</p>	<p>1. Cycle Lanes: The provision of sustainable modes of transport is essential in accordance with the Climate Action Plan, National Development Plan and Regional Spatial and Economic Strategy. Limerick City and County Council is committed to developing sustainable modes of transport including the provision of pedestrian and cycling infrastructure as a priority and subject to funding.</p>

<p>Exiting onto the R510 is fraught and requires planning. The road is busy and extremely so at certain times. It is too dangerous to turn right and going left towards the Quin's Cross roundabout involves awareness of vehicular traffic coming from the right and pedestrian traffic in both directions. Adding a cycle lane to this situation would make the observer a prisoner in his own home, especially as there have been no suggestions of traffic calming measures on cycle lanes and many cyclists can easily travel at speeds in excess of 25km/hr. There are several other houses on the R510 in a similar situation. Cycle lanes at the other side of the road could be constructed where there are no exits from private houses onto the R510.</p> <p>When the Council "took over" the area between the new wall and the footpath in 1990, the purpose was specifically for "providing sight distance".</p> <p>2. Bord Gais: Bord Gais installed a gas main pipe in the grass area instead of under the footpath. There was a condition that the "entrance ramp at the roadway be improved". This was never done with the result that stormwater from the road often causes flooding of the observer's site. This has now been exacerbated by the raising of the ground level at the rear by over 1 metre to facilitate the Mungret Gate development.</p> <p>3. Services: This is a suburban area and connections to existing stormwater and sewerage, the Limerick Main Drainage System is presupposed.</p>	<p>The draft LSMATS sets out proposals for a Cycle Network for Limerick City and Environs. The provision of this network is supported through the land use policies set out under the Draft Southern Environs Local Area Plan.</p> <p>Concerns in relation to the proposed cycling infrastructure is noted. Proposals for the provision of cycling infrastructure on the R510 between Raheen Roundabout and Quins Cross are under preparation by the Physical Development Directorate of Limerick City and County Council, who have responsibility for the design and construction of the cycle network. Draft design proposals for this cycling infrastructure will go through a Section 38 public consultation process, which will allow members of the public an opportunity to consult and engage with Physical Development on any issues in relation to the proposed design of this infrastructure.</p> <p>2. Bord Gais: Issues arising from works undertaken by An Bord Gais are outside of the scope of the Planning Authority.</p> <p>3. Services: The provision of private connections to the public water and foul sewer is a matter for a connection enquiry to Irish Water.</p>
Chief Executive's Recommendations:	
No Change	
SEA/AA Response: N/A	

33	Name/Group:	John Philip Ryan on behalf of Teresa Ryan
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Submission:	Response
<p>1. Ballyclough: Ballyclough has been excluded from the Southern Environs area. Ballyclough is a substantial community (100+ residents) comparable to other residential areas in the Southern Environs, Northside and Castletroy areas. The residential and commercial community is enclosed by the M20 and Limerick Golf Club. Ballyclough should be included in the Southern Environs Area to ensure the continued orderly development of the community. Exclusion is at odds with the National Development Plan Project Ireland 2040.</p> <p>2. Community: Ballyclough has developed over the last 50 years, initially comprising the Euroville estate the community has extended to over 100 houses with one off houses and estates including The Belfry, Ryedale, Thorndale and Riverslea. Growth has been supported by Roxboro Primary School (St. Nessian's & St. Paul's aswell), The Crescent Comprehensive Secondary School and the third level institutes. Supported by amenities at Limerick Golf Club, Old Crescent Rugby Football Club, Regional United AFC and Mungret GAA. The Raheen Business Park, Castletroy Business Park and Limerick City Centre are easily accessible.</p> <p>The community can be strengthened and enhanced by more local services. Exclusion from the Development Plan will exclude the community from new services and</p>	<p>1. Ballyclough: The area of the Southern Environs is defined under the Limerick Development Plan 2010 – 2016 (as extended). An amendment to the plan area boundary to include Ballyclough therefore cannot be considered under the review of the Local Area Plan.</p> <p>Ballyclough is remotely located with respect to the Southern Environs plan boundary and would require substantial tracts of lands to be incorporated into the zoned area beyond the M20 motorway. In this regard, there are sufficient zoned lands within the boundary of the Local Area Plan to serve the needs of the area for the next 6 years and beyond.</p> <p>The amendment of the plan area boundary to include Ballyclough would be contrary to the National Strategic Objectives for Compact Growth and the delivery of new development within the existing built up footprints of the city and suburbs as set out under the National Planning Framework.</p> <p>2. Community: Noted. Refer to response under Ballyclough above.</p>

