

DRAFT LIMERICK DEVELOPMENT PLAN 2022-2028

Chief Executive's Report on Public Consultation

Volume 1

Prepared in accordance with Section 12(4) of
the Planning and Development Act 2000 (As Amended)

26th November 2021

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Part A - Introduction, Purpose and Consultation

1. Introduction

Limerick City and County Council has prepared a Draft Limerick Development Plan 2022 – 2028, which will replace both the Limerick City Development Plan 2010 – 2016 (as extended) and the Limerick County Development Plan 2010 – 2016 (as extended). The Limerick Development Plan 2022 – 2028, will be the first consolidated Development Plan for Limerick City and County, since the merger of the two Local Authorities in 2014.

The preparation of the new Limerick Development Plan (hereafter referred to as the Draft Plan) is one of the most important functions of the Council. The Draft Plan will act as a blueprint for the development of Limerick from a physical, economic, social and environmental perspective over its lifetime.

Under Section 12 of the Planning and Development Act 2000 (as amended) the Planning Authority published notice of the making of the Draft Plan on 23rd June 2021. The notice indicated that the Draft Plan would be available for inspection and invited submissions or observations until 6th of September 2021.

Notwithstanding the restrictions placed on public events and meetings due to the Covid-19 pandemic and associated public health measures, the level of engagement was high with a total of 285 submissions received. A further 3 late submissions were received after the closing date.

Limerick City and County Council wish to take the opportunity to sincerely thank all those who made submissions, all those who gave their time to attend meetings, both physical and virtual and engaged with officials and also the Elected Members.

1.1 Format of the Report

This Chief Executive’s Report is set out as follows:

- Part A sets out the introduction, purpose and legislative requirements of this report and outlines the public consultation process;
- Part B summarises the submissions received from the Office of the Planning Regulator, the Southern Regional Assembly, followed by submissions by members of the public and sets out the Chief Executive’s opinion and recommendations on the issues raised. The submissions are set out under 13 different themes;
- Volume 2 sets out the proposed Material Alterations arising from the Chief Executive’s recommendations set out in Part B;
- Appendix A lists the late submissions and Appendix B includes a copy of the newspaper advertisement.

1.2 Legislative Background for the Chief Executive’s Report

Under Section 12 (4)(a) of the Planning and Development Act 2000 (as amended), the Chief Executive is required to prepare a report on any submissions and observations received and submit the report to the Members of the Local Authority for their consideration. The report is required to:

- List the persons or bodies who made the submissions or observations;
- Summarise the recommendations, submissions and observations made by the Office of the Planning Regulator;
- Summarise the submissions and observations made by any other persons, in relation to the Draft Plan;
- Summarise the issues raised and recommendations made by the relevant Regional Assembly and outline the recommendations of the Chief Executive in relation to the manner in which those issues and recommendations should be addressed in the Plan;
- Give the response by the Chief Executive to the issues raised, taking account of any directions of the members of the Authority, the proper planning and sustainable development of the area, the statutory obligations of the Local Authority and any relevant policies or objectives of the Government or of any Minister of the Government.

1.3 Purpose of the Chief Executive’s Report and Next Stage

The preparation of a new Plan involves a 3 Stage process as set out in Figure 1 below. This report forms part of Stage 2 of the statutory process for making a new Development Plan.

The purpose of the Chief Executive’s Report is to set out the consultation process on the Draft Plan, including a summary of any submissions or observations, the setting out of the Chief Executive’s response to the issues raised and recommendations on alterations to the Draft Plan. This report will be issued to the Elected Members of Limerick City and County Council for their consideration.

The next step involves the Elected Members considering the Draft Plan and this Chief Executive’s Report within a period of 12 weeks under Section 12 (5) of the Planning and Development Act 2000 (as amended). Elected Members may accept or amend the Draft Plan.

Any Material Alterations made by the Elected Members must go on public display for a period of 4 weeks, under Section 12 (7) of the Planning and Development Act 2000 (as amended). This public display invites submissions or observations on the proposed Material

Alterations only. This is followed by the preparation of a further Chief Executive’s Report on any submissions or observations received on the proposed Material Alterations.

Members may then make the Plan with or without the proposed alterations, or with modifications to the proposed alterations as they consider appropriate. The ‘Adopted Plan’ comes into effect six weeks from the day that it is made.

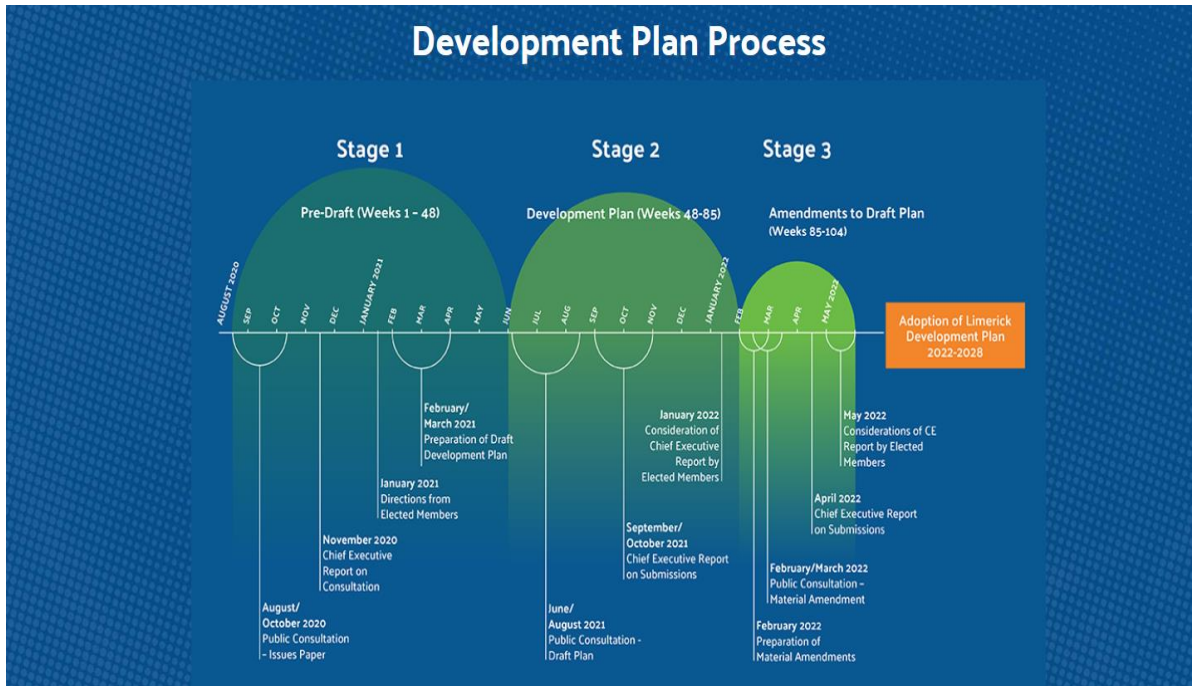


Figure 1: Development Plan Process

1.4 Draft Plan Consultation

The process of making a Development Plan must be open, transparent and inclusive. All individuals and organisations, at local, regional and national level, must be given adequate opportunity to make submissions or observations on the Draft Plan for consideration by the Elected Members.

The Draft Plan consultation was carried out between 26th of June 2021 and 6th of September 2021.

The Covid-19 public health crisis and the related restrictions on public gatherings provided a significant challenge to the consultation process. Building on the consultation to the pre-draft Issues Paper stage, Limerick City and County Council looked for new ways to consult with the public, when the ‘traditional’ drop in consultation evenings were not possible due to Government guidelines. Engagement in the process was actively encouraged through various methods including:

- The new brand for the Development Plan was developed further creating a new visual stage to the plan process distinct to Stage 1;
- The dedicated webpage on www.limerick.ie was continually updated and email address devplan@limerick.ie used for communication throughout this phase of the process.
- A social media campaign, primarily focused on Twitter and LinkedIn provided video clips, updates on public consultation events, details of the webinar etc.;
- Members of the team participated in local radio interviews;
- An online webinar presentation;
- A number of presentations were made to the Public Private Network (PPN).

1.4.1 Webpage

A dedicated Development Plan webpage was hosted by the Local Authority, which included a simple format with a number of tabs to ensure ease of access for the public. There were 15,329 hits on the website during the public consultation period.

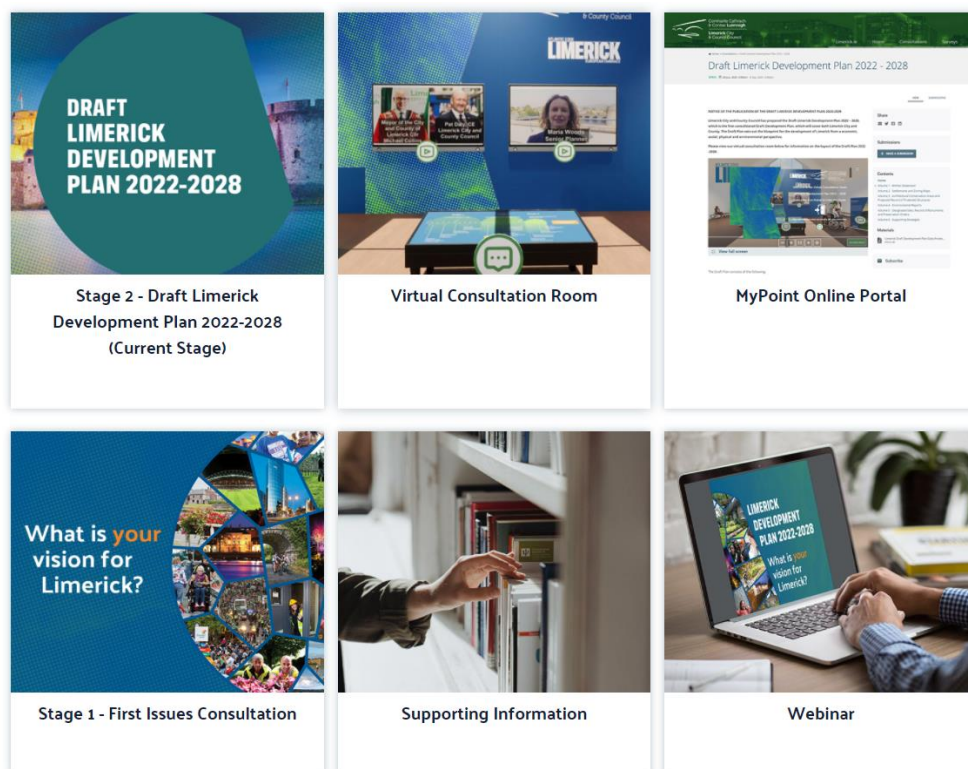


Figure 2: Webpage

The webpage displayed the key elements in terms of content and included the following:

- The Stage 2 Draft Development Plan including all associated volumes;
- A virtual consultation room;

- Details of public meetings and how to make a submission via the various methods including email, post or the online portal;
- An online portal to facilitate the making of submissions under headings. The portal facilitated compliance with the Planning and Development Act 2000 (as amended), which requires all submissions to be placed online within 10 days of receipt;
- The Stage 1 First Issues Consultation documentation;
- Supporting information, which included the existing Limerick City and County Development Plans, the National Planning Framework and the Regional Spatial and Economic Strategy for the Southern Region;
- Details of registering for the webinar, which was hosted on 15th July 2021 and a link to the recording of the webinar for subsequent viewing.

1.4.2 Virtual Consultation Room

A second virtual room allowed the public to access a ‘virtual consultation’ of the Draft Plan. The virtual room allowed users the experience of a drop in public consultation from the comfort of their own home. Given the public health measures and implications associated with the Covid-19 pandemic, the Local Authority wanted to continue to provide a safe alternative to the ‘traditional’ drop in consultation evenings, similar to that used at Pre-Draft First Issues stage.

The virtual room included welcome notes by the Limerick Mayor Michael Collins, preceded by Mayor Daniel Butler and Limerick City and County Council’s Chief Executive Dr. Pat Daly. By following the room layout, the user could access information on the Draft Plan. The room primarily focused on Volume 1 of the Draft Plan with an overview of each of the Chapters of the Written Statement presented across a number of banners. The room also included an interactive mapping tool, a timeline for the preparation of the Development Plan and associated links to each of the Volumes 1-6 and additional information on how to find out more/how to make a submission.

1.4.3 Public Meetings

Notwithstanding the Covid-19 public health measures, there was demand for physical meetings with members of the Development Plan team. Public meetings were facilitated, by appointment only, in each of the Municipal Districts as set out below.

- 29th June 2021, Corporate Headquarters, 10.00 am – 7.00 pm;
- 1st July 2021, Cappamore – Kilmallock Municipal Office, 2.00 pm – 7.00 pm;
- 5th July 2021, Corporate Headquarters, 10.00 am – 7.00 pm;
- 7th July 2021, Cappamore Community Centre, 2.00 pm – 7.00 pm;

- 8th July 2021, Newcastle West Municipal Office, 2.00 pm – 7.00 pm;
- 12th July 2021, Rathkeale House Hotel, 2.00 pm – 7.00 pm;
- 14th July 2021, Corporate Headquarters, 10.00 am – 5.00 pm.

1.4.4 Webinar

An online webinar was held on the evening of the 15th of July 2021. The webinar included an outline of the plan, relevant legislation and overall vision. It further included a presentation on how to access the online Mypoint Consultation Tool, additional information on how to make a submission and instructions on accessing and navigating the online virtual room. Following the event, the presentation was made publicly available on the Development Plan website.



Figure 3: Webinar Presentations

1.4.5 Social Media Analytics

The social media campaign on various platforms commenced on the 24th of June 2021 with information links, online portal links, videos and advertisements to create awareness around the Draft Plan and a call for the public to get involved. The following table includes a brief outline of the social media analytics collected from the 26th of June 2021 to 6th of September 2021.

Social Media Analytics	
Impressions on Social Media (Number of times users saw the Tweet on Twitter)	50,089

Engagements – Total number of times a user interacted with a Tweet	229
Engagement rate	.46%
Media Views – Number of times people saw media file for three seconds or more	4,421
Most popular tweet	2,907 views
Website Views	15,329
Webinar Recorded View	117

Table 1: Social Media Analytics

1.5 Overview of Submissions Received

In total, there were 288 submissions received during the Draft Plan public consultation, which comprised 285 valid submissions and 3 late submissions. Of the 285 valid submissions:

- 78 (27%) were online submissions submitted via the online consultation portal;
- 20 (7%) were submitted by post;
- 187 (66%) were submitted by email.

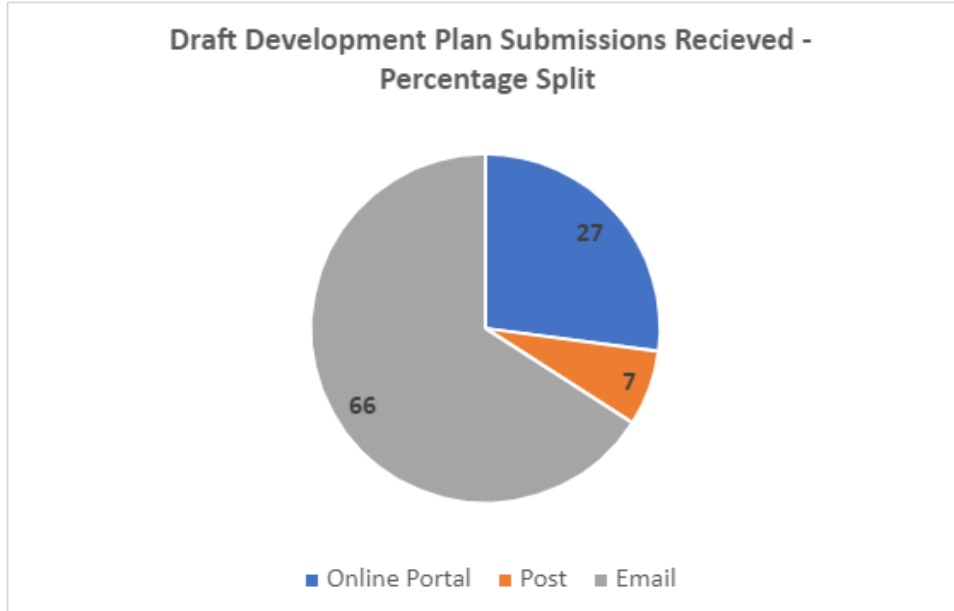


Figure 4: Method of Receipt of Submissions

A wide range of issues were raised in the submissions received to the Draft Plan. The submissions or observations are summarised and a response and recommendation from the Chief Executive to each submission is set out in Part B of this report. While a list of all those who made a submission outside of the public consultation period is included in Appendix A.

Part B – Submission Summaries, Chief Executive’s Responses and Recommendations

No. 225	Ref. & Name/ Group:	LCC- C62-225 Office of Planning Regulator (OPR)	
Submission/ Observation Summary		Chief Executive’s Response	
<p>The OPR wishes to acknowledge the considerable work the Local Authority has undertaken in the preparation of the draft Plan against the backdrop of an evolving national and regional planning policy and regulatory context and in particular the challenge of preparing a single development plan for the merged city and county area.</p>		<p>The Planning Authority welcomes the OPR’s acknowledgement of both the considerable work undertaken by the Local Authority in the preparation of the Draft Plan, and also the recognition of the evolving planning policy and regulatory context.</p>	
<p>The submission acknowledges the total population projections in the Core Strategy are generally consistent with the RSES and NPF. The OPR commends the preparation of the housing supply targets in line with the Housing Supply Target Methodology Guidelines for Planning Authorities (2020). With the exception of issues in relation to Level 1 Cities – Metropolitan Area and the designation of Kilmallock as a Key Town, the OPR considers the overall settlement hierarchy is consistent with national and regional policy.</p>		<p>The Planning Authority welcomes the comments of the OPR highlighting general consistency with the NPF and the RSES and on the preparation of the housing supply targets in line with the Housing Supply Target Methodology Guidelines for Planning Authorities (2020). The Planning Authority also welcomes the comments of the OPR highlighting general consistency with the NPF and the RSES, with regard to the settlement hierarchy.</p>	
<p>The submission outlines the role of the OPR in the assessment of statutory plans, furthermore, it states that recommendations issued by the OPR relate to clear breaches of legislative provisions of policy at a national or regional level or of government, as set out in</p>		<p>The concerns raised by the OPR are addressed in the detailed sections below.</p>	

<p>Ministerial guidelines set out under Section 28. Observations take the form of a request for additional information, justification on a matter or clarification regarding specific provisions of the plan. There are a number of areas that require further consideration, which are outlined in the recommendations and observations and are detailed below.</p> <p>Recommendation 1: Limerick Shannon Metropolitan Area (i) The planning authority is required to amend the proposed written statement to include a standalone chapter addressing the future planning of the Limerick Metropolitan Area as a distinct spatial planning unit, forming part of the Limerick Shannon Metropolitan Area, and to draw together the relevant development issues and policy approaches relating to the Metropolitan Area. This should include a city spatial strategy (as a subset of the overall Core Strategy and as derived from the Limerick 2030 strategy) reflecting the following:</p> <p>(ii) Greater details, and integration, of existing vacant lands and buildings across the city together with brownfield and regeneration opportunities and ongoing initiatives. This should include the regeneration of Colbert, as well as the Limerick 2030 DAC sites and remaining deliverables from the</p>	<p>Recommendation 1: Limerick Shannon Metropolitan Area (i) The Planning Authority acknowledge the OPR’s comments in relation to the importance of a concisely and practical written spatial strategy for Limerick City and the County and will amend the draft plan to incorporate a dedicated chapter, which will seek to draw together the relevant development issues and policy approaches as suggested. This new chapter, Chapter 3 will set out the overall spatial strategy for Limerick City and County, and will be divided into three distinct sections (a) Introduction and overall objectives (b) Limerick Metropolitan Area Spatial Strategy and (c) Limerick County Spatial Strategy. The Chapter will set out the overall approach to development of Limerick in line with national and regional planning policy.</p> <p>(ii) Chapter 3 will build on the work already undertaken in relation to the TAZ and will seek to expand the focus on the integration of existing vacant lands, with brownfield/regeneration opportunities, promoting compact growth in the Limerick Metropolitan Area and throughout</p>
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<p>2013 Limerick Regeneration Framework Implementation Plan;</p> <p>(iii) Relevant outputs/conclusions of the building heights strategy, retail strategy and key elements from the evolving Limerick-Shannon Metropolitan Transport Strategy (LSMATS), particularly as regards the strategic active and public transport network and specific interventions to enable same such as bus prioritisation measures, strategic greenway network and cross-river bridging requirements;</p> <p>(iv) Co-ordination of the urban character area analysis at Table 5.1 and the building height strategy;</p> <p>(v) Safeguards to prevent further “doughnut” residential development progressing at the expense of new housing supply in the city core, such as phasing and matching of suburban delivery to city core delivery.</p>	<p>Limerick. The Chapter will incorporate the opportunity sites set out in chapter 10 of the Draft Plan, including Colbert, Limerick 2030 sites and key objectives of the Limerick Regeneration Framework Implementation Plan.</p> <p>(iii) Chapter 3 will include the key outcomes of the Building Height Strategy, Retail Strategy, Draft Limerick Shannon Metropolitan Area Transport Strategy (LSMATS) and Review and Update of the Limerick 2030 Plan. The revised Chapter will set out the overall spatial strategy for the development of the Limerick Metropolitan Area over the lifetime of the proposed Plan.</p> <p>(iv) Details of the urban character area analysis as outlined will be coordinated in Chapter 3, along with the Landscape Character Assessment for the urban area. New text and a new table will be inserted into the Development Management Standards setting out criteria for the development of buildings of height in the City.</p> <p>(v) The Council have been actively implementing measures to safeguard Limerick City Centre, including the employment of a City Centre coordinator, whose sole responsibility is City Centre revitalisation, seeking to promote the City Centre, engaging with relevant stakeholders and providing a coordinated approach to enhancing the liveability of the City Centre.</p>
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	<p>Recommendation 2 – Limerick - Shannon Metropolitan Area: Core Strategy Table and Diagrammatic Map</p>	<p>Furthermore, the Council have established a team with sole responsibility for the implementing the Vacant Site Levy/Derelict Site legalisation, to work directly with landowners/developers to actively enable sites for development within the City Centre and beyond. The Council have been actively monitoring vacancy within the City Centre for the last 4 years and liaising with the dedicated team, to address vacancy and dereliction, as sites arise.</p> <p>The Council has recently published a Draft Development Contribution Scheme 2022 – 2026, which outlines reduced development contributions for development of sites in the City Centre and Town Centres to further incentivise development within the City and town cores.</p> <p>The City Centre first approach is very much the ethos of Limerick City and County Council in terms of growth of the wider Limerick region and the importance of this approach will be expanded within this new dedicated chapter.</p> <p>Residential zoning in the draft plan is in line with the ESRI figures, ‘Regional Demographics and Structural Housing Demand at a County Level’, forecasts that were issued by the Department. Therefore, it is not considered necessary or appropriate to phase residential zoned lands, particularly having regard to the current demand for housing in Limerick city and environs.</p> <p>Recommendation 2 – Limerick - Shannon Metropolitan Area: Core Strategy Table and Diagrammatic Map</p>
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<p>(i) Level 1 Metropolitan City and Environs, including Mungret and Annacotty, does not accord with the Metropolitan Area of Limerick Shannon, but reflects the existing Limerick City Environs area, which has no status under the NPF, the RSES or MASP. The draft core strategy figures and map do not provide the information relevant to the Metropolitan Area.</p> <p>(ii) The Planning Authority is required to amend the proposed core strategy table to ensure consistency with the provisions of the NPF, the RSES and the MASP for the future development of Limerick City and suburbs and the Limerick - Shannon Metropolitan Area as a regional driver, including:</p> <p>(a) Limerick City and suburbs as defined by the Central Statistics Office (CSO) boundary, having regard to NPO 3b and NPO 8;</p> <p>(b) Strategic residential development areas for the city (such as Mungret) in accordance with the MASP;</p> <p>(c) Other settlements located within the defined Metropolitan Area, taking account of the full MASP boundary (note in particular the strategic potential of Castleconnell, Patrickswell and other smaller settlements in addition to Annacotty); and</p> <p>(d) Rural areas within the MASP.</p> <p>(iii) The planning authority is required to amend the core strategy diagrammatic map consistent with the requirements of Section 10(2B). In this regard, the planning authority is advised to delineate the boundary of the Limerick - Shannon</p>	<p>(i) The Core Strategy Map will be revised so that it is consistent with the revised Table and will include details of the city centre, areas designated for significant development during the plan period and the availability of public transport and retail centres throughout Limerick.</p> <p>(ii) The Core Strategy Table will be amended to ensure consistency with the provisions of the NPF, RSES and the MASP and will include Limerick City and Suburbs, as defined by the Central Statistics Office in Limerick. The table will also set out population growth for Mungret and Annacotty, which are key areas of growth within Limerick City and Environs. It will also identify the settlements located within the Metropolitan Area, such as, Castleconnell, Patrickswell, Clarina, Montpelier and the rural areas.</p> <p>(iii) The Core Strategy Map will be amended in line with the requirements of the submission, including the delineation of the boundary of the Limerick – Shannon Metropolitan Area. The Map will also include key employment and residential</p>
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<p>Metropolitan Area, as context. Consideration should also be given to including relevant details (such as employment and residential growth areas, and infrastructure) for that part of the Metropolitan Area within County Clare, in consultation with Clare County Council and the Southern Regional Assembly, as may be appropriate, and in view of the requirements of section 9(4) of the Act.</p> <p>Recommendation 3: Settlement Hierarchy: Kilmallock The submission indicates that Newcastle West is the only settlement defined as a Key Town in the RSES, based on a variety of criteria, including size and wider service functions. Although Kilmallock performs a key role in the southeast of Limerick, this must be reflected in the plan consistent with the RSES. Therefore having regard to the settlement typology and the designation of a limited number of Key Towns in the Southern Region under the RSES (Table 3.2 Settlement Typology and RPO 3 refer), the planning authority is required to amend the county settlement hierarchy providing for Newcastle West as the only Key Town in Level 2 of the hierarchy. The positioning of Kilmallock within the settlement hierarchy should therefore be amended to reflect the RSES settlement typology.</p> <p>Recommendation 4 – Future Growth of Patrickswell Having regard to National Policy Objectives NPO 3c and NPO 9 of the NPF, which limits population growth outside of cities, regional growth centres and key towns to 30% by 2040, the</p>	<p>growth areas and key proposed infrastructure for the Metropolitan area. However, it is not considered appropriate to include key growth areas within Clare, as the delivery of such sites is outside the control of Limerick City and County Council.</p> <p>Recommendation 3: Settlement Hierarchy: Kilmallock Kilmallock plays a key role as a service centre in the south east of Limerick and while the population of the town is limited, it displays a wide variety of services functions akin to many of the key towns identified in the RSES and serves a wide hinterland. However, the Planning Authority note the comments of the OPR with regard to the location of Kilmallock on the settlement hierarchy and acknowledge that it’s not identified as a key town in the RSES. Accordingly, it is proposed to relocate Kilmallock to Level 3 on the settlement hierarchy in line with the OPR’s recommendation.</p> <p>Recommendation 4 – Future Growth of Patrickswell (i) Patrickswell is located within the Limerick – Shannon Metropolitan Area and had a population of 847 in the 2016 Census and despite its proximity to Limerick City and Suburbs,</p>
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<p>requirements of section 10(2)(n) of the Planning and Development Act 2000 (as amended), and the housing unit allocations to Patrickswell (growth rate of 97% proposed), a Level 4 (large villages) settlement, the planning authority is required to:</p> <p>(i) Review the assumptions upon which this very high allocation was based;</p> <p>(ii) Reconsider the housing and population allocation having regard to the potential for adverse impacts on the settlement arising from such rapid growth due to inadequate services and infrastructure and car dependent development.</p>	<p>it has experienced limited growth between 2001 and 2016, primarily as a result of lack of wastewater infrastructure to accommodate any development. Patrickswell village was connected to the Limerick main drainage scheme in 2013, which was during the economic crash, however, subsequent to this connection and the availability of this much needed infrastructure, a significant number of planning applications have been submitted for residential development. However, the contents of the recommendation are noted and the Council recognise the anomaly that is presented for Patrickswell, with the projected growth for the settlement. The Planning Authority have reviewed the assumptions for Patrickswell and the extent of extant planning permissions in the village. A survey of the nature and extent of services and infrastructure to support development in Patrickswell was also undertaken. Following this assessment, it was concluded that having regard to the unique situation in the village, the limited growth over a prolonged period and location of the village in the Metropolitan Area, that 36% growth is considered appropriate in this instance.</p> <p>(ii) The Council have reconsidered the housing and population allocation, having regard to the unique location and circumstances in the village. Patrickswell is well located and well served with local convenience shopping facilities, a national school, community facilities and some employment within the village, all of which will support the projected</p>
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Recommendation 5 – Core Strategy and Zoning for Residential Use

Having regard to Section 10(2A) of the Planning and Development Act 2000 (as amended) the requirement for compact growth in accordance with National Policy Objective 3, the planning authority is required to:

(i) Review the core strategy to ensure that, for each settlement, the core strategy takes account of the total area (in ha) of lands proposed to be zoned for (a) residential use and (b) for a mixture of residential and other uses in accordance with section 10(2A)(d), including the potential housing yield for those lands, having regard to national policy that development of land shall take place on a phased basis;

(ii) The submission indicates that the residential density assumptions (Table 2.6) which inform the core strategy do not fully align with the Sustainable Residential Development in Urban Areas (Cities, Towns and Villages), Guidelines for Planning Authorities (2009) and Circular Letter NRUP 2/2021, particularly in respect to settlements outside of the Metropolitan Area. The core strategy assumes that 20% of all housing in settlement levels below level 1 will be developed at 10 units per hectare, which is not justified in view of the

growth. The village is also connected by pedestrian and cycle facilities to Raheen Business Park, which is a strategic employment location in Limerick.

Recommendation 5 – Core Strategy and Zoning for Residential Use

(i) The Settlement Plans for Level 4 settlements in Volume 2 of the draft development plan already set out the projected quantum of housing units on residential / serviced site zoned lands and village / town centre, which takes into account the level of dereliction and brownfield opportunities. Using this information the Core Strategy Table will be amended to provide the total area (in ha) of lands proposed to be zoned for (a) residential use and (b) for a mixture of residential and other uses and will include the potential housing yield for those lands. The Core Strategy will be amended to include extant permissions where relevant.

(ii) The density assumptions used to estimate the quantity of zoned land in Table 2.6, have been prepared, having regard to the recommended densities set out in the Sustainable Residential Development in Urban Areas (Cities, Towns and Villages), Guidelines for Planning Authorities (2009) and Circular Letter NRUP 2/2021. The densities set out in the Draft Development Plan were considered based on specific locations, which given the composition of the Local Authority comprises of City Centre locations to rural countryside, the

<p>objectives for compact growth. Therefore the Planning Authority is required to:</p> <p>Review the density assumptions used to estimate the quantity of zoned land arising from the Housing Supply Targets in the revised Core Strategy to ensure consistency with the recommended residential densities for large towns, small towns and villages in the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (2009).</p> <p>Recommendation 6 – Compact Growth</p> <p>Having regard to the national policy objectives for compact growth NPO 3b that 50% of all new homes targeted for delivery in the City and Suburbs of Limerick are to be delivered within the existing built up footprint of the settlement, with a minimum of 30% to apply to all other settlement under NPO 3c and the corresponding regional objectives, the planning authority is required to:</p> <p>(i) Amend the core strategy to include columns for the quantum of land in each settlement that will contribute to compact growth (50% for Limerick City and Suburbs and 30%</p>	<p>assumptions were applied to provide a robust estimation of potential housing yield to inform the Core Strategy Table.</p> <p>The Planning Authority notes the OPRs concerns regarding the core strategy assumption for 20% of housing units at 10 units per hectare in settlements below level 1. This designation of lands for Serviced Sites is proposed to provide a real alternative to the pressure for one – off rural housing, which exists in the County. These densities apply to sites on the edge of towns and villages and are in line with section 6.12 of the ‘Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities’. It is noted that in section 4 of the OPR submission, that the promotion of serviced sites within the rural towns and villages through the identification of suitable lands is welcomed.</p> <p>Recommendation 6 – Compact Growth</p> <p>(i) The Council recognise and are committed to the delivery of compact growth in line with the NPF and the corresponding objectives from the RSES. The tiered approach to zoning (TAZ), identifies the sites for growth in the City and Suburbs, with in excess of 50% of the lands identified for growth, being on brownfield and infill sites. Similarly on review of the Local Area Plans and in terms of the settlements contained in Volume 2, in excess of 30% of the development lands have been identified for growth. The Core Strategy Table will be updated to reflect the quantum of land, which will contribute to compact growth.</p>
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<p>for other settlements), including infill and brownfield lands, and the anticipated housing yield from compact growth for each settlement;</p> <p>(ii) Identify in the plan sites contributing to compact growth, including regeneration sites for all zoned settlements; and</p> <p>(iii) Include objectives for the monitoring of the implementation of compact growth.</p> <p>Recommendation 7 – Land Use Zoning and Local Area Plans Limerick City and County has a very high number of Local Area Plans (LAPs) which include the zoning objectives. The draft Plan does not include zoning objectives for the Level 2 or Level 3 settlement tiers (Newcastle West, Kilmallock, Castleconnell, Abbeyfeale, Rathkeale and Caherconlish), or for the settlements of Adare, Askeaton, Croom and Patrickswell which have live Local Area Plans (LAPs). The majority of these LAPs pre-date both the NPF and the RSES and are not therefore based on the current policy. The core strategy Table 2.7 indicates that there is a significant excess of existing zoned lands in these settlements to cater for the housing target allocations, the land use zoning objectives of</p>	<p>(ii) The sites which contribute to compact growth will be identified on the Tiered Approach to Zoning Map and Tables, which will be renamed the Settlement Capacity Audit in line with the Draft Development Plan Guidelines for Development Plans.</p> <p>(iii) An additional objective will be included to support the monitoring of the development of sites, which contribute to delivering compact growth, will be included.</p> <p>Recommendation 7 – Land Use Zoning and Local Area Plans The Council acknowledge the high number of Local Area Plans, which include zoning objectives, that will require preparation following the adoption of the Limerick Development Plan 2022 – 2028. The level of work required by the Local Authority in this regard is also recognised. It is the intention of the Planning Authority to incorporate more Local Area Plans into the Development Plan in the long term. However, having regard to the time required to carry out the in-depth analysis to undertake this it was not feasible to do so while drafting the Development plan. Six Local Area Plans have been incorporated into the Draft Development Plan, namely Bruff, Cappamore, Castletroy, Hospital, Kilfinane and the Southern Environs.</p>
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<p>those LAPs conflict with the provisions of the core strategy under the draft Plan.</p> <p>The preparation of LAPs for all of these settlements will present a very significant challenge. The planning authority should consider including relevant objectives for some or all of the settlements concerned in the draft plan. Therefore, having regard to the provisions of sections 18(4)(b) and 19(2B) of the Planning and Development Act 2000 (as amended), which will require the planning authority to amend or replace the local area plans for up to ten settlements within one year of the making of the development plan, the planning authority is required at a minimum to:</p> <p>Identify the compact growth area, key regeneration sites, significant constraints such as flooding, sustainable mobility objectives and relevant key future priorities for these in order to ensure greater consistency with the draft Plan, the principles of compact growth, and to clearly set out how the objectives in section 10(2) of the Planning and Development Act 2000 (as amended) are to be achieved in the interim pending the adoption of Local Area Plans for these settlements.</p>	<p>The Local Authority is committed to the review of all Local Area Plans in a timely manner to ensure consistency with the proposed Development Plan. A programme for the review of all Local Area Plans is proposed as follows:</p> <ul style="list-style-type: none"> - Rathkeale Local Area Plan 2012 – 2018 (As Extended) commenced October 2021 - Caherconlish Local Area Plan 2012 – 2018 (As Extended) - commencing January 2022. - Newcastle West Local Area Plan 2014 – 2020 (As Extended) commencing April 2022 - Abbeyfeale Local Area Plan 2014 – 2020 (As Extended) – commencing April 2022 - Adare Local Area Plan 2015 – 2021 (As Extended) – commencing May 2022 - Patrickswell Local Area Plan 2015 – 2021 (As Extended) – commencing May 2022 - Castleconnell Local Area Plan 2012 – 2019 (As Extended) – commencing May 2022 - Askeaton Local Area Plan 2015 – 2021 (As Extended) will commence at a later stage. As highlighted in the Irish Water submission, there is currently no capacity in the network to accommodate growth, however, this is will be addressed within the lifetime of the proposed Development Plan. Therefore, growth cannot take place until the capacity issue is dealt with. - Kilmallock Local Area Plan 2019 - 2025 and Croom Local Area Plan 2020 – 2026 have both been reviewed since the publication of the NPF and while the RSES
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		<p>was being prepared, it is acknowledged that, there is some over zoning, having regard to the updated Housing Supply Targets and the methodology for preparation of Core Strategy Figures. These plans have been completed taking account of national and regional policy and will be reviewed subsequent to the above list of plans.</p> <p>The Council consider that it is not appropriate or practical to include the detail in the Draft Development Plan, as recommended by the OPR for each of the Local Area Plans. This is due to the scale of the proposed Development Plan, and the analysis and work required to identify key compact growth areas, constraints and specific objectives for each of the Local Area Plans. In accordance with Section 2.4 of the Local Area Plans Guidelines for Planning Authorities, which states ‘Local area plans must play a key role in achieving the objectives contained in higher-level plans and strategies such as...Development Plans’, Local Area Plans will be prepared, as set out in the programme above to comply with the Development Plan when adopted. On review of the Local Area Plans, a comprehensive review of the extent and demand for enterprise and employment lands will also be carried out, as per the Tiered Approach to Zoning completed for the Limerick Metropolitan Area. Until such time as these processes are completed, the policies and objectives of the proposed Development Plan shall guide development.</p>
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	<p>Recommendation 8: Tiered Approach to Zoning: Having regard to the provisions of NPO 72c and to the wastewater treatment capacity constraints affecting the settlements of Hospital and Murroe, for which there appear to be currently no proposals by Irish Water or the local authority to resolve over the plan period, lands should not be zoned for development during the period of the proposed plan. The planning authority should therefore amend the plan for consistency with NPO 72c or demonstrate how the wastewater capacity constraints will be resolved during the plan period.</p>	<p>The Local Authority acknowledge that there is significant over zoning in a number of the settlements with a significant amount of Phase 2/3 lands zoned. Having regard to the Draft Plan’s Core Strategy figures, it is likely that some of this land will be de-zoned during the Local Area Plan Review. In order to allow a degree of flexibility to applicants who meet the rural housing need and who wish to build their homes on lands zoned Phase 2 or phase 3 within a Local Area Plan, it is recommended to include an objective in consideration of applications for individual houses on lands zoned Phase 2/3 Residential Development subject to meeting rural housing criteria on a case-by-case basis having regard to all relevant planning criteria.</p> <p>Recommendation 8: Tiered Approach to Zoning: Hospital has been successful in a bid for funding under the Small Towns and Villages Scheme, which is administered by Irish Water. This is a unique programme developed to address infrastructural deficits in water and waste water to support growth. This funding will support the development of a new waste water treatment plant in Hospital, within the lifetime of the plan. An objective shall be included to restrict development in Hospital until such time as the necessary upgrade to the treatment plant has been complete.</p> <p>The OPRs observation in relation to Murroe is correct, in that there are constraints in terms of the wastewater treatment plant. While funding may become available within the lifetime</p>
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<p>Recommendation 9 Development Management Standards: In relation to Development Management Standards, the NPF signals a move away from rigidly applied, blanket planning standards in relation to building height, garden size and car parking in favour of performance based standards (NPO 13) where appropriate. Therefore in accordance with section 10(2A)(a) of the Planning and Development Act 2000 (as amended), and having regard to NPO 3, 6, 13 and 35, the planning authority is required to:</p> <p>(i) Include an additional policy objective to state that car-free developments will be considered in Zone 1, and associated revisions made to all parts of Table DM 8(a) to highlight the potential for such an approach in urban areas in accordance with NPO 13;</p> <p>(ii) Remove the site coverage and plot ratio standards and minimum separation distances between opposing windows and instead focus on assessing individual development proposals on performance based criteria dependent on location and individual site characteristics in accordance with the provisions of NPO</p>	<p>of the plan to progress the upgrade of the treatment plant it is considered appropriate to change the zoning of the residential lands to Tier 2. An objective shall also be included to restrict development in Murroe until such time as the necessary upgrade to the treatment plant has been complete.</p> <p>Recommendation 9 Development Management Standards: The contents of submission is noted and the Council is committed to ensuring Development Management Standards comply with relevant policies and Guidelines.</p> <p>(i) Noted, the Development Management Standards Table DM 8 (a) will be amended to incorporate car-free developments in Zone 1, where appropriate.</p> <p>(ii) Noted, details in relation to plot ratio, standards, minimum separation distances between opposing windows will be removed. Performance based criteria dependent on location and individual site characteristics will be included in the Development Management Standards.</p>
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<p>(iii) Include a development management standard in the Plan requiring consistency with the residential density standards set out in the Sustainable Residential Density Guidelines for Planning Authorities (2009); and</p> <p>(iv) Include appropriate policy objectives for building height and tall buildings, consistent with the Draft Limerick Building Height Strategy accompanying the draft.</p> <p>Recommendation 10 Rural Housing Policy: The OPR acknowledges that Limerick has a strong rural-based population but states that it is imperative that policy protects against ribbon and over-spill development from urban areas. It also needs to support the National Strategic Outcomes (NSO) of compact growth, sustainable mobility, transition to a low carbon and climate resilient society and sustainable management of environmental resources. The submission states that the plan identifies two rural categories, ‘areas of strong urban influence’ and ‘rural areas elsewhere’, which is consistent with NPO 19. It further acknowledges that these areas are informed by the workforce commute to the city, but states that this may not fully reveal any other areas of pressures, such as other large settlements (e.g. Newcastle West and Abbeyfeale) and/or the influence of the N21 and N20 routes and along the Cork county border with Charleville. Other criteria needs to be considered in determining rural areas, within the context of</p>	<p>(iii) Noted, details requiring consistency with the Sustainable Residential Density Guidelines for Planning Authorities (2009), as appropriate shall be included in the Development Management Standards.</p> <p>(iv) Noted, policy objectives for building height, tall buildings shall be incorporated into the proposed new chapter i.e. City Spatial Strategy, Chapter 3 and Chapter 11 Development Management.</p> <p>Recommendation 10 Rural Housing Policy: In line with the NPF, the Planning Authority utilised POWSCAR to identify the workforce commuters to Limerick City, which is identified as the area under strong urban influence.</p> <p>In response to the OPRs recommendation, additional spatial analysis was undertaken to identify areas within the influence or catchment of larger settlements such as Newcastle West, Abbeyfeale and along the Cork County border with Charleville. This involved consideration of population growth/decline in the electoral divisions over the last Census period. It is proposed that any electoral division in which the population has increased should be added to the area of strong urban influence and any electoral division, where the population has remained stagnant or declined, has been identified as structurally weak, in line with the Sustainable Rural Housing Guidelines 2005.</p>
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<p>the rural area classifications. The following is therefore recommended:</p> <p>Having regard to NPO 19, the planning authority is required to review in an evidence based approach and to consider, by way of additional spatial analysis, the rural settlement strategy (map CDP-C3-RSS) in respect of the area to the south of the county which may be within the influence or catchment of larger settlements such as Newcastle West, Abbeyfeale and along the Cork county border with Charleville. To ensure that the overarching policy objectives, as set out in the core strategy, are not undermined by reason of the rural housing policy the planning authority should consider:</p> <ul style="list-style-type: none"> (i) The proximity to larger towns or to major transport corridors with ready access to urban areas including those large urban centres beyond the county boundary; (ii) Any rural areas with high population growth in the county (CSO data); and (iii) Those rural areas which have direct access to the national primary and secondary road network which provides access to the larger urban areas. <p>Observation 1 – Rural Housing Policy:</p> <p>Having regard to Section 10 (2) (a) of the Planning and Development Act 2000 (as amended), a development plan shall include objectives for the zoning of land for the use solely or primarily for a particular purpose in accordance with the proper planning and sustainable development of</p>	<p>This addresses the 3 points in terms of locations in proximity to national road infrastructure, proximity to the Cork border at Charleville and proximity to Newcastle West and Abbeyfeale.</p> <p>Observation 1 – Rural Housing Policy:</p> <p>The Council acknowledge the inappropriateness of the inclusion of this footnote, in relation to rural housing policy and clarify it was included in error. The footnote should read as Footnote 8 ‘Purpose built student/ancillary accommodation’ and relate to the Education and Community</p>
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<p>the area. The planning authority is advised to remove Footnote 9 to the Land Use Zoning Matrix (Section 12.4) which states that residential use is permissible in ‘Education and Community’ subject to “compliance with the Rural Housing Policy” as this approach is not transparent and has the potential to undermine delivery of the primary objective of the zoning objective.</p> <p>Recommendation 11 Traveller Accommodation: Having regard to the requirements of section 10(2)(i) of the Planning and Development Act 2000, (as amended) the planning authority is required to include objectives in the plan for the provision of accommodation for Travellers, and the use of particular areas for that purpose in accordance with the legislative requirements under section 10(2)(i) of the Act. This should include the identification of specific locations in the land use zoning maps for the county.</p> <p>Observation 2: Alignment of Employment policy with RSES:</p>	<p>Zoning. Therefore, the draft plan shall be amended accordingly.</p> <p>Recommendation 11 Traveller Accommodation The contents of the submission is noted and the Council recognise the importance of the provision of Traveller accommodation. The Council has prepared a Travellers Accommodation Programme 2019 – 2024, in accordance with the relevant legislation, which outlines the accommodation needs, policy and implementation measures to address the accommodation needs of the Traveller Community. Furthermore, The Housing Strategy summarises the assessment of requirements and the delivery actions of the Limerick Traveller Accommodation Programme 2019-2024. The Housing Strategy also provides policy support for the delivery of the TAP and its future replacement. Objective HO O15 will be amended to take into account Housing Policy Objective 8: Increase and Improve accommodation for the Traveller Community. In addition, zoning maps will be amended as appropriate.</p> <p>Observation 2: Alignment of Employment policy with RSES:</p>
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Having regard to the Regional Spatial and Economic Strategy for the Southern Regional Assembly, the Planning Authority is requested to review Chapter 4 of the draft Plan to ensure that it accurately reflects the regional policy objectives set out in the RSES for Limerick City and County area, specifically with regard to the identification of the role of Newcastle West as the Key Town and Abbeyfeale and Rathkeale as part of the inter-urban networks set out in RPO 30 of the RSES.