<p>investment in critical infrastructure under Project Ireland 2040. The existing community will be weakened and residents will move elsewhere.</p> <p>3. Sustainability: Development at Ballyclough is reliant on septic tanks. Faulty septic tanks continue to pose a major public health and environmental pollution threat and can contaminate household wells and pollute rivers. Approximately 50+ septic tanks have been constructed incorrectly or are not being properly maintained. Ballyclough is drained by two waterways flowing into a tributary of the River Shannon. It is essential that this area is included within future wastewater treatment planning to ensure sustainable management of water and wastewater and to preserve the biodiversity of national waterways.</p> <p>4. Connectivity: Ballyclough is located within 4.5km of Limerick City Centre, an equivalent distance to Castletroy, Mungret, Raheen and Annacotty. For the proper planning and enhancement of connectivity infrastructure it is essential that Ballyclough is included in the Southern Environs Area. Ballyclough has been excluded from the infrastructure planning set out under the Limerick Shannon Metropolitan Area Transport Strategy 2040.</p> <p>5. Walking/ Cycling: Ballyclough is underserved by walking and cycling infrastructure. The community has limited footpaths with no overall inter connected network. There is no dedicated cycling infrastructure and none proposed under LSMATS. Ballyclough could be included within the overall city's cycling infrastructure by adding a cycle route to the Southern Environs green route.</p> <p>6. Public Transport: Ballyclough is not served by public transport. No public transport is proposed under LSMATS as the area is excluded from the Southern Environs.</p>	<p>3. Sustainability: Noted. Refer to response under Ballyclough above.</p> <p>4. Connectivity: Noted. Refer to response under Ballyclough above.</p> <p>5. Walking/ Cycling: Noted. Refer to response under Ballyclough above.</p> <p>6. Public Transport: Noted. Refer to response under Ballyclough above.</p>
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<p>Inclusion in the Southern Environs would enable public transport infrastructure, support the objectives of Project Ireland 2040, reduce car dependency and enhance sustainable transport options.</p> <p>7. Road: Ballyclough is strategically located at the merger of critical local and national road access with access to Shannon International Airport and major urban centres. This will be enhanced further with the Northern Distributor Road giving greater accessibility to all parks of Limerick City and the mid-west region.</p> <p>8. Compact Growth: Development of the Ballyclough community in the Euroville area would be in keeping with the objective for compact growth within the existing suburban footprint. Project Ireland 2040 requires 50% of new city housing within the existing urban and suburban footprint.</p> <p>The existing barriers of the M20, Limerick Golf Course and existing residential development prevent the uncontrolled expansion of Ballyclough. This area can be an infill development area where controlled residential development and services should be supported and encouraged, in accordance with the objectives for compact growth.</p> <p>Ballyclough is within the area of the Limerick Shannon Metropolitan Area Spatial Plan earmarked at national and regional level to accommodate substantial population growth. Exclusion of Ballyclough from the Southern Environs will encourage one off housing and disrupt the delivery of a holistic suburban residential environment properly interconnected with the wider city. Infill development at Ballyclough is a better solution than residential development on operational farmland in the greater Mungret area, located further from the city.</p>	<p>7. Road: Noted. Refer to response under Ballyclough above.</p> <p>8. Compact Growth: Noted. Refer to response under Ballyclough above.</p>
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	Chief Executive's Recommendations:
	No Change
	SEA/AA Response: N/A

The following submission was received outside of the statutory period for submissions:

Name/Group:	National Transport Authority (NTA)	
Submission:	Response	
<p>1. Zoning at the M20/M7 Interchange: The NTA has serious concerns regarding the zoning of lands for Enterprise and Employment at the M7/M20 interchange. The site is neither within nor contiguous to the built-up area of Limerick, severed from existing development by a combination of the M7, M20, and the Limerick-Foynes Rail line. Under LSMATS, the primary spine bus route is likely to be on Ballinacurra Road rather than Rosbrien Road. The level of bus service is unlikely to be sufficient to serve large-scale employment or a significant number of future employees.</p> <p>The NTA considers the proposed zoning is not consistent with national planning guidelines and regional land use planning policy, and should be reviewed prior to the adoption of the Local Area Plan.</p> <p>2. Zoning at the N18 / N69 / Dock Road Interchange: It is recognized that the significant quantum of land zoned for Enterprise and Employment at the N18 / N69 / Dock Road interchange is provided for in the current Local Area Plan. The NTA has similar concerns related to this existing zoning as the above. While its removal would be optimal in terms of consistency with the LSMATS, RSES and MASP, its maintenance may be acceptable, subject to the following specific objective for the site, or via updating the text of the Enterprise and Employment Land Use Zoning in Chapter 15:</p> <p>-The development of this site would be governed by a Masterplan agreed between the landowners, Limerick City and County Council, Transport Infrastructure Ireland and the NTA;</p>	<p>1. Zoning at the M20/M7 Interchange: The Planning Authority notes the concerns of the NTA in relation to the zoning of lands, national guidance and regional policy in relation to same at Junction 30 Rosbrien. The Planning Authority also notes the location of the lands with respect to Junction 30 within the M20 Cork to Limerick study area and the potential for intensive traffic movements associated with development of these lands for Enterprise and Employment uses. Pending completion of assessments in relation to the proposed M20 Cork to Limerick study in 2021 and issues of traffic movements, noise and flooding, it is considered that the zoning for Enterprise and Employment would be premature at this time.</p> <p>2. Zoning at the N18/N69/Dock Road Interchange: The Planning Authority notes the concerns of the NTA in relation to the zoning of lands at Junction 2 Dock Road. The subject lands were previously zoned under the 2011 Local Area Plan for the Southern Environs. The modification to the zoning designations reflect the existing uses of these lands. The Planning Authority also notes the issues of congestion in this area and proposals for a primary bus route and provision of cycle lanes on the Dock Road in accordance with LSMATS, which should facilitate alleviation of same. The Planning Authority further notes the suggested specific objective for these lands to facilitate the alleviation of traffic associated with the development of these lands. On the basis of the proposed bus route and cycle lanes it is considered reasonable to retain the zoning of these lands subject to the inclusion of a</p>	

<p>- Car parking will be provided at a rate below that provided for in the County Development Plan and provided on an area-wide basis rather than according to the requirements of individual developments;</p> <p>- Cycle parking will be provided in all developments to cater for 20% of all trips to be made by this mode;</p> <p>- All developments will include end-of-trip cycling facilities for employees such as showers and lockers;</p> <p>-All new roads would incorporate segregated cycle tracks designed in accordance with the National Cycle Manual;</p> <p>- All new roads will seek, in the first instance, to provide for filtered permeability, in order to avoid creating additional capacity for car traffic; and</p> <p>- The Masterplan, and all subsequent development proposals would include Mobility Management Plans, with clear targets and commitments to implementing measures to promote sustainable transport.</p> <p>3. Transport and Movement: The NTA broadly supports the general thrust of the policies and objectives of the Draft Local Area Plan insofar as they seek to reduce car use and promote public transport, walking and cycling. The following changes are recommended:</p> <p>Strategic Policy – Replace “sufficient” with “appropriate”.</p> <p>TM01 – reword as follows: “Facilitate implementation and delivery of the proposals that will be contained in the final Limerick Shannon Metropolitan Area Transport Strategy”.</p> <p>TM016 – reword as follows: “Improve the layout and efficiency of junctions in order to maximise the flow of people within and through the Environs”.</p>	<p>specific objective generally in accordance the NTA submission.</p> <p>3. Transport and Movement: The suggested amendments to the text and policies of the plan are noted.</p>
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	<p>Insert New TMO – Cycle Network as follows: “Implement in full, the Cycle Network as set out in the draft LSMATS, with priority given in the short term to delivering the primary cycle network and cycle routes serving schools”. This new TMO may also require some redrafting of TMO5.</p> <p>Insert New TMOs – Cycle Parking as follows:</p> <ul style="list-style-type: none"> - “Ensure cycle parking is provided for in all residential developments at a rate which will cater for all future residents”; and - “Ensure cycle parking is provided in all non-residential developments at a rate that will cater for 10-20% of all trips to be undertaken by bicycle”. 	
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PART B