Recommendation 12 – Employment Zoned Lands:

(i) Having regard to National Strategic Outcome for Compact Growth, NPO 10b, the principles of sequential approach to zoning (Section 28 Development Plans Guidelines (2007) & Section 6.2.5 of the draft Development Plans Guidelines (2021), the Regional Spatial and Economic Strategy and the Limerick-Shannon MASP, Section 2.7 of the Spatial Planning and National Road Guidelines for Planning Authorities (2012) and the objectives of the Draft Limerick Shannon Metropolitan Area Transport Strategy (LSMATs), the planning authority is required to provide robust justification for the extent and location of employment zoned land and to demonstrate that the criteria of the aforementioned have

The Council acknowledge the importance of inter urban networks and the creation of networks and the development of synergies to support development in these rural towns, which may facilitate clustering of similar types of development or shared learnings for these towns. Section 4.6.8 of the draft plan highlights the strong sub-regional interdependencies that exist between Newcastle West, Listowel, Rathkeale and Abbeyfeale. Furthermore, objective ECON 07 supports and promotes the role of Newcastle West as a strategic urban centre of significant influence to realise the full potential of the town, including its role as part of the Atlantic Economic Corridor Initiative. Additional text is therefore, not considered necessary.

Recommendation 12 – Employment Zoned Lands:

(i) The Council recognises the importance of compact growth for both residential and employment uses and the sequential approach to development. The formulation of the Draft Limerick Development Plan has very much centred around this approach to development, in line with the NPF and the RSES. The draft plan also places a strong emphasis on integration of land-use, transport planning, and had particular regard to the Draft Limerick – Shannon Metropolitan Area Transport Strategy. However, for Limerick to become a centre of scale as proposed in the NPF there is a need for sufficient enterprise and employment zoned lands.

<p>been satisfied specifically in respect of the following employment zonings:</p> <p>(a) Lands to the south of Raheen Business Park (Ref No 35 in TAZ, Volume 2) with a zoning objective to provide for high tech/manufacturing campus and agriculture which are identified in the TAZ in Volume 2 as being unserviced lands.</p>	<p>(a) Raheen Business Park is identified as a Strategic Employment location in the RSES and is a key employment centre for Limerick with over 5,000 jobs (2016 Census). The Raheen Business Park consists of a 170 hectare/c.420-acre park, located 5km south of Limerick City Centre, has only approximately 33 hectares available for development, in the existing park. The Park is identified as a High Tech/Manufacturing site and is home to a number of large employers, such as Regeneron Pharmaceutical, Analog Devices, Dell, Banta, and Stryker Corp. The existing Park is almost at capacity and many of the uses contained in the Park, require large floor plates that cannot be accommodated in City Centre locations.</p> <p>The proposed newly zoned lands are currently unserviced, however, services are available in close proximity and the Planning Authority are satisfied that the lands can be serviced within the lifetime of the plan. Having regard to the level of existing infrastructure, including active sustainable travel infrastructure and proximity to residential areas, an extension of these lands to the west would appear the most appropriate approach from a planning perspective. This zoning will also support the existing Strategic Employment Location and ensure sufficient zoned lands are available to accommodate such uses, which cannot be accommodated in the City Centre.</p>
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<p>(b) Lands to east of Delta Retail Park (Ref No 14 in TAZ, Volume 2) with a zoning objective to provide for enterprise and employment.</p> <p>(c) Map 4.1 Askeaton Industrial Park, located outside of any settlement boundary and whereby objective ECON O14 (a) is to safeguard the lands for the accommodation of large establishments of regional importance. It is acknowledged that these lands are identified in the Shannon Integrated Framework Plan (SIFP) for marine related industry and the specifics of this have not been clearly transposed into the draft Plan.</p> <p>(d) Map 4.2 at Annacotty Business Park, located outside of any settlement boundary, whereby objective ECON O14 (b) is to facilitate sustainable expansion of a scale, phasing and character compatible with the surrounding land use and capacity of the road network.</p>	<p>(b) The lands identified to the east of the Delta Retail Park, are located at Crossagalla, and are an extension of the Ballysimon lands on the east side of the City. These have been identified due demand for large land banks on this side of the City. They can connect to the Castletroy/Ballysimon area, via a bridge which would need to be constructed over/under the rail line. There are existing cycling and walking facilities, which would readily connect back to the adjoining areas, as well as serving the communities of the Old Cork Road.</p> <p>(c) The lands zoned at Askeaton Business Park outside the settlement of Askeaton forms part of the lands identified in the Strategic Integrated Framework Plan for the Shannon Estuary. Supporting text/objectives from the SIFP are already incorporated in to the Draft Development Plan to support the development of these lands in line with the principals identified in the SIFP.</p> <p>(d) The lands zoned in the Annacotty Business Park, have been zoned to reflect the existing uses, which have established over a long period of time at this location. There are a number of submissions received to expand the Business Park to support further development at this location, however, in the interest of achieving compact growth, supporting sustainable means of travel for employment use and traffic safety, no further</p>
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<p>Observation 3 – Extractive Industry: Having regard to National Policy Objective 23 and the Section 28 Quarries and Ancillary Activities Guidelines for Planning Authorities (2004), the planning authority is requested to include a map to show the location of quarries and minerals across County Limerick.</p> <p>Recommendation 13 - Retail and Regeneration: The Office welcomes the preparation of a joint retail strategy by Limerick and Clare local authorities, consistent with RSES MASP Policy Objective 17. Further strengthening of the retail policy framework is required to support the strategic role of Limerick City, and the vibrancy and vitality of other town centres consistent with the Retail Planning Guidelines (2012) and the RSES. Therefore, having regard to the provisions of the Section 28 Retail Planning Guidelines (2012) and the Southern Regional Assembly Regional Spatial Economic Strategy 2040, Limerick MASP Policy Objective 2 and 17, the Planning Authority is required to review the retail policies under Section 4.6.1 – 4.6.4 of the draft Plan to include additional policy objectives to prioritise retail provision within the city centre and the urban cores of the settlements, included in Table 4.1a and 4.1b of the retail hierarchy, and the need to adopt a sequential approach to development as set out in the Retail Planning Guidelines (2012) by;</p>	<p>expansion of the Business Park is considered appropriate at this stage.</p> <p>Observation 3 – Extractive Industry: The plan shall be amended to include a map showing the location of quarries and minerals across County Limerick. This will support Objective ECON O32.</p> <p>Recommendation 13 - Retail and Regeneration: The Council recognises the importance of Limerick City Centre at the heart of the retail hierarchy. The importance of enhancing the vitality and viability of the City Centre and Town Centres, in line with the City/Town first approach is also recognised. The retail section shall be revised to include objectives to strengthen retail cores by addressing vacancy and derelict/underutilised sites, support for a diverse mix of uses including residential and living over the shop opportunities, and to promote the town centre first for expansion of retail floor space as part of a sequential approach.</p>
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<p>(i) Identifying the core retail area for the city and district centres on the Limerick City and Environs Zoning Map (Map CDP/V2/02) consistent with the retail strategy;</p> <p>(ii) Include policy objectives to promote the opportunity sites identified in the Retail Strategy included in Volume 6;</p> <p>(iii) Include policy objectives to support the implementation of the key actions and recommendations set out in Section 5 of the Draft Retail Strategy included in Volume 6. This should include expansion of the District Centre Retail Parks.</p> <p>Recommendation 14 – Modal Share and Sustainable Transport: In order to ensure the effective planning, implementation and monitoring of the development plan requirements under</p>	<p>(i) The core retail areas have been identified on the Zoning Map through the zoning objectives for the City Centre, District Centres and Local Centres. Given the changing nature of the retail sector and the increasing trends towards on-line retailing it is not considered necessary to further identify the core retail areas.</p> <p>(ii) Objectives shall be included to promote the opportunity sites identified in the Retail Strategy and these will be incorporated into the revised Chapter 3.</p> <p>(iii) Key recommendations and actions identified in Section 5 of the Retail Strategy shall be incorporated into the revised Chapter 4 A Strong Economy.</p> <p>With regard to the expansion of the District Centre Retail Parks, the Draft Retail Strategy has carried out the relevant assessment and identified that there is no need for significant retail expansion of the District Centres. The draft plan also supports the development of these centres as mixed-use urban centres to include residential, supporting services and commercial office components where appropriate. Accordingly, there will be No change in this regard.</p> <p>Recommendation 14 – Modal Share and Sustainable Transport:</p>
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<p>section 10(2)(n) of the Planning and Development Act 2000 (as amended), the planning authority is required, in consultation with the National Transport Authority (and Transport Infrastructure Ireland), as appropriate, to:</p> <p>(i) Include existing baseline figures for modal share for the overall county and modal share targets for the plan period. It is recommended that this could best be provided at individual settlement level for the larger settlements, and at aggregate level for rural towns and villages and the open countryside; and</p> <p>(ii) Provide an effective monitoring regime for the implementation of the planning authority’s sustainable transport strategy and the modal share targets in particular.</p> <p>Observation 4 - Implementation of Sustainable Transport: Having regard to the requirement to include objectives for sustainable settlement and transport strategies under section 10(2)(n) of the Planning and Development Act 2000, (as amended) the Planning Authority is advised that the following amendments would further improve the overall sustainability of the approach to transport under Chapter 6:</p>	<p>The Council is committed to the implementation of sustainable mobility in line with national and regional policy and are also committed to the implementation of the outcomes of the final LSMATS when finalised. The Council have liaised with and the NTA to development baseline figures for mode share for the Limerick Metropolitan Area, Newcastle West and County Limerick. These baseline figures and targets will be incorporated into the Sustainable Mobility Chapter.</p> <p>(i) Baseline figures shall be provided for the Limerick Metropolitan Area utilising the best available information and targets will be established in line with the draft LSMATS. Baseline figures will also be established for Newcastle West and for County Limerick. This is also dealt with in response to the NTA’s submission (submission no. 247).</p> <p>(ii) Chapter 13 shall be updated to establish an effective monitoring regime for the proposed Limerick Development Plan. Limerick City and County Council have recently developed an Active Travel Office funded by the NTA. Monitoring and reporting from this Office will support the objectives identified in the proposed Plan.</p> <p>Observation 4 - Implementation of Sustainable Transport:</p>
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<p>(i) Consider including a table of the policies, objectives and measures contained in the plan that align with the implementation of the elements of the Avoid Shift Improve (ASI) framework;</p> <p>(ii) A clear commitment to implementing DMURS for urban areas where a speed limit of 60kph or less applies, for both development management and forward planning functions, should be included in the plan.</p> <p>(iii) Consideration should be given to whether the plan would benefit from moving Section 6.8 Rural Transport to after Section 6.5 Sustainable Mobility. Roads objectives under Section 6.4 may be more appropriate in Section 6.7.</p> <p>Recommendation 15 – Exceptional circumstances for access onto National Roads: Objective TR O35(d) National Roads provides an exception for access onto national roads for members of the farming community, on a case-by-case basis. This is inconsistent with Section 2.6 of the Spatial Planning and National Roads Guidelines for Planning Authorities (2012). Therefore, the planning authority is required to omit the exemptions provided for under objective TR O35(d).</p>	<p>(i) Noted, the Council will include a table, which outlines policies and objectives contained in the proposed Plan that align with the implementation of the elements of the ASI framework.</p> <p>(ii) An objective will be included to support the implementation of DMURS for urban areas where a speed limit of 60kph or less applies, for all developments.</p> <p>(iii) The structure of the Chapter titled Sustainable Mobility will be reorganised, to take account of the changes hereby mentioned and additional amendments, as a result of other submissions received.</p> <p>Recommendation 15 – Exceptional circumstances for access onto National Roads: Section 2.5 of the Spatial Planning and National Roads Guidelines requires that development plans should make it clear that the policy of the Planning Authority will be to avoid the creation of additional access points from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 50kph apply save for the exceptions outlined in Section 2.6 of the same Guidelines, accordingly. Objective TR</p>
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<p>Observation 5 Limerick Northern Distributor Road: Objective TR O6 is consistent with the RSES and LSMASP. However, the objective should reflect the need to protect the strategic nature of the future road in accordance with the draft Limerick Shannon Metropolitan Area Transport Strategy (p.75). This envisages that: <i>‘In terms of a strategic land use planning policy based approach and the management of longer-term changes to land use patterns, the route of the LNDR will be regarded as being similar to roads covered by the National roads and the Spatial Planning and National Roads Guidelines and that implementation of the LNDR would not support any significant development along the route, subject to any strategic and/or national considerations’</i>. Therefore, the planning authority is requested to reflect the provisions of the draft LSMATS in the written statement of the draft Plan in respect of strategic land use policy, in co-ordination with adjoining authorities, along the emerging alignment of the Northern Distributor Road.</p> <p>Recommendation 16 – Renewable Energy Targets and Wind Energy: In accordance with the provisions of Section 28(1C) of the Act, and having regard to the government’s commitment in the Climate Action Plan to achieve 70% of electricity from</p>	<p>O35 will be amended to omit the existing text outlined in (d) and replace with the exceptions identified in Section 2.6 of the Guidelines.</p> <p>Observation 5 Limerick Northern Distributor Road: The Council recognise the strategic nature of the LNDR and its importance for the wider region, furthermore, the Council concur with the OPR in so far as, the LNDR will be regarded as being similar to roads covered by the National roads and the Spatial Planning and National Roads Guidelines and that implementation of the LNDR would not support any significant development along the route, subject to any strategic and/or national considerations. Objective TR O6 will be supplemented to include relevant text to safeguard the carrying capacity of the LNDR.</p> <p>Recommendation 16 – Renewable Energy Targets and Wind Energy: The Draft Development recognises the importance of Climate Action and has reflected this by the inclusion of a standalone</p>
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<p>renewable sources by 2030 (adding 12GW of renewable energy capacity nationally), National Policy Objective 55 which promotes renewable energy use and generation to meet national targets, and Section 28 guidelines Wind Energy Development Guidelines (2006) and the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (2017), the Planning Authority is required to:</p> <p>(i) Indicate how the development plan will contribute to meeting national renewable energy targets, including specific targets in megawatts for wind energy potential in the county. In the absence of any nationally or regionally determined targets for County Limerick specifically, you are advised to demonstrate appropriate metrics in this regard, which could include Limerick’s share of estimates of additional national renewable electricity target as defined by the % of national land area represented by the county, linked back to the cumulative renewable energy production potential of the areas designated for renewables development.</p>	<p>Chapter covering Climate Action as well as ensuring that it was considered as a cross cutting theme throughout the Plan.</p> <p>(i) The proposed plan will be amended to support the implementation of the Limerick Climate Change Adaptation Strategy (2019) in line with associated Council obligations on climate change.</p> <p>In identifying targets for renewable energy in the draft Development Plan, the approach that the Council has taken is to include all current technologies rather than just wind energy, referred to in the Guidelines. Renewable energy projects with planning permission up to June 2020 has been taken as a baseline. This approach indicates the technologies that have made their way through the planning process. In the case of geothermal energy, it is also informed by the GSI submission to the plan and on-going survey of geological heritage sites in the County.</p> <p>Most of the Wind Energy developments in Limerick are located in either Special Protections Areas or Special Areas of Conservation and thus may be subject to constraints in terms of new applications. The Council has, as a result, concentrated on repowering as a means of achieving renewable wind energy targets. IWEA (2019) highlights that this can have both wildlife and visual advantages with generally less and more capable turbines being installed in place of a larger number of older less capable models. They also quote a possible increase in capacity of 65% (IWEA 2019, p.11). This comes very close to</p>
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	<p>(ii) Delete the requirement set out in Section 11.7.2.1 which states that “turbines shall be no closer than 100m from the boundaries of adjacent properties without the written consent of the landowner in areas preferred for wind farm development” as the inclusion of a requirement for would restrict the potential for wind farm development in the county (areas open for consideration), would undermine other policy objectives supporting wind farm development and be contrary to national policy and Ministerial guidance on wind farm development.</p>	<p>the figure of 70% of electricity from renewable sources that the Government has set as a 2030 target. As a result, the Council has decided to use the 65% target and the draft plan shall be amended to include a table, which will summarise the allocations for each of the renewable energy technologies. The shortfall is made up by larger allocations for the other renewable technologies. Queries are also being received in relation to planning thresholds as they relate to smaller renewable energy technology projects and while these would be outside the planning process they will also help to achieve renewable energy targets.</p> <p>In terms of off shore renewables Objectives CAF 32 and 33 support the development of offshore wind. CAF037 supports the adoption of emerging renewable technologies as they become available.</p> <p>(ii) The requirement for separation distances from turbines to adjacent property boundaries will be removed from the proposed Development Plan to comply with the relevant guidance.</p>
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(iii) Clarify the evidence basis for the Wind Energy Locations map (Map 8.1) and coordinate the objectives for wind energy development in the development plan with those of the neighbouring counties to ensure for a coordinated wind energy strategy across the region. Particular coordination shall be required with Tipperary County Council and Cork County Council where current conflicts arise in the identification of preferable locations in the consideration of their recently published Draft Development Plans.

Recommendation 17 – Flood Risk Management:

The Strategic Flood Risk Assessment has been reviewed by the OPR and OPW and the inclusion of the Plan-making justification test is welcomed. However, Flood maps for Limerick Metropolitan Area are of poor resolution and are unclear. A number of specific sites within the settlements require a review where inconsistencies with the Guidelines have been identified. Therefore, the planning authority is required to:

(i) Provide clear maps showing lands identified as flood risk A and B for the Limerick-Shannon Metropolitan area

(iii) Extensive consultation was carried out with adjoining Local Authorities, as part of the Pre – draft Consultation phase, with regard to the development of wind energy mapping, in an effort to deliver a coordinated approach to wind energy. Local Authorities consulted included Clare County Council, Kerry County Council, Cork County Council and Tipperary County Council. It was anticipated that an overall coordinated approach could be developed for wind energy, however there are many natural constraints that make this difficult to deliver including the fact that Limerick County is flanked on its county bounds with designated sites, such as the Stack to Mullaighreirks SPA, The Slieve Felim Hills SPA, the Gatee SAC site and the Rive Shannon and Fergus SPA.

Recommendation 17 – Flood Risk Management:

The Council engaged the expertise of Flood Consultants to carry out a Strategic Flood Risk Assessment to inform the plan making process, the precautionary approach was generally applied in accordance with the Planning System and Flood Risk Management, Guidelines for Planning Authorities (2009).

(i) Clear maps identifying Flood Zone A and B will be provided for the Limerick Metropolitan Area.

<p>(ii) Undertake a plan making Justification Test for lands located in Flood Zone A at Dock Road, zoned Industry and Enterprise and Employment.</p> <p>(iii) Include a policy objective to ensure that any new development (vulnerable uses) in existing developed areas located in Flood Zone A and B is limited to minor development only. This should be applied to all relevant settlements.</p> <p>Observation 6 – Public Rights of Way: The planning authority is advised to revisit the policy objective SCI O38 to ensure that the policy includes a clear timeline and to set a measurable target and timeline against which the implementation of additional public rights of way can be added to the plan.</p> <p>Observation 7 – Implementation and Monitoring: Having regard to the commitment of the planning authority to securing and monitoring the implementation of the strategies, policies and objectives of the draft Plan, the Office</p>	<p>(ii) A plan making justification test has been carried out for all lands which are at risk of flooding and have been zoned within the Limerick Metropolitan Area.</p> <p>(iii) The SFRA includes the provision, through the use of the sequential approach and the Justification Tests, to limit new, vulnerable development in Flood Zone A and B to minor development (as Section 5.28 of the Planning Guidelines). This applies to all settlements, unless the Plan Making Justification Test has been specifically applied and passed. The Development Plan already contains a policy and a number of objectives which requires applicants to comply with the Section 28 Guidelines and the SFRA so inclusion of a specific objective in this regard is not considered necessary in this regard.</p> <p>Observation 6 – Public Rights of Way: Public Rights of Way are often fraught with legal difficulties and are difficult to incorporate into the Development Plan process and in this regard the Council welcome the Case Study Paper developed by the OPR in 2021. Objective SCI O38 shall be amended to have regard to the observation made by the OPR.</p> <p>Observation 7 – Implementation and Monitoring: The Council recognise the importance of monitoring the implementation of the any plan or programme. Chapter 13 will be amended to provide a comprehensive list of indicators</p>
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<p>advises the planning authority to consider how Chapter 13 ‘Implementation and Monitoring’ could be amended to ensure that any monitoring is strategic in nature consistent with Part 10 of the Development Plans, Guidelines for Planning Authorities, Consultation Draft (August 2021).</p> <p>General and Procedural Matters:</p> <p>(i) The Office would advise the planning authority to ensure that the draft Plan correctly reflects the terminology and spatial areas applied in the NPF, the RSES and the MASP. In particular, this relates to references to the Limerick Shannon Metropolitan Area under the Core Strategy and Settlement Hierarchy.</p> <p>(ii) Maps have not been included for the ACAs in Volume 3, or for SEVESO sites within county.</p> <p>(iii) Having regard to the Development Plans, Guidelines for Planning Authorities, Consultation Draft (August 2021), the planning authority should consider revising the zoning objectives to align with the standardised zoning objectives in Appendix B.</p>	<p>to be monitored in order to assess the success with which the development plan is being implemented. This will take into account the Development Plans, Guidelines for Planning Authorities, Consultation Draft (August 2021) which sets out a comprehensive list of indicators to be monitored and reported on, on an annual basis. The Council is committed the establishment of a strong, frequent and ongoing monitoring system for their development plan as a permanent function, within the organisation.</p> <p>General and Procedural Matters:</p> <p>(i) Noted, the plan will be updated where required to ensure correct terminology and spatial areas are applied, particularly in relation to the Limerick Shannon Metropolitan Area.</p> <p>(ii) Noted, maps will be provided for the Architectural Conservation Areas in Volume 3 and updated maps and table will also be provided for SEVESO sites in Limerick and included in Chapter 7.</p> <p>(iii) The zoning objectives set out in the Draft Plan, align in so far as possible with the Development Plans, Guidelines for Planning Authorities, Consultation Draft (August 2021). It is not considered appropriate to alter these zoning objectives at this stage as they reflect particular circumstances within Limerick.</p>
<p>Chief Executive’s Recommendations</p>	

Recommendation 1:

(i) – (iii) Insert new Chapter 3 as identified in Volume 2 of the Report.

(iv) Insert new text and a table into the Development Management Standards setting out the criteria for the development of buildings of height in the City.

(v) No change.

Recommendation 2:

(i) (ii) (iii) Amend Core Strategy Table and Map, as identified in Volume 2 of this Report.

Recommendation 3:

Amend Settlement Hierarchy, Core Strategy Table and Map as identified in Volume 2 of this Report.
Amend Objective SS O4 and SS O8.

Recommendation 4:

Amend Core Strategy Table and Map as identified in Volume 2 of this Report.

Recommendation 5:

(i) Amend Core Strategy Table and Map as identified in Volume 2 of this Report.

(ii) No change

Recommendation 6:

(i) Amend Core Strategy Table and Map as identified in Volume 2 of this Report.

(ii) Amend Core Strategy Table and update Settlement Capacity Audit Tables and Maps as identified in Volume 2 of this Report.

(iii) Insert new policy into the new Chapter 3 as follows: [Monitoring of Brownfield/Infill Sites: It is policy of the Council to monitor the development of brownfield and infill sites and their contribution to delivering on the targets established, over the lifetime of the plan.](#)

Recommendation 7:

Insert the following text and associated objective as a new section under Local Area Plans in Chapter 2:

Phasing of Lands – Local Area Plans

A number of existing Local Area Plans have a significant amount of Phase 2 lands zoned. Phase 2 lands cannot proceed for development until 50% of the lands in Phase 1 have been developed. Having regard to the Draft Plan’s Core Strategy figures, it is likely that some of this land will be de-zoned during the Local Area Plan Review. In order to allow a degree of flexibility to applicants who meet the rural housing need, as outlined in Chapter 3 and who wish to build their homes on lands zoned Phase 2 / 3 within a Local Area Plan, individual planning applications will be considered on their merit and on a case-by-case basis having regard to all relevant planning criteria.

Objective XXX Phase 2 Residential Development Lands: It is an objective of the Council to:

Consider applications for individual houses on lands currently zoned Phase 2/3 Residential Development, within Local Area Plans subject to the applicant meeting rural housing criteria as outlined in Objective SS O17 or Objective SS O18 of the Rural Settlement Strategy, whichever is applicable. Applications for individual planning applications will be considered on their merit and on a case-by-case basis having regard to all relevant planning criteria.

Recommendation 8:

Insert the following new objectives into Volume 2 under the settlements of Murroe and Hospital as Objective HO O2 and Objective MU O2.

HO O2: No significant development shall take place within the settlement, until such time as an adequate wastewater treatment system is in place.

MU O2: No significant development shall take place within the settlement, until such time as an adequate wastewater treatment system is in place.

Recommendation 9:

(i) Update Table DM8 Car and Bicycling Standards (a) are identified in Volume 2 of this report.

(ii) Amend Table DM 6 Chapter 11 Development Management Standards as follows:

Table DM6~~Site Coverage and Plot Ratio~~ Site Coverage

On greenfield sites, ~~the indicated site coverage is generally 40 – 50%~~ flexibility in the development standards will be considered on a case by case basis, appropriate to the location, ~~unless~~ the design characteristics of the scheme, the site context, the proposed uses and the Mobility Management Plan. ~~indicate the need for higher site coverage.~~ In urban locations, in order to facilitate the development of a compact centre, a flexible design solution will be considered where a proposal fulfils objectives for compact growth and regeneration, while achieving a high level of design and amenity. ~~a plot ratio and site coverage of 1:5 and 70% will generally be expected.~~

Amend **Section 11.4.1.3** as follows:

In general, ~~a minimum~~ an appropriate separation distance ~~of 22m~~ is required between opposing windows in the case of apartments up to three storeys in height. Discretion of this standard will be dependent on-site layout characteristics and flexibility may be employed where appropriate design can be adequately demonstrated.

Amend **Section 11.4.2:**

As per NPF National Policy Objective NPO13 ~~the 2009 Sustainable Residential Guidelines~~, in the interest of residential amenity the following applies:

- ~~A minimum of 22m~~ An appropriate separation distance between directly opposing rear windows at first floor level in the case of detached, semi-detached and terraced units will be dependent on-site layout characteristics and flexibility may be employed where performance-based criteria can be adequately demonstrated. (For example, where a side garden of equal or greater dimensions can be substituted for rear garden space and where a situation of overlooking is demonstrably avoided).

(iii) Include a Development Management Standard 11.2.1 Design Criteria as follows:

The following criteria will be taken into account when assessing applications:

Consistency with Sustainable Residential Density Guidelines for Planning Authorities 2009 and any subsequent update thereafter

(iv) Insert new Chapter 3 as identified in Volume 2 of the Report and additional guidance in Chapter 11 Development Management.

Recommendation 10:

Amend Rural Housing Settlement Strategy Map as identified in Volume 2 of the Report.

Observation 1:

Amend the Land Use Zoning Matrix (Section 12.4) to state that residential use is permissible in ‘Education and Community Infrastructure’ zones subject to ~~Footnote 9 “Subject to compliance with the Rural Housing Policy~~ Footnote 8 “Purpose built student/ancillary accommodation only”

Recommendation 11:

Amend Objective HO O15 as follows:

Objective HO O15 - Traveller Accommodation - It is an objective of the Council to support ~~the provision of housing suited to the need of the travelling community~~ the quantity and quality of delivery of traveller-specific accommodation with the relevant agencies and to implement the Traveller Accommodation Programme 2019- 2024 and any subsequent updates.

Amend Zoning Maps to identify the location of existing Traveller Accommodation as identified in Volume 2.

Observation 2:

No change

Recommendation 12:

(a) No change;

(b) No change;

(c) Update ECON O14 to remove the word ~~Strategic~~ from title;

(d) No change;

Observation 3

Include a Map identifying quarries and mineral deposits as identified in Volume 2 of this Report.

Recommendation 13

(i) No change;

(ii) Include new Chapter 3 as identified in Volume 2 of this report.

(iii) Include the following text in Section 4.6.1 of the Draft Plan - Retail in Limerick:

The Retail Strategy has identified a number of key actions and recommendations to facilitate improvements to sustain the vitality and viability of the City Centre as follows:

1. Consider pedestrianisation and public realm improvements (new attractive hard landscaping) to encourage pedestrian activity within the core retail area.
2. Maintain the vitality and viability of Limerick City Centre by consolidating the core retail area to ensure any future retail development is directed towards this area in the first instance.
3. Encourage and facilitate the reuse of vacant buildings or under-utilised sites throughout the City Centre, with a focus on brownfield sites.
4. Consider improvements to the public realm within the City Centre, waterfront and consider improving pedestrian linkages to create a more pedestrian friendly environment.
5. Promote access to Limerick’s historic core through improved signage/street maps to make visitors aware of the presence and location.
6. Incentivise owners to make improvements to their buildings/shopfronts within the retail core through grant funding via the ‘Business and Retail Incentive Scheme’.
7. Adopt a pilot programme for the extension of opening hours to allow for late night shopping within the retail core, this could be scheduled to take place alongside one of the City’s major festival/events which will support the night-time economy.
8. Undertake an access audit of the built environment to seek to improve accessibility within the City for people with disabilities.
9. Support the retail charter for operators and landlords to sign-up to high quality goals for retail in the City Centre.

10. [Support synergy with non-retail uses that attract footfall to the City Centre.](#)
11. [Work to define character areas and invest in marketing campaigns to communicate a broad City Centre experience to attract visitors and consumers.](#)
12. [Develop multi-channel synergy between retail, service and cultural offer of the City Centre.](#)

Recommendation 14

See recommendation in response to NTA’s submission no. 247

Observation 4

(i) Insert within amended Chapter 6, a new table, which outlines policies and objectives contained in the proposed Plan that align with the implementation of the elements of the ASI framework.

(ii) Insert new objective into Chapter 6 in support of the implementation of DMURS for urban areas, where the 60kmph or less applies as follows: [Design Manual for Urban Roads and Streets: It is an objective of the Council to support appropriate road design standards of all roads and streets within the urban areas, including suburbs, towns and villages within the 60kph zone shall be as per the Design Manual for Urban Roads and Streets.](#)

(iii) Insert amended Chapter 6 as identified Volume 2 of this report.

Recommendation 15

Amend Objective TR O35 as follows:

Objective TR O35 National Roads It is an objective of Council to:

- a) Prevent, [except in exceptional circumstances as outlined in the Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ \(DoECLG, 2012\)](#), 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 junction.
- b) Avoid the creation of any new direct access points from development, or the generation of increased traffic from existing direct access/egress points to the national road network, to which speed limits greater than 60kmph apply;

- c) Facilitate a limited level of new accesses, or the intensified use of existing accesses, to the national road network on the approaches to, or exit from, urban centres that are subject to a speed limit of between 50kmph and 60kmph. Such accesses will be considered where they facilitate orderly urban development and would not result in a proliferation of such entrances;
- ~~d) Consider permitting access where members of the farming community wish to build their houses for their own occupation, on their own land where the house is required for occupation by a member of the farming community, in connection with the working of the farm and where no reasonable alternative access is available to them and where that access is safe and the traffic levels generated are reasonably low. Such developments shall be subject to a Road Safety Audit.~~

Observation 5

The following text to be added to Chapter 6 including the amendment of TR O6:

The development of the Limerick Northern Distributor Road (LNDR) is a key strategic road infrastructure project as outlined in RSES. The LNDR will improve access to the University of Limerick and the IDA National Technology Park and will reduce City Centre traffic. It will provide a direct link between Shannon International Airport, the businesses and industries in the Shannon area and the university campus. In terms of land use planning policy, although the LNDR will be a regional route, it will be treated in a similar way to National roads and the Spatial Planning and National Roads Guidelines will be applied to potential changes to land use policy on this corridor. Aside from what is proposed in RSES and the associated Local Authority Core Strategies, any significant developments along the LNDR will not be supported and its strategic function will be protected.

Amend TR O6 to include the following:

b) Ensure that the LNDR will be subject to the Spatial Planning and National Road Guidelines and ensure its implementation will not support any significant development along the route, subject to any strategic and/or national considerations.

Recommendation 16

(i) Amend CAF O1 as follows:

(b) Support the implementation of ~~Cognisance shall be had to~~ the Limerick Climate Change Adaptation Strategy (2019) while cognisance shall be had to any revised or forthcoming adaptation, mitigation or climate action strategies or plans at local, regional and national level in the formulation of any plans or policies.

Include a new table in chapter 8 as follows:

Table X Renewable Energy allocations for differing technologies

<u>Output Current and Projected</u>	<u>Wind</u>	<u>Anaerobic Digestion</u>	<u>Solar</u>	<u>Hydro</u>	<u>Geothermal</u>
<u>Current capacity MW</u>	<u>234.35</u>	<u>2.0</u>	<u>113.49</u>	<u>0.1 MW</u>	<u>0</u>
<u>Target Capacity MW (2030)</u>	<u>386.45 (+65%)</u>	<u>20 (+1000%)</u>	<u>227.0 (+100%)</u>	<u>0.3MW (+300%)</u>	<u>0.5MW</u>

Note: Baseline figures drawn from LCCC sources June 2020

(ii) Amend text in Section 11.7.2.1 to the following:

~~Turbines shall be no closer than 100m from the boundaries of adjacent properties without the written consent of the landowner in areas preferred for wind farm development. In areas open to consideration they shall be no closer than 150m from the boundary~~

Appropriate setback distance shall be determined on a case-by-case basis in line with the Wind Energy Guidelines 2006 and any subsequent update.

(iii) No change

Recommendation 17

(i) Amend Flood maps showing lands outlining Flood Zone A and B for the Limerick Metropolitan Area as identified in Volume 2 of this report.

(ii) Include justification tests for all lands which have been zoned and may be at risk of flooding in the updated SFRA.

(iii) No change.

Observation 6

Amend Objective SCS1 O38 as follows:

Objective SCS1 O38 Public Rights of Way ~~It is an objective of the Council to encourage the preservation of existing public rights of way within the plan area~~

It is an objective of the Council to examine the feasibility of identifying and mapping new public rights of way in the recreational and amenity area in Limerick in the context of emerging national guidance, within the lifetime of the Plan.

Observation 7

Insert amended Chapter 13 as identified in Volume 2 of this Report.

General and Procedural Matters

- (i) Update terminology and spatial areas referenced throughout the full Draft Plan.
- (ii) Include Maps identifying Architectural Conservation Areas as identified in Volume 2 of the report.
- (iii) Include Maps and updated table 7.1 identifying all SEVESO sites in Limerick, as identified in Volume 2 of this report.

Table 7.1 Seveso Sites in Limerick

Tier	Name	Location
Lower Tier	Grassland Agro	Dock Road, Co. Limerick
	Exolum Shannon Ltd. (formerly Interterminals Shannon Ltd)	Foynes Harbour, Foynes, Co. Limerick
	Analog Devices International	Bay F1, Raheen Business Park, Co. Limerick
Upper Tier	Atlantic Fuel Supply Company Ltd.	Foynes Harbour, Co. Limerick
	Goulding Chemical Ltd.	Morgan's South Durnish Askeaton, Co. Limerick

SEA/ AA Response

Many of the changes outlined to the proposed Draft Plan, include positive alterations, which will provide clarification and compliance with national and regional policy. The following is a general commentary on the issues that the OPR had raised. The addition of a new Chapter 3, which will set out the Spatial Strategy for Limerick, with clearly presented policies for the

Limerick Shannon Metropolitan Area (LSMA) and the remainder of Limerick will ensure that they are presented in a consolidated manner and relate specifically to the orderly development of the Limerick. The presentation of the material in this fashion will also demonstrate compliance with higher tier plans, an issue which the EPA submission emphasises.

This compliance will be demonstrated through the emphasis on compact and brownfield development on suitable sites in line with national and regional policy. It should be noted that Limerick City and County Council in its development contribution scheme, provides a financial incentive for city and town centre development sites, through reduced contribution fees, as an incentive to development city and town centres rather than on greenfield sites, supporting the concept of sustainable development.

A strong emphasis has been placed in the Core Strategy on compact growth. This will be further emphasised with a map and other material which will comply with CSO boundaries and will show residential and other zonings and supporting figures. Also, in terms of settlement Kilmallock will be relocated to Level 3 in the Settlement hierarchy to ensure compliance with the RSES. Patrickswell growth will be reduced to 40%, above its 2016 Census of population figure. This is a unique situation as there are a number of extant planning permissions in this settlement, which is close to the city and has sustainable transport links (cycle and walkways) to both the city and nearby employment location, such as the Raheen Business Park.

The comments regarding the number of Local Area Plans are noted. Many of these have been integrated into the Draft Development Plan and a rolling programme of reviews has begun to update the remainder to ensure compliance with higher tier plans, such as the NPF and the RSES, the reason many of these was delayed was both due to introduction of national and regional planning policy and the preparation of the Draft Development Plan. The Development Plan is informed by the NPF and the RSES and it makes procedural sense to begin the review of the plans, which will in turn inform the LAPs which are lower in the plan hierarchy.

With regard to settlements which have been incorporated into the plan Murroe and Hospital will have restrictions placed on development, pending the delivery of adequate waste water treatment facilities. It is likely, though, that Hospital and Murroe will have adequate facilities delivered during the life time of the plan.

In terms of the rural settlement strategy, it has been informed by detailed analysis, in addition to compliance with the NPF, the Council have also considered growth in population between the 2011 and 2016 Census periods, in line with the

Sustainable Rural Housing Guidelines 2015. Electoral Divisions in areas identified as a concern by the OPR have been now included as Areas of Strong Urban Influence, such as close to Newcastle West, Abbeyfeale and close to Chaleville. Continuing on the theme of housing, the issue of traveller accommodation is supported by both the Housing Strategy and the Traveller Accommodation Strategy. This indicates a level of cooperation between documents which ensures a coordinated response to the issue from higher tier policy documents.

In relation to important topic of employment the importance of Raheen Business Park is outlined and also the fact that the Business Park there is nearing capacity. The zoning of additional lands is necessary in order to ensure that the needs of larger employers are catered for, but also to ensure further development close to the parent plans which would ensure better synergies and efficiencies between the older and newer plants.

For retail industries further emphasis on addressing vacancies will be put in place and a continuing emphasis on avoiding the doughnut effect, there is strong policy support for city centre revitalisation and repositioning the city centre at the heart of the Mid-West region.

There has been changes to the policy content in the plan for extractive industries. Updated policies in relation to mining and mineral extraction has been included, informed in part by a survey of geological heritage of the county which is nearing completion. These additions reflect the important mineral assets, particularly those of scheduled minerals that are in Limerick.

Renewable energy is an essential part of climate mitigation new targets have been assigned to the different renewable technologies, which reflects a broader approach than just assigning targets to on shore wind. These are also included in the Environmental Report. Close consultation has taken place with neighbouring local authorities on the issue. The importance of offshore renewables has also been highlighted as has the potential for Foynes port to function as a service centre for the offshore renewable industry.

In relation to flooding, a comprehensive Strategic Flood Risk Assessment has been prepared to inform the plan. Following the public display period, it is being updated with new maps and supported by site specific justification tests.

In simple term the changes proposed above in response to the OPR submission will confer environmental benefits, when implemented and will ensure compliance with higher tier plans and guidance.

No. 249	Ref. & Name/ Group:	LCC-C62-249 Southern Regional Assembly	
Submission/ Observation Summary		Chief Executive’s Response	
<p>The submission outlines the key regional priorities for Limerick: Limerick Shannon Metropolitan Area as the primary driver of economic and population growth in the Southern Region; Newcastle West Key Town as an economic driver with a sub-regional role for interregional collaborations; Limerick’s strategic intra-regional and inter-regional road and rail transport connections; Galway Ennis-Shannon-Limerick Economic Network, North Kerry/West Limerick/Shannon Estuary/Clare; and Limerick-Waterford Transport and Economic network/axis.</p> <p>Core Strategy: The RSES seeks a tailored approach to the achievement of NPF and RSES growth targets, with RPO 3 requiring that in preparing Core Strategies, Local Authorities shall determine a hierarchy of settlement and appropriate growth rates in accordance with guiding principles in Section 3.3 of the RSES. The Core Strategy is a fundamental element in setting Limerick City and County Council on the path to transformational change by 2040, in its guidance for the quantum and location of development</p>		<p>Noted. The Council recognise the importance of the key regional priorities set out in the RSES and the growth of the MASP to support the development of Limerick. The Council is committed to working with the Regional Assembly to realise this growth and to support the implementation of the RSES.</p> <p>Core Strategy: Noted. The Core Strategy sets out the growth for Limerick over the lifetime of the Plan, in line with the Planning and Development Act 2000 (As amended), and will be updated to reflect the comments received from the OPR and the SRA.</p>	

in a sustainable, infrastructural led manner to achieve national and regional policy targets for accelerated growth in the region.