**PROPOSED AMENDMENTS TO DRAFT SOUTHERN ENVIRONS LOCAL AREA PLAN 2021 -
2027**

(To be read in tandem with Part A)

Note: The following sets out amendments omitting the wording ~~struck through in green~~ and wording to be inserted underlined in red. Where policies or objectives are proposed to be included or amended, the policy / objective numbers of those in the Draft may need to be revised.

Amendments to Draft LAP Text:

Chapter 5: Economic Development:

-Amend Section 6.3.2 Availability of zoned lands as follows:

Given the high demand for employment type lands in the Metropolitan Area additional land has been included for Enterprise and Employment uses. In this regard, an area of 204ha. of “High Tech/ Manufacturing”, ~~110ha~~ 69.16ha. of “Enterprise and Employment” and 340ha. of “Industrial” zoned land is available for development in the Southern Environs.

-Amend Section 6.7 District Centre text as follows:

~~Pending the completion of the new Limerick Shannon Metropolitan Retail Strategy, limited~~ no additional retail floor space and services will be permitted and re-investment and upgrade works supported at the Crescent. ~~Limited~~ no additional retail floor space and services will be permitted and re-investment and upgrade works supported at the Crescent. Any proposed retail development shall comply with the new Limerick Shannon Metropolitan Retail Strategy on completion.

Chapter: 7 Housing:

-Amend reference in Objective H O5 as follows:

The Design Manual for Urban Roads and Streets, DTTS and DECLG (2019) ~~(2013)~~.

-Amend Objective H O15 as follows:

Permit housing on agriculturally zoned land outside of Flood Zones A and B for the permanent habitation of farmers and the sons and/or daughters of farmers only and subject to the terms and conditions of the rural housing policy as set out in the Limerick County Development Plan 2010 – 2016 (as extended). Dwellings are categorised as ‘highly vulnerable development’ in the section 28 The Planning System and Flood Risk Management Guidelines for Planning Authorities (2010) and will not be permitted in flood zones.

Chapter: 8 Development Opportunities:

-Amend text as follows:

The Design Manual for Urban Roads and Streets, DTTS and DECLG (2019) ~~(2013)~~;

Chapter 10: Key Infrastructure:

-Amend text as follows:

The Limerick Main Drainage Scheme has the capacity to cater for future population growth. Foul effluent is treated at the Bunlicky wastewater treatment plant, which is operating below its design capacity of 186,000 ~~130,000~~ population equivalents.

Chapter 11: Transport & Movement:

-Amend Objective TM O10 as follows:

Require the submission of Mobility Management Plans and Traffic and Transport Assessments in accordance with the requirements of "Traffic and Transport Assessment Guidelines" (2014) for large scale employment related developments, including at the Strategic Employment Locations of Raheen Business Park and University Hospital Limerick.

-Amend Objective TM O11 as follows:

Protect the capacity of the national road network, having regard to all relevant Government guidance including DoECLG "Spatial Planning and National Roads Guidelines" (DoECLG, 2012) in the carrying out of Local Authority functions and ensure development does not prejudice the future development or impair the capacity of the planned core network under TEN-T Regulations, which includes the M20 Cork to Limerick Scheme and Foynes to Limerick Road (including Adare Bypass) projects.

-Amend Objective TM O12 as follows:

Prevent inappropriate development on lands adjacent to the existing national road network, which would adversely affect the safety, current and future capacity and function of national roads and having regard to reservation corridors to cater for possible future upgrades of the national roads and junctions. Support delivery of strategic road infrastructure identified in the RSES including:

-M20 Cork to Limerick Scheme;

-Foynes to Limerick Road Scheme (including Adare Bypass);

-Upgrade of arterial roads from the motorway network to increase capacity, including the provision

of public transport infrastructure and Park and Ride facilities, including at the R527 Dock Road.

-Include Objective TM O21 as follows:

- Ensure all developments protect and safeguard the capacity and efficiency of the drainage regimes of the national road network.

Retain the zoning of lands at Junction 2 Dock Road subject to the addition of the following specific objective: TM O22:

- Industrial and Enterprise and Employment lands adjacent to Junction 2 shall be developed for uses with low levels of traffic movements only;

- Car parking shall be provided at a rate below that provided for in the Development Plan and provided on an area-wide basis rather than according to the requirements of individual developments;

- Cycle parking shall be provided in all developments at an appropriate level to encourage modal shift;

- All developments shall include end-of-trip cycling facilities for employees such as showers and lockers;

-All new roads shall incorporate segregated cycle tracks designed in accordance with the National Cycle Manual;

- All new roads shall seek, in the first instance, to provide filtered permeability, in order to avoid creating additional capacity for car traffic; and

- All development proposals shall include Mobility Management Plans, with clear targets and commitments to implementing measures to promote sustainable transport.

Chapter 14: Climate Change & Flood Management:

-Amend LAP text as follows:

Climate Change: Context: “Implementation of the LAP will take into account relevant targets and actions arising from sectoral adaptation plans approved in 2019 ~~that will be prepared~~ to comply with the requirements of the Climate Action and Low Carbon Development Act 2015”.

Flood Management: Context: “This Flood Scheme follows the Catchment Flood Risk Assessment and Management (CFRAM) programme, which is a medium to long-term strategy for the reduction and management of flood risk in Ireland covering a number of Units of Measures (as defined in the EU Floods Directive) ~~single National River Basin District~~”.

-Amend Objective FM O1 as follows:

Manage flood risk in accordance with the requirements of “The Planning System and Flood Risk Management Guidelines for Planning Authorities”, DECLG and OPW (2009) and any revisions thereof and consider the potential impacts of climate change in the application of these guidelines.

-Amend Objective FM O4 as follows:

Ensure development proposals within the areas outlined on the Flood Risk Map are subject to Site Specific Flood Risk Assessment as outlined in “The Planning System and Flood Risk

Management Guidelines”, DECLG and OPW (2009). A Site Specific Flood Risk Assessment will be required for developments proposed on sites in areas at risk of flooding from groundwater, in particular in the vicinity of Monteen and Loughmore Commons Turloughs.

- Include Objective FM 08 as follows:

It is an objective of the Council to “Ensure that no development shall commence on these lands identified as being at flood risk adjacent to the Raheen Business Park in the townlands of Ballycummin/Rootiagh, zoned for High Tech/Manufacturing, until a site-specific flood risk assessment, including hydraulic model has been prepared for the lands, which demonstrates that the flood risk for the lands can be mitigated or that a less vulnerable use can be accommodated on site”.

- Include Objective FM 09 as follows:

It is an objective of the Council to “Ensure that no development shall commence on the lands identified as being at flood risk, off Blackberry Lane in the townland of Ballykeeffe, zoned for Enterprise and Employment, until a site-specific flood assessment, including hydraulic model has been prepared for the lands, which demonstrates that the flood risk for the lands can be mitigated or that a less vulnerable use can be accommodated on site”.

Chapter 15: Implementation:

-Amend the Purpose of the Agriculture Objective as follows:

“One off dwellings will only be considered on agriculturally zoned land outside of Flood Zones A and B for the permanent habitation of farmers and the sons and/or daughters of farmers only and subject to the terms and conditions of the rural housing policy as set out in the Limerick County Development Plan 2010 – 2016 (as extended)”.