Population Growth Targets and Settlement Hierarchy: The submission refers to Appendix 1 of the RSES confirming transitional Local Authority population projections to 2031 including Limerick City and County. The submission refers to Section 2.3 of the Draft Plan which details the Core Strategy Methodology for Limerick City and County and Table 2.7 sets out the settlement hierarchy and household growth up to period Q2 2028 plus zoned land provision. It is noted that this Section does not reflect the categories for population allocation identified in the NPF or Section 5.0 of the Limerick-Shannon MASP. The submission further outlines that it is not possible to accurately assess the allocation of growth to the Metropolitan Area. For example, projections for Annacotty and Mungret are included with Limerick City and Suburbs as Level 1. The submission goes on to identify the importance of Castleconnell and Patrickswell within the Metropolitan Area and the breakdown of growth in the various Levels identified in the Draft Plan.

Limerick-Shannon Metropolitan Area:

Recommendations 1(a) It is recommended that the Development Plan provide additional content on the Limerick-Shannon Metropolitan Area to reflect its

Population Growth Targets and Settlement Hierarchy: The Settlement Hierarchy was established in line with the RSES and will be revised to take account of the comments of the OPR and the SRA.

Limerick-Shannon Metropolitan Area:

Recommendations 1(a) This submission is similar to the issues raised by the OPR in recommendation 1. As set out in response to the OPRs

identification in the NPF and RSES as a priority location for significant housing and employment growth and develop the Limerick Shannon MASP Vision for the Metropolitan Area ‘to exert critical-mass leverage at an international level’.

In recognition of the significant role which Limerick City and County Council play in the implementation of the Limerick-Shannon MASP, it is recommended that a distinct section/chapter is provided to address the challenges and opportunities which the Metropolitan Area provides for the Region. This could, for example, link the redevelopment of opportunity sites (as detailed in Chapter 10) to the Core Strategy and settlement policy approach. This should include a shared section developed with Clare County Council and the SRA relating to the MASP and which could be included in both Development Plans. The Regional Assembly are happy to assist in the development of this content.

Recommendation 1(b) The Regional Assembly considers that greater clarity and analysis on the population projections in relation to the Metropolitan Area is required to strengthen the Core Strategy and to demonstrate that the approach is consistent with the Limerick Shannon MASP. This should be expressed in a revised Table 2.7 and should include:

submission, it is proposed that a new dedicated chapter that will address the city spatial strategy is included in the draft plan.

This Chapter will address challenges and opportunities within the Metropolitan Area, as well as addressing the key opportunity sites, which will enable the delivery of compact growth, within the Metropolitan Area. Furthermore the Chapter will address the key recommendation of the Retail Strategy, Building Height Strategy and the update of the Limerick 2030 Plan, which will be presented in a cohesive manner. This Chapter will identify shared infrastructure and proposals/plans such as LSMATS, however, it will not address development proposals in County Clare, as this is beyond the scope of the proposed Limerick Development Plan.

Recommendation 1(b) See response to recommendation 2 from the OPR, the Core Strategy Table will be updated in this regard.

- The inclusion of the population categories referenced for the Limerick Shannon MASP in the NPF Roadmap and Section 5.0 of the MASP
- Identification of number and percentage of units targeted for green field development and those targeted for the existing built-up footprint to clarify compliance with NPF NPO 3b and RPO 35.

Recommendation 1(c) It is recommended that the Draft Plan should promote a collaborative intra-regional partnership approach between Limerick-Shannon, Cork, Waterford and Galway reflecting their priority status within the NPF.

Recommendation 1(d) It is recommended that the plan should apply greater consistency in terminology based on the established hierarchy set through the NPF, RSES and Limerick-Shannon Metropolitan Area.

The Submission notes the different references to the Limerick-Shannon Metropolitan Area and other terminology across the Draft Plan. It is recommended that consistency in terminology is applied by applying the terms provided in the NPF, RSES and Limerick-Shannon MASP.

Key Towns

Recommendation 1(c) The Council recognise the importance of intra – regional partnerships and will include an objective to promote the development of intra- regional collaboration partnership approach between Limerick – Shannon, Cork, Waterford and Galway. However the coordination and leadership of this partnership should be led by the Regional Assemblies.

Recommendation 1(d) The Council will amend the plan and ensure that there is consistency in the terminology throughout the proposed Development Plan to avoid any confusion for end user.

Key Towns

Recommendation 2(a): Newcastle West is identified in the RSES, as Limerick’s only key town and the Council acknowledge the importance

Recommendation 2(a): Key Towns play a critical role in underpinning the RSES and ensuring a consolidated spread of growth beyond the cities to the sub-regional level. Section 3.5: Key Towns, RPO 11: Key Towns and RPO 22: Newcastle West provide a significant policy platform for the role and future development of Newcastle West as a Key Town. The Planning Authority is requested to review the content on Newcastle West having regard to its designation as a Key Town with a view to the inclusion of a separate and distinct section in the Plan to set out Newcastle West’s role as a Key Town in more detail. This could include greater policy emphasis on areas including, employment and economic development, placemaking initiatives, upskilling, lifelong learning, social infrastructure.

Recommendation 2(b): The submission refers to the identification of Kilmallock as a Key Town within the Draft Plan. The submission notes the NPF provides for the identification of Key Towns by Regional Assemblies in the statutory RSES based on identified criteria. Kilmallock was not identified as a Key Town as part of this process and therefore the inclusion of Kilmallock as a Key Town in the Draft Plan is not in accordance with the RSES and it is

of the status for Newcastle West. This is recognized in section 3.4.2 of the draft plan and also in section 4.6.8. Notwithstanding this it is considered appropriate to include additional text in the new chapter setting out the spatial strategy to emphasis the importance of Newcastle West within Limerick and its potential for growth both in terms of residential and employment developments.

A Local Area Plan is in place for Newcastle West, which will be reviewed on completion of the proposed Limerick Development Plan and the Local Area Plan will deal with the more detailed approach to the development of Newcastle West in line with its ambition as a Key Town in Limerick. The LAP will consider in detail employment and economic development opportunities, placemaking initiatives, upskilling, lifelong learning, social infrastructure. In addition to the LAP, the Council is committed to the preparation of a Local Transport Plan for Newcastle West, which will consider sustainable mobility and placemaking, as a key element of the growth of Newcastle West.

Recommendation 2(b): See response to recommendation 3 from the OPR, which addresses the relocation of Kilmallock from Level 2.

<p>submitted that reference to Kilmallock as a Key Town in the Draft Plan should be omitted.</p> <p>Compact Growth Compact Growth and regeneration are cross cutting themes for settlements of all sizes. The submission welcomes Chapter 10 Compact Growth and notes the Draft Plan contains a strong commitment to achieving compact growth through objectives, regeneration and active land management initiatives.</p> <p>Recommendation 3(a): It is recommended that the Plan demonstrate how targets for compact growth, as per RPO 35 (Support for Compact Growth), are being met within the existing built-up footprints of settlements from Level 1 to Level 5. The submission proposes this could be achieved by the identification on maps and details presented in Volume 2 of the number and percentage of units targeted for greenfield development and those targeted for the existing built-up footprint. Inclusion of the yield of residential units from zoned sites within the built-up footprint would assist Development Plan monitoring on how each settlement is performing successfully under NPF and RSES compact growth objectives, including RPO 35, NPO 3 (b) and 3 (c).</p> <p>Recommendation 3(b): The submission notes it would be beneficial if the “Limerick Metropolitan Area Zoning and Tiered Approach to Zoning” map included the density</p>	<p>Compact Growth: Noted.</p> <p>Recommendation 3(a): See response to recommendation 6 from the OPR above. This will be dealt with, by amended the Core Strategy Table.</p> <p>Recommendation 3(b): Noted, the density map will be overlain on the Tiered Approach to Zoning Map, (which will be renamed the Settlement Capacity Assessment in line with the Draft Development Plan</p>
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assumptions as contained in Table 2.6 in Chapter 2 as it would visually inform the reader of where these density assumptions are applied.

Recommendation 3(c): It is recommended that the population and housing ambition for various parts of the Limerick City and Suburbs are presented in a more accessible manner in Volume 2 to demonstrate the level of growth and priority assigned to the City Centre and how a Living City as per the Guiding Principles of the Limerick-Shannon MASP is being achieved. The submission proposes this could be achieved by following the density zones for Limerick City and Suburbs as per Table 2.6 of the Draft Plan.

Rural Housing

The submission sets out that NPF and the RSES (RPO 27) make a distinction between areas under urban influence and other rural areas and aims to avoid ribbon and overspill development from urban areas, support revitalised towns and villages, achieve sustainable compact growth targets and protect the rural resource for rural communities. The Development Plan should ensure that rural housing policy does not undermine the viability of smaller towns, rural settlements, protecting the rural resource for rural communities.

Guidelines for Planning Authorities 2021) and will be contained in Volume 2.

Recommendation 3(c): The ambition for the development of the Limerick Metropolitan Area will be demonstrated throughout a number of elements in the proposed Material Alterations. The Tiered Approach to Zoning will be updated along with its associated Map to demonstrate the housing yield from each of the sites identified, both brownfield and greenfield.

Rural Housing

The Council is committed to safeguarding rural County Limerick, while protecting and enhancing rural communities and supporting the development of these areas in line with national and regional policy.

<p>Recommendation 4(a): Prior to finalisation of the Draft Plan, it is recommended that the Council should ensure that policies and objectives relating to housing in the open countryside is consistent with RPO 27, national policy (NPO 17), Circular Letter PL Circular letter PL 2/2017 Re: Sustainable Rural Housing Guidelines for Planning Authorities and is also consistent with other objectives in the Draft Plan for Climate Action and environmental management.</p> <p>Recommendation 4(b): It is recommended that the Planning Authority clarify the criteria used for Map 3.1: Rural Housing Map and the identification of areas adjacent to Newcastle West as structurally weak</p> <p>RSES Economic Principles A Strong Economy, Retail: The submission welcomes the Retail Strategy for the Limerick-Shannon Metropolitan Area and County Limerick 2022-2028 and notes its consistency with Limerick-Shannon MASP Policy Objective 17. The submission advises that the population figures in the Retail</p>	<p>Recommendation 4(a): The Council is satisfied that the proposed Development Plan is consistent with national and regional policies. Objective SS O17 and Objective SS O18, both relating to the development of housing in rural areas requires that climate action measures shall be submitted as part of any proposed application, to support a transition to a low carbon economy.</p> <p>Recommendation 4(b): In line with the national planning policy set out in the NPF, the criteria used for Map 3.1 to establish Areas of Strong Urban Influence, the Council utilised POWSCAR information to establish, where greater than 15% of the workforce commuted to Limerick City for work purposes. However, in line with the recommendation of the OPR, further spatial analysis methods have been considered including examination of population growth to determine the extent of the Areas of Strong Urban Influence around the southern region of the county. Expansion of the Areas of Strong Urban Influence in line with the Sustainable Rural Housing Guidelines 2005, shall safeguard the area adjacent around Newcastle West.</p> <p>RSES Economic Principles A Strong Economy, Retail: The Council have re-examined the population figures sets out in the Draft Retail Strategy and has identified an error in some of the baseline figures. The proposed Retail Strategy shall be updated to reflect the correct population figures.</p>
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<p>Strategy need to be examined to ensure no miscalculations.</p> <p>Learning City concept: The submission refers to Chapter 4 Section 2 Enterprise and Employment and notes the potential to expand the Learning City concept to the wider county area and proposes the Planning Authority to explore how Newcastle West could benefit from such an initiative. The submission outlines that the SRA are currently preparing a ‘Learning Regional Action Plan’ which may assist.</p> <p>Recommendation 5: The Planning Authority is requested to reflect and integrate RSES Economic Strategy, including the five economic principles of the RSES into the Development Plans economic strategy.</p> <p>Atlantic Economic Corridor (AEC): Recommendation 6: Atlantic Economic Corridor (AEC) Limerick’s central location within the Atlantic Economic Corridor (AEC) is a significant advantage and presents an</p>	<p>Learning City concept: The Council recognise the importance of education in securing a skilled workforce and welcome the preparation of the ‘Learning Regional Action Plan’ by the SRA and look forward to inputting into the plan. The Learning City concept shall be expanded to the remainder of County Limerick.</p> <p>Recommendation 5: The RSES sets out the five economic principles, which includes Smart Specialisation, Clustering, Placemaking for enterprise development, Knowledge Diffusion, and Capacity Building. The Council acknowledge the importance of the need for economic transformation throughout Limerick and have mobilised many building blocks for this transformation, such as the establishment of purpose built vehicles to support economic growth, including Limerick Twenty Thirty and Innovate Limerick. However, we recognise the evolving economic innovations that are required for success and the introduction to chapter 4 shall be amended as suggested in the SRA submission.</p> <p>Atlantic Economic Corridor (AEC): Recommendation 6: The Council acknowledge the Atlantic Economic Corridor initiative and collaborative inter-regional approach it seeks to deliver for economic development. The Council has committed to working with the AEC Initiative and have dedicated resources to</p>
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<p>opportunity for Limerick to play a lead role in inter-regional collaboration initiatives. The Planning Authority is encouraged to examine this opportunity in further detail.</p> <p>Towns, Villages and Rural Development: Recommendation 7: Town, Villages and Rural Development Rural areas have different requirements requiring local customised responses, but all require greater economic diversity and innovation to ensure resilience. The submission considers that Table 2.7 of the Draft Plan presents a generally uniform growth rate across Levels 2, 3 and 4 and it is considered that the Draft Plan would benefit by identification of the relevant economic development and employment provisions underpinning the population growth rates for Levels 3 and 4 settlements. This should take account of rural diversity and tailoring an integrated policy approach relevant to differing settlements</p> <p>Networks: Recommendation 8: Having regard to the potential for collaboration and sub-regional growth opportunities</p>	<p>progress the work of the AEC and will continue to work with the AEC to progress positive economic outcomes for Limerick. Policy support for the AEC initiative shall be enhanced within Chapter 4, A Strong Economy.</p> <p>Towns, Villages and Rural Development: Recommendation 7: The growth rates allocated to levels 3 and 4 were determined following a detailed assessment and consideration of particular circumstances for each settlement, with emphasis on the availability of infrastructure. This approach is in compliance with both national and regional policy. It should be noted that a uniform growth rate does not mean an equal number of housing units will be built across each of the level 3 and 4 settlements, as the base figure is different in each settlement. For example, a 28% growth rate is proposed for both Askeaton and Doon, which results in potentially 119 housing units for Askeaton and 52 for Doon.</p> <p>The settlement and zoning maps in Volume 2 illustrates the potential economic sites, which were determined having regard to local assessments and circumstances. The identification of employment provision will be considered in level 3 settlements during the preparation of the Local Area Plans. Having regard to the above it is not considered necessary to amend the plan.</p> <p>Networks: Recommendation 8:</p>
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through the development of the networks identified at Section 3.8 and RPO 30, the Planning Authority is requested to include additional content or policy references to reflect their potential. The RSES also supports the development of Rural Settlement Networks and other cross-boundary collaborations, and the Planning Authority may wish to consider other options for smaller scale networks of collaboration and partnership.

Climate Action

The submission outlines the importance of addressing climate action and the transition to a low carbon economy by greater economic and sectoral diversification. Having regard to the evolving and highly ambitious climate action legislation and policy platforms. The Planning Authority should quantify its climate action policies and objectives.

Recommendation 9(a): The transition to a low carbon economy can offer significant opportunities to achieve sectoral diversification, particularly for rural areas. It can also promote sustainable local development including building inclusive, climate resilient and energy efficient communities. This should be further explored in the Draft Plan and RPO 56: Low Carbon Economy, and Section 1 of Chapter 5 of the RSES is particularly relevant. The Planning

The Council is committed to working collaboratively with relevant stakeholders to exploit the economic potential and are currently working on a number of such inter regional networks, such as the AEC. The Council also work with adjoining Local Authorities to progress infrastructural projects such as the N/M20, LNDR, upgrade of the N24, to name just a few. Additional policy support will be included in Chapter 4 – A Strong Economy to enhance the policy support for the development of networks to support collaborative working.

Climate Action

The Council recognises the importance of addressing climate action and as well as a dedicated Chapter to address climate change, climate action was addressed as a cross cutting themes across all aspects of Draft Development Plan. Addressing climate action and transition to a low carbon economy is a key consideration for the development plan. The integration of land use and transport planning, development of the 10 minute city/town concept, in addition to addressing flooding are key considerations in the Draft Development Plan.

Recommendation 9(a): The transition to a low carbon future will require a wide range of responses across all sectors and in communities to change how we use energy at home, in our work and how we travel. The Draft Development Plan sets out how this change will be implemented, with policy changes to more sustainable settlement patterns. The focus on compact growth, place making, sustainable transport, and focus on the sustainable location of development, all of these key elements are fundamental to deliver benefits to climate

<p>Authority may also consider a section on Climate Action and jobs.</p> <p>Recommendation 9(b): Having regard to the evolving and highly ambitious Climate Action legislative and policy platforms at national and EU level, the Planning Authority should consider how to quantify its Climate Action policies and objectives. RPO 163: Sustainable Mobility Targets is particularly relevant in this regard as it calls for targets and actions which will help achieve higher performance in modal shift to sustainable mobility. In addition to addressing implementation and consistency with RPO: 163, the Planning Authority should consider how Climate Action targets could be applied to other areas of the Draft Plan.</p> <p>Recommendation 9(c): Given the important leadership role played by local authorities in the transition to renewable energy, it is considered that the use of specific targets would serve to strengthen the approach to renewable energy in Section 8.5 of the Draft Plan</p> <p>Sustainable Mobility and Transport: The submission welcomes the focus of Section 6.3 on Integrated Land Use and Transport and the objectives aligning with the RSES. The submission also notes the focus of the Chapter on the integration of land use and transport, implementation of the Limerick-Shannon Metropolitan</p>	<p>action. The Draft Plan focused on the growth of existing settlement with consolidation of development within settlements, in a bid to reduce the need to travel for work purposes.</p> <p>Recommendation 9(b): The Council acknowledge the comments of the SRA. See response to recommendation 14 from the OPR in this regard. The Material Alteration will include a detailed modal shift targets with an examination of baselines figures for Limerick.</p> <p>Recommendation 9(c): The Council recognise the role they have to play in terms of leadership in the transition to a low carbon economy. See response to recommendation 10 from the OPR in this regard. The Material Alteration will include specific targets for renewable energy.</p> <p>Sustainable Mobility and Transport: The Council is committed to the integration of land use and transport planning as outlined in the Draft Plan. The Limerick – Shannon Metropolitan Area Transport Strategy remains in draft format and the Council will continue to work with the National Transport Authority to</p>
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<p>Area Transport Strategy (LSMATS), Local Transport Plans (LTP) and on the Ten-Minute.</p> <p>Recommendation 10(a): In complement to objectives relating to a Smart City in Section Chapter 4, Section 4.7.8, a specific objective supporting infrastructure and facilities for Smart Mobility (aligned with RPO 161) and Multi-Modal Travel Integration (aligned with RPO 162) would be beneficial to encourage innovation in sustainable mobility and support the achievement Draft LSMATS targets as cited in Section 6.5.1: Promoting Modal Shift.</p> <p>Recommendation 10(b): It is considered that the incorporation of the provisions of Policy Objective 6 (b) and (d) of the Limerick-Shannon MASP into a specific objective, possibility Objective TR O12, would further strengthen the policy commitment to sustainable transportation and enhanced alignment with Guiding Principle “Integrated transport and land use” as contained in Section 3.2 of the Limerick-Shannon MASP.</p> <p>Infrastructure: The submission outlines the recognition of the Draft Plan that infrastructure must keep pace with modern demand and the provision of high quality infrastructure, energy networks and environmental services is fundamental to prosperity. The submission also commend the Local Authority for innovations in digital services and highlights</p>	<p>incorporate the relevant elements of the transport strategy in to the proposed Development Plan.</p> <p>Recommendation 10(a): An objective supporting infrastructure and facilities for Smart Mobility will be included to encourage innovation in sustainable mobility and to support the achievement Draft LSMATS targets. See recommendation to Submission No. 247 National Transport Authority regarding Objective TR O20 - Transport Interchange.</p> <p>Recommendation 10(b): The provisions of Policy Objective 6 (b) and (d) of the Limerick-Shannon MASP should be incorporated into Objective TR O12, to further strengthen the policy commitment to sustainable transportation and land use planning.</p> <p>Infrastructure: Noted. The Council continues to develop digital services and will work with relevant stakeholders to enhance digital innovations throughout Limerick, as opportunities arise.</p>
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<p>the potential for further synergies with developments in Shannon in the area of Connected and Autonomous Vehicles.</p> <p>Section 7.5.3 outlines analysis in terms of capacity in public infrastructure in terms of waste water and water infrastructure. Clarification is requested in the figures presented in this section in terms of capacity.</p> <p>The Draft Plan provides very positive policy approach to SuDS, particularly in relation to Blue Green Infrastructure and Nature Based Solution and this complements the strong environmental approach in Chapter 5.</p> <p>The submission recommends the following:</p> <p>Recommendation 11(a): Further alignment with Section 8.3: A Smart Metropolitan Area and Strengths in Attracting FDI and Policy Objective 12 of the Limerick-Shannon MASP can be achieved by elaborating on the digital and Smart City opportunities for the Metropolitan Area as a whole. This will assist in developing a positive business ecosystem which is essential to the achieving the vision of the Limerick-Shannon MASP.</p> <p>Recommendation 11(b): Considering that the Core Strategy generally provides high and uniform growth rates across Levels 2, 3 and 4, the Planning Authority is requested to clarify and confirm the details as presented in</p>	<p>The figures include a typographical error and shall be corrected. Clarification will be provided in relation to the figures provided.</p> <p>The Council welcome the comments from the SRA with regard to the positive approach outlined in the Draft Plan.</p> <p>Recommendation 11(a): Further elaboration will be incorporated into the proposed Development Plan, on the digital and Smart City opportunities for the Metropolitan Area as a whole and seek opportunities for synergies with Clare County Council where possible.</p> <p>Recommendation 11(b): The Council has liaised directly with Irish Water to assess the capacity of all waste water and water infrastructure throughout Limerick to accommodate the growth identified in the Draft</p>
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Section 7.5.3 Public Waste Water Treatment and ensure water and wastewater infrastructure is coordinated and delivered in a timely manner to facilitate growth targets.

Environment, Heritage, Landscape and Green Infrastructure

The submission outlines how the Draft Plan is particularly strong in relation to biodiversity, Nature Based Solutions and Blue Green Infrastructure, noting the Blue Green Infrastructure Strategy as very positive and welcomes the inclusion of this concept in the approach to SuDS in Chapter 7. The Submission highlights the RSES’S commitment to a high quality environment and promotion of ecosystem services.

Recommendation 12: RPO 110 Ecosystem Services of the RSES and NPO 58 of the NPF which require that ecosystem services be incorporated into the preparation of statutory land use plans. The submission notes the Draft Plan is particularly strong and proactive in relation to the natural environment, but it is not clear how RPO 110 has been implemented. The submission requests that the Planning Authority provide clarification in this regard.

Sustainable Communities and Social Infrastructure:

The SRA welcomes the comprehensive approach outlined in Chapter 9 and highlights particularly the need to

Plan. Hospital Wastewater Treatment Plant has been successfully is securing funding from Irish Water to upgrade the system, details shall be updated as appropriate.

Environment, Heritage, Landscape and Green Infrastructure

The Council welcomes the positive comments in relation to the approach set out in the Draft Plan to safeguarding and enhancing the natural environment.

Recommendation 12: The proposed Plan will be updated to clarify the position in relation to the implementation of Ecosystem Services.

Sustainable Communities and Social Infrastructure:

The Council recognise the importance of healthy places as a key requirement for quality of life and sense of place and pride in their

<p>enhance the focus around the Learning City and health, place making and communities.</p> <p>Recommendation 13(a): A strengthening of the policy approach is recommended in relation to social and economic proposition that is offered by enhancing Lifelong Learning and building on Limerick’s work as a UNESCO Learning City. In preparing this strengthened policy response, the submission advises that reference should be made to RPOs 186: Lifelong Learning, RPO 190: Lifelong Learning and Healthy Cities, Limerick-Shannon MASP Policy Objective 18 and MASP Sections 8.9 and 10.</p> <p>Recommendation 13(b): The submission refers to Section 9.4 Health Place-making and Communities nothing it should be strengthened to include placemaking for enterprise development as per section 4.7 of the RSES. Tools such as Health Place Audits for Placemaking (RSES Section 4.7 and RPO 61) is recommended as informing this strengthening approach.</p> <p>Environmental Assessment The submission notes the RSES is informed by extensive environmental assessments, contained in the SEA Statement, AA Determination and Natura Impact Report, which are available on the SRA Website. These assessments looked at environmental sensitivities for all parts of the Region and the submission recommends that</p>	<p>place. Chapter 9 sets out the focus for the development of healthy communities and connected places.</p> <p>Recommendation 13(a): Policies set out in Chapter 9 in relation to Lifelong Learning shall be enhanced to strengthened policy response, reference will be made to RPOs 186: Lifelong Learning, RPO 190: Lifelong Learning and Healthy Cities, Limerick-Shannon MASP Policy Objective 18 and MASP Sections 8.9 and 10.</p> <p>Recommendation 13(b): Section 9.4 will be enhanced to include placemaking for enterprise and relevant tools such as Health Place Audits for Placemaking will be incorporated.</p> <p>Environmental Assessment Noted, The Council are committed to protection of the environment and will review the documents to identify sensitivities and incorporate into the development plan as appropriate.</p>
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<p>Limerick City & County Council review these documents to inform the Council’s own environmental assessments and to ensure that mitigation measures identified to address environmental sensitivities and constraints are included in the Draft Development Plan where relevant.</p>	
<p>Chief Executive’s Recommendations</p>	
<p>Recommendation 1</p> <p>(a): Insert revised Chapter 3 as outlined in Volume 2 of this report.</p> <p>(b): Amend Core Strategy Table and Map as identified in Volume 2 of this Report.</p> <p>(c): Include new objectives in Chapter 4 as follows: <u>It is an objective of the Council to support the development of inter urban links as identified in the RSES, between Newcastle West, Abbeyfeale and Rathkeale and across the County boundary into Co. Kerry and to develop partnership and synergies to support the development of the wider area;</u></p> <p>(d): Amend terminology throughout the Draft Plan with reference to the Limerick Metropolitan Area.</p> <p>Recommendation 2</p> <p>(a): Insert new Chapter 3 as identified in Volume 2 of this report.</p> <p>(b): Amend Settlement Hierarchy and Core Strategy Table and Map as identified in Volume 2 of this Report.</p> <p>Recommendation 3</p> <p>(a): Amend Core Strategy Table and Settlement Audit Tables and Maps as identified in Volume 2 of this report.</p> <p>(b): Overlay Density Map and Settlement Capacity Assessment Map as identified in Volume 2 of this Report.</p> <p>Recommendation 4</p> <p>(a): No change</p> <p>(b): Amend Rural Housing Settlement Strategy Map as identified in Volume 2 of this report.</p> <p>A Strong Economy, Retail: Amend population figures in the Draft Retail Strategy and update the Draft Retail Strategy accordingly.</p>	

Population in each Catchment Area					
Year	Census	Catchment Populations as allocated under NPF alignments			
	2016	2022	2024	2026	2028
Limerick Catchment					
Population	213,934	236,758	244,366	251,974	259,582
	<u>209,413</u>	<u>234,642</u>	<u>243,051</u>	<u>251,461</u>	<u>259,767</u>
Change # from 2016	-	22,824 <u>25,229</u>	30,432 <u>33,638</u>	38,040 <u>42,048</u>	45,648 <u>50,354</u>
Change % from 2016	-	10.7% <u>12.0%</u>	14.2% <u>16.1%</u>	17.8% <u>20.1%</u>	21.3% <u>24%</u>
Newcastle West Catchment					
Population	27,043	29,172	29,882	30,591	31,301
Change # from 2016	-	2,129	2,839	3,548	4,258
Change % from 2016	-	7.9%	10.5%	13.1%	15.7%

Recommendation 5:

Insert the following Text in Chapter 4 A Strong Economy

New Section: Economic Principals:

The economic vision set out in the RSES for the Southern Region seeks to develop a strong and diverse economic base to enable sustainable, competitive, inclusive and resilient growth. These five principles form the corner stones of the economic strategy for Limerick. The five principals include:

Smart Specialisation - bringing together key stakeholders (local communities, national enterprise bodies, higher education institutions and private enterprises) to identify the competitive advantages of an area with the view of developing economic opportunities.

Clustering - Clusters are a geographic or virtual concentration of interrelated companies, suppliers, and associated institutions. Clusters put in place a favourable and connected regional business ecosystem in which new players emerge and support the development of new industrial value chains and emerging industries.

Placemaking for enterprise development – The Draft Plan places significant emphasis on placemaking, which involves ensuring that geographical locations are attractive places to live, learn and work. The knowledge economy has shifted trends. Effective place-making can create the necessary conditions for sustaining and creating jobs while also creating compact, attractive, vibrant and safe environments in which to live, work, visit and invest.

Knowledge Diffusion: The policy of “knowledge diffusion” is the spreading of knowledge - the process of knowledge transfer to different segments of society to create an environment that attracts inward investment and promotion of a knowledge economy.

Capacity Building: Capacity building is defined by the RSES as building capacity to enable effective implementation and to respond to emerging challenges. Capacity building aims at developing a secure and stable economy that enables economic resilience by adapting to challenges and anticipating changes.

Insert the following Objective into Chapter 4 **Section 4.4 Strategy:**

Promote Limerick Shannon Metropolitan area as a key location for economic development supporting the provision of increased employment through the expansion of the existing enterprise ecosystem in the region and the development of smart specialisation.

Recommendations 6 and Recommendation 8:

Include new objective as follows in Chapter 4 A Strong Economy:

Networks: It is an objective of the Council to work as part of different networks, including economic networks and the Atlantic Economic Corridor Initiative, to share assets, collaborate and drive economic growth and competitiveness.

Recommendation 7: No change

Recommendation 9

(a): No change

(b): Include revised Chapter 6 as included in Volume 2 of this Report.

(c): Include new Table in Chapter 8 as follows:

Table X Renewable Energy allocations for differing technologies

<u>Output Current and Projected</u>	<u>Wind</u>	<u>Anaerobic Digestion</u>	<u>Solar</u>	<u>Hydro</u>	<u>Geothermal</u>
<u>Current capacity MW</u>	<u>234.35</u>	<u>2.0</u>	<u>113.49</u>	<u>0.1 MW</u>	<u>0</u>
<u>Target Capacity MW (2030)</u>	<u>386.45 (+65%)</u>	<u>20 (+1000%)</u>	<u>227.0 (+100%)</u>	<u>0.3MW (+300%)</u>	<u>0.5MW</u>

Note: Baseline figures drawn from LCCC sources June 2020

Recommendation 10

(a): Insert the following text as additional bullet point (h):

Objective IN O2 Digital Connectivity It is an objective of the Council to:

(h) Support emerging innovations in the digital transformation of transportation, E-Mobility and sustainable mobility, as identified in final LSMATS.

(b): Insert the following text into Objective TR O12:

Objective TR O12 - Limerick – Shannon Metropolitan Area Transport Strategy – It is an objective of the Council to facilitate the implementation and delivery of the proposals that will be contained in the final Limerick Shannon Metropolitan Area Transport Strategy, in conjunction with the National Transport Authority, Transport Infrastructure Ireland and Clare County Council and other relevant stakeholders to achieve successful integration between land use and transport planning and targeted growth along high quality public transport corridors and sustainable higher densities.

Infrastructure: Delete the following textbox from Section 7.5.3 Public Waste Water Treatment

- ~~• 7.3% of settlements in Limerick have adequate wastewater capacity to facilitate future growth;~~
- ~~• Three settlements that have limited wastewater capacity for future growth and currently do not comply with the Waste Water Discharge Licence granted by the EPA are Adare, Caherconlish and Kilfinane;~~
- ~~• 20% of settlements have no spare wastewater capacity, including Newcastle West, Askeaton and Foynes;~~
- ~~• There is chronic overloading of the Waste Water Treatment Plants (WWTP) in Askeaton, Hospital, Dromcollogher and Murroe~~

Recommendation 11

(a): Insert a new objective into Section 7.4 Digital Connectivity and Limerick’s Digital Strategy as follows:

Digital Innovations: Limerick Shannon Metropolitan Area: It is an objective of the Council to continue to develop digital services and work with relevant stakeholders to enhance digital innovations and digital transformation throughout Limerick and the Limerick Shannon Metropolitan Area, as opportunities arise.

(b): No change

Recommendation 12:

Insert the following in Chapter 5:

New Section: Ecosystem Services Approach

Ecosystem services are defined as the direct and indirect contributions of ecosystems to human wellbeing, and have an impact on our survival and quality of life. This includes the ability of humans to obtain products from ecosystems, such as food, water and resources; benefits obtained from the natural processes such as climate regulation, pollination and water purification; and the cultural services that benefit people through recreation and appreciation of nature.

Include new objectives as follows:

Ecosystem Services Approach: It is an objective of the Council to promote an Ecosystem Services Approach, subject to suitable assessment, in the preparation of lower-level Plans, Strategies and in the Development Management process.

Insert the following into Objective EH O12:

Objective EH O12 Blue Green Infrastructure It is an objective of the Council to:

e) Seek to advance the use of an ecosystem services approach and ecosystem services valuation as a decision-making tool in plans and projects, subject to appropriate ecological assessment.

Recommendation 13

(a): Insert the following text into Objective ECON O17 in Section 4.7.5 Education and Skills

It is an objective of the Council to

(a) Sustain the existing high levels of educational attainment and skilled workforce, to encourage employment generation to maintain this resource within Limerick and to promote the availability of education opportunities to all residents in Limerick City and County.

(b) Support the continued collaborative work undertaken by the Mid-West Regional Enterprise Plan (REP) and the Mid-West Regional Skills Forum in employment generation and fostering of the knowledge-based economy to the Limerick-Shannon Metropolitan Area and Mid-West.

Insert the following new objective into Section 4.7.4 Knowledge Economy

New Objective: Learning Region: It is an objective of the Council to support the further development of Limerick, as an inclusive Learning City and County and to work with relevant stakeholders as appropriate.

(b): Insert the following text into Section 9.4

New Objective Health Place Audits: It is an objective of the Council to support the creation of attractive, enterprise development friendly, liveable, well-designed, high-quality places that are home to a diverse enterprise base mix and integrated communities by using tools such as Health Place Audits to audit locations in meeting necessary conditions.

SEA/ AA Response

Similar to the OPR submission, the addition of a new Chapter 3 will clearly present policies as they relate to the Core Strategy. Similar to the response to the OPR, the Council is aware of links between settlements in the county and outside and will present policies to encourage such links. The Core Strategy section will be updated in line with OPR and Southern Regional Assembly.

The updating of the figures in the Draft Retail Strategy will ensure adequately informed policy responses based on population and hence possible demand figures for retail services. Similarly, the updating of the economic policies of the plan will also ensure updated policy responses to the issue of employment and the encouragement of a diverse economic base. This is consistent with Economic Protection Objective P2 which states the following: “Provide policy support for the provision of suitable employment and facilities for the local population”.

As mentioned in the OPR response, targets have been assigned to the various renewable energy technologies. The Council will continue to monitor the developments in this area. There is policy support in the Draft Plan to support emerging technologies, which are likely to occur over the lifetime of the plan.

The addition of the policy content on ecosystem services approach has been revised to include the necessity for adequate ecological assessment of any such proposals as it is important to ensure that any ecosystem approach put forward by any planning strategy does not cause any ecological deterioration. When properly planned, an ecosystem approach can deliver ecological benefits, but any such interventions need to be carefully designed and implemented.

The Council will review the series of environmental assessments that were part of the background to the RSES and incorporate relevant content into Environmental Report and Natura Impact Statement, as appropriate.

Theme 1: City and Environs

No. 11	Ref. & Name/ Group:	LCC-C62-11 Moyross Residents Forum CLG	
Submission/ Observation Summary		Chief Executive’s Response	
		<p>1. Zoning: Pineview Gardens is zoned Open Space, but should be zoned Residential. There were 188 homes originally, with 71 homes remaining. This area has been residential for over 30 years.</p> <p>Moyross covers an area of over 155 acres. The zoning of Pineview Gardens to Open Space will lead to a further 12 acres of green areas, amounting to 24% of Moyross zoned as a green area.</p> <p>There are over 2,000 people living in Moyross, with 200 in Pineview Gardens, this equates to 10% of the population. Pineview Gardens is occupied by 71 families in 71 dwellings, comprising 205 people. It is imperative that these homes be protected in a housing crisis.</p> <p>2. New Developments: The majority of new units proposed are aimed at 1-3 persons. A significant proportion of new units aimed at 5-6 persons should be provided, so that families will have access to housing in the future.</p>	<p>1. Zoning: A review of Pineview Gardens by the Regeneration Department, in conjunction with the Department of Housing and Moyross Residents, with respect to the estate’s status within the Demolition Strategy of the Limerick Regeneration Framework Implementation Plan has been undertaken.</p> <p>A potential Pineview Gardens Retention proposal has been progressed, with the endorsement of the Moyross Regeneration Committee, including the demolition of 9 no. units and the provision of additional infill units. In order to accommodate the retention of existing dwellings and to facilitate the new proposal for demolition and infill, it is recommended that an element of Pineview Gardens be rezoned to Existing Residential. This will reflect the existing use on the site.</p> <p>2. New Developments: The Housing Need Demand Assessment, which has informed the Housing Strategy, identifies the need for a mix of house types to reflect the diverse housing needs of the existing and future population. Objective H0 01 requires all new developments to</p>

	<p>3. Small micro enterprise units/ light industrial/ warehouse units: Request increasing the availability of small micro enterprise units within Moyross, to provide employment opportunities. Provision should be made for development of light industrial/ warehouse units for existing or new services, such as mechanics, carpentry or other trades and service providers.</p>	<p>provide a mix of dwelling types and sizes to meet the housing needs of all members of society.</p> <p>3. Small micro enterprise units/ light industrial/ warehouse units: The Draft Development Plan includes an area of 38.5ha. zoned for Enterprise and Employment and Mixed Use in the Moyross area, including lands identified for a new Northside Business Campus and The Bays opportunity site. The development of these lands for employment creating uses is supported through the objectives of the Draft Plan including:</p> <p>Objective M O1 Moyross: It is an objective of the Council to:</p> <p>C) Ensure sufficient land zoning around the Coonagh/ Knockalisheen Road capable of delivering a Northside Business Campus as referred to in the RSES, to attract and enhance job creation and economic investment in the area;</p> <p>N) Promote the redevelopment of the Bays site to add additional local capacity and contribute to the formation of a natural training cluster;</p> <p>R) Reinforce existing Employment and Enterprise Uses at Moyross Enterprise Centre</p> <p>Objective BM O1 The Bays Moyross: It is an objective of the Council to:</p> <p>a) Facilitate creation of a mixed use employment zone enhancing a broad range of employment opportunities for the local community. No residential use shall be permitted in this zone.</p> <p>In addition, the Planning Authority will support and facilitate the development of economic opportunities in Moyross through the</p>
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	various zoning objectives as set out on the Zoning Map and the objectives set out in Chapter 4 A Strong Economy of the Draft Plan.
Chief Executive’s Recommendations	
1. Change an element of zoning from Open Space to Existing Residential at Pineview Gardens, Moyross. 2 - 3: No change.	
SEA/ AA Response	
1. The zoning is being amended to reflect the existing residential use on these lands, there are no environmental effects. This is a clarification of existing land uses with no additional environmental or ecological effects over those existing currently.	

No. 47	Ref. & Name/ Group:	LCC-C62-47 Fr. Pat Hogan, Corpus Christi Parish
	Submission/ Observation Summary	
	<p>1. Zoning: The submission requests that Pineview Gardens remain zoned Residential and not to be zoned as Open Space and Recreation.</p> <p>The observer notes the legal implications of such a zoning designation. 14 years ago, the Council announced the plans to demolish the houses in Pineview Gardens. The houses are of good quality and the demolition will mean people will lose their homes and neighbours. Anxiety and stress associated with the reminders that Pineview Gardens is a planned demolition area have resulted in residents not investing in their homes.</p>	
Chief Executive’s Response		<p>1. Zoning: The content of the submission received is noted. See Response No. 1 to Submission No. 11 above.</p>

	The submission also raises concerns in relation to overcrowding and references the use of unsuitable accommodation for young families.	
Chief Executive’s Recommendations		
1. Change an element of zoning from Open Space to Existing Residential at Pineview Gardens, Moyross.		
SEA/ AA Response		
1. The zoning is being amended to reflect the existing residential use on these lands, there are no environmental effects. This is a clarification of existing land uses with no additional environmental or ecological effects over those existing currently		

No. 63	Ref. & Name/ Group:	LCC-C62-63 Residents of Pineview Gardens, Catherine Power, Janette Quinn, Janice Long, Stephen Conway, Eileen Canty, Geraldine Ryan, Bridie Chaddad, Michael Glasheen, Sandra Fitzgerald, Michael Crawford, James Ryan and Jennifer Ryan, Eugene Coghlan, E. Carey, Lynda Hannon, Debbie Kelly, Mike Broderick, Martin Noonan, Laura O’Connell, Genieve Hoare, Anne O’Connell, Marie Ryan, Noreen Coughlan, Nicole Hoare, Lisa Troy, Mark Hannon, Maureen Neinan, Rebecca Hartigan, Antoinette Hamon, Patrick Madigan, Amy McDonnell, Margaret Calvert, Stephen Bourke, Jamie McMahan, Olga Murphy, Gavin Cashin & Mary Begley, Rita Clancy, B. Moran, Lucia Begley, Eileen McMahan, Michael Heelan, Rose & John Griffin, Leona O’Gorman, Sharon Woodland, Mary Begley, Albert Begley, Tina O’Gorman, Jean O’Callaghan, Alan O’Callaghan	
	Submission/ Observation Summary		Chief Executive’s Response
	1. Zoning: The observers are requesting the re-zoning of Pineview Gardens to Residential from Open Space as the observers have been residents of Pineview Gardens for up to 37 years and wish to remain living there.		1. Zoning: The content of the submission received is noted
	Chief Executive’s Recommendations		
	1. Change an element of zoning from Open Space to Existing Residential at Pineview Gardens, Moyross.		