Amendments to Maps

Amendments to Land Use Zoning Map:

-Amend the land use zoning map Enterprise and Employment zoning revert to Agriculture as per the 2011 LAP zoning at Junction 30 Rosbrien (Submission No’s 1, 3, 20).

Amendments to Flood Map:

-Amend the Flood Map to include Flood Zones A, B and C (Submission No. 5).

Amendments to Transport Map:

-Amend Transport Map 4 to relocate the indicative link road outside of the observer’s landholding (Submission No. 14).

-Amend Transport Map 4 to include the existing and proposed cycle lane on the R510 (Submission No. 28).

PART C

**STRATEGIC ENVIRONMENTAL ASSESSMENT SCREENING AND APPROPRIATE ASSESSMENT
SCREENING**

The changes proposed are not significant and therefore alterations to the Environmental and Appropriate Assessment screening report are not required.

Chief Executive's Recommendation:

In accordance with Section 20(3) of the Planning and Development Act 2000 (Amended), it is recommended that proposed Local Area Plan is made in accordance with the Draft Plan published on the 10th October 2020 and the proposed amendments outlined in the Chief Executives Report above. It is considered that the changes listed above will not have any implications for Strategic Environmental Assessment or Appropriate Assessment.



Dr. Pat Daly,
Chief Executive

LEGEND

- Agriculture
- Existing Residential
- New Residential
- Education & Community Infrastructure
- Enterprise & Employment
- Retail Warehousing
- Industry
- High Tech/ Manufacturing
- Local Centre
- District Centre
- Open Space & Recreation
- Special Control Area
- Semi Natural Open Space
- Proposed Natural Heritage Area
- Utilities
- Proposed Link Roads (Indicative)
- Ecological Buffer Zone
- Special Area of Conservation
- Special Protection Area

Indicative link road Amended

Area zoned Enterprise & Employment changed to Agriculture

Forward Planning
Economic Development Directorate

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SCALE	NA	DWG. NO.	SE-21-27-01
DRAWN BY	C.O'Keefe	CHECKED BY	L. Bolger
DATE		DATE	Dec '20