SEA/ AA Response
1. The zoning is being amended to reflect the existing residential use on these lands, there are no environmental effects. This is a clarification of existing land uses with no additional environmental or ecological effects over those existing currently

No. 90	Ref. &Name/ Group:	LCC-C62-90 Moyross Residents Forum
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Zoning: The Forum have made a submission in relation to the proposed Open Space and Recreation zoning of Pineview Gardens as indicated in the Draft Plan. The zoning is derived from the Demolition Strategy of the Limerick Regeneration Framework Implementation Plan, embedded into the statutory Limerick City Development Plan in 2016.</p> <p>In conjunction with the Regeneration Department, a review of Pineview Garden’s zoning within the Draft Plan and its status within the Demolition Strategy took place, including a community survey and open day discussion to help inform any additional submissions by the Forum.</p> <p>Taking on board the community consultation, a future potential Pineview Gardens Retention proposal was progressed. The observation is requesting the removal of a portion of Pineview Gardens from the Open Space and Recreation zoning and requiring a revised zoning accommodating the potential retention of existing houses and the provision of infill units, to strengthen Pineview</p>	<p>1. Zoning: The content of the submission received is noted. See response No. 1 to Submission No. 11 above.</p>

	Gardens as a community. The proposal allows demolition of 9 no. units as per the current Demolition Strategy.	
Chief Executive’s Recommendations		
1. Change an element of zoning from Open Space to Existing Residential at Pineview Gardens, Moyross.		
SEA/ AA Response		
1. The zoning is being amended to reflect the existing residential use on these lands, there are no environmental effects. This is a clarification of existing land uses with no additional environmental or ecological effects over those existing currentlyT		

No. 125	Ref. & Name/ Group:	LCC-C62-125 Limerick Sinn Fein
Submission/ Observation Summary		Chief Executive’s Response
<p>1. Zoning: Housing need in Moyross has greatly changed since the Limerick Regeneration Framework Implementation Plan and the Draft Plan needs to be reflective of this. The Draft Plan designates Pineview Gardens as Open Space, which needs to be zoned Residential.</p> <p>Under the Regeneration programme, an undertaking was made to demolish homes in Pineview Gardens. Of the 188 original houses only 71 remain. Residents have been prevented from availing of the Thermal Upgrade works or regular maintenance and have lived without security for over 10 years.</p> <p>Due to demolitions, Pineview Gardens has become a scattered estate with the individual houses isolated from each other. There is a high demand for housing in Moyross</p>		<p>1. Zoning: The content of the submission received is noted. See Response No. 1 to Submission No. 11 above.</p>

	and construction of new homes is essential to enhance the community and improve social and physical connectivity.	
	Chief Executive’s Recommendations	
	1. Change an element of zoning from Open Space to Existing Residential at Pineview Gardens, Moyross.	
	SEA/ AA Response	
	1. The zoning is being amended to reflect the existing residential use on these lands, there are no environmental effects. This is a clarification of existing land uses with no additional environmental or ecological effects over those existing currently	

No. 15	Ref. & Name/ Group:	LCC-C62-15 James McNamara	
	Submission/ Observation Summary	Chief Executive’s Response	
	<p>1. Funding and Growth: The observer is glad that funding is held for Limerick and its growth but questions if it is enough. Limerick’s presence as Ireland’s 3rd City needs to be kept.</p> <p>2. Georgian City: Limerick is a Georgian City at its core and this is forgotten. Public buildings and department stores have been lost such as the original Penney’s and Brown Thomas’s sites. Two new facades on these landmark buildings would bring back their former glory and make the city feel established.</p> <p>3. Limerick Docks: To compete with Cork’s and Galway’s plans for office space in the docks, businesses should be enticed with cheaper cost of rentals in an office or special economic zone similar to the Dublin Docklands.</p>	<p>1. Funding and Growth: The observation is noted. The Draft Plan envisages Limerick as the principal focus within the region, with the potential to generate and be the focus of significant population, employment and housing growth. Targets for growth are set out in national and regional planning policy.</p> <p>2. Georgian City: The observation is noted. The Local Authority encourages and facilitates the sensitive restoration and upgrade of buildings in private ownership as set out in the Development Management Standards of the Draft Development Plan.</p> <p>3. Limerick Docks: The Shannon Foynes Port Company have prepared a Limerick Docklands Framework Strategy to create an economic and employment hub in the area of the Docks. The development of this</p>	

<p>4. City Centre: The Centre of Limerick to a lot of people is Penney’s and Cruise’s Street, if a public square was put in the vicinity of the AIB building the city’s centre can be stretched upwards.</p> <p>5. Georgian Buildings: The renovation of the Georgian buildings should include original windows, crestings doorways and mouldings similar to what they would have been. The Georgian buildings that have been plastered on O’Connell Street need to be restored to their former glory with all the brick underneath, through enacting laws prohibiting excessive signage and colours of paint and use of guidelines for sash windows and clean brick.</p> <p>6. Office Space: More office space is required as the amount of offices needed with an influx from Brexit is not realised and we will be passed by Galway and Cork. Many jobs are needed to raise the population and stay as Ireland’s 3rd city.</p>	<p>area for offices is supported through the objectives of the Draft Development Plan.</p> <p>4. City Centre: Both the Draft Development Plan and the Limerick 2030 plan acknowledge the need for a vibrant city centre and lists a number of key potential revitalisation and transformation sites which will deliver this objective, including the preparation of a public realm strategy for the city.</p> <p>5. Georgian Buildings: See response to item no. 2 above.</p> <p>6. Office Space: The Draft Plan acknowledges the requirement to have a range of locations for additional office space in the city centre over and above that provided through Limerick 2030 at the Gardens International, Opera and Cleeves sites.</p>
Chief Executive’s Recommendations	
1 – 6: No change.	
SEA/ AA Response	
N/A	

No. 16	Ref. & Name/ Group:	LCC-C62-16 Eamonn Baker
Submission/ Observation Summary		Chief Executive’s Response
<p>1. King’s Island: This area should be developed as a new quarter for Limerick City focused on:</p> <ul style="list-style-type: none"> i. Culture – Street Artists, Music, Concert Hall, Art Gallery, Festivals; ii. History – City Museum; iii. Tourism – Castle, Old Quarter, Cafes, River Boat Trips; iv. Leisure – Footbridge, Cafes, City Square and Park, Restaurants, Pubs, Hotels, Cinema, Bike Path etc.; v. Housing/ Offices: Residential Offices, Remote Working Hubs etc. <p>The new quarter would move the focus back to the historical centre on King’s Island and the River. This could be the new development hub for the city and could include a city square, artistic, leisure and cultural hub.</p>		<p>1. King’s Island: King’s Island represents an important asset to the City, particularly in terms of its ecological importance, archaeological significance and tourism potential.</p> <p>Critical success factors for the development of Limerick as a Wild Atlantic Way Gateway City include maximising the tourism potential of the Medieval Quarter/Nicholas Street, Georgian Quarter and Market Quarter and supporting existing tourist attractions including King John’s Castle, Hunt Museum, St. Mary’s Cathedral, Limerick City Gallery of Art, Limerick Museum and the People’s Museum of Limerick.</p> <p>The Draft Plan sets out under Chapter 4, A Strong Economy that Limerick will seek to increase the range of day and evening experience options for visitors, by working collaboratively to deliver an improved visitor environment. Ongoing public realm improvement works in the City Centre and a new Wayfinding Orientation and Signage Plan supported in the Draft Plan will enhance the visitor experience, by introducing and orientating visitors through the City, delivering new and coherent visitor experiences including the Medieval Quarter.</p> <p>The ‘Review and Update of the Limerick 2030 Plan’ identifies King’s Island as an opportunity site. However, the plan would benefit from</p>

	an update to include greater focus on cultural and tourism potential within this area.
Chief Executive’s Recommendations	
1. Amend the ‘Limerick 2030 Review and Update Plan’ to include greater focus on cultural and tourism opportunities within King’s Island.	
SEA/ AA Response	
These activities will be regulated through the various licencing and planning mechanisms as operated by the Council. All of these will have to comply with minimum standards before being permitted to proceed. For those elements of the arts and culture field that fall under planning, any applications will be assessed with both the environmental and social needs of the city in mind. It is considered that there are sufficient safeguards within the current licensing and planning systems to ensure that no adverse impacts will occur.	

No. 18	Ref. & Name/ Group:	LCC-C62-18 Ian Doyle on behalf of Alice Kehoe
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Zoning: The observer is requesting that a 1.7 acre site on the Kilmallock Road be re-zoned from Local Centre to New Residential.</p> <p>The submission argues that despite planning permission being granted on the site under Ref. 06/1145 for a mixed-use development including 8 no. retail/ commercial units, 251 no. residential units including 8 no. apartments over the retail development and a crèche, the development has not been forthcoming due to lack of market interest and the location of other shops within a 5 minute drive time. In the absence of an increased local population, the use as a neighbourhood centre will continue to remain unviable.</p>	<p>1. Zoning: The content of the submission received, including the planning history, Draft Plan provisions, planning context, public transport and the justification for the request to rezone these lands from Local Centre to New Residential is noted.</p> <p>With respect to the proposed Local Centre zoning under the Draft Plan, it is noted that there is a small local shop at the adjoining Costcutter site and there are other retail/service centres in the wider vicinity. However, there are no local level services at this location such as a dentist, doctor or hairdressers for example. The creation of sustainable urban communities as envisaged under the NPF, involves the provision of a suitable mix of uses and facilities in tandem with residential growth. It is therefore important that housing is not the only type of development on infill sites and sufficient lands should be</p>

	<p>The submission argues that zoning of the suburban infill site for residential will integrate with existing development in accordance with Sustainable Residential Development in Urban Areas Guidelines, is suited to the peripheral location and represents consolidation of the established urban footprint. It is also submitted that the proposal would be in line with section 2.6 of the National Planning Framework and NPOs 3a, 6, 35 and NSO 1.</p> <p>The submission also indicates that the owner has been approached by the Council to establish a bus stop on the road frontage of the site and intends to cooperate fully. The NPF advocates residential development at higher densities at public transport nodes.</p>	<p>available for the provision of local level services. In this regard, there are approximately 466 no. existing dwelling units within approximately 800m or 10 minutes’ walk of these lands. The area also serves a large rural population in the wider area. In the interests of sustainable community development, it is considered that the proposed zoning for Local Centre should be retained.</p>
Chief Executive’s Recommendations		
1. No change.		
SEA/ AA Response		
N/A		

No. 24	Ref. & Name/ Group:	LCC-C62-24 AK Planning on behalf of Tom O’Connor	
Submission/ Observation Summary		Chief Executive’s Response	
<p>1. Zoning: The submission relates to a 5.3ha. site at Ballyclough, Castletroy, zoned ‘Residential Phase 2’ under the Castletroy Local Area Plan 2019-2025, but ‘Agriculture’ in the Draft Plan.</p>		<p>1. Zoning: The content of the submission received is noted, including the potential options for development of the site. There are a number of issues in relation to the request to zone these lands for residential use as follows:</p> <p>i. Compact Growth: Having regard to:</p>	

<p>The submission outlines details of the site context, including its location in proximity to amenities/facilities such as Castletroy College, Newtown Municipal Park, Newtown Neighbourhood Centre, Annacotty Village Centre, Plassey Business Park, Castletroy Shopping centre and University of Limerick and details of the infrastructural services/utilities serving the site, including a 2m wide footpath and is located in proximity to the public transport network at Newtown Neighbourhood Centre and Castletroy Shopping Centre.</p> <p>The submission outlines three options for the development of the site:</p> <p>-Option A: The proposal includes a noise separation corridor of 80m re-designated as agricultural lands, which would reduce the 5.3ha of Phase 2 Land currently designated to 2.9ha to be zoned Residential Phase 1. The developable area would yield 100-120 dwellings, the majority would be in excess of 100m from the M7, protected by a landscaped noise bund along the southern boundary.</p> <p>The owner is eager to pursue an affordable housing scheme and is in a position to apply for permission immediately.</p> <p>The majority of the lands are not within a flood zone as per CFRAMS Mapping. There is a small marginal area of benefitting lands shown to be vulnerable to Fluvial flooding only.</p>	<p>-The National Planning Framework objectives to secure compact and sustainable growth under National Policy Objective 3, including National Planning Objective 3b which aims to deliver at least 50% of all new homes within the existing built-up footprint of Limerick city and suburbs and the objectives to coordinate land use zoning, infrastructure and services under National Policy Objective 72a-c and;</p> <p>-The Climate Action Plan 2019, which requires a reduction in car based transport and carbon emissions,</p> <p>The Planning Authority is required to take a sequential and compact approach to development, while increasing the integration of land use and sustainable modes of transport. This approach requires higher densities within the established City and suburbs footprint and identification of strategically located greenfield sites, within walking distance of centres and accessible by public transport and other service infrastructure.</p> <p>The Draft Plan includes policies and objectives for compact growth, which require the development of brownfield and infill sites and the intensification of underutilised sites in accordance with Active Land Management Measures. This approach is essential to comply with the objectives of the National Planning Framework.</p> <p>Development on the edge of existing residential areas would not be sequential with the city first approach, exacerbating dependence on private based motorised transport and contributing to unsustainable patterns of development. Development of these lands would</p>
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	<p>-Option B: The entirety of the lands could be considered for Low Density Serviced Sites as an alternative to one-off housing.</p> <p>-Option C: The observer requests that the Phase 2 Residential zoning be retained as per the Castletroy Local Area Plan.</p>	<p>therefore be contrary to compact growth objectives, the Climate Action Plan objectives to reduce energy use, emissions and transition to a low carbon and climate resilient society and the requirements of Section 10(2)(n) of the Planning and Development Act in relation to climate action.</p> <p>Alternative zoned lands closer to the centre are available which comply with the compact growth, sustainable transport and climate mitigation objectives. On the basis of the above, it is recommended that these lands not be included for zoning.</p> <p>ii. Flood Risk: The Planning and Development Act 2000 (as amended) requires the preparation of the Development Plan in accordance with Section 28 Ministerial Guidelines. In accordance with The Planning System and Flood Risk Management, Guidelines for Planning Authorities (the Guidelines), a Strategic Flood Risk Assessment (SFRA) has been prepared to assess flood risk within the plan area.</p> <p>In order to achieve the aims and objectives and comply with the requirements of the Guidelines, the Local Authority’s approach to the zoning of land is to avoid development in areas at risk, where possible and substitute less vulnerable uses, where avoidance is not possible. A precautionary approach will be applied, where necessary to reflect uncertainties in flooding datasets and assessment techniques and the ability to predict the future climate and performance of flood defences.</p>
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		<p>Although not within the mapped CFRAM outlines, there is one (and possibly two) watercourse(s) passing through the site. This was not included in the CFRAM study so there is additional, unmapped, risk on site. To determine the flood extents, a detailed study of the catchment would be required which would need to take into account inputs to the stream from neighbouring urban development. A precautionary approach in accordance with the Flood Risk Management Guidelines is therefore required.</p> <p>Section 3.5 of the Flood Guidelines indicates that development in Flood Zones should be avoided and/or only considered in exceptional circumstances, such as in city and town centers, or in the case of essential infrastructure that cannot be located elsewhere and where the Justification Test has been applied.</p> <p>Highly vulnerable uses including residential are only appropriate if a Justification Test is passed. In considering the Justification Test it should be noted that in order to achieve Compact Growth, the Draft Plan takes a City Centre first approach to the spatial development of Limerick City and Environs. The core is defined as the area zoned “City Centre”. Furthermore, Part 2 of the Justification Test requires the Local Authority to consider a number of factors, including whether the site is located within the core, or if there are 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 Plan has zoned sufficient alternative residential lands to meet the requirements of the Core Strategy, in areas that are not at risk of flooding and suitable for the provision of</p>
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		<p>highly vulnerable uses in accordance with the sequential approach of the Guidelines. The Justification Test does not pass, it is recommended that these lands are not included for New Residential zoning.</p> <p>iii. Noise: The site has been identified on the noise maps produced by Transport Infrastructure Ireland in 2018 as having considerable noise levels. Road traffic noise levels are expected to be excessive at this location, based on the strategic noise mapping being between 55 – 70 decibels across the site during the day and 50 – 65 decibels during the night. This issue has already resulted in the de-zoning of lands elsewhere in Castletroy and the Southern Environs.</p> <p>The existing noise levels are significantly in excess of the World Health Organisation's (WHO) recommendation that human exposure to road noise should be below 53 dB <i>Lden</i> and 45 dB <i>Lnight</i> for health and well-being. Additionally, the Council has experience of receiving complaints of annoyance from residents living near major roads where road noise is at these levels. There is strong evidence by the WHO Guideline Development Group (GDG) that noise levels above these thresholds are known to be associated with adverse impacts to human health and quality of life. The GDG strongly recommends policy-makers to implement measures to reduce noise exposure to levels below the guideline values. On the basis of the above, it is recommended that these lands not be included for zoning.</p>
Chief Executive’s Recommendations		
1. No change.		

	SEA/ AA Response
	N/A

No. 31	Ref. & Name/ Group:	LCC-C62-31 Eamonn Baker
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Lands at Rhebogue: The submission refers to land around Rhebogue, near the River Shannon some of which experiences flooding in winter. These lands could be used by Rhebogue residents as garden plots to grow vegetable and flowers. Access would be restricted during the winter months when flooding is expected, but would act as a summer resource for the community.</p>	<p>1. Lands at Rhebogue: The Local Authority acknowledges that community gardens and allotments make a valuable contribution to sustainable development, including neighbourhood improvement, a sense of community, social inclusion and connection to the environment and green infrastructure network in an area. The Draft Plan supports the development of community gardens and allotments in appropriate locations, but notes it is also important to ensure that they are developed and managed appropriately.</p> <p>In this regard, Chapter 9 Sustainable Communities and Social Infrastructure includes Objective SCS1 O37 Community Gardens and Allotments, whereby ‘it is an objective of the Council to facilitate the development of community gardens and allotments in Limerick, subject to normal planning and environmental considerations’.</p> <p>Although it is not possible to ascertain the exact location the observer is referring to, the lands at Rhebogue toward the River Shannon are predominantly zoned ‘Open Space and Recreation’. The Land Use Zoning Matrix set out in the Draft Plan indicates that ‘Allotments’ are a type of use which are ‘Open for Consideration’ within this zone.</p>

	Chief Executive’s Recommendations
	1. No change.
	SEA/ AA Response
	N/A

No. 32	Ref. & Name/ Group:	LCC-C62-32 Gerry O’Reilly
	Submission/ Observation Summary	Chief Executive’s Response
	<p>The submission makes a number of suggestions in relation to Limerick – both City and County.</p> <p>1. Retail: The submission describes the changes in retail, the impact of the Covid 19 pandemic and the move to online retail. The hospitality industry, entertainment and residential streets are the future for Limerick. A robust education system will bring life and revenue into the city and towns. The submission notes the issue with vacancy in the City long before Covid.</p>	<p>1. Retail: An objective of the Limerick Shannon Metropolitan Area Strategic Plan as set out under the Regional and Spatial Economic Strategy, is to promote Limerick City Centre as the primary commercial area, supporting a range of retail, tourism, social and cultural activities. Limerick City Centre is to be repositioned at the top of the retail hierarchy, through improving the range and quality of shopping on offer and creating an enhanced customer experience of visiting the City Centre.</p> <p>The Draft Plan acknowledges that the closure of businesses in the City Centre has resulted in a lack of maintenance of some vacant buildings, with urban decay evident on parts of some streets and that it is vital to ensure that the City Centre is suitable to attract and retain retail and other businesses. A City Centre Revitalisation Manager has been appointed for the professional management of a city-wide public sector led approach to revitalisation of the City Centre and retail sector. As set out under Chapter 4 A Strong Economy, Objective ECON 01 focuses on retail development within Limerick, whereby ‘It is an objective of the Council to:</p>

	<p>2. Proposals for Limerick City: The submission outlines a number of proposals to improve the City including:</p> <ul style="list-style-type: none"> - Create a more positive image; - Become more Irish with Irish names; - Limerick needs to downsize and return to the small, compact, busy laneways and residential streets it originally had; - Need for busy laneways, entertainment, residential streets, nature, tourism, education, retail and digital hub; - Use the laneways to bring people back to the city for food, entertainment; 	<p>a) Ensure retail development complies with the Draft Retail Strategy for the Limerick Shannon Metropolitan Area and County Limerick;</p> <p>b) Protect, promote, support and enhance the role of Limerick City Centre as the primary retail centre in the Limerick Shannon Metropolitan Area and Mid-West Region, in accordance with the objectives of the National Planning Framework and Regional Spatial and Economic Strategy for the Southern Region;</p> <p>c) Enhance the vitality of the City Centre through a mixture of uses, reuse of vacant units, increased residential population and revitalisation. Retail is an integral part of the City’s economy complementing its inherent strengths including innovation, enterprise, tourism, culture and services and has an important array of amenities, vibrancy, liveability/quality of life and quality-built environment. Development shall be designed so as to enhance the public realm and creation of a sense of place’.</p> <p>2. Proposals for Limerick City: The Draft Plan focuses on a Strategic Vision for Limerick – ‘By 2030, Limerick will become a green City region on the Shannon Estuary connected through people and places. This will be achieved through engagement, innovation and resilient urban development and self-sustaining rural communities’. In January 2020, Limerick City and County Council launched the new Limerick brand and international marketing campaign ‘Limerick: Atlantic Edge, European Embrace’ to promote Limerick nationally and globally as a destination for inward industry investment, tourism, education and for people to live and work in and in turn create a more positive image of Limerick.</p>
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	<p>- Issues with climate change are noted and proposes the creation of a nature forest city and towns to create a better, more livable city and more homely towns.</p>	<p>The Draft Plan includes policy support for the Limerick Laneways Project, which is part of the wider Living Limerick City Centre Initiative. This project will develop a strategy to guide the repurposing of twenty-five laneways in the City Centre, through examining issues such as movement, planting, lighting and refuse. Chapter 10 Compact Growth and Revitalisation includes Objective LL O1 Limerick Laneways, whereby ‘it is an objective of the Council to:</p> <ul style="list-style-type: none"> a) Promote reuse of vacant buildings and support existing uses within the City Centre; b) Improve connections and maintain linkages within and through the City Centre; c) Promote high design quality and improve the public realm. <p>The Draft Plan has been prepared with climate action and transition to a low carbon economy, as key considerations throughout formulation of all policies and objectives. The Plan’s Strategic Objective 8 aims to ‘Protect, enhance and connect areas of natural heritage, green infrastructure and open space for the benefits of quality of life, biodiversity, protected species and habitats, while having the potential to facilitate climate change adaptation and flood risk measures’.</p> <p>The Council are currently in the process of preparing a Tree Strategy for Limerick. The strategy, when completed will address in more detail, the amenity, ecological and health benefits of trees and put forward suggestions for the expansion management and protection of tree stocks within Limerick.</p>
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<p>3. A Strong Economy: The submission outlines how economic growth can be facilitated and how it will change into the future including the following:</p> <ul style="list-style-type: none"> - A strong economy needs – low, medium and high skilled workers. Robots are making an impact, including replacing low skilled workers. Retraining low skilled workers is a priority, outlining a number of potential apprenticeships across a range of employment sectors; - Robots will replace construction workers and will also impact on medium skilled workers, whereas highly skilled workers will use robots to their advantage; - For Limerick to become a better city, it must be innovative to create employment. <p>4. Education: The submission outlines the benefits of providing free amenities to students in the City, including a ‘free student digital pass’, free public transport, annual passes to bars and clubs, iconic sites and souvenirs/memorabilia with Limerick logos.</p> <p>5. Manufacturing: The submission outlines a number of proposals for the manufacturing sector including:</p>	<p>3. A Strong Economy: One of the key ambitions underpinning the strategic vision of the Draft Plan is ‘a Sustainable, Innovative and Competitive Economy: The Limerick region will be an inclusive, self-sustaining economy built on growth and innovation and which maximises its competitive edge. This will enhance local enterprises, attract international investment in a manner which guarantees quality of life’.</p> <p>The Draft Plan acknowledges that the future growth, resilience and competitiveness of Limerick’s economy is dependent on a range of factors. Such factors include export-led growth, a diverse sectoral mix, indigenous enterprise and foreign direct investment, innovation, infrastructure, skills/ talent and a high quality of life to attract and retain a future labour supply. In this regard, Chapter 4 A Strong Economy, Policy ECON P5 Enterprise and Employment Development Opportunities states ‘It is a policy of the Council to promote and facilitate opportunities for sectoral development in Limerick, to increase productivity, create employment and to diversify the economy and ensure future economic resilience’.</p> <p>4. Education: The submission received is noted. However, student promotions and better student offers are outside of the remit of the Draft Plan.</p> <p>5. Manufacturing: Limerick has a history in advanced manufacturing, particularly manufacturing in the ICT sector. The Limerick 2030</p>
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<ul style="list-style-type: none"> - Moving manufacturing jobs to the county towns, where there is more space for factories and community gardens. - Encourage more businesses to manufacture in Limerick, noting the success of Treaty Craft Beers and Mother Macs; - Development of manufacturing such as robot maintenance, electronic, computer app design and encourage big businesses to open manufacturing plants in Limerick; - Focus on various products such as the manufacturing of mycelium fungus, robot parts, 3D printing, cycling/e-scooter parts and other eco-products; - Investment in and manufacturing of eco products. <p>6. Night Time Economy: The submission addresses the need to build a night time economy to include:</p> <ul style="list-style-type: none"> - A focus on multi-functional streets, street closures and removing larger vehicles from the city and town centres, to make them safer; - Catherine Street, a residential street, with many derelict buildings should be a neighbourhood for residents only; - A number of specific road closures including Catherine Street and William Street. 	<p>Economic and Spatial Plan highlights that building on the existing skills base and collaboration with research and government is important for advancing the sector and for Limerick to become a leader in ICT innovation, design and production.</p> <p>The Local Authority will continue to support investment in and build on the success of the High Tech/Manufacturing zoned lands, which have contributed significantly to the economic growth of Limerick.</p> <p>6. Night Time Economy: The Draft Plan recognises the importance of the night time economy throughout Limerick, which is an important form of economic activity that occurs after 5pm and includes dining, nightlife, arts, music, theatre, entertainment, festivals, events, activities and tourist attractions that are open at night. As set out under Chapter 4 A Strong Economy the Draft Plan includes Objective ECON O12 Night Time Economy, whereby ‘It is an objective of the Council to support the development of the night time economy throughout Limerick and to prepare a night time strategy and ensure the implementation of this strategy on completion’.</p> <p>7. Environment/Public Realm Improvements and Proposals: Limerick City and County Council are currently preparing a Public Realm</p>
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7. Environment/ Public Realm Improvements and

Proposals: The submission outlines improvements that are required across the city including:

- Remove bollards and replace them with metal planters of flowers, bushes or trees;
- Increase urban farming by using top floors of carparks;
- Develop Baker Place as a quiet area for lunch and reading;
- Introduce cargo bikes, more trees, bird and bat boxes;
- Issue with noise pollution from cars and extractor fans;
- Business owners in the city have a responsibility to keep the city and towns looking their best;
- Removal of bins from view, large metal containers to disguise bins, underground city bins, usage of empty carparks for storage bins;
- Other public realm improvements including - Usage of multi-use bollards, more bike parking and E-scooter parking, removing unnecessary public infrastructure, more planters;
- Need for safe zones (colourful and include planting/seating);
- Themed streets/festival streets;
- Increase bike parking at fast food restaurants;
- Increase planting and CCTV;
- Entry points need to be upgraded to make a better impression and more welcoming to tourists;
- Need for Irish Street Names;

Strategy. The Public Realm Strategy will also complement measures that will be contained in the final Limerick Shannon Metropolitan Area Transport Strategy (LSMATS), Limerick 2030 Vision: An Economic and Spatial Plan for Limerick, Limerick City and Environs Flood Relief Scheme and Public Realm Project; the “World Class” Waterfront Development and the Limerick Wayfinding Strategy and Implementation Plan. As set out under Objective CGR O1 of Chapter 10 Compact Growth and Revitalisation ‘It is an objective of the Council to: b) Prepare and facilitate implementation of Public Realm Plans for settlements including Limerick City, Adare and Rathkeale’.

The Public Realm Strategy will include consideration of opportunities for the greening of the City and for green design features, such as measures for the control of surface water run-off, to enhance biodiversity or to promote a varied streetscape. The Strategy will consider the quality of the appearance and durability/sustainability of materials/street furniture and will examine opportunities to enhance public realm at night.

As outlined under Item 2 above, the Limerick Laneways Project will guide the repurposing of twenty-five laneways in the City Centre, through examining issues such as movement, planting, lighting and refuse, including examining different ways to reorganise bins in a more aesthetic manner.

Traffic-related noise is the main source of environmental noise effecting communities in Limerick. As set out under Chapter 6 Sustainable Mobility and Transport, Objective TR 049 outlines that ‘It is

	<p>- Entry point into Limerick by train needs to be improved. Issues with anti-social behaviour upon leaving the station.</p>	<p>an objective of the Council to identify appropriate mitigation measures to reduce noise levels from traffic where they are potentially harmful, in accordance with Limerick’s Noise Action Plan’. In addition, Section 5.3.11.2 of Chapter 5 Environment, Heritage, Landscape and Green Infrastructure, deals with Commercial and Industrial Noise, which it acknowledges has the potential to have adverse impacts on the health and well-being of occupants of noise sensitive properties. In this regard, Objective EH 021 states ‘It is an objective of the Council to prevent members of the public being significantly adversely effected by environmental noise from commercial and industrial noise activities’. The observer is advised to access additional information on noise nuisance at https://www.limerick.ie/council/services/environment/environmental-control/noise-nuisance where relevant information and complainant advice is provided.</p> <p>The Draft Plan facilitates the implementation and delivery of LSMATS, which includes an objective in support of a significant uplift in provision of high quality, secure, short-stay cycle parking in the City Centre, metropolitan town centres, schools, rail and bus stations, public buildings, shopping areas and workplaces.</p> <p>The provision of CCTV on individual private businesses is outside the remit of the Draft Plan.</p> <p>8. Tourism: The Draft Plan outlines that during its lifespan, the Local Authority will increase the range of day and evening experience options for visitors, by working collaboratively to deliver an improved</p>
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<p>8. Tourism: In relation to tourism, the submission outlines a number of proposals including:</p> <ul style="list-style-type: none"> - The need for digital information boards and tourism information; - Proposes the Railway or Glenworth Hotel to be turned into a hostel; - Rage rooms – rage or anger rooms for mental health and stress relief; - Horse Tourism – horse and carriage trips around the city; - Additional festivals throughout the year – Spring Street Festival, Easter holidays, Autumn Farmers Market, Christmas Market, Halloween, Community Meal Events, Box Cart Racing, monthly summer street festivals citing Cruises Street, Potatoe Market, William Street or Roaches Street, Barrington Street/Pery Square or Georges Quay as potential locations; - Eco-tourism – rewilding, cleaning up lakes and rivers, entice nature lovers; - Limerick Tourism Cruise operated by solar/electric or hydrogen powered and run by Limerick City and County Council; - Develop Curraghchase House as a restaurant. 	<p>visitor environment. Ongoing public realm improvement works in the City Centre and a new Wayfinding Orientation and Signage Plan will enhance the visitor experience, by introducing and orientating visitors through the City, including the delivery of public information displays.</p> <p>The Limerick Tourism Development Strategy 2019-2023 aims to revitalise the tourism sector in Limerick, capture key opportunities to grow the sector and highlight priority action areas to unlock the significant benefits that a thriving tourism industry can bring. Key actions on tourism development in this strategy include Action Area No. 1.9: ‘Encourage and facilitate the further development of additional hotels throughout Limerick (This should include hostel type accommodation options)’.</p> <p>In response to the observer’s reference to festivals/events and water tourism, it is noted that Objective ECON O36 of Chapter 4 A Strong Economy, outlines the following:</p> <ul style="list-style-type: none"> e) Actively develop Limerick as an Events location with the appropriate infrastructure to attract international conferences, sporting, cultural and commercial events, including the development of an International Conference Centre and improved public realm, which supports outdoor performance and events of scale; g) To work with Waterways Ireland and Fáilte Ireland to develop the water activity sector in Limerick by exploring the potential for increased accessibility to Limerick’s waterways for water-based tourism activity.
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<p>9. Settlements: In relation to the settlements outside of the City, the observer has outlined a number of proposals/ideas including:</p> <ul style="list-style-type: none"> -Patrickswell: Change of use of the petrol stations to a café with outdoor seating/restaurant; widen footpaths; storage area down side roads; double bike rack parking with covers; electric charging points; a funfair town with shuttle buses/tram; potential location for Christmas parties; horse riding tack shop; student village. -Croom: Digital hub; apartments to serve Raheen Industrial Estate; student village for UL/Mary Immaculate College with tram links. -Castleconnell: Digital hub; apartments; research labs; bicycle/E-scooter training centre. -Newcastle West: Location for eco-manufacturing; change car sales business to apartments/digital hub; auto trade behind Tesco/Longcourt change to a bike manufacturing hub; enterprise center proposed as manufacturing hub; Temple tyres manufacturing to bike tyres; petrol station to 	<p>Further to the above, the Limerick Tourism Development Strategy 2019-2023 Action 4 includes the following objective: ‘Building on key strengths, which have become internationally recognised during the National City of Culture and European Capital of Culture bidding processes, Limerick will support and augment ways to continue to develop a dynamic and active festivals and events scene, which energises our civic spaces, engages citizens and celebrates contemporary creative practices’.</p> <p>9. Settlements: The Draft Plan’s Settlement Strategy includes Patrickswell, Croom, Askeaton and Adare as Level 4 settlements. In Volume 2 of the Draft Plan, the settlement zoning and development objectives for the Level 4 settlements are outlined. Each settlement profile includes individual objectives specific to that settlement. In conjunction with these, there are a number of common objectives or goals, which relate to all Level 4 settlements. These include an objective on tourism development, retail development, promotion of smarter travel modes, blue-green infrastructure opportunities and reuse of vacant and derelict buildings.</p> <p>Newcastle West and Kilmallock (both Level 2 Key Towns under Draft Plan Settlement Strategy) and Askeaton and Adare (both Level 4 settlements under Draft Plan Settlement Strategy) have existing Local Area Plans. Following the adoption of the Draft Plan, a review of the existing Local Area Plans will be undertaken to ensure consistency with the Core Strategy and policies and objectives of the Development Plan. There will be further opportunity at this point for public consultation to shape the future of these settlements.</p>
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<p>furniture store potential location for IKEA; St. Ita’s Road church carpark to be developed as a green area with seating and bike parking; remove all parking aside from disabled parking from The Square and return to the market – create a ‘people’s plaza’; revamp laneways; develop a dog park/playground; petrol station at Ballintemple Inn used as outdoor seating; potential location for a parklet; introduce large festivals for the Square; needs a cinema, arcade and bowling alley; hammocks near the Greenway.</p> <p>-Askeaton: Rewilding project at Stonehall Wildlife Park, shipping opportunities in Foynes – benefit from eco-tourism.</p> <p>-Abbeyfeale: Location for a bicycle hub/manufacturing for greenway; River Feale for swimming/fishing competitions; a horse and cart business; woollen mill and shop for Aran jumpers/souvenirs of Limerick products.</p> <p>-Adare: Remove traffic.</p> <p>-Kilmallock: Digital hub; sorting facilities; Amazon or eBay storage centre.</p> <p>10. Sustainable Transport and Mobility: The submission outlines a number of proposals/ requirements to improve transport in Limerick including:</p> <ul style="list-style-type: none"> - Trains/trams to enable faster and better movement of people allowing better sales/profits. Congestion impacts profits; - Drones and cargo bikes; 	<p>10. Sustainable Transport and Mobility: During the lifetime of the Draft Plan, the Council will strengthen the links between land use and transportation planning and will seek to promote sustainable transport, through the management of the road network in Limerick. The Draft Plan outlines that focus will be placed on creating a shift to more sustainable transport modes, enhanced walking and cycling</p>
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<ul style="list-style-type: none"> - Improve transport links with Nenagh Hospital; - New and existing entry points to cycle ways need improvement; - Develop a highway greenway connecting Limerick to Shannon and Ennis, proposes reducing the tunnel to one-way vehicular access with the inbound lane used for active travel; - Develop railing around the city for bike parking similar to the Netherlands; - Importance of a modern public tram system is urgently needed to create a modern city and county; - Limerick is ill-equipped for large volumes of private cars, need cars to stay outside of city core or town centres, except disabled drivers/emergency vehicles; - Promotes the last mile by cargo bike; - Electric cars are space invaders, costing resources and have knock on effects on infrastructure; - The use of drones will increase and will help decrease traffic issues; - Need for increased use of the river and canals for boat transport; - Introduction of moorings for Canal Boat Residents; - Loud unnecessary vehicles should not be allowed within the city after 8pm; - The American style model that Limerick is based on has not worked and the city is ill-equipped for immense volumes of traffic; 	<p>facilities and by improving energy efficiency of our transport, thus reducing our carbon footprint.</p> <p>The National Transport Authority in conjunction with Limerick City and County Council and Clare County Council have prepared a Draft Limerick – Shannon Metropolitan Area Transport Strategy (LSMATs), which is currently undergoing review and is due to proceed to further public consultation in the coming months. The Draft LSMATS sets out an integrated and balanced sustainable transport strategy for the Limerick – Shannon Metropolitan Area and will address all travel modes including walking, cycling, road, bus and rail. Although much of what has been raised in the submission is either outside the scope of the Development Plan or a matter for LSMATS, the following policies are noted in response to the issues raised.</p> <p>The Draft Plan facilitates the implementation and delivery of LSMATS under Chapter 6 Sustainable Mobility and Transport, Objective TR O12 Limerick – Shannon Metropolitan Area Transport Strategy states ‘It is an objective of the Council to facilitate the implementation and delivery of the proposals that will be contained in the final Limerick Shannon Metropolitan Area Transport Strategy, in conjunction with the National Transport Authority, Transport Infrastructure Ireland and Clare County Council and other relevant stakeholders. The Council will continue to play an important role in the development of an efficient transport system and in planning for the future transport needs of Limerick. In pursuing the objective of encouraging modal shift, the Council will co-operate closely with other relevant agencies and stakeholders, including the NTA. The Council aims to deliver</p>
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<ul style="list-style-type: none"> - Not everyone can afford electric cars and the Government needs to take this into account. Proposes a new ebike for an old car; - Low Traffic Neighbourhoods to stop rat runs creating safer spaces for children including Greenfields, O’Callaghan Strand, Clancy Strand, Mayorstone; - Issue with illegal and dangerous parking on footpaths; - Introduce cargo bikes; - More bike parking and E-scooter parking. 	<p>infrastructure and public realm projects required to significantly increase levels of walking, cycling and public transport use throughout Limerick, making it more accessible, inclusive, safe and welcoming to all. The RSES includes policy objectives requiring the preparation of Local Transport Plans in selected settlements in the region, including Newcastle West, which is identified as a key town’.</p> <p>With regards to promotion of last mile trips, the following objective is included in Chapter 6 of the Draft Plan Objective TR O10 Delivery and Servicing Strategy, which states ‘It is an objective of the Council to:</p> <ol style="list-style-type: none"> a) Reduce the amount of ‘last mile trips’ being made by motorised vehicles; b) Facilitate the transition to zero emission delivery vehicles such as cargo bikes, solar powered and electric vehicles; and c) Support local ‘Click and Collect’ facilities where appropriate to minimise trips to individual homes and workplaces’. <p>The Draft Plan, in support and encouragement of new, and upgrading of the existing, rail network and stations includes under Chapter 6 Objective TR O21 Rail Network, which states ‘It is an objective of the Council to support and encourage new and upgrading of existing rail networks and railway stations and protect, as required, lands necessary for the upgrading of existing railway lines or stations, which would improve journey times and enable an increase in the frequency of services and connections’.</p> <p>The Draft Plan outlines how the Council have commenced work with the National Transport Authority in the preparation of the Limerick</p>
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	<p>11. Housing Crisis: The submission addresses the housing crisis and makes a number of proposes including the following:</p> <ul style="list-style-type: none"> - Promote residential development in historic areas of Limerick City; - Remove businesses from Georgian Quarter and return to family homes; - Thomas Street carpark should be redeveloped as an apartment block; - Newenham Street, Barrington Street and Pery Square to become neighbourhoods with planting instead of carparking – entry points into city and town centres to become residential streets to create a better image; 	<p>City Centre Traffic Management Plan. The key principles for the plan are to rebalance the City’s street network towards sustainable modes of transport and the management of Heavy Goods Vehicles. Traffic management measures in the City Centre will be underpinned by public realm improvements that support walkability and active travel, that promote a high standard of urban design and provide a clear sense of place that respects the existing character of Limerick’s Georgian heritage.</p> <p>To support the reduction in peak-time HGV movements through Limerick City, Objective TR O43 HGV Restrictions under Chapter 6 states ‘It is an objective of the Council to identify specific lorry routes and/or time restrictions, to reduce peak-time HGV movements through Limerick City and neighbourhoods’.</p> <p>11. Housing Crisis: The Regional Spatial and Economic Strategy (RSES) for the Southern Region seeks to prioritise housing and employment development in locations within and contiguous to existing urban footprints, where it can be served by public transport, walking and cycling networks. Achieving compact growth targets will be through the development of brownfield and infill sites and the promotion of brownfield lands over greenfield developments in all urban areas. The RSES also seeks the targeting of measures to reduce vacancy in our building stock and investment in refurbishment, to bring underutilised properties into residential use. The Limerick Shannon Metropolitan Area Strategic Plan (MASP) supports a number of key infrastructure and transformative projects within Limerick City, including City Centre Consolidation and Revitalisation based on Limerick 2030, comprising</p>
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<ul style="list-style-type: none"> - Henry Street Garda Station replaced with apartments; - Develop an eco-village in the city, potentially at Cleeves Site, with potential to develop more eco villages operating on renewable energy. EcoCocon has a construction system designed by nature. <p>12. Regeneration Areas: The submission notes the following in relation to the regeneration areas:</p> <ul style="list-style-type: none"> - Need to address six disadvantaged areas/communities – Moyross, Southill, Weston, St. Mary’s Park, Garryowen and the Travelling Community; - The funding allocated to these estates have not made a difference and are a failure on behalf of previous governments; - The city is dying because the disadvantaged areas are not being tackled. This spills over into the city, affecting customers and businesses and the local economy; - People do not want to come into the city because of the visible drink and drug problem; 	<p>social, physical and economic revitalisation and formation of a higher density Georgian Living City with all essential services and community facilities.</p> <p>Chapter 10 Compact Growth and Revitalisation of the Draft Plan includes identifies a number of projects and Opportunity Sites which will contribute to compact growth, increased residential density and revitalisation across the City. Such projects include the Living Limerick City Centre Initiative, the Limerick Laneways Project, redevelopment of the Opera Site and the opportunities presented by the sites at Cleeves Riverside Quarter, Arthur’s Quay, Colbert Quarter and Ellen Street Carpark, all of which have potential for a substantial residential component.</p> <p>12. Regeneration Areas: Under Chapter 10, Compact Growth and Revitalisation, the Draft Plan includes Policy RA P1 Regeneration Strategy, which states ‘It is a strategic policy of the Council to support the implementation of the Limerick Regeneration Framework Implementation Plan, in a coordinated and sustainable manner and to cooperate with other agencies in the Region to deliver the goals and objectives set out in the Plan’.</p> <p>A review of the LRFIP was carried out in 2016 and found that the significant amount of work being carried out in the four regeneration areas across Limerick City is having a very positive impact on the communities. The review included 17 recommendations in the continued implementation of the Plan.</p>
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<ul style="list-style-type: none"> - Need more Garda presence in the City and extra resources. <p>The submission proposes the following solutions for the regeneration areas:</p> <ul style="list-style-type: none"> - Opening up rehabilitation centres and medical centres to tackle drink and drug addiction; - Introduce injection rooms for safe use for drug users; - Zero tolerance is needed on drug dealing, money lenders and major criminals; - Need for community led volunteer groups who can educate and reskill people to get them back into the workplace. Importance of education and life skills; - Move away from social media and back to community chats; - Rebuild homes in disadvantaged areas with rapid build homes. The community to build their own homes – get people back into employment and gain pride in their areas/properties; - Build stables for horses – caring for animals and the link to reduction in addiction/crime in disadvantaged areas. <p>13. Irish Cement: The submission proposes to recycle the tyres that are licensed to be incinerated to be used for road surfacing.</p> <p>14. Heritage: The submission outlines that monuments and heritage sites need to be properly maintained.</p>	<p>A programme of social and economic initiatives will also be advanced over the coming years to address unemployment blackspots and low education rates. While the scheme is scheduled to be completed by 2023, the cross-cutting objectives of the Draft Plan will support the continuation of all programmes for the physical, social and economic regeneration of the most deprived areas of Limerick City.</p> <p>The contents of the submissions regarding antisocial behaviour are noted. The Council continue to liaise with the Joint Policing Committee to address issues of antisocial behaviour.</p> <p>Limerick City and County Council have plans to implement fourteen ‘rapid-build’ housing units in Carew Park, to accommodate homeless families. Another rapid build development is proposed for Hartigan’s Villas and Delmege Park in Moyross.</p> <p>13. Irish Cement: The proposals for the recycling of tyres incinerated at the Irish Cement factory is outside the remit of the Development Plan.</p> <p>14. Heritage: The Draft Plan recognises that the conservation and enhancement of, and access to, Limerick’s heritage has the potential</p>
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<p>15. Street Network: In relation to the street network of the City, the submission outlines:</p> <ul style="list-style-type: none"> - Proposals for William Street to be kept free flowing and become a copy of O’Connell Street without the new footpaths; - Request for Roches Street to include proper traffic calming and three raised pedestrian crossings to reduce dangerous speeding from all modes; Replace carparking spaces with bike stands; Allow pedestrians only on the footpaths; Include electric car chargers; - Need for full pedestrianisation of the Quays and closure of Lower Shannon Street for Dunnes Stores deliveries. <p>16. Environment: The submission queries why Green Roofs were removed by Cllr.s and notes the importance for biodiversity and carbon sequestration.</p>	<p>to contribute to individual well-being, shared community identities, social cohesion and the liveability of our towns and villages as well as our visitor economy. This is reinforced in Chapter 5, Environment, Heritage, Landscape and Green Infrastructure under Policy EH P2 Sustainable Management and Conservation, which states ‘It is a policy of the Council to ensure the sustainable management and conservation of areas of natural environmental and geological value within Limerick and to protect, enhance, create and connect, where ecologically suitable, natural heritage, green spaces and high-quality amenity areas for the benefit of biodiversity’.</p> <p>15. Street Network: It is an objective of the Draft Plan to support the implementation and delivery of the proposals that will be contained in the final Limerick Shannon Metropolitan Area Transport Strategy. The LSMATS acknowledges that much of Limerick City Centre is dominated by private car parking, through-traffic and HGVs. As part of the strategy, the City’s street network will be reviewed with the aim of prioritising space for walking, cycling and public transport provision, with the intention of creating a more attractive and vibrant experience for residents and visitors. This will be achieved by reallocating a significant amount of space to sustainable modes in the central area by removing on-street parking, reducing levels of car traffic and narrowing carriageways and junctions.</p> <p>16. Environment: The submission received is noted. Under Section 12 of the Planning and Development Act 2000 (as amended) the making of the Draft Plan is a reserved function of the Elected Members. The Elected Members had concerns in relation to the cost and</p>
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	<p>17. Other: The observer notes that submissions aren’t listened to and are a box ticking exercise for PR purposes.</p>	<p>maintenance of green roofs on all buildings and voted to remove the proposed objective accordingly.</p> <p>17. Other: The procedure for the making of a new Development Plan is set out under Section 12 of the Planning and Development Act 2000 (as amended), including stages for consultation in order to enable members of the public opportunities to provide input into the plan making process.</p> <p>The purpose of the Chief Executive’s Report is to set out the consultation process on the Draft Plan, including a summary of any submissions or observations received, the setting out of the Chief Executive’s response to the issues raised and recommendations on alterations to the Draft Plan. Each submission is considered in full by the Planning Authority and discussed with various Departments of the Council as necessary in order to prepare responses and recommendations for alterations to the Draft Plan where appropriate. It must be borne in mind that the Development Plan is a land use plan and can only address issues within the remit of the Local Authority.</p> <p>This Chief Executive’s report will be issued to the Elected Members of Limerick City and County Council for their consideration. The next step involves the Elected Members considering the Draft Plan and this Chief Executive’s Report, including any submissions received, within a period of 12 weeks under Section 12 (5) of the Planning and Development Act 2000 (as amended). Elected Members may then accept or amend the Draft Plan.</p>
<p>Chief Executive’s Recommendations</p>		

	1 - 17: No change.
	SEA/ AA Response
	N/A

No. 33	Ref. & Name/ Group:	LCC-C62-33 Eamonn Baker
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. High Road, Thomondgate: A section of street after crossing Thomond Bridge in the direction of Thomond Park is a very poor vista. The row of houses look poor and depressing. A regeneration project should be put in place to tackle this and improve the streetscape, through landscaping and encouraging the upgrade of the house facades. The current streetscape provides a poor image of the city on one of the main routes and should be addressed.</p>	<p>1. High Road, Thomondgate: Limerick City and County Council are currently preparing a Public Realm Strategy for the City as supported under Objective CGR O1 of Chapter 10 Compact Growth and Revitalisation of the Draft Plan. The Public Realm Strategy will consider the enhancement of the City, including areas of Thomondgate. The Public Realm Strategy will also complement measures that will be contained in the final Limerick Shannon Metropolitan Area Transport Strategy (LSMATS) and Limerick City and County Council’s Limerick 2030 – An Economic and Spatial Plan for Limerick, which will allow opportunities to enhance public realm.</p> <p>The aim of the Public Realm Strategy will be to:</p> <ul style="list-style-type: none"> - Guide the enhancement, management, use and development of the public domain in collaboration with all stakeholders; - Strengthen and enhance the attributes which contribute to the distinctive physical and social character of Limerick City; - Ensure that the interests of all users are considered; - Set out co-ordinated projects/priorities that will enhance and improve the way the city functions;

		<ul style="list-style-type: none"> - Ensure that public realm design contributes to the overall liveability and sustainability of the city and embraces the concepts of urban greening and nature-based solutions. <p>The section of road referenced within the submission will come within the study area of the Public Realm Strategy.</p>
	Chief Executive’s Recommendations	
	1. No change.	
	SEA/ AA Response	
	N/A	

No. 34	Ref. & Name/ Group:	LCC-C62-34 Eamonn Baker
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. City Center Concert Hall: A Concert Hall is needed in the City Centre – a cultural centre for concerts, drama, music, film etc. This is a core part of a plan to revitalise and bring life in the city centre especially after 5pm. The Cleeves site may be suitable, within a short walk of the City Centre and called the ‘Dolores O’Riordan’ Concert Hall.</p>	<p>1. City Center Concert Hall: The Council recognises the value of the arts sector to the social, cultural and economic development of the City and their impact, direct and indirect, on communities. The Limerick Cultural Strategy 2016-2030, Limerick Local Economic and Community Plan 2016-2021 and Limerick City and County Heritage Plan 2030, recognise the Council’s pivotal role in the promotion and encouragement of the arts and culture, while prioritising direction for future development and investment.</p> <p>The Limerick 2030 Review identifies a number of goals and objectives for the development of the City Centre, including the development of a cultural centre/ creative hub, which could include the development of a concert hall. The review indicates that culture must be viewed as an economic enabler and is underdeveloped in Limerick. The review</p>

		<p>identifies the need to establish a Working Group to grow the creative sector, develop a cultural centre/ creative hub in the city and ensure cultural facilities are available in towns.</p> <p>The Draft Plan includes policy objectives in support of the provision of venues and art and cultural infrastructure in Limerick. Specifically, the objective includes the provision of such infrastructure to help revitalise the City Centre. In this regard, Objective SCS1 030 Arts and Culture of Chapter 9 Sustainable Communities and Social Infrastructure aims to:</p> <ul style="list-style-type: none"> e) Promote the provision of venues that are flexible spaces that are fit for purpose for theatre, music or dance performance and visual arts in locations that are accessible with respect to public transport, are inclusive in terms of accessibility and would contribute to creative clusters through their location, design and accessibility; f) Strengthen existing art and cultural infrastructure; g) Promote the provision of studios and specialised facilities for arts and music production, film and digital media, where they would help revitalise the City Centre, historic towns, areas earmarked for regeneration or renewal and as part of renewal programmes or projects; h) Consider the protection of spaces and facilities for the arts. <p>The proposed naming of such a venue is outside the remit of the Draft Plan.</p>
Chief Executive’s Recommendations		
1. No change.		

	SEA/ AA Response
	N/A

No. 38	Ref. & Name/ Group:	LCC-C62-38 Michael Begley
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Zoning: The observer is requesting the re-zoning of 3.9ha. of Agricultural lands for Low Density Residential at Caher Road, Mungret.</p> <p>The land is served by public water and sewerage at the north-western corner.</p> <p>Considering the future development of the general Mungret area under Education, Sports and Recreation, Commercial and Light Industry, the observer believes there will be major demand for housing in the area.</p>	<p>1. Zoning: The content of the submission received is noted. There are a number of issues in relation to the zoning of these lands as follows:</p> <p>-Compact Growth: Having regard to:</p> <ul style="list-style-type: none"> - The National Planning Framework objectives to secure compact and sustainable growth under National Policy Objective 3, including National Planning Objective 3b which aims to deliver at least 50% of all new homes within the existing built-up footprint of Limerick city and suburbs and the objectives to coordinate land use zoning, infrastructure and services under National Policy Objective 72a-c and; - The Climate Action Plan 2019, which requires a reduction in car based transport and carbon emissions, <p>The Planning Authority is required to take a sequential and compact approach to development, while increasing the integration of land use and sustainable modes of transport. This approach requires higher densities within the established City and suburbs footprint and identification of strategically located greenfield sites, within walking distance of centres and accessible by public transport and other service infrastructure.</p>

		<p>The Draft Plan includes policies and objectives for compact growth, which require the development of brownfield and infill sites and the intensification of underutilised sites in accordance with Active Land Management Measures. This approach is essential to comply with the objectives of the National Planning Framework.</p> <p>Development on the edge of existing residential areas would not be sequential with the city first approach, exacerbating dependence on private based motorised transport and contributing to unsustainable patterns of development. Development of these lands would therefore be contrary to compact growth objectives, the Climate Action Plan objectives to reduce energy use, emissions and transition to a low carbon and climate resilient society and the requirements of Section 10(2)(n) of the Planning and Development Act in relation to climate action.</p> <p>Alternative zoned lands closer to the centre are available which comply with the compact growth, sustainable transport and climate mitigation objectives. On the basis of the above, it is recommended that these lands not be included for zoning.</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</p>
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		<p>pedestrian and cycle connections to Mungret village. This issue has been raised in recent refusals of planning permission closer to the village by An Bord Pleanála under PI. Ref. 21/252. Having regard to the prioritisation of pedestrian facilities, particularly in the Design Manual for Urban Roads and Streets, issued by the Government in 2019, the absence of any pedestrian facilities would be contrary to national policy and lead to an increase in unsustainable use of private transport.</p> <p>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	
	1. No change.	
	SEA/ AA Response	
	N/A	

No. 41	Ref. & Name/ Group:	LCC-C62-41 AK Planning on behalf of O’Mara Family
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Zoning: The former Shannon Minerals site at Upper Clare Street, off the main Dublin Road, circa 0.9 ha. has been designated as Enterprise and Employment. The observation requests that the site be retained as Mixed-</p>	<p>1. Zoning: The content of the submission received is noted.</p> <p>The Draft Plan includes a limited number of Mixed-Use zones to reflect specific site proposals only. In accordance with the Draft Development</p>

<p>Use or zoned as New Residential to allow for a development that is primarily residential.</p> <p>The site is zoned ‘5A Mixed Use’ in the Limerick City Development Plan 2010-2016 (as extended). The observation outlines the land use type permitted within Objective ZO.5 (A) General Mixed Use.</p> <p>The site is fully serviced and brownfield in an accessible edge of centre/inner suburban urban location. The site houses a vacant factory building and expansive hard standing area. The primary vehicular entrance is located on the Pa Healy Road and limited car parking spaces located on Upper Clare Street.</p> <p>-Flood Risk: The submission notes the reasoning behind the redesignation was a result of the Strategic Flood Risk Assessment. CS Consulting were engaged to carry out a detailed Site-Specific Flood Risk Assessment, which was submitted as part of the submission.</p> <p>The FRA proposes that the site is suitable for development. No vulnerable development will be located at ground floor level, all habitable areas will be located at first floor level and only car parking and landscaping will be located at ground floor level. As part of any new multi storey development there will not be any proposal to</p>	<p>Plan Guidelines for Planning Authorities, the Draft Plan is moving towards a standardised national set of zoning objectives. In this regard, the provision of additional mixed use zoned sites is not recommended.</p> <p>With respect to the request to zone the lands to allow a primarily residential development, the main issue in relation to this site is the location in Flood Zones A and B.</p> <p>-Flood Risk: The Planning and Development Act 2000 (as amended) requires the preparation of the Development Plan in accordance with Section 28 Ministerial Guidelines. In accordance with The Planning System and Flood Risk Management, Guidelines for Planning Authorities (the Guidelines), a Strategic Flood Risk Assessment (SFRA) has been prepared to assess flood risk within the plan area.</p> <p>In order to achieve the aims and objectives and comply with the requirements of the Guidelines, the Local Authority’s approach to the zoning of land is to avoid development in areas at risk, where possible and substitute less vulnerable uses, where avoidance is not possible. A precautionary approach will be applied, where necessary to reflect uncertainties in flooding datasets and assessment techniques and the ability to predict the future climate and performance of flood defences.</p> <p>A Flood Risk Assessment has been submitted which correctly indicates the likely cause of flooding to be predominantly tidal, rather than fluvial as shown in the CFRAM maps. However, this does not</p>
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	<p>remove flood plain and so the FRA does not contain a Justification Test.</p>	<p>fundamentally change the Flood Zones, although it should be noted that the undefended Flood zones (in the SFRA) are greater than the defended flood extents from the CFRAM.</p> <p>In accordance with Section 2.25 of the Guidelines, the presence of flood protection structures should be ignored in determining flood zones. This is because areas protected by flood defences still carry a residual risk of flooding from overtopping or breach of defences and the fact that there may be no guarantee that the defences will be maintained in perpetuity. The Flood Risk Assessment submitted with the submission includes the defended scenario, which is contrary to Section 2.25 of the Guidelines as outlined above.</p> <p>The lands are located within Flood Zones A (high probability of flooding) and B (moderate probability of flooding). Section 3.5 of the Flood Guidelines indicates that development in this zone should be avoided and/or only considered in exceptional circumstances, such as in city and town centres, or in the case of essential infrastructure that cannot be located elsewhere and where the Justification Test has been applied. Table 3.1 of the Flood Guidelines makes a distinction between various land uses, where residential is considered a ‘highly vulnerable development’ and commercial is a ‘less vulnerable development’.</p> <p>Highly vulnerable uses including residential are only appropriate if a Justification Test is passed. In considering the Justification Test it should be noted that in order to achieve Compact Growth, the Draft Plan takes a City Centre first approach to the spatial development of</p>
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	<p>-Access and Connectivity: Infrastructure includes pedestrian and cycling links to amenities and the city centre and a 2 minute walk to the bus stop. The Limerick Shannon Metropolitan Area Transport Strategy focuses on enhanced bus corridors on main arteries serving the City Center, UL and Shannon Airport. The site is in close proximity to national schools, post primary schools and third level institutions and a number of amenities including playing pitches, Grove Island Leisure Complex, a public park and canal walk.</p> <p>-Development Potential: The site provides a prime residential apartment opportunity and could consist of</p>	<p>Limerick City and Environs. The core is defined as the area zoned “City Centre”. Furthermore, Part 2 of the Justification Test requires the Local Authority to consider a number of factors, including whether the site is located within the core, or if there are 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 Plan has zoned sufficient alternative residential lands to meet the requirements of the Core Strategy, in areas that are not at risk of flooding and suitable for the provision of highly vulnerable uses in accordance with the sequential approach of the Guidelines. The Justification Test does not pass, it is recommended that these lands are not included for zoning which accommodates residential use.</p> <p>-Access and Connectivity: The content of the submission received is noted. Such connectivity will be of equal importance for the ‘Enterprise and Employment’ zoning proposed in the Draft Plan.</p> <p>-Development Potential: The content of the submission received is noted. The development potential of the site as a residential area is undermined by the location’s vulnerability to flooding. In this regard,</p>
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<p>one or more blocks of 6 – 9 storeys, accommodating circa 150 apartments units and ancillary commercial/retail.</p> <p>-Gael Cholaiste/Dawn Dairies: The owners have provided consent to Limerick and Clare Education and Training Board, to include part of the Shannon Minerals site for an application for a new Gael Cholaiste second level school, on the former Dawn Dairies site adjacent. The site would facilitate an entrance to the school and the existing entrance would be extinguished. Permission was granted for the proposed school.</p> <p>The designation of the site within the Draft would militate against a shared entrance, as it would be difficult to foresee a situation where the current access to Shannon Minerals could be sacrificed to facilitate a diluted shared access to a large secondary school.</p> <p>-Strategic Housing Development: The site was the subject of a detailed pre-planning as part of a Strategic Housing Development for a multi storey residential apartment scheme in late 2018. Due to non-planning issues the application did not materialise. The clients are now in a position to proceed and need the certainty of a medium-term mixed use or residential designation. The</p>	<p>the Planning Authority considers that the new zoning for ‘Enterprise and Employment’ proposed in the Draft Plan offers the best compromise between less vulnerable uses and development opportunities.</p> <p>-Gael Cholaiste/Dawn Dairies: The content of the submission received is noted. Agreements between landowners and applicants in relation to entrances are a civil matter outside of the scope of the Development Plan.</p> <p>-Strategic Housing Development: The content of the submission received is noted.</p>
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	submission includes correspondence with LCCC regarding a preliminary SHD meeting.	
	Chief Executive’s Recommendations	
	1. No change.	
	SEA/ AA Response	
	N/A	

No. 50	Ref. & Name/ Group:	LCC-C62-50 HRA Planning on behalf of John O’Neill
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Zoning: The submission relates to 3.6ha. of lands at the former Coonagh Cross roundabout in Clondrinagh and requests the change of zoning from Educational and Community Infrastructure to Mixed Use.</p> <p>The submission argues that the proposed re-zoning will:</p> <ul style="list-style-type: none"> - Facilitate industry and/or enterprise use on a brownfield site with previously established commercial use in accordance with Objective ECON 015; - Facilitate effective utilisation of serviced lands; - Provide synergies with neighbouring industrial uses; - Continue to maintain the education and community infrastructure objectives ECON 018 and SCS1 04; and 	<p>1. Zoning: The content of the submission received is noted. There are a number of issues in relation to the zoning of these lands.</p> <p>The Draft Plan includes a limited number of Mixed-Use zones to reflect specific site proposals only. In accordance with the Draft Development Plan Guidelines for Planning Authorities, the Draft Plan is moving towards a standardised national set of zoning objectives. In this regard, the provision of additional mixed use zoned sites is not recommended.</p> <p>The main issue in relation to the request for re-zoning relates to Flood Risk. The whole site is within Flood Zone A, defended and tidal. The “Flood Risk Management Guidelines for Planning Authorities (2009)” requires a Plan Making Justification Test to be carried out when zoning lands within Flood zones A and B, prior to engineering or other solutions to manage risk being considered. The Justification Test has</p>

	<p>- Facilitate infill development and promote compact growth at a strategic gateway from the west.</p> <p>-Material Considerations: There are a number of material considerations including historic zoning, pattern of development, lack of evidential need for such extensive education and community purposes zoning and the location of the site removed from centres of population and residentially zoned lands. Reference is made to the Draft Development Plan Guidelines which state that ‘Planning Authorities should approach the development plan with a clear focus on the delivery of expected development outcomes’. In this case it is not the intention of the landowner to develop or dispose of the site for education and community infrastructure purposes.</p>	<p>considered the existing brownfield and derelict nature of this site and its location at a prominent gateway in the cluster of commercial developments at Coonagh. The re-zoning of the lands to a less vulnerable Enterprise and Employment use is therefore considered reasonable and would allow for the re-development of this gateway site, improving the visual amenities of the area.</p> <p>On the basis of the above it is recommended to re-zone these lands from Education and Community Infrastructure to Enterprise and Employment.</p>
Chief Executive’s Recommendations		
1. Change the zoning of 3.6ha. of lands from Community and Education to Enterprise and Employment at Coonagh.		
SEA/ AA Response		
1. The site is brownfield and derelict and in accordance the SFRA and The Planning System and Flood Risk Management, Guidelines for Planning Authorities (2009), a detailed flood risk assessment will be required for any proposed new development on the site. The proposed change is to a less vulnerable use in line with the above Guidelines and a Plan Making Justification Test has been carried out.		

No. 54	Ref. & Name/ Group:	LCC-C62-54 Michael Hennessy
Submission/ Observation Summary		Chief Executive’s Response
1. Zoning: The observer opposes the proposal to rezone Open Space to Residential in Dromroe Estate, Rhebogue.		1. Zoning: The content of the submission received is noted. The Local Authority also notes that the lands subject of this submission,

<p>Planning permission requires the area to be open space. Re-zoning would be contrary to the permission and leave residents without space for recreation. The existing planning conditions should be enforced, including maintenance.</p> <p>The Council previously granted planning for housing on this green area. The decision was overturned by An Bord Pleanála due to inappropriate planning.</p> <p>The green area is landscaped and has several mature trees and is essential for recreation, child’s play and dog walking. With 168 houses within the estate, development would increase the density and reduce open space to an unacceptable level to residents and planning guidelines.</p> <p>The 2011 CFRAM identified land likely to flood, including the back of the estate of Dromroe. This risk will be reduced by the flood relief works, but not within the lifetime of the Development Plan. Rezoning of this open space would be contrary to guidelines.</p>	<p>comprising site no. 49 in the Draft Plan Tiered Approach to Zoning, are zoned Residential under the current City Development Plan 2010 – 2016 (as extended).</p> <p>Following a planning history search it is noted that the Dromroe Estate was subject to a number of previous planning applications, including reference nos. 98/314, 99/443 (ABP ref 30.121200) and 99/444, whereby permission was granted for a substantial residential development. The permissions also included the provision of open space, including the area subject of this observation. Conditions of the previous permissions required the development of this area for open space. The Planning Authority acknowledges the planning history of the site, the use of these lands for open space and recreation by the residents of the Dromroe Estate and the adjoining recreation land uses for rugby and GAA. Having regard to the planning history on the site and in order to maintain the amenities of the area, it is considered reasonable that these lands be zoned for Open Space and Recreation.</p> <p>2. It is noted that the zoning map layer is not fully visible in the Draft Plan for an area of Open Space zoning to the east of Dromroe Estate at Anglers Walk, Rhebogue. While there is No change proposed to the zoning, in the interest of clarity this area should form part of the Material Alterations.</p>
<p>Chief Executive’s Recommendations</p>	
<p>1. Change the zoning of 1.133ha. from New Residential to Open Space at Dromroe Estate.</p> <p>2. In the interest of clarity, lands to the east subject of this submission and zoned Open Space should form part of the Material Alterations. Change the mapping layer to ensure lands are shown as Open Space zoning to the east of Dromroe Estate.</p>	
<p>SEA/ AA Response</p>	

The establishment of additional open space zonings within the urban area is a positive change, as it adds to the overall stock of such space within the City and Environs. Open space can make a positive contribution to flood management on a city-wide scale, as water percolates through soils rather than runs off impermeable surfaces. This zoning also makes an ecological contribution as open space is often used by many forms of wildlife. Recent literature has stressed the importance of open space for wintering wildfowl and is particularly relevant in Limerick, as it is close to the Shannon which is a Special Protection Area. The effects of this change are expected to be beneficial from an ecological perspective, not least having regard to Article 10 of the Habitats Directive, which stresses the importance of landscape features outside designated sites for the conservation of species of ecological concern.

No. 56	Ref. & Name/ Group:	LCC-C62-56 Carrie Dryburgh
	Submission/ Observation Summary	
	1. Zoning: The observer opposes the proposal to rezone Open Space to Residential in Dromroe Estate, Rhebogoe. This submission is the same as No. 54. See No. 54 above for summary.	
	Chief Executive’s Response	
	1. Zoning: The content of the submission received is noted. See Response No. 1 to Submission No. 54 above.	
	Chief Executive’s Recommendations	
	1. Change the zoning of 1.133ha. from New Residential to Open Space at Dromroe Estate.	
SEA/ AA Response		
See Response to Submission No. 54 above.		

No. 58	Ref. & Name/ Group:	LCC-C62-58 Siobhan O’Brien
	Submission/ Observation Summary	
	1. Zoning: The observer opposes the proposal to rezone Open Space to Residential in Dromroe Estate, Rhebogoe. This submission is the same as No. 54. See No. 54 above for summary.	
Chief Executive’s Response		
1. Zoning: The content of the submission received is noted. See Response No. 1 to Submission No. 54 above.		

Chief Executive’s Recommendations	
1. Change the zoning of 1.133ha. from New Residential to Open Space at Dromroe Estate.	
SEA/ AA Response	
See response to Submission No. 54 above.	

No. 60	Ref. & Name/ Group:	LCC-C62-60 Tracy Chapman
	Submission/ Observation Summary	
	1. Zoning: The observer opposes the proposal to rezone Open Space to Residential in Dromroe Estate, Rhebogue. This submission is the same as No. 54. See No. 54 above for summary.	
	Chief Executive’s Response	
	1. Zoning: The content of the submission received is noted. See Response No. 1 to Submission No. 54 above.	
	Chief Executive’s Recommendations	
	1. Change the zoning of 1.133ha. from New Residential to Open Space at Dromroe Estate.	
SEA/ AA Response		
See response to Submission No.54 above.		

No. 61	Ref. & Name/ Group:	LCC-C62-61 Ann Fitzgerald and John Considine
	Submission/ Observation Summary	
	1. Zoning: The observer opposes the proposal to rezone Open Space to Residential in Dromroe Estate, Rhebogue. This submission is the same as No. 54. See No. 54 above for summary.	
	Chief Executive’s Response	
	1. Zoning: The content of the submission received is noted. See Response No. 1 to Submission No. 54 above.	
	Chief Executive’s Recommendations	
	1. Change the zoning of 1.133ha. from New Residential to Open Space at Dromroe Estate.	
SEA/ AA Response		
See response to Submission No.54 above.		

No. 62	Ref. & Name/ Group:	LCC-C62-62 Ashley Ryan	
	Submission/ Observation Summary		Chief Executive’s Response
	<p>1. Zoning: The observer opposes the proposal to rezone Open Space to Residential in Dromroe Estate, Rhebogoe. This submission is the same as No. 54. See No. 54 above for summary.</p>		<p>1. Zoning: The content of the submission received is noted. See Response No. 1 to Submission No. 54 above.</p>
	Chief Executive’s Recommendations		
	<p>1. Change the zoning of 1.133ha. from New Residential to Open Space at Dromroe Estate.</p>		
	SEA/ AA Response		
See response to Submission No. 54 above.			

No. 65	Ref. & Name/ Group:	LCC-C62-65 Susan De Costa	
	Submission/ Observation Summary		Chief Executive’s Response
	<p>1. Zoning: The observer opposes the proposal to rezone Open Space to Residential in Dromroe Estate, Rhebogoe. This submission is the same as No. 54. See No. 54 above for summary.</p>		<p>1. Zoning: The content of the submission received is noted. See Response No. 1 to Submission No. 54 above.</p>
	Chief Executive’s Recommendations		
	<p>1. Change the zoning of 1.133ha. from New Residential to Open Space at Dromroe Estate.</p>		
	SEA/ AA Response		
See response to Submission No.54 above.			

No.	Ref. & Name/ Group:	LCC-C62-71 Joanne Cowhey
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71	Submission/ Observation Summary	Chief Executive’s Response
	1. Zoning: The observer opposes the proposal to rezone Open Space to Residential in Dromroe Estate, Rhebogoe. This submission is the same as No. 54. See No. 54 above for summary.	1. Zoning: The content of the submission received is noted. See Response No. 1 to Submission No. 54 above.
	Chief Executive’s Recommendations	
	1. Change the zoning of 1.133ha. from New Residential to Open Space at Dromroe Estate.	
	SEA/ AA Response	
See response to Submission No.54 above.		

No. 72	Ref. & Name/ Group:	LCC-C62-72 Niall Hogan	
	Submission/ Observation Summary	Chief Executive’s Response	
	1. Zoning: The observer opposes the proposal to rezone Open Space to Residential in Dromroe Estate, Rhebogoe. This submission is the same as No. 54. See No. 54 above for summary.	1. Zoning: The content of the submission received is noted. See Response No. 1 to Submission No. 54 above.	
	Chief Executive’s Recommendations		
	1. Change the zoning of 1.133ha. from New Residential to Open Space at Dromroe Estate.		
	SEA/ AA Response		
See response to Submission No.54 above.			

No.177	Ref. & Name/ Group:	LCC-C62-177 Eamonn Baker	
	Submission/ Observation Summary	Chief Executive’s Response	
	1. Zoning: This submission relates to a section of land located at the northern end of Dromroe Housing Estate	1. Zoning: The content of the submission received is noted. See Response No. 1 to Submission No. 54 above.	

	<p>Site, Rhebogoe and requests re-zoning from Residential to Open Space.</p> <p>The zoning and proposed use of this parcel of land needs to be changed to Open Space based on the following:</p> <ul style="list-style-type: none"> • Planning Applications 99/770444 and 03/770271 were approved on the provision that the open space required for these houses was to be provided at this location. • 12/770035 for residential development was appealed to An Bord Pleanala (ABP) PL 30.241522 who refused permission and determined that the land being proposed for development of houses was supposed to be used as “Open Space” as per 99/770444 and 03/770271. • LCCC are proposing to deprive the existing residents of the required open space. • The green area is currently landscaped and has several mature trees. The use of this area by residents for recreation is essential for kids playing or adults walking their dogs. • The proposal to remove ‘The Green’ and build housing would increase the density and reduce the area of open space to a level that is not acceptable to residents or planning guidelines. 	
Chief Executive’s Recommendations		
1. Change the zoning of 1.133ha. from New Residential to Open Space at Dromroe Estate.		
SEA/ AA Response		

See response to Submission No.54 above.

No. 192	Ref. & Name/Group	LCC-C62-192 David France
	Submission/Observation Summary	Chief Executive’s Response
	1. Zoning: It is improper to zone land north of Dromroe, south of the Canal and east of St. Patrick’s GAA club as New Residential given the planning history of the lands including a determination by ABP that the lands remain open space for the amenity of residents under ref: ABP PL30241522.	1. Zoning: The content of the submission received is noted. See Response No. 1 to Submission No. 54.
	Chief Executive’s Recommendation	
	1. Change the zoning of 1.133ha. from New Residential to Open Space at Dromroe Estate.	
	SEA/AA Response	
See response to Submission No.54 above.		

No. 279	Ref. & Name/ Group:	LCC-C62-279 Residents Association Rhebogue
	Submission/ Observation Summary	Chief Executive’s Response
	1. Zoning: The observer opposes the proposal to rezone Open Space to Residential in Dromroe Estate, Rhebogue. This submission is the same as No. 54. See No. 54 above for summary.	1. Zoning: The content of the submission received is noted. See Response No. 1 to Submission No. 54 above.
	Chief Executive’s Recommendations	
	1. Change the zoning of 1.133ha. from New Residential to Open Space at Dromroe Estate.	
	SEA/ AA Response	

See response to Submission No.54 above.

No. 286	Ref. & Name/ Group:	LCC-C62-286 Caroline Werfeilli	
	Submission/ Observation Summary		Chief Executive’s Response
	<p>1. Dromroe Housing Development: The submission objects to a housing development in Dromroe. The submission notes the planned development site is located on the only large green space existing in the residential estate. The submission refers to the large number of children and teenagers that need space to play and meet safely with their friends within the estate.</p> <p>The submission notes the existing issue of traffic congestion in Rhebogoe in the mornings.</p>		<p>1. Zoning: The content of the submission received is noted. See Response No. 1 to Submission No. 54 above.</p>
	Chief Executive’s Recommendations		
	1. Change the zoning of 1.133ha. from New Residential to Open Space at Dromroe Estate.		
	SEA/ AA Response		
	See response to Submission No.54 above.		

No. 55	Ref. & Name/ Group:	LCC-C62-55 Pat Downes on behalf of the Downes Family	
	Submission/ Observation Summary		Chief Executive’s Response
<p>1. Zoning: This submission relates to brownfield lands to the south of the <u>Pa Healy Road</u> and requests the proposed</p>		<p>1. Zoning: The content of the submission received is noted. There are a number of issues in relation to the zoning of these lands.</p>	

<p><u>Education and Community zoning be reverted to ‘Mixed Use’.</u></p> <p>This is part of a bigger land holding, which also includes lands which were subject to an SHD application on lands between the Pa Healy Road and Park Canal as the first phase. The submission argues that the lands south of Pa Healy Road are more suitable for mixed-use.</p> <p>The Draft Plan proposes to rezone the lands to the south for Education and Community. This will restrict the development potential of the site, within 1km of the City Centre, close to services, public transport connections and the cycle and walkways network. This underutilised urban land can be developed in keeping with the targets set out in the NPF and RSES. The site is ideally located to contribute to the efficient use of infrastructure and compact growth.</p> <p>-Flood Risk: A Site-Specific Flood Risk Assessment has been prepared by CS Consulting Group.</p>	<p>-Mixed-Use: The Draft Plan includes a limited number of Mixed-Use zones to reflect specific site proposals only. In accordance with the Draft Development Plan Guidelines for Planning Authorities, the Draft Plan is moving towards a standardised national set of zoning objectives. In this regard, the provision of additional mixed use zoned sites is not recommended.</p> <p>-Education and Community: The draft Development Plan proposes substantial population growth that will need to be supported in tandem with sustainable community infrastructure, including the extension of existing and provision of new schools and social facilities.</p> <p>The provision of such infrastructure is supported through the objectives of Chapter 9, Sustainable Communities and Social Infrastructure. The inclusion of these lands for Education and Community use is necessary to future proof the expansion of existing and provision of new supporting social and community infrastructure and services, in tandem with the substantial population growth envisaged for the City and Environs. The retention of the Education and Community zoning is essential to achieve the objectives for compact growth and sustainable communities.</p> <p>-Flood Risk: The Planning and Development Act 2000 (as amended) requires the preparation of the Development Plan in accordance with Section 28 Ministerial Guidelines. In accordance with The Planning System and Flood Risk Management, Guidelines for</p>
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<p>The CFRAM Fluvial Map shows a large part of the site within the 0.1% AEP flood zone. The Coastal Map indicates that a notable portion of the site is liable to flood, but is in an area defended.</p> <p>The submission notes that a Mixed-Use (incorporating residential) development is classified as ‘highly vulnerable’ and as the site is confirmed by CFRAM mapping to potentially flood, a justification test is required.</p> <p>The submission concludes that the site passes the Development Plan justification test.</p>	<p>Planning Authorities (the Guidelines), a Strategic Flood Risk Assessment (SFRA) has been prepared to assess flood risk within the plan area.</p> <p>In order to achieve the aims and objectives and comply with the requirements of the Guidelines, the Local Authority’s approach to the zoning of land is to avoid development in areas at risk, where possible and substitute less vulnerable uses, where avoidance is not possible. A precautionary approach will be applied, where necessary to reflect uncertainties in flooding datasets and assessment techniques and the ability to predict the future climate and performance of flood defences.</p> <p>In accordance with Section 2.25 of the Guidelines, the presence of flood protection structures should be ignored in determining flood zones. This is because areas protected by flood defences still carry a residual risk of flooding from overtopping or breach of defences and the fact that there may be no guarantee that the defences will be maintained in perpetuity.</p> <p>The lands are located within Flood Zones A (high probability of flooding), B (moderate probability of flooding) and a small area in C (low probability of flooding). Section 3.5 of the Flood Guidelines indicates that development in this zone should be avoided and/or only considered in exceptional circumstances, such as in city and town centres, or in the case of essential infrastructure that cannot be located elsewhere and where the Justification Test has been applied. Table 3.1 of the Flood Guidelines makes a distinction</p>
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		<p>between various land uses, where residential is considered a ‘highly vulnerable development’ and commercial is a ‘less vulnerable development’.</p> <p>Highly vulnerable uses including residential are only appropriate if a Justification Test is passed. In considering the Justification Test it should be noted that in order to achieve Compact Growth, the Draft Plan takes a City Centre first approach to the spatial development of Limerick City and Environs. The core is defined as the area zoned “City Centre”. Furthermore, Part 2 of the Justification Test requires the Local Authority to consider a number of factors, including whether the site is located within the core, or if there are 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 Plan has zoned sufficient alternative residential lands to meet the requirements of the Core Strategy, in areas that are not at risk of flooding and suitable for the provision of highly vulnerable uses in accordance with the sequential approach of the Guidelines. The Justification Test does not pass, it is recommended that these lands are not included for zoning to accommodate residential development.</p>
	Chief Executive’s Recommendations	
	1. No change.	
	SEA/ AA Response	
	N/A	

No. 66	Ref. & Name/ Group:	LCC-C62-66 Arnold Leahy on behalf of Ballymount Properties
Submission/ Observation Summary		Chief Executive’s Response
<p>1. Zoning: The observation requests the change of zoning from Education and Community to Residential of 0.393ha. of land in Beechfield adjacent to the recently completed Beechfield housing development and Monaleen National School, Castletroy.</p> <p>Planning has been granted to the Monaleen National School for upgrade and significant expansion under Plg. Ref. 21/660.</p> <p>The rezoning of the land would facilitate a cluster of retirement homes and provide a number of planning gains including:</p> <ul style="list-style-type: none"> -Proposed layout would help address issues regarding the exposed rear boundary of Beechfield Grove; -Provide a more attractive boundary to the adjacent school lands; -Passive security would be provided for the currently exposed school boundary flanking the site; -Make use of fully serviced lands. 		<p>1. Zoning: The content of the submission received is noted.</p> <p>The Economic and Social Research Institute’s ‘Regional Demographics and Structural Housing Demand at a County Level’ sets out a forecast for an additional 15,591 households, or residential units, over the Plan period 2022 – 2028. The Core Strategy of the Draft Plan has been prepared in accordance with and fully complies with this growth forecast issued by the Department of Housing, Local Government and Heritage as required by the Planning and Development Act 2000 (as amended). This substantial population growth will need to be supported in tandem with sustainable community infrastructure, including the extension of existing and provision of new schools and social facilities.</p> <p>The provision of such infrastructure is supported through the objectives of Chapter 9, Sustainable Communities and Social Infrastructure of the Draft Plan. In particular, it is an objective (SCSI O9) of the Council to ‘a) Reserve lands to facilitate the delivery of new educational facilities, including extensions of existing schools in cooperation with the Department of Education’.</p> <p>The submission received from the Department as set out under the Community and Education theme, identifies the need to future proof the expansion of existing schools and provide for new schools. In this regard, the Department, in their submission have requested</p>

		<p>the protection of land buffers around existing schools in order to enable schools to expand. The submission also projects a requirement for three additional primary schools and one post primary school to serve the Castletroy and Annacotty area.</p> <p>Therefore, the inclusion of these lands for Education and Community use is necessary to future proof the expansion of existing and provision of new schools and other supporting social and community infrastructure and services, in tandem with the substantial population growth envisaged for the City and Environs. The retention of the Education and Community zoning is essential to achieve the objectives for compact growth and sustainable communities.</p>
	Chief Executive’s Recommendations	
	1. No change.	
	SEA/ AA Response	
	N/A	

No. 67	Ref. & Name/ Group:	LCC-C62-67 Town & Country Resources Limited on behalf of the Little Company of Mary
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Zoning: The observer’s clients own lands at Millford Castletroy. Adjoining lands are in the ownership of Milford Care Centre. All lands in the ownership of LCM are now zoned ‘Education and Community Facilities’. The owners welcome this alteration.</p>	<p>1. Zoning: The content of the submission received is noted.</p>

<p>2. Land Use Zoning Matrix: The lands at Milford serve an important residential function for the Sisters of the LCM. The Sisters have been residing and operating at this location since 1923, there are 3 separate Convent facilities on site. The Land Use Matrix indicates that a ‘Nursing Home/ Residential Care or Institution/ Retirement Village’ are classified as ‘Open for Consideration’ on ‘Education and Community Facilities’ lands. The LCM welcomes this element of the matrix.</p> <p>For clarity it would be helpful to insert a definition for the ‘Residential Institution’ which might include ‘a building or land used as a residential institution and includes a convent, monastery, hostel, home for older persons’.</p>	<p>2. Land Use Zoning Matrix: The content of the submission received is noted.</p> <p>A) The proposed request to include a definition for a ‘Residential Institution’ is considered reasonable and shall be included in the Draft as per Recommendation 2 (a) below.</p> <p>B) In the interests of clarity, the Education and Community Zoning Objective in section 12.3 shall also be amended to state that Residential Care / Institutions to support the main use of the site will be considered as per Recommendation 2 (b) below.</p> <p>C) In the interests of clarity, it is considered reasonable to amend the Land Use Zoning Matrix, such that Nursing Home/ Retirement Village under Education and Community zoning will generally not be permitted, with the exception of Milford Care Centre and Little Company of Mary (New footnote to be included) as per Recommendation 2 (c) below. This is to ensure the protection of the Education and Community Infrastructure lands for appropriate uses.</p>
<p>Chief Executive’s Recommendations</p>	
<p>1. No change.</p> <p>2. It is recommended under Chapter 12 Land Use Zoning Strategy:</p> <p>(A) Under Definitions include Residential Institution, as <u>the use of a building or land as a convent, monastery, hostel, or home for older persons.</u></p> <p>(B) Amend the purpose of the Education and Community Infrastructure zoning objective as follows: This land use will provide for community facilities, healthcare services, childcare, religious, social and civic infrastructure, ancillary purpose-built accommodation <u>such as residential care or institutions to support the main use only,</u> and other facilities.</p>	

	<p>(C) Amend the zoning matrix table and add a new footnote to state: <u>Nursing Home/ Retirement Village are uses which are “Generally Not Permitted” in the Education and Community Infrastructure zone, except at Milford Care Centre and Little Company of Mary Milford, where Nursing Homes are “Open for Consideration”.</u></p>
	<p>SEA/ AA Response</p> <p>Changes will apply to possible uses that will be on zoned lands only and governed by the zoning matrix which specifies, in detail, the uses allowed. These areas would already have been subject to assessment both through SEA and NIR as to their suitability for zoning in the first instance. It is not considered that the fine detail of the changes proposed in the uses permitted under the parent zoning would cause any significant environmental or ecological effects.</p>

No. 69	Ref. & Name/ Group:	LCC-C62-69 HRA Planning on behalf of Roches Feeds
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Zoning: This observation relates to 4.65ha. of land at Bunlicky, immediately south of the Wastewater Treatment Facility on the Dock Road, adjoining the Dock Road Roundabout with access onto the existing service road to the Treatment Facility.</p> <p>The site is zoned ‘Enterprise and Employment’ in the Draft Plan. This is welcomed, supported and requested to be carried through to adoption, given the development proposals for the site, the lack of alternative lands available and the need to locate on the Dock Road in proximity to the existing business.</p>	<p>1. Zoning: The content of the submission received is noted.</p> <p>The Local Authority welcomes, facilitates and supports opportunities for the development of new and expanding businesses and the creation of job opportunities across the City and County.</p> <p>See recommendation to Submission No. 70 Transport Infrastructure Ireland regarding Junction 2 Dock Road.</p>

	<p>Roches Feeds currently operate on the Dock Road. The 4.6ha. site was purchased in 2017 to facilitate expansion of the business and construction of a new warehousing and grain drying facilities. This will advance the company’s Green Agenda and will use GM free raw materials to deliver a niche product to the farming community. This requires a separate production facility and cannot operate within the current facility on the Dock Road.</p>	
Chief Executive’s Recommendations		
1. No change.		
SEA/ AA Response		
N/A		

No. 73	Ref. & Name/ Group:	LCC-C62-73 Cormac Finn
Submission/ Observation Summary		Chief Executive’s Response
<p>1. Zoning: This observation relates to two adjacent parcels of land in Monaleen, Castletroy and requests changes in zoning to New Residential and Education and Community.</p> <p>Parcel A comprises sloping ground with an area of 0.126ha. at the end of a residential cul-de-sac. Permission was granted on appeal for a single house on these lands (Reg. Ref. 20/891). Parcel B is gently sloping with an area of 0.15ha. and part of a fenced off development site. Parcel B is part of an application site for demolition of an existing single storey national school and construction of a new two storey 32 classroom school (Reg. Ref. 21/660).</p>		<p>1. Zoning: The content of the submission received is noted. The submission is essentially requesting the “swapping” of zoned lands as follows:</p> <p>A) Parcel A of 0.126ha. zoned Existing Residential and Education and Community Facilities be re-zoned for New Residential;</p> <p>B) Parcel B of 0.15ha. zoned New Residential be re-zoned for Education and Community Facilities.</p> <p>The Planning Authority notes that permission has been granted for a dwelling on Parcel A by An Bord Pleanala under Pl. Ref. 20/891.</p>

<p>The Draft Plan zoning of Parcel A (Existing Residential and Education and Community Facilities) is unchanged and Parcel B is now zoned New Residential. The submission requests:</p> <ol style="list-style-type: none"> i. Parcel A be zoned New Residential as part of the large adjacent area zoned New Residential; ii. Parcel B be zoned Education and Community Facilities as part of the adjacent Education and Community Facilities zone for the Monaleen National School Campus. <p>These proposals would ensure the zoning objectives align with actual and intended land use activity and make most efficient and effective use of available land.</p> <p>The observer has agreed a land swap with Monaleen National School to develop Parcel B as a grass playing field as part of their planning application. A letter of the support from the school has been submitted.</p> <p>Parcel A has a distinct break of slope on the western boundary, below which the land slopes steeply. Parcel A therefore does not lend itself to development as part of the school campus and the current zoning of part of the area for education and open space is effectively redundant.</p>	<p>The principle of residential development has therefore been accepted on these lands.</p> <p>Given the substantial similarities in the size of the sites and the justification put forward in the submission in relation to the permission granted and sloping topography of Parcel A and the agreement to develop a playing pitch on Parcel B as part of Monaleen National School, it is considered that the proposed change in zoning is reasonable. The proposed rezoning would not materially impact the future proofing of additional development of the National School.</p> <p>On the basis of the above, the proposed rezoning as requested is recommended.</p>
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<p>Development of Parcel B by the school as a grass playing field is the most effective and efficient use of the land. In terms of scale and topography, Parcel B is appropriate for this use.</p>	
Chief Executive’s Recommendations	
<p>1. a) Change the zoning of 0.126ha. from Existing Residential and Education and Community to New Residential at Monaleen, Castletroy.</p> <p>b) Change the zoning of 0.15ha. from New Residential to Education and Community Facilities at Monaleen, Castletroy.</p>	
SEA/ AA Response	
<p>These are changes in the class of zoning, rather than the zoning of new lands themselves and as such do not add to the overall quantum of zoned land in the area. The change to zoning involves a direct swap in area from residential to Community and Education and vice versa, to facilitate the redevelopment of an existing school and to reflect an existing planning permission on the lands.</p>	

No. 80	Ref. & Name/ Group:	LCC-C62-80 Cllr. Catherine Slattery
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Zoning: Cllr. Slattery fully supports the submission (no. 73 above) made by Cormac Finn.</p>	<p>1. Zoning: The content of the submission received is noted. See response to Submission No. 73 above.</p>
	Chief Executive’s Recommendations	
	<p>1. a) Change Parcel A of 0.126ha. from Existing Residential and Education and Community to New Residential;</p> <p>b) Change Parcel B of 0.15ha. from New Residential to Education and Community Facilities.</p>	
	SEA/ AA Response	
	See response to Submission No.73 above.	