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LEGEND

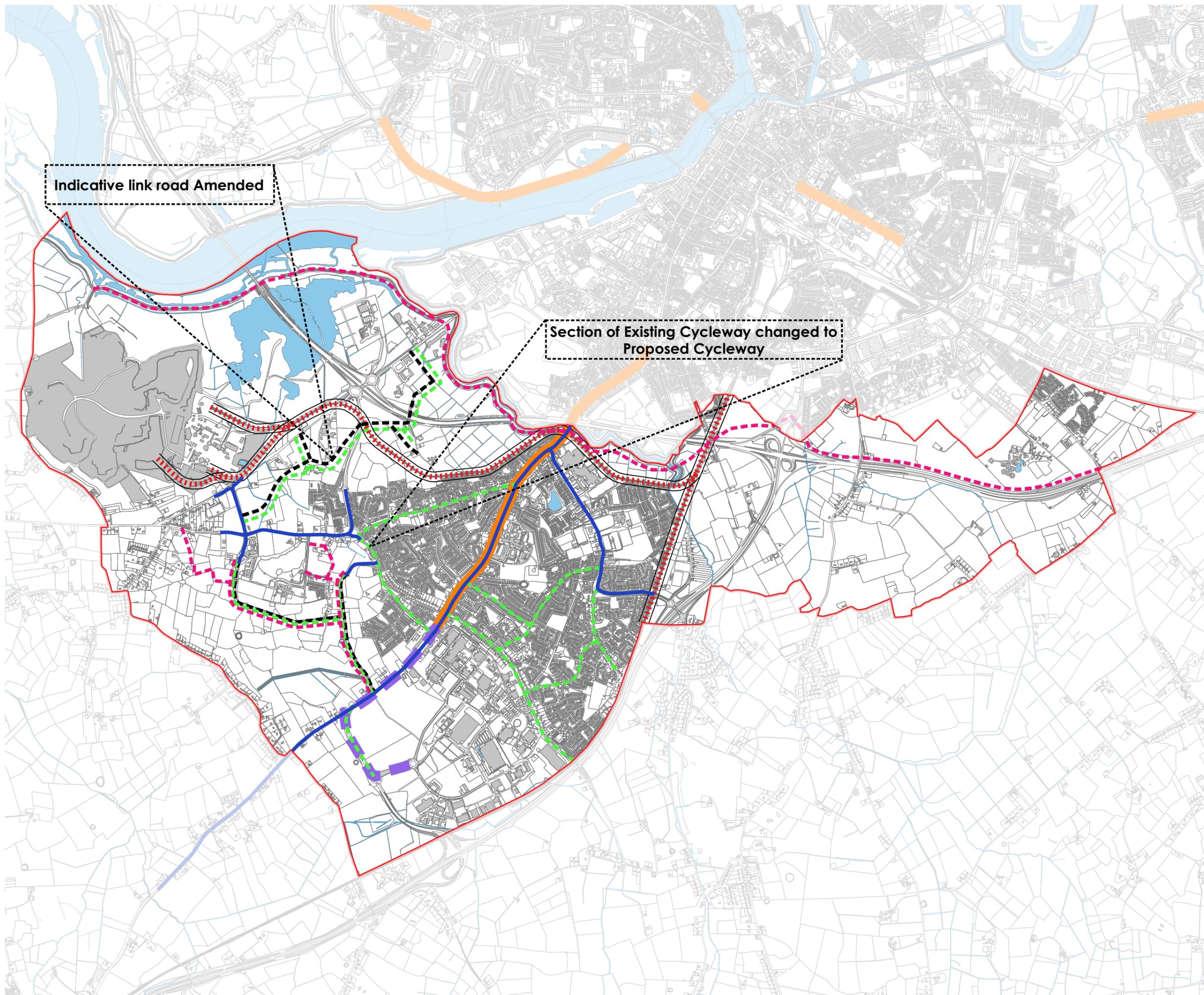
- Agriculture
- Existing Residential
- New Residential
- Education & Community Infrastructure
- Enterprise & Employment
- Retail, Warehousing
- Industry
- High Tech/ Manufacturing
- Local Centre
- District Centre
- Open Space & Recreation
- Special Control Area
- Semi Natural Open Space
- Proposed Natural Heritage Area
- Utilities
- Proposed Link Roads (Indicative)
- Ecological Buffer Zone
- Special Area of Conservation
- Special Protection Area
- CFRAMS Flood Data

Area of Flood Extents included

Forward Planning
Economic Development Directorate

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SCALE NA	Dwg. No. SE-21-27-02	DATE Dec '20	
DRAWN BY C.O'Keeffe	CHECKED BY L. Bolger		
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Indicative link road Amended

Section of Existing Cycleway changed to Proposed Cycleway

LEGEND

- Proposed Link Roads (Indicative)
- - - SE Proposed Walks
- Existing Cycleways
- - - Proposed Cycleways
- Existing Bus Lanes
- Indicative Bus Lanes
- P&R Indicative Location of Park & Ride Facility