No. 78	Ref. & Name/ Group:	LCC-C62-78 HRA Planning on behalf of A&G Thomond Builders Limited	
Submission/ Observation Summary		Chief Executive’s Response	
<p>1. Zoning: The observer’s client owns 15.3ha. of land on the northern side of Bloodmill Road. The observation is requesting to:</p> <ul style="list-style-type: none"> i. Rezone 1.78ha. of land from Groody Valley Green Wedge to Residential Development Area to provide c. 74 no. units; ii. Maintain 8.13ha. of land as Groody Valley Green Wedge to facilitate native woodland regeneration. <p>Permission has been granted for 136 no. units on the Residential zoned land and Phase 1 is under construction, with plans to deliver Phase 2 in early 2022. The Groody Valley Green Wedge (GVGW) is a historical zoning, from previous Castletroy Local Area Plans, covering areas subject to flooding and ecological value. The extent of the GVGW zoning does not bring direct social or recreational benefits to the community, largely remaining inaccessible and unused.</p> <p>The environmental sensitivities of some of the GVGW is acknowledged, there are parts, including where residential zoning is sought (1.78ha.) which are of no environmental significance. In the interests of compact growth, a more balanced approach between preservation and facilitating</p>		<p>1. Zoning: The content of the submission received is noted. The main issue in relation to the zoning of these lands is flood risk.</p> <p>-Ecological Assessment: The content of the submission received is noted. In terms of ecology, the site is part of the wider River Groody Green Wedge and its alteration could fragment the wider habitat. Given that there is more than adequate residential zoning in the plan area, it is not considered appropriate to change the zoning in the area.</p> <p>The ecological report accurately identifies the most sensitive habitats on site, i.e. the wet grassland and those wetter areas closer to the river and gives an account of the species present. The suggestion of allowing the development of riparian/alluvial woodland in the area of the site closest to the river and within the flood zone is very useful from an ecological perspective. The report also identifies the higher reaches of the site as being improved grassland and considers it to be of minor ecological value. However, in an urban context this places more significance on available habitats and it is considered in this situation that the improved grassland would be more valuable than might be the case in a rural setting.</p> <p>-Flood Risk Assessment: The Planning and Development Act 2000 (as amended) requires the preparation of the Development Plan in</p>	

<p>development must be considered. Urban land is a scarce resource. Rather than preserving large inaccessible tracts of land, consideration must be given to limited development. A number of environmental reports have been prepared. It is requested that the Council:</p> <ol style="list-style-type: none"> i. Recognises the need for zoned residential land in the area, in proximity to large centres of urban growth, employment centres and permitted schools (Towlerton); ii. Acknowledges the underutilisation of valuable, urban land, located in proximity to existing services and facilities and which can function as a natural extension to a planned residential development in the short term. <p>-Subject Lands: The general area is primarily residential. Residential development has facilitated widening of the Bloodmill Road at this point and the provision of a footpath and public lighting along the 230m extent of the frontage. Land from the holding has been ceded for road improvements. While a detailed road design was prepared, these works were never implemented.</p> <p>-Ecological Assessment: A comprehensive ecological assessment has been undertaken by Padraic Fogarty of Openfield. Development of the site would not affect high value habitats and the flood plain of the Groody would remain intact. The habitats map produced confirms the</p>	<p>accordance with Section 28 Ministerial Guidelines. In accordance with The Planning System and Flood Risk Management, Guidelines for Planning Authorities (the Guidelines), a Strategic Flood Risk Assessment (SFRA) has been prepared to assess flood risk within the plan area.</p> <p>In order to achieve the aims and objectives and comply with the requirements of the Guidelines, the Local Authority’s approach to the zoning of land is to avoid development in areas at risk, where possible and substitute less vulnerable uses, where avoidance is not possible. A precautionary approach will be applied, where necessary to reflect uncertainties in flooding datasets and assessment techniques and the ability to predict the future climate and performance of flood defences.</p> <p>The Flood Risk Assessment submitted concurs that much of the site is within Flood Zone A and B, with a small margin in Flood Zone C, based on CFRAM outputs. However, the CFRAM underestimates the flood extents from the Towlerton Stream. The proposed area to be rezoned also overlaps with the upper ends of a number of drainage channels.</p> <p>Section 3.5 of the Flood Guidelines indicates that development in Flood Zones A and B should be avoided and/or only considered in exceptional circumstances, such as in city and town centres, or in the case of essential infrastructure that cannot be located elsewhere and where the Justification Test has been applied.</p>
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<p>negligible ecological value of the 1.78ha. of land where Residential zoning is sought. The owner has agreed to promote native woodland regeneration on the wet grassland within the floodplain.</p> <p>-Flood Risk Assessment: A Site-Specific Flood Risk Assessment (SSFRA) has been undertaken. The majority of the site falls within Flood Zones A and B, except for c.1.78ha. of land located on the south-western boundary adjacent to existing zoned Residential land. This land is within Flood Zone C and not subject or liable to flooding. Restriction of development to Flood Zone C will not result in an adverse impact to the hydrological regime of the area or increase flood risk elsewhere. Given development is to be restricted to areas of Flood Zone C, the site is not subject to the requirements of the Justification Test.</p> <p>-Proposed Link Road: The Draft Plan proposes an indicative location for a future link road through the site. The current location of the proposed road is to the rear gardens of permitted and constructed houses. As proposed and indicated in the Draft Plan the proposed link road will be an isolated piece of infrastructure removed from the existing built form with no natural overlooking to the rear of houses and requiring the removal of recently constructed units.</p> <p>The proposed link road should follow the line of the permitted primary access road through the site, extending</p>	<p>Highly vulnerable uses including residential are only appropriate if a Justification Test is passed. In considering the Justification Test it should be noted that in order to achieve Compact Growth, the Draft Plan takes a City Centre first approach to the spatial development of Limerick City and Environs. The core is defined as the area zoned “City Centre”. Furthermore, Part 2 of the Justification Test requires the Local Authority to consider a number of factors, including whether the site is located within the core, or if there are 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 Plan has zoned sufficient alternative residential lands to meet the requirements of the Core Strategy, in areas that are not at risk of flooding and suitable for the provision of highly vulnerable uses in accordance with the sequential approach of the Guidelines. The Justification Test does not pass, it is recommended that these lands are not included for New Residential zoning.</p> <p>-Function and Purpose of Existing Zoning: The Groody Valley Wedge objective aims “to preserve and protect the Groody Valley from development”. With respect to the purpose of the zone, the River Groody green wedge located in the eastern part of the metropolitan area, fulfils a number of valuable open space related functions. It is a valuable habitat for wintering wildfowl with species such as Lapwing encountered there. Otters are also present along this stretch of the river.</p>
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<p>into the area of land where New Residential zoning is sought and then extending northwards as proposed. Zoning of the lands provides an opportunity to incorporate the development and deliver the link road as part of the future development of the land. This will ensure the best principles of urban design and DMURS are adopted.</p> <p>-A Tiered Approach to Landuse Zoning: In accordance with the Methodology for a Tiered Approach to Landuse Zoning, the lands can be classified as Tier 1, having all the infrastructure necessary. The observer’s clients are committed to developing the land within the lifetime of the plan subject to market demand.</p> <p>-Suitability of Location: The submission highlights the existing services and facilities available within a 5 and 15 minute walk of the site, including Springfield neighbourhood, Childers Road Retail Park, Parkway Shopping Centre, Northern Trust at City East Plaza and other business on the Ballysimon Road ensure employment opportunities in proximity. A new secondary school at Towlerton is a significant service provider, which should and can be supported by additional housing.</p>	<p>In addition, it also serves a valuable flood residence function which will become increasingly important as part of flood management initiatives in Limerick in the future. The Groody River Valley also has huge potential as an amenity area for the city as it would be possible to sensitively develop a park on part of the infilled lands. The potential development of the area for recreation purposes is being assessed through the Limerick City and Environs Green and Blue Infrastructure Strategy, currently under preparation.</p> <p>2. Locational Choice and Road Infrastructure: The content of the submission received is noted. The Local Authority support delivery of new and improved link roads and junctions accommodating public transport, cycle and pedestrian connections. It should be noted that the alignment of the new roads in the Draft Plan is indicative only. All new link roads will be designed in accordance with the requirements of the Design Manual for Urban Roads and Streets 2019. These roads shall be aligned definitively as part of the detailed design and development process. Similarly, the location of junctions is indicative and the exact position for construction purposes will be dependent on detailed design. However, in this instance it is considered that the indicative link road at this location should be removed.</p>
Chief Executive’s Recommendations	
<ol style="list-style-type: none"> 1. No change. 2. Remove indicative link road at Bloodmill Road traversing these lands. 	
SEA/ AA Response	
<p>The removal of the indicative link reduces any potential impact from an environmental or ecological perspective.</p>	

No. 95	Ref. & Name/ Group:	LCC-C62-95 Board of Management Scoil Ide
Submission/ Observation Summary		Chief Executive’s Response
<p>1. Zoning: The observer is appealing for the current zoning on the Bishop’s Field in Corbally to be retained to allow for the potential expansion of the school.</p> <p>Consideration should be given to the potential development of facilities that would provide for the needs of the school community and the broader community.</p> <p>There has been no development at the school since 1995 and there are 750 children enrolled, with projections suggesting this will remain stable. The following facilities will be required:</p> <ul style="list-style-type: none"> -A sports hall – the GP hall (20m by 10m) is used by 28 classes per week; -A new yard to cater for the senior school of 200+ pupils; -A full size astro pitch – Currently using Corbally United and St. Munchin’s facilities; -A 2 classroom SCF with sensory garden (NCSE) to cater for children within the community with Autism Spectrum Disorder. 		<p>1. Zoning: The content of the submission received is noted.</p> <p>The provision of Education and Community infrastructure is supported through the objectives of Chapter 9, Sustainable Communities and Social Infrastructure of the Draft Plan. In particular, it is an objective (SCSI O9) of the Council to ‘a) Reserve lands to facilitate the delivery of new educational facilities, including extensions of existing schools in cooperation with the Department of Education’.</p> <p>The submission received from the Department as set out under the Community and Education theme, identifies the need to future proof the expansion of existing schools and provide for new schools. In this regard, the Department have identified a need for approximately 11 additional schools across the City and Environs.</p> <p>The inclusion of these lands for Education and Community use is necessary to future proof the expansion of existing and provision of new schools and other supporting social and community infrastructure and services, in tandem with the substantial population growth envisaged for the City and Environs. The retention of the Education and Community zoning is essential to achieve the objectives for compact growth and sustainable communities.</p>

<p>2. Infrastructure: The school has been designated as a ‘Safer Routes to School’s school as well as St. Munchin’s, designed to encourage walking and cycling. Two thirds of the 750 pupils access the school from the Corbally Road. Morning traffic is very congested. The road layout and school means drop off and collection is precarious and dangerous. The area would benefit from the development of a cycle lane from the school towards Shannon Banks, Westbury and Grove Island. The majority of pupils live within a 3km radius. Children do not cycle because of safety concerns. Proper walking and cycling infrastructure would be beneficial for health and wellbeing and reducing traffic.</p>	<p>2. Infrastructure: LSMATS will set out an integrated and balanced sustainable transport strategy for the Limerick – Shannon Metropolitan Area and will address all travel modes including walking, cycling, road, bus and rail. Objective TR O12 and TR O15 of the Draft Plan supports the implementation of LSMATS, including the implementation of a cycle network for the Limerick Shannon Metropolitan Area to which the Corbally Network is included as priority for delivery within the lifetime of the Development Plan. The Corbally Network includes the delivery of an integrated, high quality cycle network connecting the City Centre to Westbury and Ardnacrusha along the Corbally Road (R463).</p> <p>Scoil Ide is one of the schools involved in the ‘Safe Routes to School’ programme in Limerick which is funding by the Department of Transport through the NTA and coordinated by An Taisce’s Green Schools (ATGS). ATGS are currently undertaking consultation with all the schools and will go on to prepare an outline delivery plan. This plan will then be submitted to Limerick City and County Council for detailed design and implementation. Objective TR O30 Behavioural Change Measures of the Draft Plan supports the implementation of behavioural change initiatives and the facilitation of school streets and school zones in the promotion of active travel options for Limerick’s children.</p>
Chief Executive’s Recommendations	
1 - 2: No change.	
SEA/ AA Response	
N/A	

No. 96	Ref. & Name/ Group:	LCC-C62-96 Healy Partners Architects on behalf of Limerick Gaelic Grounds Ltd.	
	Submission/ Observation Summary	Chief Executive’s Response	
	<p>1. Zoning: Limerick Gaelic Grounds Ltd are embarking on a redevelopment project at Pairc naGael, zoned Sports Arena. The observation welcomes this zoning and requests the Council to adopt this zoning.</p> <p>2. Zoning Matrix: The Land Use Matrix for Sports Arena, lists the following as Generally Not Permitted:</p> <ul style="list-style-type: none"> -Fast Food Outlet/ Take Away -Offices -Public House -Restaurant/Cafe -Retail Convenience </150m2 nfa. <p>These uses could form part of a redevelopment strategy at Pairc naGael as ancillary elements to a masterplan project. The observation is requesting an amendment to the matrix to provide that each of these uses are Generally Permitted Ancillary to the Primary Use Only on Sports Arena lands.</p>	<p>1. Zoning: The content of the submission received is noted.</p> <p>2. Zoning Matrix: The Local Authority acknowledges that the uses indicated would be appropriate as ancillary uses to the main use of the Sports Arena zones only. It is noted that there are two Sports Arenas in the City, comprising the Gaelic Grounds and Thomond Park. While the proposed uses would contribute to the provision and enhancement of existing leisure facilities at these Sports Arenas, such uses would not be appropriate at every community or sports club facility, due to the potential adverse impact on the viability and vitality of Local/District Centres.</p> <p>Given that the request relates to two locations in the City and Environs only, it is considered reasonable to amend the Zoning Matrix for Sports Arenas to allow the uses requested.</p>	
	Chief Executive’s Recommendations		
	<p>1. No change.</p> <p>2. Change the Zoning Matrix to include in the Sports Arena zone:</p> <ul style="list-style-type: none"> -Fast Food Outlet/ Take Away 		

	<p>-Offices -Public House -Restaurant/Cafe -Retail Convenience </150m2 nfa. As uses which are “Generally Permitted” with the caveat “Ancillary to the Primary Use Only”.</p> <p>3. Amend the land use zoning objective, ‘Sports Arena’ in Section 12.3 to include the above caveat.</p>
	SEA/ AA Response
	<p>The changes to the zoning matrix are to allow additional uses within previously zoned land. In this situation, it is likely that these would be facilities that would be used by existing patrons of the Limerick Gaelic Grounds and which increase the overall utility of these ground as a public amenity. It is not considered that there would be any environmental effects from allowing these uses because as indicated there is sufficient capacity within the metropolitan waste water treatment systems to cater for the proposed uses, within zoned lands within the lifetime of the plan.</p>

No. 98	Ref. & Name/ Group:	LCC-C62-98 John Hurley and Olivia Grimes	
	Submission/ Observation Summary	Chief Executive’s Response	
	<p>1. Zoning: The designation of an Enterprise and Employment zone on the observers’ land at Crossagalla, Old Cork Road is welcomed. The new link from Ballysimon to the Kilmallock Road is also welcomed.</p> <p>The observers request that 12 acres of the Enterprise and Employment lands be designated Residential Development Phase 1 to enable the Rosmor estate to extend, provide affordable housing and act as a transitional area between residential and enterprise and employment areas.</p>	<p>1. Zoning: The content of the submission received is noted. There are a number of issues in relation to the proposed zoning of these lands.</p> <p>With respect to the Draft Plan proposed zoning for Enterprise and Employment, the OPR submission raises concerns in relation to the proposed zoning having regard to the ‘Guiding Principles to identify locations for Strategic Employment Development’ in the Draft Plan, and RPO 62 Locations for Employment Development of the RSES. The OPR have highlighted the potential of these lands to conflict</p>	

	<p>The submission outlines a framework to show that the lands can facilitate residential use, provide ancillary services lacking in Crossagalla and creating linkages and permeability with Rosmor.</p> <p>A Preliminary Services Report outlining the availability of infrastructure for the proposed development was also submitted along with a Noise Impact Assessment. This includes mitigation recommendations such as minimum performance specification wall and roof construction, sound insulation glazing/ doors/ facades, 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>with the principle of compact growth. On the basis of the above and having regard to undeveloped lands in the vicinity, the main issue with respect to the request to rezone these lands to Residential relates to compact growth.</p> <p>The Planning Authority is required to take a sequential and compact approach to development, while increasing the integration of land use and sustainable modes of transport. The Draft Plan includes policies and objectives for compact growth, which require the development of brownfield and infill sites and the intensification of underutilised sites in accordance with Active Land Management Measures. This approach is essential to comply with the objectives of the National Planning Framework.</p> <p>Development on the edge of existing residential areas would not be sequential with the city first approach, exacerbating dependence on private based motorised transport and contributing to unsustainable patterns of development. Development of these lands would therefore be contrary to compact growth objectives, the Climate Action Plan objectives to reduce energy use, emissions and transition to a low carbon and climate resilient society and the requirements of Section 10(2)(n) of the Planning and Development Act in relation to climate action.</p> <p>Alternative zoned lands closer to the centre are available which comply with the compact growth, sustainable transport and climate mitigation objectives. On the basis of the above, it is recommended that these lands not be included for zoning.</p>
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		<p>-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> <p>The existing noise levels are significantly in excess of the World Health Organisation's (WHO) recommendation that human exposure to road noise should be below 53 dB <i>Lden</i> and 45 dB <i>Lnight</i> for health and well-being. Additionally, the Council has experience of receiving complaints of annoyance from residents living near major roads where road noise is at these levels. There is strong evidence by the WHO Guideline Development Group (GDG) that noise levels above these thresholds are known to be associated with adverse impacts to human health and quality of life. The GDG strongly recommends policy-makers to implement measures to reduce noise exposure to levels below the guideline values.</p>
Chief Executive’s Recommendations		
1 - 5: No change.		
SEA/ AA Response		
N/A		

No. 99	Ref. & Name/ Group:	LCC-C62-99 Caislean na hAbhann Resident’s Association	
Submission/ Observation Summary		Chief Executive’s Response	
<p>1. Introduction: The residents of Caislean na hAbhann estate and wider Groody Road community highlight the need for investment. This area is ignored, despite being an important feeder community to the University and Technology Park. With the new secondary school, hospital and Northern Trust, increases in footfall, traffic and interest have occurred. Investment in infrastructure and facilities is needed. Features of the Castletroy Local Area Plan have been removed.</p> <p>2. Castletroy Garda Station: The population of Castletroy has increased significantly with c.15,000 people in 2016. The nearest Garda Station at Henry Street is 6km away. Call out times are significant. Castletroy needs a dedicated Garda Station.</p> <p>3. Groody Road Trees: The trees along the Groody Road have become a main feature. These line either side of the road every 2-3metres and form a continuous line. However, they have been cut down to accommodate bus stops, local businesses and the school, which have significantly decreased their impact. The trees, footpaths and fences have become neglected. It is requested that the trees are preserved and protected and properly cared for.</p>		<p>1. Introduction: The content of the submission received is noted.</p> <p>2. Castletroy Garda Station: An Garda Siochana were consulted during the pre-draft stage of the Plan preparation and while they have not sought a site for a new Garda Station and no funding is available for same, the Draft Plan ensures that there is sufficient land zoned to facilitate such development.</p> <p>3. Groody Road Trees: The retention of trees and hedgerows is part of the policy content of the Draft Plan. Furthermore, the Council has recently published a ‘Draft Tree Policy’ which aims to ensure a planned approach to the management of the Council’s tree stock and represents a significant change in how the Council manage trees, with the development of a more strategic, proactive, planned approach to inspection, planting, maintenance and management.</p>	

4. Groody Neighbourhood Centre: The Groody Road is a main link and feeder road for the Limerick Bypass to UL and technology park, it is an important area for commuters to stop. The estates adjacent to the Groody Centre have no access to local shops, amenities, restaurants and cafes. Investment and support is needed for the Groody Neighbourhood Centre which should be designated a District Centre.

5. Groody Road Facilities: With the significant increase in footfall, traffic and housing from the proposed revitalisation of Towlerton (TN O1) and Groody Valley area (GV O1), more facilities are needed along the Groody Road. The nearest playground or park is 6km away at Castletroy, there is no community centre or GAA. The Castletroy LAP included a walkway within the Groody Valley Green Wedge, this is not in the Draft Plan. The Plan should include more in the Groody Valley area than the student accommodation on the Dublin Road (SCSI O1), including a playground, community centre, a walkway connecting the Green Wedge and/or sports grounds. Significant increases in infrastructure have brought no facilities for the local community. More facilities and amenities should be included in GV O1 Groody Valley revitalisation plan.

4. Groody Neighbourhood Centre: The Draft Retail Strategy for Limerick-Shannon Metropolitan Area and County Limerick 2022-2028 sets out the retail hierarchy for the Metropolitan area in accordance with the Regional Spatial and Economic Strategy for the Southern Region. The City Centre is at the top of the hierarchy, supported by the District Centres and the lower tier Local/ Neighbourhood Centres as identified in the Plan. In accordance with the provisions of the Retail Strategy, the Groody Valley Centre is appropriately designated a Local/ Neighbourhood Centre with local level services only. Any re-designation of this centre to a District Centre would undermine the viability and vitality of the retail sector in the City Centre and the Castletroy and Parkway District Centres.

5. Groody Road Facilities: As set out under Chapter 9 Sustainable Communities and Social Infrastructure, policy support is in place to facilitate the development of community facilities, sports facilities, open space including playgrounds and amenity walkways. Objective SCSI 021 indicates that it is an objective of the Council to identify suitable sites for the provision of new parks/ playgrounds in the vicinity of Caherdavin, Corbally and the Groody Valley. The Groody River Valley has huge potential as an amenity area for the city as it would be possible to sensitively develop a park on part of the infilled lands. The potential development of the area for recreation purposes is being assessed through the Limerick City and Environs Green and Blue Infrastructure Strategy, currently under preparation and is supported through Objective EH O13 of the Draft Plan.

6. Groody Valley Traffic Assessment: Prior to Covid 19 the traffic on the Groody Road was unmanageable being the main link between the Limerick Bypass and UL and technology park. A secondary school and private hospital have been granted permission and a new Bloodmill Road-Groody Road link has opened. The traffic assessments for these applications highlighted the significant traffic problem and called for further investment. Even with the opening of the Groody Road-School House Road link, the increase in traffic will cause the road to be gridlocked all day, making entering and exiting the estates impossible. The recommendations of the traffic reports should be implemented as a matter of urgency as the Covid 19 restrictions lift and the traffic volumes return to normal. Immediate investment is requested in the road and surrounding roads to alleviate traffic volumes. The installation of cycle paths is welcomed, but the uptake of cycling in the area is not significant and further congest the Groody Road.

7. School House Road to Groody Road Link: The observation requests the immediate implementation of the School House to Groody Road link. This is imperative given the increase in local infrastructure and associated traffic (secondary school and hospital). This road should link these

6. Groody Valley Traffic Assessment: The draft LSMATS sets out a framework for investment in transport for the Limerick Shannon Metropolitan Area for the next 20 years and includes proposals for the significant development of the cycle network and enhancement of bus services and infrastructure. One of the main focus areas of the plan is to achieve a modal transfer from short duration car mode trips to more active and public transport modes. The BusConnects Limerick programme, included within the Strategy will provide a reliable, high frequency public transport service to improve connectivity of Limerick City and suburbs. In addition, the planned cycling network focuses on connecting key attractors, such as education, residential and employment areas. The Castletroy Network and the Southern Orbital Network (Childers Road) are two such networks which are identified as priority for delivery within the lifetime of the plan.

Objective TR O30 Behavioural Change Measures of the Draft Plan supports the implementation of behavioural change initiatives and ‘softer measures’ aimed at enabling and promoting sustainable travel across Limerick’s workplaces, campuses, schools and communities as identified in LSMATS.

7. School House Road to Groody Road Link: The Local Authority support delivery of new and improved link roads and junctions accommodating public transport, cycle and pedestrian connections. The requirement for a link road from the Childers Road to Golf Links Road via Bloodmill Road and Groody Road has been identified

	<p>two roads and alleviate traffic on the Groody Road, taking account of the protected structure adjacent (Mary Magdalene’s Well) and invest in highlighting this old and historic feature of the area. As it is the first known Holy Well of Limerick it should be given maintenance and repair.</p> <p>8. Primary School for Castletroy: With the rapid expansion of population in Castletroy, specifically the Groody Valley Area, the observation indicates the need for more primary schools.</p>	<p>under Limerick Shannon Metropolitan Area Transport Strategy and is currently under design considerations. The receiving environment will be considered in these design considerations.</p> <p>8. Primary School for Castletroy: The provision of new school infrastructure is supported through the objectives of Chapter 9, Sustainable Communities and Social Infrastructure and the Land Use Zoning Strategy of the Draft Plan. In particular, it is an objective (SCSI O9) of the Council to ‘Reserve lands to facilitate the delivery of new educational facilities, including extensions of existing schools in cooperation with the Department of Education’. The draft plan has zoned land for Education and Community purposes to facilitate future school expansion and has also zoned land for a new school site within this area.</p>
Chief Executive’s Recommendations		
1 – 8: No change.		
SEA/ AA Response		
N/A		

No. 210	Ref. & Name/ Group:	LCC-C62-210 Milford Grange Residents
Submission/ Observation Summary		Chief Executive’s Response
1. Draft Plan: The Draft Plan has failed to:		1. Draft Plan: The content of the submission received is noted. The issues raised are principally a matter of public order for An Garda

<ul style="list-style-type: none"> • Include a strategy for Student Accommodation despite there being a crisis in this area for many years. • Distinguish between short-term residential lets for the academic year i.e. HMOs (Houses of Multiple Occupancy) and other types of houses available for rent in the residential sector. • Address the continuing increase in unregulated HMOs in residential areas near UL. • Consider HMO’s and student accommodation as a zoning category within residential development. • Consider the density of ‘unmanaged’ student accommodation and HMOs in particular residential areas near UL. • Consider the complete lack of suitably managed student accommodation for the numbers that are currently attending UL. • Appears not to mention the planned Garda Station for the Castletroy area recently in the local media. <p>-Resilient residential communities:</p> <ul style="list-style-type: none"> • Strategic objective three aims to ensure that new residential developments are healthy, sustainable and resilient, there is no mention of existing residential areas with the same need. • The lived experience of residents of high density HMOs areas, is that this type of rented house does not lead to a sustainable community. Many 	<p>Siochana. The Local Authority notes that there is ongoing dialogue between the residents and UL. While the Council’s role is limited to clean ups, maintenance of the green areas etc., the Council has met and will continue to engage with UL, An Garda Siochana and residents in order to facilitate a solution to the issues identified, however this is in the main a matter for UL.</p> <p>The Development Plan sets out a land use plan for the lifetime of the plan in accordance with the requirement of the Planning and Development Act 2000 (as amended). The Housing Strategy of the Draft Plan has also been prepared in accordance with the Planning and Development Act 2000 (as amended) and the Housing Need Demand Assessment (HNDA) requirements of the National Planning Framework.</p> <p>The Economic and Social Research Institute’s ‘Regional Demographics and Structural Housing Demand at a County Level’ sets out a forecast for an additional 15,591 households, or residential units in Limerick, over the Plan period 2022 – 2028. In accordance with the Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities, 2020, these overall figures form the basis for the HNDA and Housing Strategy and do not differentiate between standard residential accommodation, student accommodation, houses of multiple occupancy etc.</p> <p>Students are an increasingly important part of the housing demand in Limerick, particularly in Limerick City and Environs. Owing to the</p>
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	<p>residents sell up because of issues of noise, litter, illegal dumping, public urination, drinking, drug use etc. These homes are bought by HMO landlords and 4 bedroom homes become 6-12 bedroom homes with 6-12 adults resident on a short term basis.</p> <ul style="list-style-type: none"> • Approx. 803 homes in the area from Plassey roundabout, J&J roundabout and UL, yet Milford National School has approx. 68 links with parents residing in the parish compared to 98 links to parents working in UL. • High densities of HMOs do not lead to resilient and inclusive communities, but a concentration of antisocial behaviour including car accidents, public drinking and urinating, drug taking, noise, large gatherings. This leads to sleepless nights, stress and anxiety. • Milford Grange is already a 10 minute neighbourhood, however there are high levels of car use in HMOs, which competes against sustainable travel and cause access issues for emergency and service vehicles. • In 18 months, 3 cars have gone off the road and one overturned on the main road into Milford Grange. • Area is used for parking by those accessing UL but not residing in the area. 	<p>high number of third level students in Limerick City there is a significant demand for on-campus accommodation, privately owned student accommodation and accommodation provided through the private rental market including houses in multiple occupancy. The Local Authority notes that there is a growing shortage of student accommodation in Limerick and will seek to ensure that student demand is addressed through purpose built accommodation as far as possible. The future expansion of third-level institutes must be considered in tandem with the provision of high quality, purpose built and professionally managed student accommodation schemes. Purpose-built student accommodation can alleviate pressure on the private rental and housing market, freeing up stock through increased offer and competition. Purpose-built and managed accommodation will address the antisocial aspects of locating significant numbers of students in the local community.</p> <p>While students can contribute positively to creating an inclusive mix within the community and the viability of local retail and service centres, an overconcentration of students in unmanaged accommodation including houses of multiple occupancy, has the potential to result in a poor quality of place, antisocial behaviour, crime, noise, nuisance, under investment, poor maintenance, littering, a diminished sense of community and the loss of attractive areas for family living. The Planning Authority acknowledge that this has become an issue in certain residential areas of Castletroy, resulting in tensions within the community and on-going complaints to An Garda Siochana and UL. The overconcentration of unmanaged houses of multiple occupancy accommodating students in particular</p>
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	<ul style="list-style-type: none"> • LCCC needs to research the density of HMOs in Milford Grange and other areas with HMOS and measure the impact on residential community and their quality of life and well-being, with a view to identifying and implementing measures that reduces and preferably negate the negative aspects. • The 2019-24 Limerick City and County Council Corporate Plan aims to promote a socially integrated, healthy and safe Limerick. This is not the experience of residents living in proximity to a high density of HMOs. As a matter of policy, the Council and UL should be investigating the negative impacts of HMOs rented for the academic year on residential communities and actively engaging with the residential community. <p>-Section 3.7.10: When student accommodation is referred to in the Draft Plan, there is no reference to:</p> <ul style="list-style-type: none"> • Houses of Multiple Occupancy that the majority of students appear to be housed in, (particularly near UL) and the negative impact they have on a residential community. (Local children under eleven years of age have often been unable to play on the green outside their home as much larger, stronger young people from HMOs are using the green.) 	<p>residential estates has led to unlivable conditions for residents, resulting in families and the elderly leaving the area. This has a detrimental and unacceptable effect on the remaining residents and the creation of balanced communities.</p> <p>The Local Authority will facilitate and collaborate with the third level institutes to prepare a Strategy for Student Accommodation, identifying the student accommodation requirements and proposed solutions to address same in accordance with the National Student Accommodation Strategy. In particular, the Local Authority will support the provision of such schemes on campus in the first instance, or in appropriate locations accessible by public transport or cycle networks, which avoid harmful overconcentration of student housing and does not adversely impact on the existing residential amenities of a particular area.</p> <p>The Planning and Development legislation does not require a change of use planning application for the conversion of family dwelling units to houses of multiple occupancy. In this regard, the Planning Authority are not in a position to require planning applications for such forms of development through the Development Plan. The Development Plan can therefore only guide planning applications for student accommodation in accordance with Objective HO O8, the Development Management Standards set out under Section 11.4.4.7 Student Accommodation and the Land Use Zoning Strategy. However, having regard to the concerns outlined in the submission it is considered appropriate to</p>
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<ul style="list-style-type: none"> • Third level institutes not being allowed to continue to increase student numbers without adequately managed accommodation being provided for by the relevant third level. • Third level institutes particularly those with land banks being obliged to provide on campus accommodation for their students. <p>-Objective HO 07 Shared Accommodation/Co-Living: Houses of Multiple Occupancy are a type of shared accommodation/co-living. The experience of living in areas with high levels of HMO shared accommodation and co-living is negative. This type of new development needs careful thought to prevent issues that have arisen in areas with HMOs. HMOs reduce the quality of life for long-term residents (rented and homeowners). HMOs absorb a substantial amount of public money by way of Garda resources and Council’s enforcement and operational teams.</p> <p>-Objective HO 09: Refers to older people living independently. There are instances where older people and other vulnerable members of our community have had to leave their homes where they were living independently, or living independently with support due to the antisocial behaviour from HMOs.</p>	<p>strengthen objective H0 08, as set out under the Chief Executive’s Recommendation 1 below.</p>
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-Third Level Education Institutions: The observation agrees these are an asset to the immediate area, Limerick and the region. However, these assets, particularly UL need to be prevailed upon to address the negative impacts of HMOs on local communities and plan adequately for on and off campus student appropriately managed accommodation. UL has vacancies for only 2,800 students in their on campus accommodation and provide listings of off campus HMOs and landlord contact details for the incoming enrolment. Many off campus HMOs are completely unmanaged during the academic year, leading to ongoing antisocial behaviour. Some are leased for the summer, sublet or run as AirBnBs, this also leads to antisocial behaviour and a draw on public resources. There is a crisis in availability of appropriately managed student accommodation in Limerick.

The University of Limerick is planning a 25% increase in student registrations to 19,416 students by 2023/2024. Where is the Student Accommodation Plan to address this expansion? How and why the Council continuing to give planning for the further expansion of UL without addressing the severe impact this expansion has on existing residential areas near UL. UL’s land bank, which is zoned for education, should also include a zoning for a residential area for educational purposes within the campus adequately proportional to its rate of student increase.

-Objective HO O8 Provision of Student Accommodation:

This objective is not strong enough and has not been adequately addressed.

College Court has only 4-6 long-term residents remaining. Milford Grange (excluding Plassey Grove) has approx. 60 long-term residents and approx. 120 plus HMOs.

Significant resources of enforcement and clean up teams continue to be deployed. There is the potential for significant damage to UL and Limerick’s local, regional, national and international reputation if anti-social issues get out of hand and are reported by media organisations. This was seen in February 2021 with the incidents in College Court. Where are the measures to control this trend that threatens the quality of lives of long-term residents.

-Zones and types of Residential Areas: The Draft Plan would serve the citizens better particularly in areas near third levels if it included:

- Categories of zoning and appropriate densities for HMOs particularly those rented for the academic year. These are often leased as summer rentals.
- Student accommodation is not addressed in the Housing Need Demand Assessment.

-Zones and types of Residential Areas: The Housing Strategy of the Draft Plan has been prepared in accordance with Part V of the Planning and Development Act 2000 (as amended) and the Housing Need Demand Assessment (HNDA) requirements of the National Planning Framework. In accordance with the Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities, 2020, these overall figures form the basis for the HNDA and Housing Strategy and do not differentiate between standard residential accommodation, student accommodation, houses of multiple occupancy etc.

<p>If it is not permitted under planning legislation to distinguish between HMOs and other residential rental homes, the Plan and LCCC should investigate and track HMOs and their densities within residential areas near UL.</p> <p>-Objective SS O5: Monitoring Growth Patterns: There has been no monitoring of the growth patterns in the areas with high levels of HMOs particularly near UL. The trend seems to be moving towards any houses on the market being purchased by ‘landlords’ and turned into HMOs for short term rental for the academic year.</p> <ul style="list-style-type: none"> • What organisation is tasked with doing this monitoring? • What team within that organisation will oversee this monitoring? • Where can Limerick citizens living in the area feed into this monitoring? 	<p>While the Draft Plan enables the provision of sufficient zoned lands to cater for the residential growth of the settlement, the physical provision of student accommodation is outside the remit of the Planning Authority. However, it is considered reasonable to identify Student Accommodation as a separate use in the Land Use Zoning Matrix of Chapter 12 Land Use Zoning Strategy as set out under Recommendation 2 below.</p> <p>Density is based upon the number of residential units per hectare and is not calculated using bed spaces. In this regard, it would not be appropriate to apply a density parameter for student accommodation. The Local Authority has no legislative basis, regulatory or enforcement powers in relation to the number of occupants per dwelling unit.</p> <p>-Objective SS O5: Monitoring Growth Patterns: See response to Submission No. 1.</p>
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<p>-Sustainable Travel: Residential areas near UL and Plassey have the potential to provide homes for staff and families within a 10-minute neighbourhood. This would help reduce the significant on campus traffic issues and surrounding roads. With HMOs there are often three plus cars to one house, excluding visitors. These numbers increase substantially with college events. Residential parking permits should not be considered for HMOs without proof or registration with the RTB. Milford Grange is used as a carpark for non-resident students. The UL land bank should be used for accommodating students and creating a 10-minute student neighbourhood.</p> <p>-Data: There are concerns in relation to data from the CSO sourced from the Residential Tenancy Board:</p> <ul style="list-style-type: none"> • Data supplied by the RTB is not fit for purpose. For the 2020/21 academic year, almost 1/3 of HMOs in Milford Grange were not registered. 	<p>-Sustainable Travel: Residential parking permits are issued pursuant to Bye-Laws of Limerick City and County Council to the owner/ occupier of dwellings in certain areas, including College Court, Castletroy. The issuing of parking permits is outside the scope of the Development Plan.</p> <p>The University of Limerick is a National Transport Authority Smarter Travel Campus and have a dedicated Smarter Travel Team implementing a site-specific Mobility Management Plan. The Mobility Management Plan includes behavioural change measures to encourage both staff and students to use sustainable modes of transport. A new Limerick Active Travel unit, which is funded by the Department of Transport, is in initial stages of being established within Limerick City and County Council and will be working with the NTA’s Smarter Travel Workplaces and Campuses to implement active travel measures across Limerick. This team will also be responsible for the role out of additional sustainable travel infrastructure, with the overall objective to reduce car-based transport. The content of this submission has been forwarded to the new Active Travel Unit.</p> <p>-Data: The content of the submission received is noted. This matter is outside the remit of the Local Authority.</p>
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- RTB are not fit for purpose in terms of enforcement and or 3rd party complaints.
- HMOs registered appear to be available to address housing needs, but these are not available for general housing needs.

Chief Executive’s Recommendations

1. Amend Objective HO O8 Student Accommodation as follows: It is an objective of the Council to:

A) Support the provision of high quality, professionally managed purpose-built student accommodation either on campus, or in appropriate and accessible locations on public transport or cycle networks. All forms of student accommodation shall respect and protect the existing residential amenities of the area in which it is proposed. Student accommodation shall be and of appropriate design, in accordance with the Department of Education and Science ‘Guidelines on Residential Development for Third Level Students’ (1999), and (2005) ~~National Student Accommodation Strategy (2017)~~ and any subsequent updates. Applications for change of use from student housing to any other form of ~~housing use~~ shall be strongly resisted, without adequate demonstration that there is no longer a need for such use in the area and an over-provision of student housing exists’.

B) Ensure that all applications for new off campus purpose built student accommodation, the change of use to student accommodation in existing residential areas, or extensions to existing dwellings to facilitate student accommodation, include a Student Demand and Concentration Statement with details outlining the presence and distribution of any permanent residential occupiers, the extent of students renting in the private housing market and the presence of any other housing catering primarily for students and short term lets in the area/estate. The application should address any potential impacts of the proposal on residential amenity and any permanent residents in the area.

C) Require all applications for off campus purpose built student accommodation to be accompanied by a Student Management Plan outlining how the scheme will be professionally managed. The Plan shall demonstrate how the development will be managed so as to avoid potential negative impacts from occupants on surrounding properties and neighbourhoods and ensure the maintenance of safe, secure and clean environments for the community, occupants and nearby residents.

D) Ensure permissions for student accommodation will be subject to a condition requiring planning permission for a change of use to any other type of use, including short term holiday letting. Future applications for this type of change of use will be resisted. Where it is demonstrated that such form of housing is no longer required a planning application will require details of a proper management plan for the non-student use of the units to prevent adverse impacts on traditional residential estates.

	<p>2. Amend the Land Use Zoning Matrix in Chapter 12 Land Use Zoning Strategy to include purpose-built Student Accommodation as a separate use “Generally Permitted” in the City Centre, Town Centre, District Centre, Local/ Neighbourhood Centre, Existing Residential, New Residential and Mixed-Use zones, and “Generally Permitted” “Ancillary to the primary use only” in the Education and Community Infrastructure and University zones.</p>
	<p>SEA/ AA Response</p>
	<p>The provision of purpose-built student accommodation coupled with its location on sustainable transport links addresses a need within what is a university city and also fulfills accommodation needs for significant proration of Limerick population during the academic year. From the point of view of human health and catering for the accommodation needs of a specific subset of the population this is regarded as beneficial. The addition of planning conditions requiring that any change of use would require planning permission, means that any proposal to change usage would be carefully assessed. The policy additions would mean that the issue of student accommodation would be more carefully managed in the future, which would be useful from both a social and local amenity perspective.</p>

No.238	Ref. & Name/ Group:	LCC-062-238 Cllr. Elena Secas
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Objective HO O8: Provision of Student Accommodation:</p> <ul style="list-style-type: none"> • Inclusion of a strategy for Student Accommodation given the existing crisis especially in the Castletroy area • Consider HMO’s and student accommodation as a zoning category within residential development • Measure the impact of HMO’s on residential community and their quality of life and well-being with a view to identifying and implementing 	<p>1. Objective HO O8: Provision of Student Accommodation: See Response No. 1 and Recommendation No. 1 to Submission No. 210 above.</p>

	<p>measures that reduce and preferably negate the negative aspects of this.</p> <ul style="list-style-type: none"> • Consider other types of student accommodation apart from purpose built accommodation given the shortage of student accommodation across Limerick City and County and the growing nature of the student population. <p>2. Sustainable Travel: (i) The submission welcomes the commitment to reduce car dependency and facilitate sustainable modes of transport through the delivery of walking, cycling and public transport infrastructure. The submission requests the provision of an appropriate level of road reallocation away from the private car to support existing and future development of active modes and to enhance connectivity.</p>	<p>2. Sustainable Travel: (i) Chapter 6 of the Draft Plan supports the rebalancing of the transport system towards more sustainable modes of transport, in order to mitigate against the potential impacts of climate change and to remove congestion from our city, towns and villages. Policy TR P4 Delivery of Transport Infrastructure in line with National Policy includes supportive text which outlines a number of proposed deliverables considered key to enabling growth in Limerick including the delivery of the full BusConnects programme, development of a park and ride programme for Limerick and the delivery of a comprehensive cycling and walking network for Limerick City Metropolitan Area</p> <p>Objective TR O12 provides support for the implementation of LSMATS which sets out a framework for investment in transport for the Limerick Shannon Metropolitan Area for the next 20 years and includes proposals for the significant development of the cycle network and enhancement of bus services and infrastructure. One of the main focus areas of the plan is to achieve a modal transfer from short duration car mode trips to more active and public</p>
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	<p>(ii) The submission requests the construction and extension to the footpath from Daly’s Cross to Castleconnell Scout Campsite on the western side (closest to the village) of the R525 Road to minimise motor vehicle usage and concomitant carbon levels while facilitating active transport and connectivity in line with increasing sustainable mobility and transport by building sustainable communities and infrastructure which, altogether, will help achieve “Key Ambition 1” of the Draft Limerick Development Plan 2022 – 2028.</p> <p>3. Objective TR O43 HGV Restrictions: Amend this objective as follows: “It is an objective of the Council to identify specific lorry routes to eliminate HGV movements through Limerick City and neighbourhoods.” “It is an objective of the Council to limit deliveries to businesses in the city core to before 11am each day to further improve the safety of pedestrians and active mode users and to facilitate better use of street space for business and of liveability for citizens.”</p>	<p>transport modes. The BusConnects Limerick programme, included within the Strategy will provide a reliable, high frequency public transport service to improve connectivity of Limerick City and suburbs. In addition, the planned cycling network focuses on connecting key attractors, such as education, residential and employment areas.</p> <p>(ii) The provision of specific pedestrian infrastructure is an operational issue and is outside the remit of the Development Plan. However, Castleconnell is located within the study area of LSMATS and significant investment in sustainable modes of transport are planned as part of this strategy.</p> <p>3. Objective TR O43 HGV Restrictions: TR O43 outlines the Councils objective on HGV Restrictions: ‘It is an objective of the Council to identify specific lorry routes and/or time restrictions, to reduce peak-time HGV movements through Limerick City and neighbourhoods’. In addition, the Council, in conjunction with the National Transport Authority have commenced the preparation of a Limerick City Centre Traffic Management Plan. The key principals of this plan include the rebalancing of the City’s street network towards sustainable modes of transport and the management of Heavy Goods Vehicles. The movement of HGVs within the City</p>
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	<p>4. Other Recommendations:</p> <p>-Graveyards: Identify strategic sites for provision of additional graveyards in areas where population is expected to grow significantly in the next seven years and identify a strategic site immediately for the Castletroy area.</p> <p>-Housing Mix: Consider a mix of house types which will deliver single storey houses to meet requirements needs of the older population who want to downsize and continue living in their own areas.</p> <p>-School Zones: Provide school streets and school zones for every school in Limerick to ensure that children can walk, cycle and scoot safely to and from school.</p>	<p>centre will be considered as part of the Traffic Management Plan and is outside the remit of the Development Plan.</p> <p>4. Other Recommendation:</p> <p>-Graveyards: As set out under Objective SCS1 O36 Burial Grounds/ Crematoria, it is an objective of the Council to ‘provide and facilitate the provision of burial grounds in Castletroy and other towns throughout Limerick identified in the Burial Grounds Strategy’.</p> <p>-Housing Mix: The Development Management Standards of the Draft Plan requires a detailed breakdown of the proposed unit type and size, including a split between 1/2/3+ bed units, in order to ensure an adequate mix of dwelling sizes and types in accordance with the requirements identified in the Housing Need Demand Assessment.</p> <p>-School Zones: Objective TR O30 Behavioural Change Measures of the Draft Plan supports the implementation of behavioural change initiatives and the facilitation of school streets and school zones in the promotion of active travel options for Limerick’s children. There are a number of Limerick schools involved in An Taisce’s ‘Safe Routes to School’ programme. An Taisce Green Schools are currently doing consultation with all the chosen schools and will then, go on to prepare an outline delivery plan. This plan will then be submitted to Limerick City and County Council for detailed design and implementation.</p>
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	<p>-Strategic Sites: Identify a strategic site for a Garda Station, library and community centre in the Castletroy area.</p> <p>-Groody Centre: Acknowledge Groody Neighbourhood Centre as a district centre.</p> <p>-Groody Green Wedge: Preserve the Groody Valley green wedge.</p> <p>-Trees: Preserve and protect the trees along the Groody Link Road and develop a comprehensive tree strategy and establish a full-time tree officer role within the Council.</p> <p>-Regeneration Areas: Identify the steps on how the designated Regeneration Areas will be integrated into the wider City area, and highlight in each section, i.e. transport, housing, zoning and climate the unique challenges facing the designated Regeneration Areas.</p>	<p>In addition to the Safe Route to Schools Programme, Limerick City and County Council are available to work with all schools in Limerick regarding mobility management planning. Interested schools are welcome to contact the Transportation and Mobility Directorate to find out more information</p> <p>-Strategic Sites: Sufficient lands have been zoned in Castletroy to accommodate the provision of a Garda Station, Library and Community Centre.</p> <p>-Groody Centre: See Response No. 4 to Submission No. 99 above.</p> <p>-Groody Green Wedge: A specific zoning objective Groody Valley Wedge aims ‘to preserve and protect the Groody Valley from development’. The purpose of this zoning ‘recognises the importance and need for protection of these areas for wildlife, habitat, flora and fauna and floodwater storage. Within these areas development will be prohibited in order to maintain the integrity of the sites.</p> <p>-Trees: See Response No. 3 to Submission No. 99 above.</p> <p>-Regeneration Areas: A new Spatial Strategy chapter will set out the overall strategy for the development of the Limerick Metropolitan Area, including the Regeneration Areas, supported by</p>
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		the Limerick Integration Regeneration Framework Plan, LSMATS, zoning maps and objectives and Strategic Flood Risk Assessment for the Draft Plan.
Chief Executive’s Recommendations		
<p>1. Amend Objective HO O8 Student Accommodation as follows: It is an objective of the Council to:</p> <p>A) Support the provision of <u>high quality, professionally managed</u> purpose-built student accommodation <u>either on campus, or</u> in appropriate and accessible locations <u>on public transport or cycle networks. All forms of student accommodation shall respect and protect the existing residential amenities of the area in which it is proposed. Student accommodation shall be</u> and of appropriate design, in accordance with the <u>Department of Education and Science ‘Guidelines on Residential Development for Third Level Students’ (1999)</u>, and (2005) National Student Accommodation Strategy (2017) and any subsequent updates. Applications for change of use from student housing to any other form of <u>housing use</u> shall be <u>strongly</u> resisted, without adequate demonstration that <u>there is no longer a need for such use in the area and</u> an over-provision of student housing exists’.</p> <p><u>B) Ensure that all applications for new off campus purpose built student accommodation, the change of use to student accommodation in existing residential areas, or extensions to existing dwellings to facilitate student accommodation, include a Student Demand and Concentration Statement with details outlining the presence and distribution of any permanent residential occupiers, the extent of students renting in the private housing market and the presence of any other housing catering primarily for students and short term lets in the area/estate. The application should address any potential impacts of the proposal on residential amenity and any permanent residents in the area.</u></p> <p><u>C) Require all applications for off campus purpose built student accommodation to be accompanied by a Student Management Plan outlining how the scheme will be professionally managed. The Plan shall demonstrate how the development will be managed so as to avoid potential negative impacts from occupants on surrounding properties and neighbourhoods and ensure the maintenance of safe, secure and clean environments for the community, occupants and nearby residents.</u></p> <p><u>D) Ensure permissions for student accommodation will be subject to a condition requiring planning permission for a change of use to any other type of use, including short term holiday letting. Future applications for this type of change of use will be resisted. Where it is demonstrated that such form of housing is no longer required a planning application will require details of a proper management plan for the non-student use of the units to prevent adverse impacts on traditional residential estates.</u></p> <p>2 - 4: No change.</p>		
SEA/ AA Response		

See response to Submission No. 210 above.

No. 100	Ref. & Name/ Group:	LCC-C62-100 Tom Phillips + Associates on behalf of Voyage Properties	
	Submission/ Observation Summary	Chief Executive’s Response	
	<p>1. Zoning: In relation to a c.47 ha. landholding comprising the former Racecourse lands at Greenpark, Dock Road, the observation is seeking the re-zoning of 19.3ha. from Enterprise and Employment to New Residential.</p> <p>The submission sets out that zoning of the lands has changed as follows:</p> <ul style="list-style-type: none"> • The General Mixed Use and Neighbourhood Centre zoning has been removed, the Residential component is significantly reduced (from c.19.3 ha to c.4.4 ha). These areas have now been replaced with a single Enterprise and Employment zone (c.24.7 ha). • The remaining residual New Residential zoned area comprises c.4.4 ha of land. • An additional c.1.8 ha of land is now zoned for Public Open Space in lieu of New Residential land use. <p>It is accepted appropriate to zone c.12 ha of land for Enterprise and Employment to support and complement the</p>	<p>1. Zoning: The content of the submission received is noted. The main issue in relation to the re-zoning of these lands from Enterprise and Employment to New Residential relates to Flood Risk.</p> <p>-Flood Risk: The Planning and Development Act 2000 (as amended) requires the preparation of the Development Plan in accordance with Section 28 Ministerial Guidelines. In accordance with The Planning System and Flood Risk Management, Guidelines for Planning Authorities (the Guidelines), a Strategic Flood Risk Assessment (SFRA) has been prepared to assess flood risk within the plan area.</p> <p>In order to achieve the aims and objectives and comply with the requirements of the Guidelines, the Local Authority’s approach to the zoning of land is to avoid development in areas at risk, where possible and substitute less vulnerable uses, where avoidance is not possible. A precautionary approach will be applied, where necessary to reflect uncertainties in flooding datasets and assessment techniques and the ability to predict the future climate and performance of flood defences.</p>	

<p>economic growth strategy in line with the Limerick 2030 Interim Update.</p> <p>The site comprises one of the largest remaining best located undeveloped strategic land banks and should be identified as an opportunity site. In the absence of any such designation, it is inconsistent with the Limerick 2030 Interim Update and Review, which identifies the site as being both an employment opportunity site (c. 12 ha) and a ‘major residential opportunity site’. This promotes a mixed use approach in line with the Current Development Plan, which identifies the Greenpark Lands as being capable of delivering 1,188 no. residential units. The strategic importance of the Greenpark Lands (‘Racecourse lands’) as a major Residential site in Limerick City is illustrated by designation as a key development site under the Rebuilding Ireland LIHAF programme. This is not reflected in the proposed zoning in the Draft Plan that includes c.4.4 ha of Residential zoning and c.24.7 ha of Enterprise and Employment zoning.</p> <p>The submission summarises comments from An Bord Pleanála as part of the recent pre-application consultation process regarding a Strategic Housing Development proposal on a portion of the lands (July 2021).</p> <p>The submission is accompanied by a report setting out an overview of past, prevailing and potential future demand for</p>	<p>Notwithstanding the fact that Greenpark lands are located in Flood Zone A, the SSFRA submitted as part of the submission identified that <i>‘the risk of flooding to the Greenpark lands is low, as the OPW maintained Arterial Drainage scheme provides protection during both the 0.5% and 0.1% AEP tidal events’</i>. The defences referred to are part of the OPW arterial drainage scheme and are of unknown condition and standard of protection. In accordance with Section 2.25 of the Guidelines, the presence of flood protection structures should be ignored in determining flood zones. This is because areas protected by flood defences still carry a residual risk of flooding from overtopping or breach of defences and the fact that there may be no guarantee that the defences will be maintained in perpetuity.</p> <p>The lands are located within Flood Zones A (high probability of flooding). Section 3.5 of the Flood Guidelines indicates that development in this zone should be avoided and/or only considered in exceptional circumstances, such as in city and town centres, or in the case of essential infrastructure that cannot be located elsewhere and where the Justification Test has been applied.</p> <p>The submission indicates that there should be no distinction between land uses. However, Table 3.1 of the Flood Guidelines makes a distinction between various land uses, where residential is considered a ‘highly vulnerable development’ and commercial is a ‘less vulnerable development’.</p>
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<p>the industrial, office and residential accommodation sectors in Limerick, in addition to an analysis of the quantum of development proposed in the Draft Plan.</p> <p>A change of zoning will result in Limerick City losing hundreds of potential new homes, capable of delivery in the short term. This site is not reliant on the provision of new infrastructure and is in single ownership. There is no planning and development rationale for the proposed zoning and the weighting for Enterprise and Employment zoning is entirely disproportionate.</p> <p>The submission sets out the context for the requested rezoning with respect to National, Regional and Local planning policy, documents and guidelines.</p> <p>A Flood Risk Assessment acknowledges that the lands are subject to Flood Risk designations and are subject to the provisions of the ‘Planning System and Flood Risk Management Guidelines for Planning Authorities 2009’, including the Development Plan Justification Test in respect of land use zoning.</p> <p>The Greenpark Lands satisfy the criteria of the Development Plan Justification Test. The Justification Test applies to ‘...future development of areas in an urban settlement that are at moderate or high risk of flooding, for uses or development vulnerable to flooding that would generally be</p>	<p>Highly vulnerable uses including residential are only appropriate if a Justification Test is passed. In considering the Justification Test, it should be noted that in order to achieve Compact Growth, the Draft Plan takes a City Centre first approach to the spatial development of Limerick City and Environs. The core is defined as the area zoned “City Centre”. Furthermore, Part 2 of the Justification Test requires the Local Authority to consider a number of factors, including whether the site is located within the core, or if there are 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 Plan has zoned sufficient alternative residential lands to meet the requirements of the Core Strategy, in areas that are not at risk of flooding and suitable for the provision of highly vulnerable uses in accordance with the sequential approach of the Guidelines. The Justification Test does not pass, it is recommended that these lands are not included for New Residential zoning.</p> <p>-Reference to Limerick 2030 review: Updates to the LK2030 Review and Update document are required to reflect the flood zones and Strategic Flood Risk Assessment for the Draft Plan.</p>
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	<p>inappropriate as set out in Table 3.2’. There is no distinction drawn, therefore, in the submitted Test between land use types (residential, commercial) or whether the uses are highly or less vulnerable.</p> <p>The site is suitable for significant Residential use being crucial to the achievement of a balanced ‘compact growth’ strategy and projected population increase, which are envisaged for Limerick City. The Greenpark Lands satisfy the criteria of the Justification Test for Residential use.</p> <p>A detailed Site-Specific Flood Risk Assessment (SSFRA) by RPS, Consulting Engineers includes substantial and robust modelling and breach analysis, that confirms that the site can be fully developed in a safe manner without impact on third party lands. Based on the proposed mitigation measures, consideration of the designated zoning and the proposed urban design, the report concludes that each of criteria in the Development Management Justification Test was shown to be satisfied.</p>	
Chief Executive’s Recommendations		
<ol style="list-style-type: none"> 1. No change to zoning. 2. Update the Interim Review and Update of the LK2030 Plan to reflect the findings of the SFRA. 		
SEA/ AA Response		
<p>The main constraint to development in this case is flood risk. Residential development is regarded as being amongst the most vulnerable of land uses to flood risk. To avoid this risk and to ensure compliance with higher tier guidance, as outlined in The Planning System and Flood Risk Management Guidelines (2009), it is considered to retain the zoning as Enterprise and Employment, which is a less vulnerable usage.</p>		

No. 103	Ref. & Name/ Group:	LCC-C62-103 Frank Larkin	
Submission/ Observation Summary		Chief Executive’s Response	
<p>1. Limerick 2030 Plan Interim Review and Update: There are many good proposals in the Interim Review and Update, however the proposal to construct a pedestrian bridge across the River Shannon at Barrington’s Pier should be instantly discarded.</p> <p>This proposal shows a complete lack of appreciation and understanding of the historical and present day importance of Limerick City as a city which has had a direct connection to the sea from before the time of the Vikings. Limerick has a thriving port with a regular shipping trade linking to the UK, Europe and beyond. A pedestrian bridge at Barrington’s Pier would present enormous practical difficulties for an important shipping trade link.</p> <p>Limerick City as a port at the head of an estuary with direct access to the sea has enormous potential for the development of marine tourism. A bridge across the river would completely rule out any such development.</p>		<p>1. Limerick 2030 Plan Interim Review and Update: The content of the submission received is noted. The Local Authority fully support the operations at Limerick Port as a key trade route for Limerick and the region and acknowledge the importance of the Port for direct and indirect employment, business and economic growth. The Local Authority recognises the importance of the Marine Economy as set out under Chapter 4 A Strong Economy of the Draft Plan. The Strategic Integrated Framework Plan for the Shannon Estuary is also included as Appendix 6 of the Draft Plan. Objective SIFP MU 1.2.16 Limerick Dock states the following: ‘To safeguard the role and function of Limerick Docks as a working Port Facility and key driver of economic growth within the Estuary, Gateway and Mid West Region’. The Draft Plan also includes Objective TR O32 Docks and Ports ‘It is an objective of the Council to support the continued development of Shannon Foynes Port as an EU Core Network Port (TEN-T) and Limerick Docks as marine related assets, in accordance with the 2013 National Ports Policy.’</p> <p>In order to ensure the continued free flow of marine traffic and accessibility of the Port for shipping, it is considered that the proposed pedestrian bridge at Barrington’s Pier should be removed from the Interim Review and Update of the LK2030 Plan.</p>	
Chief Executive’s Recommendations			

<p>1. Remove proposals for a pedestrian bridge at Barrington’s Pier in the Interim Review and Update of the LK2030 Plan.</p>
<p>SEA/ AA Response</p>
<p>The proposal to create a pedestrian link would compromise connection to the Shannon Estuary from Limerick Port and with that might help compromise more sustainable transport links with the outside world. The construction of such bridges would also have considerable ecological effects and disturbance, particularly during the construction phase and would be located within the River Shannon and Fergus Estuary Special Protection Area and the Lower River Shannon Special Area of Conservation site.</p>

No. 118	Ref. & Name/ Group:	LCC-C62-118 Mullock & Sons (Shipbrokers) Ltd.
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. LK2030 Spatial Plan Review: The construction of a pedestrian bridge down river of Ted Russell dock would obstruct the navigation channel to Limerick Port.</p> <p>The proposed obstruction across a key manoeuvring point for vessels will result in the marine based operations being forced to shrink or cease, becoming uneconomic or abandoned, putting jobs and revenue at risk (440 employees generating €25.2m income).</p> <p>A structure encroaching the navigation channel will restrict and hinder the ability of the Port to operate and restrict businesses from operating in the mid-west.</p> <p>The pedestrian bridge, or any other obstruction in the navigation channel should be prevented to protect the current and future international trade gateway.</p>	<p>1. LK2030 Spatial Plan Review: The content of the submission received is noted. See response No. 1 to Submission No. 103 above.</p>

	Chief Executive’s Recommendations
	1. Remove proposals for a pedestrian bridge at Barrington’s Pier in the Interim Review and Update of the LK2030 Plan.
	SEA/ AA Response
	See response to Submission No.103 above.

No. 181	Name/ Group:	LCC-C62-181 United Metal Recycling Group
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. LK2030 Spatial Plan Review: A key pedestrian route and the construction of a pedestrian bridge down river of Ted Russell dock would obstruct the navigation channel.</p> <p>The current City Development Plan incorporated the Strategic Integrated Framework Plan for the Shannon Estuary (Variation No. 5), a key objective of which is ‘to safeguard the core commercial shipping lane, port and berthing facilities and critical navigational assets from inappropriate development’.</p> <p>The proposed pedestrian bridge is an inappropriate development that will severely and irrevocably compromise the ability of the Port to meet the existing needs, by the obstruction of key port infrastructure.</p>	<p>1. LK2030 Spatial Plan Review: The content of the submission received is noted. See response No. 1 to Submission No. 103 above.</p>

	<p>A structure encroaching the navigation channel will restrict and hinder the ability of the Port to operate and restrict businesses from operating in the mid-west.</p> <p>Limerick port has properties unique to the Shannon Foynes network of ports in that it is enclosed, protected from tidal changes and has a large quantity of quayside set down area, vital to the observer’s specific needs when exporting metal. This must be protected and developed in line with the SIFP. The observation requests that the pedestrian bridge, or any other obstruction in the navigation channel be prevented to protect the current and future international trade gateway.</p>	
	Chief Executive’s Recommendations	
	1. Remove proposals for a pedestrian bridge at Barrington’s Pier in the Interim Review and Update of the LK2030 Plan.	
	SEA/ AA Response	
	See response to Submission No.103 above.	

No. 107	Ref. & Name/ Group:	LCC-C62-107 DTW Construction Ltd. and Montpellier Developments Ltd.
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Zoning: The observer requests modification of zoning at Corbally from Open Space to New Residential, to allow an access road/route to the Corbally Road to facilitate a proposed housing development.</p> <p>The Draft Plan proposes to change the zoning of part of the site from New Residential to Open Space. The observers have</p>	<p>1. Zoning: The content of the submission received is noted. There are a number of issues in relation to the re-zoning of these lands as set out below:</p> <p>-Flood Risk: The Planning and Development Act 2000 (as amended) requires the preparation of the Development Plan in accordance with Section 28 Ministerial Guidelines. In accordance</p>

<p>plans for a stepdown housing project on similar boundaries. However, the Draft Plan renders this land without an access route.</p> <p>In relation to the site the following is indicated:</p> <ul style="list-style-type: none"> • Served by sewers and ESB lines. • The lands will need to be filled to extend the current flood defence wall so that the areas of Corbally below the flood line can be defended. • This section of land was an SAC in a previous plan. However, according to environmental consultants this should not have been designated. The land is above the Callows that the SAC is trying to preserve. • The land has been subject to considerable works in recent years as it has been excavated to provide services. The plan would be to build an access road on top of the disturbed land. It would also form part of the flood defence wall. • The design statement provides for a cyclist/ pedestrian route to Corbally and Mill Road. • Development is for "step-down" housing. The traffic it creates is minimal and off peak so will have no effect on the overall Corbally Road. 	<p>with The Planning System and Flood Risk Management, Guidelines for Planning Authorities (the Guidelines), a Strategic Flood Risk Assessment (SFRA) has been prepared to assess flood risk within the plan area.</p> <p>In order to achieve the aims and objectives and comply with the requirements of the Guidelines, the Local Authority’s approach to the zoning of land is to avoid development in areas at risk, where possible and substitute less vulnerable uses, where avoidance is not possible. A precautionary approach will be applied, where necessary to reflect uncertainties in flooding datasets and assessment techniques and the ability to predict the future climate and performance of flood defences.</p> <p>The proposed site would extend into Flood Zones A and B. Section 3.5 of the Flood Guidelines indicates that development in this zone should be avoided and/or only considered in exceptional circumstances, such as in city and town centres, or in the case of essential infrastructure that cannot be located elsewhere and where the Justification Test has been applied. In addition, the proposed access through Flood zone A/B is also not appropriate, particularly given the proposed use of the residential units for elderly persons.</p> <p>Highly vulnerable uses including residential are only appropriate if a Justification Test is passed. In considering the Justification Test it should be noted that in order to achieve Compact Growth, the Draft Plan takes a City Centre first approach to the spatial</p>
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		<p>development of Limerick City and Environs. The core is defined as the area zoned “City Centre”. Furthermore, Part 2 of the Justification Test requires the Local Authority to consider a number of factors, including whether the site is located within the core, or if there are 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 Plan has zoned sufficient alternative residential lands to meet the requirements of the Core Strategy, in areas that are not at risk of flooding and suitable for the provision of highly vulnerable uses in accordance with the sequential approach of the Guidelines. The Justification Test does not pass, it is recommended that these lands are not included for New Residential zoning.</p> <p>-Special Area of Conservation: While the upper part of the site is drier and has been modified, it has often been the practice of the NPWS when designating sites to include an additional element as a buffer for more sensitive parts of the site. In this situation these would be lower wetter areas which, in the winter, are an attraction for visiting wildfowl. Buffers would help avoid disturbance and help prevent encroachment of developments on its periphery. While the submission states that the observer’s consultants are of the opinion that this should not have been designated, no additional information has been provided as to why exactly they have formed this opinion. In this situation given that no supporting information has been furnished and that the site is designated, it is recommended that there is No change to the draft plan.</p>
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Chief Executive’s Recommendations
1. No change.
SEA/ AA Response
N/A

No. 108	Ref. & Name/ Group: LCC-C62-108 Garryowen Community Centre	
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Garryowen Community Centre: The submission relates to the need for a Community Centre for Garryowen and requests that it is specifically named in the plan with a clear timetable for construction.</p> <p>The Community of Garryowen is urgently in need of a dedicated community centre. As the recent audit of community facilities showed there is a high level of disadvantage, a large population and the only area of the city without dedicated community facilities. Garryowen CDP currently spends more than €20,000 per annum on private rented premises which are small, cramped and unfit for purpose.</p> <p>The submission states that private philanthropy is interested in providing matching funds, yet there is still no concrete commitment from the Council to the project. The Community Centre proposal is supported by An Garda Síochána, Limerick</p>	<p>1. Garryowen Community Centre: The content of the submission received is noted. Chapter 9, Sustainable Communities and Social Infrastructure of the Draft Plan sets out the relevant policies and objectives in relation to the provision of community facilities. The overall objective of the Council is to seek to improve the provision of community infrastructure opportunities for the wider community in co-operation with relevant bodies.</p> <p>The Council is committed to both protection of existing community infrastructure and provision of new and upgraded infrastructure. As the plan covers the entire City and County, it was not considered appropriate to identify specific locations where such infrastructure is required. However, in accordance with Objective SCS1 06, the Council will develop a strategy based on the community facilities audit (which was completed in 2021) and identify where new / or improved community infrastructure should be provided throughout Limerick.</p>

	<p>Youth Service, Limerick Sports Partnership, PAUL Partnership. The Council has recognised the need, but has yet to progress the project.</p> <p>A number of attachments accompanied the submission, including design proposals, Garryowen Area Profile to demonstrate the need for this community resource and a summary of Garryowen Community Centre proposal.</p>	
	Chief Executive’s Recommendations	
	1. No change.	
	SEA/ AA Response	
	N/A	

No. 119	Ref. & Name/ Group:	LCC-C62-119 Limerick Enterprise Development Partnership (LEDP)
	Submission/ Observation Summary	
	<p>1. Garryowen Community Centre: Limerick Enterprise Development Partnership (LEDP) requests that the Development Plan supports the provision of a community centre in Garryowen and outlines that there is a clear need and support for such a facility.</p>	
	Chief Executive’s Response	
	<p>1. Garryowen Community Centre: See Response to Submission No. 108 above.</p>	
	Chief Executive’s Recommendations	
1. No change.		
SEA/ AA Response		
N/A		

No. 168	Ref. & Name/ Group:	LCC-C62-168 Garryowen Residents Association	
	Submission/ Observation Summary		Chief Executive’s Response
	<p>1. Community Facilities: This submission seeks support from the Council for community facilities in Garryowen. The submission outlines the collective mission of the Association based on the 17 SDG goals. In particular, a community hub with community café and shop, Women and Men’s sheds, community forest, community farm and sports facilities are referenced for their contributions to well-being, mental health, learning opportunities, sustainable lifestyle and practices in horticulture, human connectivity and volunteerism forging community bonds and development.</p>		<p>1. Community Facilities: See Response to Submission No. 108 above.</p>
	Chief Executive’s Recommendations		
	1. No change.		
	SEA/ AA Response		
N/A			

No. 197	Ref. & Name/Group:	LCC-C62-197 Garryowen Residents Association	
	Submission/Observation Summary		Chief Executive Response
	<p>1. Community Infrastructure: The submission welcomes Objective SC06 Strategy for Community Facilities but seeks strengthening to identify where new or/or improved</p>		<p>1. Community Infrastructure: The content of the submission received is noted. See also Response to Submission No. 108 above.</p>

	<p>community infrastructure should be provided. As stated in the Draft Plan the Council is failing to commit to the necessary infrastructure. Regardless of budget constraints, the Council should work with stakeholders to identify funding streams to deliver community infrastructure.</p> <p>The following text is requested to be including in Objective SCS1 06: It is an objective of the Council to:</p> <p>Actively engage with stakeholders to support and identify suitable funding options to ensure the delivery of such infrastructure.</p> <p>The submission requests a community centre for Garryowen given its wider catchment area encompassing 5 national schools. The completion of two residential estates is welcomed but should be in tandem with community infrastructure.</p>	<p>The Local Authority collaborates with stakeholders to identify funding mechanisms for various community projects. As set out under Chapter 9, Sustainable Communities and Social Infrastructure, Policy SCS1 P1 Sustainable Communities references this as follows: It is policy of the Council to seek to improve the provision of community infrastructure and recreational opportunities for the wider community in co-operation with relevant bodies.</p>
Chief Executive Recommendation		
1. No change.		
SEA/AA Response		
N/A		

No. 110	Ref. & Name/ Group:	LCC-C62-110 RW Nolan Associates on behalf of DW Raheen
	Submission/ Observation Summary	Chief Executive’s Response

<p>1. Zoning: The submission requests a change in zoning from Open Space and Recreation to New Residential at Raheen, Ballykeefe.</p> <p>The submission indicates that New Residential would be more appropriate for the following reasons:</p> <ul style="list-style-type: none"> • The need to achieve compact growth in the city and environs area. New residential development on the subject site provides an opportunity to deliver the objectives in national and regional policy to achieve 50% of the population target for the city within the city and suburbs footprint. • The need to adopt the 'sequential principle' in the zoning of land for residential development. • A neighbourhood park is no longer proposed. The current zoning objective for Open Space and Recreational use has not been achieved since the adoption of the plan in 2011, while an objective to provide a neighbourhood park in Ballykeeffe is no longer pursued by the Local Authority. • The opportunity to integrate the site with future adjoining residential development to the west under a proposed masterplan. • Residential development can enhance green infrastructure. New residential development would not frustrate the achievement of the proposed greenway along the northern site boundary, as a corridor of public open space can be provided along 	<p>1. Zoning: The content of the submission received is noted. There are a number of issues in relation to the zoning of these lands as set out below.</p> <p>In 2004, the Elected Members agreed to vary the Southern Environs District Development Plan 1999 to rezone approximately 10 acres of land designated for the provision of a Neighbourhood Park from Open Space to Residential. The rezoning was carried out on the basis that the developer would donate the remaining 18 acres of land zoned for Neighbourhood Park to Limerick City and County Council. Contracts were never signed and in 2016 the developer reduced the area to 5 acres and a 2m pathway adjacent to the railway line. The Council confirmed that it would proceed with the transfer. However, in 2018, the Council was advised that the land earmarked as a location for a community/ local park for the area had been sold. The lands in question, 18 acres, were zoned Open Space and Recreation in the Southern Environs Local Area Plan 2011-2017.</p> <p>Due to the significant population growth proposed in this area, it is important to maintain these lands as Open Space/ Amenity for the local community. It is also an objective of the Council to improve the provision of open space throughout the plan period. On this basis it is not recommended to change the zoning of these land.</p> <p>Furthermore, there are sufficient residential zoned lands within the City and Environs to meet the projected population growth targets over the lifetime of the plan.</p>
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	<p>the cycleway while passive supervision can be provided from new residential development.</p> <ul style="list-style-type: none"> • Since the Open Space and Recreation zoning objective was adopted in 2011, this objective has not been achieved as the lands are not accessible to the public and are in agricultural use. 	
Chief Executive’s Recommendations		
1. No change.		
SEA/ AA Response		
N/A		

No. 111	Ref. & Name/ Group: LCC-C62-111 Claire Boylan	
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Planning and Flooding: The observation raises concerns regarding the rezoning of agricultural lands at Coonagh Cross and the new LIT campus to Education and Community Facilities.</p> <p>There has been a history of flooding and lack of planning compliance associated with developments in this area. A High Court Case quashed a permit for a waste facility. Permission to import 25,000 tonnes per annum was granted without an EIS. This cannot be regularised and creates flooding and pollution.</p>	<p>1. Planning and Flooding: The content of the submission received is noted.</p> <p>The rezoning of these lands from Agriculture to Education and Community Facilities reflects the granting of planning permission under Pl. Ref. 16/1 for the provision of a new LIT Campus. Some of the vacant structures on these lands have now been renovated for education purposes. The Education and Community zoning reflects the LIT Campus Masterplan to include playing pitches and open space at this location.</p>

<p>Lands are bound by OPW drains which only empty at low tide, additional loading has the potential to negatively impact any adjoining properties. There are numerous records of flooding to properties in the area.</p> <p>Development of sports facilities will have fast draining surfaces, classified as water compatible developments, these have bypassed the requirements for flood risk assessment. There will therefore be no adequate assessment individually or cumulatively to assess flood risk in the area.</p> <p>The benefit of retaining these lands as agriculture in terms of reducing flood risk to existing properties and the benefit to wildlife and biodiversity in an area to act as a buffer for the Lower Shannon SAC must be recognised.</p>	<p>The Local Authority are aware of issues of flooding in this area. The zoning of these lands has passed the Justification Test. In the event of any future planning applications, including proposals for water compatible uses on this zone it is considered reasonable to require the submission of a Site-Specific Flood Risk Assessment, in accordance with the Flood Risk Management Guidelines, 2009. In this regard, it is recommended that Objective CAF O21 Identified Flood Risk is amended as set out under Recommendation 1 below.</p>
<p>Chief Executive’s Recommendations</p>	
<p>1. Amend Objective CAF O21 Identified Flood Risk to include the following: <u>C) Ensure any planning application, including proposals for water compatible uses, on the lands in Flood Zones A and B, adjacent to the Coonagh LIT campus, zoned for Education and Community, shall include a comprehensive Site-Specific Flood Risk Assessment, incorporating a drainage assessment for the lands, which demonstrates that the flood risk can be mitigated and that water compatible uses can be accommodated without adversely impacting on the flood risk of neighbouring residential properties.</u></p>	
<p>SEA/ AA Response</p>	
<p>This is in line with the contents of The Planning System and Flood Risk Management Guidelines 2009, but also takes into account the very specific circumstances outlined in Coonagh which will ensure that the possibility of adding any potential flood risk is adequately assessed.</p>	

No. 114	Ref. & Name/ Group:	LCC-C62-114 Town & Country Resources Limited on behalf of Trustees of the Curia of the Roman Catholic Diocese of Limerick	
Submission/ Observation Summary		Chief Executive’s Response	
<p>1. Zoning: The submission requests the change of zoning of c2.3 hectares from ‘Education and Community Facilities’ to ‘New Residential’ at the Diocesan Lands, Corbally.</p> <p>The submission provides a description of the lands and site context and sets out a justification for new residential land having regard to the location and proximity to Limerick City Centre and key employment and retail resources in the city centre area. The subject site represents a prime opportunity to provide for compact growth at an infill location, within 2km of the city centre and adjacent to an existing public transport corridor. It asserts that new residential land use at the property will be compliant with national and regional strategic planning guidance in respect of the consolidation of new residential land use zonings within the built-up envelope of existing urban settlements.</p> <p>The Diocesan Lands represent significant institutional lands that can contribute to the attainment of a sustainable ‘compact city’ by consolidating the educational purpose of the lands, providing for new community facilities and contributing to the delivery of housing where a shortage is evident.</p>		<p>1. Zoning: The content of the submission received is noted.</p> <p>Having regard to the extent of lands zoned for Education and Community Facilities at this location it is considered that adequate lands are zoned to cater for the future expansion of both school campuses in this zone (St. Munchin’s and Scoil Ide).</p> <p>With respect to the request to rezone this land for New Residential, it is noted that the subject lands comply with the compact and sustainable growth objectives of the National Planning Framework, given the site’s location within walking distance of the city centre and accessibility by sustainable modes of transport. On this basis, it is recommended that the lands outside of any flood zones or designated Special Area of Conservation be re-zoned from Education and Community to New Residential.</p> <p>There are a number of mature trees on the boundary of the site, which shall be retained where possible. This will be considered as part of any planning application in accordance with the tree objectives and Development Management Standards set out in the Development Plan.</p>	

	<p>The area is served by a bus service and is close to a range of services and amenities, including foul sewer and watermain infrastructure, ESB, gas and telecommunications infrastructure.</p> <p>The submission also indicates that in tandem with the request to change the zoning, the Diocese is cognisant of requests from members of the local community for a children’s playground at its property. In acknowledgement of this request, provision for an ‘all-abilities’ community playground at the Diocesan Lands is indicated on Figure 9 of the submission. The Diocese envisages that this would be a new resource developed, operated and managed by the community. A site location and site area, which is notional at the time of writing the submission, would comprise c1 hectare, facilitating the development of a new playground.</p>	
Chief Executive’s Recommendations		
<p>1. Change the zoning of 2.3ha. outside of any flood zone from Education and Community Facilities to New Residential at Diocesan Lands, Corbally.</p>		
SEA/ AA Response		
<p>The SEA guidance outlines the need for compliance with higher tier plans and in this case the National Planning Framework and the Regional Economic and Spatial Strategy stress the need for compact development. In this case the location of these lands lends itself to achieving the goal of compact development. The retention of mature trees as part of any potential development layout should be a prerequisite of any design submitted for the lands in question.</p>		

No. 115	Ref. & Name/ Group:	LCC-C62-115 Town & Country Resources Limited on behalf of Gerard MacNamara and Matthew MacNamara	
Submission/ Observation Summary		Chief Executive’s Response	
<p>1. Zoning: This submission relates to 3.22 hectares at Clondrinagh and requests to change the zoning from Agriculture to Enterprise and Employment.</p> <p>The current Limerick City Development Plan 2010-2016 includes a ‘4B General Industry’ zoning. The Draft Limerick Development Plan changes the zoning to <i>Agriculture</i>, due to the location of the lands within Flood Zone A. The lands are considered unsuitable for agricultural use.</p> <p>The submission sets out that the proposed change in zoning is in line with national and regional policy and the compact growth approach. In relation to strategic employment locations, the Metropolitan Area Strategic Plan notes that the Clondrinagh Industrial Estate adjoining the subject site is one of the key locations for employment and enterprise in the Metropolitan Region. It states that investment at these locations is ‘<i>key to realising the potential of the Limerick-Shannon Metropolitan Area to attract and maintain economic activity and talent.</i>’ The status of Clondrinagh Industrial Estate as a Strategic Employment Location in the MASP is not repeated in the Draft Development Plan.</p>		<p>1. Zoning: The content of the submission received is noted. The main issue in relation to the request for rezoning of these lands relates to Flood Risk.</p> <p>-Flood Risk: The Planning and Development Act 2000 (as amended) requires the preparation of the Development Plan in accordance with Section 28 Ministerial Guidelines. In accordance with The Planning System and Flood Risk Management, Guidelines for Planning Authorities (the Guidelines), a Strategic Flood Risk Assessment (SFRA) has been prepared to assess flood risk within the plan area.</p> <p>In order to achieve the aims and objectives and comply with the requirements of the Guidelines, the Local Authority’s approach to the zoning of land is to avoid development in areas at risk, where possible and substitute less vulnerable uses, where avoidance is not possible. A precautionary approach will be applied, where necessary to reflect uncertainties in flooding datasets and assessment techniques and the ability to predict the future climate and performance of flood defences.</p> <p>The defences referred to are part of the OPW arterial drainage scheme and are of unknown condition and standard of protection. In accordance with Section 2.25 of the Guidelines, the presence of</p>	

-Flood Risk: It is acknowledged that the CFRAMS indicates that the site is at risk from flooding. The submission was accompanied by a letter from Garland Consulting Engineers outlining a Flood Risk Overview of the site. In summary, the following points arise:

- The site is in family ownership for over 100 years with no flooding known to have occurred.
- There are no historic flood events on the site noted by OPW.
- The site is currently defended to a 1 in 100 chance for coastal flooding; thus, the site only floods in the 1 in 1000-year chance, equivalent to Flood Zone B. Flood Zone B would permit the use of the site for Industrial purposes, its current zoning.
- Given the extent of defended lands, including residential accommodation on lands immediately adjoining the site to the west, there can be no question of the flood defences falling into disrepair.
- The fluvial flooding of the site in the 1 in 1,000-year chance is also equivalent to Flood Zone B, which again would permit the use of the site for Industrial purposes.
- A Flood Risk Assessment would be submitted with any planning application, including a Justification Test demonstrating compliance with the Flood Risk Management Guidelines, a breach assessment and practical flood defence mechanisms to achieve flood defences to 0.5% AEP Coastal Flood events.

flood protection structures should be ignored in determining flood zones. This is because areas protected by flood defences still carry a residual risk of flooding from overtopping or breach of defences and the fact that there may be no guarantee that the defences will be maintained in perpetuity.