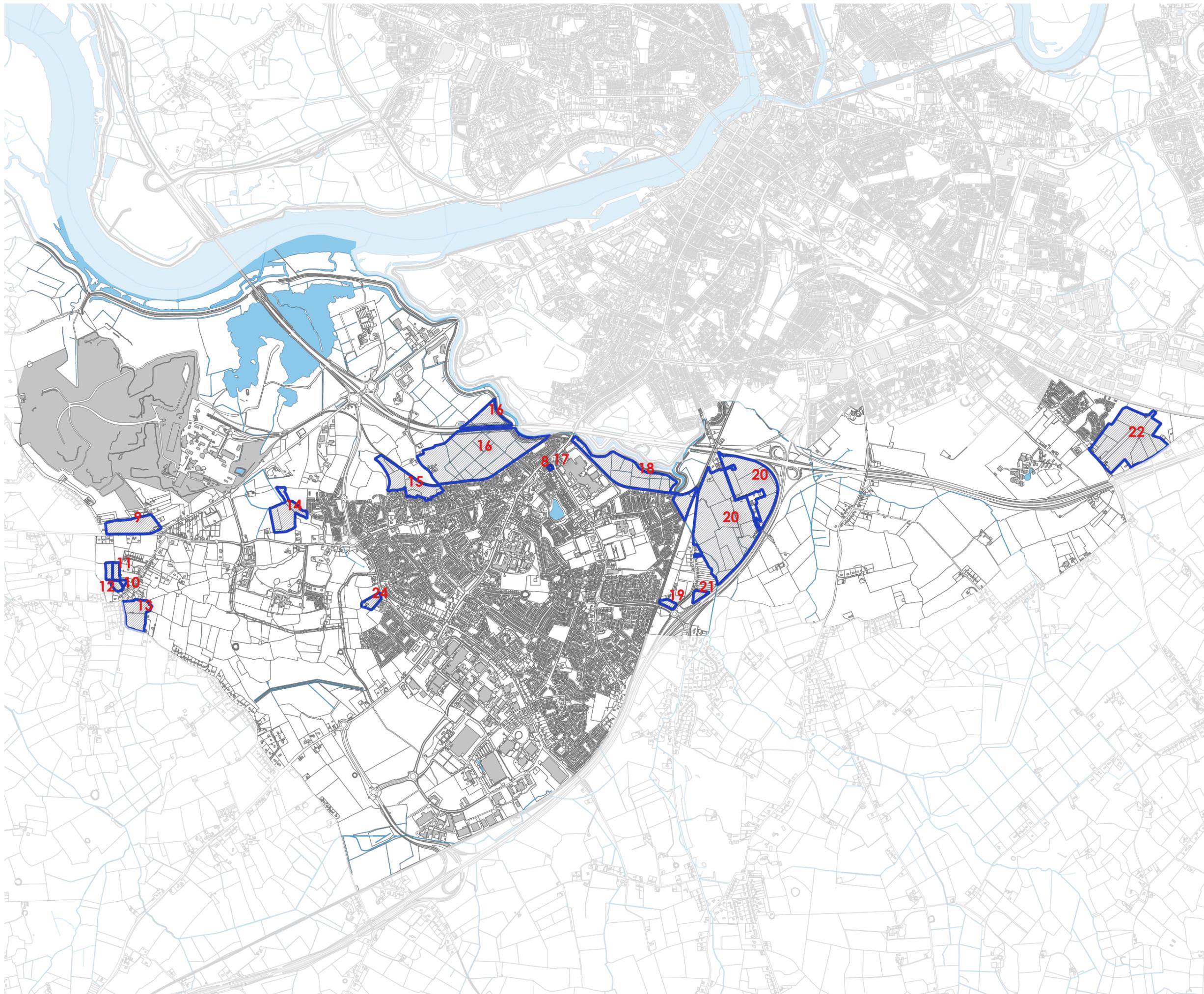
Forward Planning
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SCALE: NA	DWG. NO.: SE-21-27-04
DRAWN BY: C.O'Keefe	CHECKED BY: L. Bolger
DATE: Dec '20	
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Submissions Map



8 & 17.....Cllr. Eddie Ryan on Behalf of Dr. Eamon Howard Bowles

9..... RPS on behalf of Tergnum Properties Ltd.

10..... AK planning on behalf of Prime Bay Ltd.

11..... AK planning on behalf of Seamus Hayes

12..... AK planning on Behalf of Robert Long

13..... Michael Begley

14..... MKO planning & Environmental consultants on behalf of dwellings developments Ltd.

15..... RW Nowlan & assoc. on behalf of DW Raheen

16..... Garland concepts realised on behalf of Laurence & Elizabeth Lahiff

18..... John Spain on behalf of Clancourt

20..... Fehily Timoney & Company Ltd. on behalf of Shannon group PLC.

19..... Town & Country resources Ltd. on behalf of Charlie McDonnell

21..... HRA planning on behalf of Hibernia Senior Living

22..... John Hurley & Olivia Grimes

24..... Coakley O'Neill on behalf of Homeland group

**Forward Planning
Economic Development Directorate**

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