The lands are located within Flood Zones A (high probability of flooding). Section 3.5 of the Flood Guidelines indicates that development in this zone should be avoided and/or only considered in exceptional circumstances, such as in city and town centres, or in the case of essential infrastructure that cannot be located elsewhere and where the Justification Test has been applied.

Highly and less vulnerable uses are only appropriate if a Justification Test is passed. In considering the Justification Test it should be noted that in order to achieve Compact Growth, the Draft Plan takes a City Centre first approach to the spatial development of Limerick City and Environs. The core is defined as the area zoned “City Centre”. Furthermore, Part 2 of the Justification Test requires the Local Authority to consider a number of factors, including whether the site is located within the core, or if there are 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 Plan has zoned sufficient alternative Enterprise and Employment lands to meet the requirements of the Core Strategy, in areas that are not at risk of flooding and suitable for the provision of highly vulnerable uses in accordance with the sequential approach of the Guidelines. The Justification Test does

		<p>not pass, it is recommended that these lands are not included for Enterprise and Employment zoning.</p> <p>In relation to the justification in the submission that the site is located next to a strategic employment location, it should be noted that the Limerick Shannon MASP identifies the Strategic Employment Locations in Table 3 on page 294. In this regard, the Clondrinagh Industrial Estate has not been included, however it is noted that this area is identified as a key employment area (pg. 42) and corresponds to a mixed-use employment location on the MASP map (pg. 43), which reflects the existing uses on the site.</p>
	Chief Executive’s Recommendations	
	1. No change.	
	SEA/ AA Response	
	N/A	

No. 227	Ref. & Name/ Group:	LCC-C62-227 MWP on behalf of John Moriarty
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Zoning: The submission refers to a circa 3.12ha. green field site located between the Clondrinagh Park Halting Site and the Clondrinagh Industrial Estate and requests a change in zoning from Agriculture to Enterprise and Employment. The R445 bounds the site to the north and includes a pedestrian path on the inside of the barrier.</p>	<p>1. Zoning: The content of the submission received is noted. The site is the same as that referred to in Submission No. 115 above. See Response under Submission No. 115 above.</p>

	<p>The proposed amendment is consistent with policy at a national, regional and local level as outlined in the submission. The site is currently zoned for ‘General Industrial’ which is similar to the requested zoning for the site and identified as a Strategic Employment Location in the City Development Plan 2010 – 2016 (as extended). The site is accessible by bus, cycling and road. The Clondrinagh Industrial Estate is identified as a Strategic Employment Location in the MASP. A planning application for a warehouse and distribution facility will be submitted in advance of the adoption of the Draft Development Plan.</p>	
Chief Executive’s Recommendations		
1. No change.		
SEA/ AA Response		
N/A		

No. 117	Ref. & Name/ Group:	LCC-C62-117 Limerick Enterprise Development Partnership (LEDP)	
Submission/ Observation Summary		Chief Executive’s Response	
<p>1. Compact Growth and Revitalisation: Limerick Enterprise Development Partnership (LEDP) requests that the opportunity sites include the Limerick Enterprise Development Partnership (LEDP) Building.</p> <p>The LEDP Campus has a 143-room hotel, retail outlets, community services, a multinational retailer and multiple</p>		<p>1. Compact Growth and Revitalisation: The content of the submission received is noted. The Local Authority acknowledges and supports the work by the LEDP. Given the potential for substantial social and economic benefits to the area through the re-development of the Innovation Hub for Creative and Innovative Industries, inclusion of the LEDP building as an opportunity site is considered reasonable.</p>	

	<p>activities within the LEDP building. There are over 1,000 direct jobs supported on the original site and over 150 training and upskilling places filled annually by various partners.</p> <p>The LEDP building has multiple tenants in commercial, charity, training and upskilling and education. All revenue goes into community initiatives. The LEDP Building has had an enormous positive impact on Limerick City South, both socially and economically. By continuing to work in cohesion and partnership, the objectives set out in the LEDP’s Strategic Plan 2021-2016 can be realised, and ensure the Mid-West Region is a place where everyone can benefit.</p> <p>A vacant unit (Innovation Hub) of 33,000sq. ft. is the largest single floorplate outside of Dublin. A new multi-functional Creative & Innovative Industries Centre is planned to comprise Ireland’s first virtual production studio and space to facilitate and encourage indigenous SME sub suppliers to the Film Industry in a regeneration area.</p> <p>To facilitate this, the Development Plan should identify the LEDP Building as an "opportunity site" in its Compact Growth and Revitalisation Policies and Objectives.</p>	<p>In this regard, it is recommended that the Draft Plan is amended to:</p> <p>A) Include text and an objective to support the development of the LEDP site under the section relating to Southill.</p> <p>B) Amend the zoning on the Galvone Arms site from Enterprise and Employment to New Residential use, in order to ensure that there are adequate residential lands in the vicinity to support the accommodation requirements of the significant adjoining employment site.</p>
Chief Executive’s Recommendations		
<p>1. (A) Remove (g) from Objective KC O1 and include the following text under Kincora and Carew Parks and include on Opportunities (New Chapter 3): The Limerick Enterprise Development Partnership (LEDP) campus at Roxboro comprises 3.87ha. of</p>		

	<p><u>Enterprise and Employment and 2.49ha. of Local Centre zoned lands. The campus provides for a broad range of employment opportunities, community and education and training facilities of significant benefit to the disadvantaged area in which the campus is located. The vision for development of the campus will be focused on job creation. The redevelopment of a vacant unit (Innovation Hub) of 33,000 sq. ft. to provide a new multi-functional Creative and Innovation Industries Centre, comprising Ireland’s first virtual production studio and space will facilitate and encourage indigenous SME sub suppliers to the Film Industry to locate in a regeneration area.</u></p> <p><u>-Objective LEDP O1 Limerick Enterprise Development Partnership: It is an objective of the Council to:</u></p> <p><u>A) Support and facilitate expansion of the existing employment uses and training facilities, enhancing the broad range of employment opportunities for the local community;</u></p> <p><u>B) Facilitate the reuse of the vacant Innovation Hub for employment uses such as a multi-functional Creative and Innovative Industries Centre;</u></p> <p><u>C) Facilitate and encourage employment creation by SMEs.</u></p> <p>(B) Change the zoning of land from Enterprise and Employment to New Residential at the Galvone Arms, Southill.</p>
	SEA/ AA Response
	<p>The inclusions above emphasise the creation of employment opportunities and training for the local population, which would have benefits for human health and wellbeing. It is also located within the metropolitan area close to existing services and the population which it serves, minimising the need for travel. In short, it is a facility designed to deliver training and employment opportunities located within the population area it serves with consequent benefits for wellbeing.</p>

No. 128	Ref. & Name/ Group:	LCC-C62-128 Tom Phillips & Associates on behalf of Johnson & Johnson
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Zoning: Johnson & Johnson control c.50.3ha. of land over three sites in the National Technology Park (NTP).</p>	<p>1. Zoning: The main issue in relation to the request to change the Agriculture zone to High Tech/ Manufacturing Campus relates to flood risk.</p>

<p>The Draft Plan includes ‘High Tech/ Manufacturing Campus’ and ‘Agriculture’. Under the Castletroy Local Area Plan the lands are zoned ‘Enterprise and Employment’. This zoning should be retained.</p> <p>The strategy for future enterprise and employment opportunities is predicated on the continued zoning of lands to facilitate development. The RSES requires that existing employment centres that have capacity for further growth should be adequately facilitated. The road constraints corridor and de-zoning materially contravenes the regional objectives.</p> <p>In line with the Justification Tests of the Planning System and Flood Risk Management Guidelines, the lands are identified in the RSES as a ‘future strategic employment location’, comprises previously developed lands and will be essential in achieving compact and sustainable urban growth by facilitating the growth of a significant employer. The reduction in the quantum of lands zoned High Tech/Manufacturing Campus is contrary to the identification of the site as a Strategic Employment Location as set out in the RSES.</p> <p>The Technical Flood Report sets out that the NTP lands are defended by a flood embankment that envelops the site and protects it to the 1% AEP standard from the Mulkear and Shannon Rivers. This is not correctly represented by</p>	<p>-Flood Risk: The Planning and Development Act 2000 (as amended) requires the preparation of the Development Plan in accordance with Section 28 Ministerial Guidelines and the carrying out of a Strategic Flood Risk Assessment (SFRA) to assess flood risk within the plan area.</p> <p>The lands are located within Flood Zones A (high probability of flooding) and B (moderate probability of flooding). Section 3.5 of the Flood Guidelines indicates that development in this zone should be avoided and/or only considered in exceptional circumstances, such as in city and town centres, or in the case of essential infrastructure that cannot be located elsewhere and where the Justification Test has been applied.</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. However, in this instance it is noted that the National Technology Park is identified as a Strategic Employment Location in the MASP. The underutilised lands would facilitate expansion of the existing Johnson & Johnson development and there are no alternative lands for the expansion of the existing facility. On this basis the lands pass the Justification Test as set out in the SFRA. It is therefore recommended that an element of these lands be re-zoned to High Tech/ Manufacturing Campus. Development on these lands will require all flood mitigation measures to first be put in place prior to any construction works. An objective to this effect is recommended.</p>
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the final CFRAM flood mapping, which did not include survey details of the existing flood berm. The CFRAM mapping incorrectly represents fluvial flood risk and should not be used to inform land use zoning. Flooding in the NTP is pluvial and caused by difficulties with the existing surface water drainage system, which can be solved through appropriate engineering design. The design of the existing flood berm (which protects the site to the 1% AEP standard) can be augmented with the post-development condition increasing the level of flood protection to the 0.2% AEP standard with 500mm freeboard. This provides a fluvial flood defence that will permit future development. The fluvial flooding from the existing surface water drainage system can be resolved through augmentation, realignment and extension of the existing raised berm and surface water improvements. The berm will provide flood defences and facilitate a future road connection to the LNDR and UL Bohs.

2. LNDR: The extent of the Limerick Northern Distributor Road (LNDR) constraints area is unwarranted. There is a clear and sustainable planning rationale to reduce the size of this area, while delivering the link to the LNDR.

The constraints area impacts on the ‘High Tech/Manufacturing Campus’ zoning. The map in the Draft Plan does not correctly represent the footprint of the existing structures at the subject lands.

2. LNDR: The LNDR project has advanced to Stage 2 Appraisal. Amending or reducing the constraint area associated with this road project is not feasible, until such time as a detailed and preferred route corridor emerges from the study. The Local Authority understand that the area shown is indicative only and will be significantly smaller in the final design phase when the extent of the area needed to incorporate the road is fully known. However, amending or reducing the constraint area would mean revisiting the entire study. On this basis a reduction in the constraints area is not recommended.

Chief Executive’s Recommendations	
<p>1. -Change an element of the zoning of lands from Agriculture to High Tech/ Manufacturing Campus at the National Technology Park, Castletroy.</p> <p>-Amend Objective CAF O21 Identified Flood Risk to include the following: d) No works including the undertaking of ground level changes shall commence on the lands in the National Technology Park subject to flood risk, until all flood mitigation measures have been put in place.</p> <p>2. No change.</p>	
SEA/ AA Response	
It is essential that only the portion of the lands that are referred to as a Strategic Employment location are included in the zoning, this would ensure compliance with both the Higher tier MASP and The Planning System and Flood Risk Management. A Plan Making Flood Justification test has been carried out and a site-specific risk assessment should also be prepared.	

No. 270	Ref. & Name/ Group:	LCC-C62-270 Fehily Timoney & Company on behalf of IDA Ireland
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Zoning: To retain the existing zoning of the IDA landbank at the National Technology Park as Enterprise and Employment (or High Tech/ Manufacturing Campus) rather than Agriculture.</p> <p>The lands are located at the north of the NTP and consist of approximately 31ha. The strategic importance of the lands is set out including the RSES content regarding the importance of the NTP.</p>	<p>1. Zoning: The content of the submission received is noted. See Response to Flood Risk under Submission No. 128 above.</p>

	<p>The submission demonstrates how maintaining the site for ‘Enterprise and Employment’ use complies with the Flood Risk Management Guidelines and outlines the content of Circular PL 2/2014. A flood mitigation plan has been developed, including upgrade of the flood defence berm and drainage. A Technical Response demonstrates the effectiveness of the existing berm and proposed works. The works intend to partially retain the existing berm with a new berm constructed behind and benched into the existing. The benefits of this solution have been outlined. New sections of berm will be constructed around the Johnson and Johnson site and to provide additional flood capacity along the River Mulkear. Following planned flood mitigation measures, the subject site will be defended against a 1 in 1000-year fluvial flood event.</p>	
Chief Executive’s Recommendations		
<p>1. -Change an element of the zoning of lands from Agriculture to High Tech/ Manufacturing Campus at the National Technology Park, Castletroy.</p> <p>-Amend Objective CAF O21 Identified Flood Risk to include the following: d) No works including the undertaking of ground level changes shall commence on the lands in the National Technology Park subject to flood risk, until all flood mitigation measures have been put in place.</p>		
SEA/ AA Response		
<p>is essential that only the portion of the lands that are referred to as a Strategic Employment location are included in the zoning, this would ensure compliance with both the Higher tier MASP and The Planning System and Flood Risk Management. A Plan Making Flood Justification test has been carried out and a site-specific risk assessment should also be prepared.</p>		

No.	Ref. & Name/ Group:	LCC-C62-129 Residents Association – Greenpark
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129	<p>Submission/ Observation Summary</p> <p>1. Masterplan: The old racecourse (Greenpark) has been subject to a number of planning applications and currently an SHD. There is a piecemeal approach to this brownfield site. There is little reference to this area in the Draft Plan. It would appear opportune to prepare and adopt a Masterplan for this area to give clarity to developers and residents in relation to future development, including access arrangements. This should be identified as an opportunity brownfield site, representing a substantial portion of the undeveloped land in the city, subject to the Local Infrastructure Housing Activation Fund.</p>	<p>Chief Executive’s Response</p> <p>1. Masterplan: The content of the submission received is noted. The main issue in relation to the development of these lands relates to Flood Risk. The proposed zoning objectives for these lands reflect the identified flood risk in this area. However, given the substantial undeveloped landbank at this location, it is considered reasonable that a masterplan should be agreed with the Planning Authority prior to the lodgement of a planning application. The Masterplan should include a conceptual layout, infrastructure and phasing details.</p> <p>It is also considered that Objective CGR O3 Urban Lands and Compact Growth should be amended in order to ensure a coherent and sustainable development strategy for large scale sites, including those in multiple ownership.</p>
<p>Chief Executive’s Recommendations</p>		
<p>1. A) Amend Objective ECON O13 to remove part C and D and include in a new Objective ECON OXX with additional text as follows:</p> <p>Ensure development on the ‘High Tech/Manufacturing’ zoned lands to the west of Raheen Business Park shall be subject to the following:</p> <ul style="list-style-type: none"> ●— Cognisance to the residential amenities of the properties to the north and western side of the site and the adjacent agricultural land; ●— Access to the ‘High Tech/Manufacturing’ zoned land to the west of the R510 will be limited to the existing roundabout to the east of the site; ●— Applications for development in the low lying area in the southern section of this zone shall have regard to the attenuation infrastructure and shall include a Site Specific Flood Risk Assessment, including proposals to mitigate and control the level of run off and attenuation. 		

~~B) Ensure the provision of a minimum 20m landscaped buffer zone between proposed development and adjoining development/lands in Annacotty Business Park, Northside Business Park and the ‘High Tech/Manufacturing’ zoned lands to the west of Raheen Business Park.~~

Objective ECON OXX Specific Site Requirements: It is an objective of the Council to:

A) Ensure development on the ‘High Tech/Manufacturing’ zoned lands to the west of Raheen Business Park shall be subject to the following:

- Cognisance to the residential amenities of the properties to the north and western side of the site and the adjacent agricultural land;
- Access to the ‘High Tech/Manufacturing’ zoned land to the west of the R510 will be limited to the existing roundabout to the east of the site. Limited access maybe be provided off the Patrickswell Road;
- Applications for development in the low-lying area in the southern section of this zone shall have regard to the attenuation infrastructure and shall include a Site-Specific Flood Risk Assessment, including proposals to mitigate and control the level of run off and attenuation.

B) Ensure the provision of a minimum 20m landscaped buffer zone between proposed development and adjoining development/lands in Annacotty Business Park, Northside Business Park and the ‘High Tech/Manufacturing’ zoned lands to the west of Raheen Business Park.

C) Require the preparation of a Masterplan for the Enterprise and Employment zoning at the former racecourse lands at Greenpark. The Masterplan shall include a conceptual layout, infrastructure and phasing details.

B) Amend Objective CGR O3 Urban Lands and Compact Growth under Chapter 10 Compact Growth and Revitalisation as follows:

(d) Require ~~multiple~~ owners of large-scale urban sites to develop a masterplan for the coherent and sustainable development of such lands, addressing issues of the sustainable use of available lands, preservation of existing residential amenity, access, urban design and connectivity. These Masterplans shall set out the framework for the sustainable, phased and managed development of a particular area. The Masterplan should include the written consent of all landowners where applicable, a conceptual layout, infrastructure proposals including any consultation with service providers and phasing details.

SEA/ AA Response

The preparation of master plans for these areas will provide an opportunity for more coherent planned development and an opportunity to secure benefits for both the amenity of their local areas and local ecology, through adequate design layout and landscape design.

No. 139	Ref. & Name/ Group:	LCC-C62-139 Coakley O’Neill on behalf of Circle K Energy Group Ltd.	
	Submission/ Observation Summary		Chief Executive’s Response
	1. Zoning: The submission endorses the zoning of Thomond Service Station as a Local Centre reflecting its function at this location.		1. Zoning: The content of the submission received is noted.
	Chief Executive’s Recommendations		
	1. No change.		
	SEA/ AA Response		
N/A			

No. 143	Ref. & Name/ Group:	LCC-C62-143 Cormac Finn	
	Submission/ Observation Summary		Chief Executive’s Response
	1. Zoning: The owners support the proposal that the 5 acres of land identified in Monaleen, Castletroy, be zoned ‘New Residential’ as outlined in the Draft Limerick Development Plan.		1. Zoning: The content of the submission received is noted.
	Chief Executive’s Recommendations		
	1. No change.		
	SEA/ AA Response		
N/A			

No. 147	Ref. & Name/ Group:	LCC-C62-147 HRA PLANNING on behalf of Mary Hannon	
Submission/ Observation Summary		Chief Executive’s Response	
<p>1. Zoning: This submission relates to 11.3ha. of lands at Clonmacken and requests:</p> <p>a) A change in zoning from Agricultural (6.3 hectares) to Enterprise and Employment and;</p> <p>b) An increase in New Residential zoning from 2.68 hectares to 3.1 hectares.</p> <p>The submission outlines the suitability of the site for development in the context of the Development Plan, with particular reference to:</p> <p>-A comprehensive Site-Specific Flood Risk Assessment (SSFRA) has been prepared which demonstrates that the site is at a low risk of flooding and can be sustainably developed provided the residual risk of coastal flooding is addressed by implementing the mitigation measures proposed. With the implementation of the said measures, appropriately zoned development on the eastern portion of the site can be delivered at low risk of flooding and will not increase the risk of flooding to adjacent or nearby areas.</p> <p>-The need to plan for compact growth and accommodate a sequential approach.</p>		<p>1. Zoning: The content of the submission received is noted. The main issue in relation to the zoning of these lands relates to flood risk.</p> <p>-Flood Risk: The Planning and Development Act 2000 (as amended) requires the preparation of the Development Plan in accordance with Section 28 Ministerial Guidelines. In accordance with The Planning System and Flood Risk Management, Guidelines for Planning Authorities (the Guidelines), a Strategic Flood Risk Assessment (SFRA) has been prepared to assess flood risk within the plan area.</p> <p>In order to achieve the aims and objectives and comply with the requirements of the Guidelines, the Local Authority’s approach to the zoning of land is to avoid development in areas at risk, where possible and substitute less vulnerable uses, where avoidance is not possible. A precautionary approach will be applied, where necessary to reflect uncertainties in flooding datasets and assessment techniques and the ability to predict the future climate and performance of flood defences.</p> <p>In accordance with Section 2.25 of the Guidelines, the presence of flood protection structures should be ignored in determining flood zones. This is because areas protected by flood defences still carry a residual risk of flooding from overtopping or breach of defences and</p>	

<p>-The lack of alternative, available sites for development within/adjoining the Jetland District Centre.</p> <p>-Proposals to develop a Primary Care Centre on lands adjoining the site to the north will provide direct access to the lands, inclusive of services.</p> <p>-Availability of services and public transport.</p> <p>The approach proposed in the Draft Plan, which includes the provision of agricultural zoning in the middle of Limerick city, surrounded by residential development and a district centre is not promoting a viable landuse and is not making the most efficient use of scarce urban land, particularly given its location just 1,900m from the city centre zone.</p> <p>Whilst it is acknowledged that residential use may not be appropriate on the part of the site subject to flooding, agricultural use is also not appropriate or sustainable, given the limited area of land isolated from other agricultural land and surrounded by urban development. The land is particularly suitable for a development purpose.</p>	<p>the fact that there may be no guarantee that the defences will be maintained in perpetuity.</p> <p>The lands are located within Flood Zones A (high probability of flooding). Section 3.5 of the Flood Guidelines indicates that development in this zone should be avoided and/or only considered in exceptional circumstances, such as in city and town centres, or in the case of essential infrastructure that cannot be located elsewhere and where the Justification Test has been applied.</p> <p>Highly and less vulnerable uses are only appropriate if a Justification Test is passed. In considering the Justification Test it should be noted that in order to achieve Compact Growth, the Draft Plan takes a City Centre first approach to the spatial development of Limerick City and Environs. The core is defined as the area zoned “City Centre”. Furthermore, Part 2 of the Justification Test requires the Local Authority to consider a number of factors, including whether the site is located within the core, or if there are 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 Plan has zoned sufficient alternative residential and employment lands to meet the requirements of the Core Strategy, in areas that are not at risk of flooding and suitable for the provision of highly vulnerable uses in accordance with the sequential approach of the Guidelines. The Justification Test does not pass, it is recommended that these lands are not included for residential or employment zoning.</p>
<p>Chief Executive’s Recommendations</p>	

	1. No change.
	SEA/ AA Response
	N/A

No. 149	Ref. & Name/ Group:	LCC-C62-149 John Spain Associates on behalf of Clancourt
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Zoning: This observation relates to 30.8 hectares at Dooradoyle, including the Crescent Shopping Centre. The submission requests:</p> <ul style="list-style-type: none"> -A change in zoning from Semi Natural Open Space to Enterprise and Employment (primarily offices); -A specific map-based objective for a Masterplan or Framework Plan; -Designation of the Crescent Centre and adjoining lands as a Strategic Employment Location. <p>The submission sets out the national, regional and local level planning context. The submission includes a sequential analysis of lands within the City and suburbs considering brownfield, infill, outward expansion and public transport. The observer’s lands are a consolidation infill opportunity, at a gateway between the City and Dooradoyle, would enable linkages across the N18 dual carriageway and Ballinacurra Creek and would develop the</p>	<p>1. Zoning: The content of the submission received is noted. The main issue in relation to the zoning of these lands relates to flood risk.</p> <p>-Flood Risk Assessment: The Planning and Development Act 2000 (as amended) requires the preparation of the Development Plan in accordance with Section 28 Ministerial Guidelines. In accordance with The Planning System and Flood Risk Management, Guidelines for Planning Authorities (the Guidelines), a Strategic Flood Risk Assessment (SFRA) has been prepared to assess flood risk within the plan area.</p> <p>In order to achieve the aims and objectives and comply with the requirements of the Guidelines, the Local Authority’s approach to the zoning of land is to avoid development in areas at risk, where possible and substitute less vulnerable uses, where avoidance is not possible. A precautionary approach will be applied, where necessary to reflect uncertainties in flooding datasets and assessment</p>

<p>City and County areas in a sequential manner. The lands provide a key link on a public transport corridor linking the employment locations of Raheen, University Hospital and the Crescent Centre to the City Centre, which would be enhanced by a commuter rail line to Mungret. The lands meet all the criteria for a strategic employment site under the MASP. Office vacancy rates are the lowest on record, with supply at lowest since 2007. Lands should be designated for employment uses at appropriate locations on public transport corridors.</p> <p>-Flood Risk: A number of flood risk assessments and justification tests have been commissioned which demonstrate that:</p> <ul style="list-style-type: none"> • Under the Plan-Making and Development Management Justification Tests, the proposed development is appropriate and sequentially favourable. • The Strategic Flood Risk Assessment Report demonstrates that works on lands within the sole control of Clancourt would provide a solution to the flood risk on all of Clancourt's lands and not cause risk to other lands, by restoring the existing embankment to the 1 in 200-year design standard. <p>The only potential flow paths from a breach outside of Clancourt lands is limited to a 480m length of embankment south of the N18 and west of the R536. For flood waters to</p>	<p>techniques and the ability to predict the future climate and performance of flood defences.</p> <p>In accordance with Section 2.25 of the Flood Guidelines, the presence of flood protection structures should be ignored in determining flood zones. This is because areas protected by flood defences still carry a residual risk of flooding from overtopping or breach of defences and the fact that there may be no guarantee that the defences will be maintained in perpetuity.</p> <p>The lands are located within Flood Zones A (high probability of flooding), B (moderate probability of flooding) and partly within Flood Zone C. Section 3.5 of the Flood Guidelines indicates that development in Flood Zones A and B should be avoided and/or only considered in exceptional circumstances, such as in city and town centres, or in the case of essential infrastructure that cannot be located elsewhere. In all cases, the Justification Test for development plans must be applied and passed. Table 3.1 of the Flood Guidelines makes a distinction between various land uses, where residential is considered a ‘highly vulnerable development’ and commercial is a ‘less vulnerable development’. Highly and less vulnerable uses are only appropriate in Flood Zone A if the Justification Test is passed. The Justification Test also needs to be passed for highly vulnerable development in Flood Zone B.</p> <p>Development within Flood Zone C, such as the carpark around the Crescent Shopping Centre, is considered appropriate in accordance with the Flood Guidelines and would not be subject to the</p>
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<p>reach the Clancourt lands, a large breach would have to occur in conjunction with a flood event in excess of a 1 in 50 year return period. The FRA includes detailed modelling. Development of the lands is not reliant on the Flood Relief Scheme, but Clancourt may consider part investing in the improvement works to advance them quicker if required as a clause of any zoning.</p> <p>The proposals relate to less vulnerable, commercial uses. The Plan Making Justification Tests include a number of comparable sites determined to pass the Test for less vulnerable use. Greenpark has Enterprise and Employment zoning. The Clancourt lands are other lands available in a sequentially favourable location, which would achieve compact growth and economic targets and are protected by comparable embankments. The submission seeks an equitable assessment, inclusion of lands covered by the Dooradoyle Framework Plan and a specific objective for the flood defence works set out in the Arup report.</p> <p>The development would allow provision for a major upgrade to existing open space areas and improve access to inaccessible areas along the creek, while addressing the physical barriers of the river, rail line and N18.</p>	<p>Justification Test. There is significant capacity to accommodate growth within this area of the site.</p> <p>In considering the Justification Test, it should be noted that in order to achieve Compact Growth, the Draft Plan takes a City Centre first approach to the spatial development of Limerick City and Environs. The core is defined as the area zoned “City Centre”. Furthermore, Part 2 of the Justification Test requires the Local Authority to consider a number of factors, including whether the site is located within the core, or if there are 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 Plan has zoned sufficient alternative employment lands, in areas that are not at risk of flooding and suitable for the provision of highly vulnerable uses in accordance with the sequential approach of the Guidelines. For this reason, the Justification Test has not been passed and it is recommended that these lands are not included for Enterprise and Employment zoning.</p> <p>In relation to Part 3 of the Justification Test, a flood risk assessment has been carried out within the SFRA. In this case, an assessment of immediate risks has been carried out, which sees a high risk of breach associated with the existing embankments and resulting high depth of flooding should breach occur. Furthermore, within the Shannon CFRAM, this was identified as a source of flood risk and was highlighted within the Flood Risk Management Plan. The embankments and associated flood protection are now within the scope of the Limerick Flood Relief Scheme, which has been</p>
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	<p>2. Framework/ Masterplan: To support the zoning objective, the submission requests a Framework or Masterplan objective for the Dooradoyle District Centre and Dooradoyle Urban Quarter as follows:</p>	<p>progressed as a partnership project between OPW and Limerick City and County Council. Inclusion of an objective to fast track the flood relief scheme to accommodate the zoning of these lands is not appropriate and could affect the achievement of the overall scheme. Pending the completion of the flood relief scheme the zoning of these lands are considered premature. However, the Local Authority acknowledge that on completion of the flood relief scheme the potential for development of the lands can be re-appraised on foot of an appropriately detailed site specific flood risk assessment.</p> <p>It is noted that Limerick’s Dock Road has been identified as a key employment and enterprise location under the MASP, which acknowledges the significant potential of this area of the City for economic development. The lands at Greenpark, off the Dock Road, is also within Flood Zone A and B, but supports the expansion and consolidation of the Strategic Employment Location of the Dock Road. These lands are also essential for the provision of lands for employment uses which cannot be accommodated in the City Centre (warehousing, logistics etc.). The undeveloped area at Greenpark consolidates the existing built up area between the City Centre and the natural boundary presented by the Ballinacurra Creek and N18. These greenfield and brownfield lands are therefore essential to facilitate expansion and compact growth of Limerick City.</p> <p>2. Framework/ Masterplan: The content of the submission received is noted. Given that the lands are not recommended for zoning on</p>
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<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, retail services and supporting development. • To promote improvements to connectivity, signage and permeability within the wider area including pedestrian and cycle facilities linking to Portland Park 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. • To facilitate the early upgrading of the existing flood defence infrastructure, thus ensuring the long-term flood protection of the wider lands in Dooradoyle in a manner compatible with any future City Wide Flood Relief Scheme. • Any application on lands at risk of flooding to be accompanied by a Site Specific Flood Risk Assessment which shall demonstrate that any development does not result in additional significant flood risk in the area and does not impede the future delivery of a wider flood relief scheme for Limerick. • An overall framework plan/ masterplan is to be prepared for the lands in advance or as part of any 	<p>the basis of flood risk the inclusion of a specific objective to support the development of these lands is not considered warranted.</p>
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<p>application for a portion of the currently undeveloped lands.</p> <p>3. Strategic Employment Location: The three workplace clusters of Raheen Business Park, University Hospital Limerick and at Dooradoyle need to build on the existing assets rather than seeking new employment locations. There is an emerging employment cluster around the Crescent Centre, with potential to accommodate new office developments (2,000 jobs), including a Tech Hub and enhance this strategic employment location on the public transport corridor. The District Centre provides a significant employment role. The existing surface level car parking is subject to agreements/ tenant requirements that do not allow for development in the short term. An expansion in zoning is therefore required. The submission requests that the Centre and adjoining lands be designated as a strategic employment location.</p> <p>4. Retail: To ensure the Crescent Centre can continue to trade successfully, compete with other district centres and retail destinations in other cities and not lose trade out of Limerick, the Centre needs constant upgrading and extension. The Draft Plan should make further provision for incremental increases in retail floor space at the Crescent given its important role in the retail hierarchy and permit reconfigurations of existing units based on occupier</p>	<p>3. Strategic Employment Location: 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 MASP as Strategic Employment Locations.</p> <p>The Draft Plan supports opportunities for employment creation, business and technology development in the Southern 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.</p> <p>On the basis of the above, a specific map based objective identifying the area as a strategic employment location is not recommended.</p> <p>4. Retail: As set out under Policy ED 13 of the Draft Plan, ‘It is the policy of the Council to.....: In relation to Dooradoyle (Crescent Shopping Centre): a) It is the policy of the Council to encourage reinvestment, upgrading and limited expansion of retail floorspace within the Crescent Shopping Centre, where it does not alter its role and function with respect to Limerick City Centre and the retail hierarchy; b) Allow additional floorspace for ancillary facilities such</p>
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	<p>requirements. Additional convenience floorspace is also required.</p> <p>5. Connectivity: The lands are well served by existing bus services and proposed high priority bus routes and cycle routes in LSMATS. The Dooradoyle Urban Quarter Framework Plan focuses on improving access and permeability by active modes. The proposed Mungret Greenway is within the scheme and new pedestrian/ cycle connectivity is proposed over the N18 to connect Ballinacurra Gardens with Dooradoyle via Portland Park.</p>	<p>as banks and other financial services, restaurants and public houses, offices and leisure, social and community uses’.</p> <p>On the basis of the above, the Joint Retail Strategy enables the upgrade and limited expansion of the retail floorspace at the Crescent.</p> <p>5. Connectivity: The content of the submission received is noted.</p>
Chief Executive’s Recommendations		
1 – 5: No change		
SEA/ AA Response		
N/A		

No. 150	Ref. & Name/ Group:	LCC-C62-150 Coakley O’Neill Town Planning on behalf of Circle K
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Zoning: The observation is requesting a change in zoning from Enterprise and Employment to City Centre at the Circle K Service Station on the Dock Road.</p> <p>A City Centre zoning objective should be applied to the site, directly adjoining the City Centre zone and part of the</p>	<p>1. Zoning: The content of the submission received is noted.</p> <p>The subject lands comply with the compact and sustainable growth objectives of the National Planning Framework, given the site location within walking distance of the city centre, accessibility by sustainable modes of transport and its location next to the City</p>

<p>established city center resource, in close proximity to residential estates on Saint Alphonsus Street and proposed population and employment areas. Planning permission has been granted on the adjoining site for a Lidl store. The site forms part of the retail resource of the city and supports vitality and viability.</p> <p>The site is in an area ripe for redevelopment for higher order uses of greater density, addressing the low value uses and the underutilization of prime brownfield lands.</p> <p>The Enterprise and Employment use does not reflect the nature of the established and permitted service station retail use and restricts the nature of the existing retail use, despite being on the boundary of the city centre zone.</p>	<p>Centre zoning. On this basis it is recommended that the 0.25ha. of lands be rezoned from Enterprise and Employment to City Centre.</p>
Chief Executive’s Recommendations	
<p>1. Change the zoning of 0.25ha. of lands from Enterprise and Employment to City Centre on the Dock Road.</p>	
SEA/ AA Response	
<p>The change in land use zoning to City Centre at this location, reflects both the importance of its location and also facilitate the development of uses that would be compliant with this zoning type. Having regard to the location of the site and the use on site, it is considered appropriate to amend the use. This is in line with higher tier plans such as the RSES and the NPF which place an emphasis on compact and orderly urban development.</p>	

No. 154	Ref. & Name/ Group:	LCC-C62-154 Coakley O’Neill Town Planning on behalf of Circle K
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Zoning: The submission relates to the former Terminal site of 3.84ha. on the Dock Road and requests the</p>	<p>1. Zoning: The content of the submission received is noted. The Draft Plan includes a limited number of Mixed-Use zones to reflect</p>

<p>proposed Enterprise and Employment zoning be reverted to Mixed Use.</p> <p>The submission details the planning history and characteristics of the site, its brownfield nature, vacancy, single use ownership, positive strategic location and future redevelopment potential as a large urban regeneration site, promoting compact growth. The submission also sets out the national, regional and local policy context to support the re-zoning.</p> <p>The current Limerick City Development Plan, recognises the potential of the Docklands area to provide substantial employment, greenfield and urban renewal opportunities. The land presents an opportunity for high intensity, high quality mixed use development to include new residential uses.</p> <p>The site is located within Flood Zones A and B. The Flood Risk Management Guidelines set out the types of development appropriate to each flood zone and requiring a Justification Test.</p> <p>The zoning of the lands is contrary to the housing crisis and the Government’s Housing for All plan committing to the delivery of 33,000 units per year to 2030. The Enterprise and Employment zone restricts residential use and conflicts</p>	<p>specific site proposals only. In accordance with the Draft Development Plan Guidelines for Planning Authorities, the Draft Plan is moving towards a standardised national set of zoning objectives. In this regard, the provision of additional mixed use zoned sites is not recommended.</p> <p>With respect to the request to zone the lands to allow a primarily residential development, the main issue in relation to this site is flood risk as set out below:</p> <p>-Flood Risk: The Planning and Development Act 2000 (as amended) requires the preparation of the Development Plan in accordance with Section 28 Ministerial Guidelines. In accordance with The Planning System and Flood Risk Management, Guidelines for Planning Authorities (the Guidelines), a Strategic Flood Risk Assessment (SFRA) has been prepared to assess flood risk within the plan area.</p> <p>In order to achieve the aims and objectives and comply with the requirements of the Guidelines, the Local Authority’s approach to the zoning of land is to avoid development in areas at risk, where possible and substitute less vulnerable uses, where avoidance is not possible. A precautionary approach will be applied, where necessary to reflect uncertainties in flooding datasets and assessment techniques and the ability to predict the future climate and performance of flood defences.</p>
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<p>with the Draft Plan which recognises the potential of the Docklands as a major employment and residential quarter.</p> <p>The lands are not located within Limerick Docklands as defined by the Framework Strategy. A large commercial zoning across the extent of the docklands area is not appropriate. Some residential elements should be included. The site is vacant and adjoined by residential, local centre and educational uses, presenting a unique opportunity for residential uses supporting compact growth and use of underutilised lands in accordance with the NPF and MASP.</p> <p>The submission outlines the housing supply shortage, supply issues and population growth targets in Limerick. The re-zoning of these lands to Enterprise and Employment undermines the achievement of housing targets.</p>	<p>The lands are located within Flood Zones A (high probability of flooding) and B (moderate probability of flooding). Section 3.5 of the Flood Guidelines indicates that development in this zone should be avoided and/or only considered in exceptional circumstances, such as in city and town centres, or in the case of essential infrastructure that cannot be located elsewhere and where the Justification Test has been applied. Table 3.1 of the Flood Guidelines makes a distinction between various land uses, where residential is considered a ‘highly vulnerable development’ and commercial is a ‘less vulnerable development’.</p> <p>Highly vulnerable uses including residential are only appropriate if a Justification Test is passed. In considering the Justification Test it should be noted that in order to achieve Compact Growth, the Draft Plan takes a City Centre first approach to the spatial development of Limerick City and Environs. The core is defined as the area zoned “City Centre”. Furthermore, Part 2 of the Justification Test requires the Local Authority to consider a number of factors, including whether the site is located within the core, or if there are 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 Plan has zoned sufficient alternative residential lands to meet the requirements of the Core Strategy, in areas that are not at risk of flooding and suitable for the provision of highly vulnerable uses in accordance with the sequential approach of the Guidelines. The Justification Test does not pass, it is recommended that these lands are not included for Mixed Use zoning.</p>
<p>Chief Executive’s Recommendations</p>	

	1. No change.
	SEA/ AA Response
	N/A

No. 156	Ref. & Name/ Group:	LCC-C62-156 Lioncor Developments on behalf of 1 Walkers Limerick Land Limited	
	Submission/ Observation Summary		Chief Executive’s Response
	1. Zoning: The submission relates to a site in Newtown, Castletroy. The owners support the proposed ‘Existing Residential’ zoning and requests that this zoning is adopted. The site is currently undeveloped and has the benefit of planning permission for residential development. It is intended to implement the permission as it applies to the subject site.		1. Zoning: The content of the submission received is noted.
	Chief Executive’s Recommendations		
	1. No change.		
	SEA/ AA Response		
	N/A		

No. 159	Ref. & Name/ Group:	LCC-C62-159 McCarthy Keville O’Sullivan Ltd on behalf of Clonmacken Partnership Ltd.	
	Submission/ Observation Summary		Chief Executive’s Response
	1. Zoning: The submission requests the re-zoning from Agriculture to Residential zoning of 4ha. in Clonmacken, south of the Clondell Road.		1. Zoning: The content of the submission received is noted. The main issue in relation to the zoning of these lands is flood risk as set out below.

The submission gives an overview of the site and detailed description of its location, including the established residential nature of the area, the sustainable transport options connecting the site to the City Centre and Jetland District Centre. The submission notes the current residential zoning objective of the site in the Limerick City Development Plan 2010-2016 as extended. The submission notes how the site is subject to SHD discussions (Ref: ABP-3111114-21).

-Flood Risk: The submission includes a Site Specific Flood Risk Assessment by Hydro Environmental Consultants. Due to the topography of the site and its proximate location to the River Shannon, there are elements of the site located within Flood Zone A and B. Much of this site lies above 4.71m OD Malin, which is safe for residential development. It is possible to carry out enabling works which would bring much more of the site out of the at-risk zones and into Zone C and safe for residential development. The site to the east is currently being developed for residential and extends into both Flood Zones A and B.

A justification test for the development of these lands to provide new residential units was carried out and determined that the development, as proposed, is suitably justified.

-Flood Risk: The Planning and Development Act 2000 (as amended) requires the preparation of the Development Plan in accordance with Section 28 Ministerial Guidelines. In accordance with The Planning System and Flood Risk Management, Guidelines for Planning Authorities (the Guidelines), a Strategic Flood Risk Assessment (SFRA) has been prepared to assess flood risk within the plan area.

In order to achieve the aims and objectives and comply with the requirements of the Guidelines, the Local Authority’s approach to the zoning of land is to avoid development in areas at risk, where possible and substitute less vulnerable uses, where avoidance is not possible. A precautionary approach will be applied, where necessary to reflect uncertainties in flooding datasets and assessment techniques and the ability to predict the future climate and performance of flood defences.

The Flood Zone maps have been developed using the most appropriate and up to date data available for Limerick City and County at the time of preparing the Development Plan. The Flood Zone maps have been created specifically to inform the application of the Justification Test for Plan Making and to guide development policy within the County and have been through several iterations of review and are considered fit for purpose. The Flood Risk Assessment submitted does not warrant a change of zoning.

	<p>2. Core Strategy/ Population growth: The submission outlines significant concern that the plan does not go far enough in predicting future residential growth of the city</p>	<p>The lands are located within Flood Zones A (high probability of flooding) and B (moderate probability of flooding). Section 3.5 of the Flood Guidelines indicates that development in this zone should be avoided and/or only considered in exceptional circumstances, such as in city and town centres, or in the case of essential infrastructure that cannot be located elsewhere and where the Justification Test has been applied.</p> <p>Highly vulnerable uses including residential are only appropriate if a Justification Test is passed. In considering the Justification Test it should be noted that in order to achieve Compact Growth, the Draft Plan takes a City Centre first approach to the spatial development of Limerick City and Environs. The core is defined as the area zoned “City Centre”. Furthermore, Part 2 of the Justification Test requires the Local Authority to consider a number of factors, including whether the site is located within the core, or if there are 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 Plan has zoned sufficient alternative residential lands to meet the requirements of the Core Strategy, in areas that are not at risk of flooding and suitable for the provision of highly vulnerable uses in accordance with the sequential approach of the Guidelines. The Justification Test does not pass, it is recommended that these lands are not included for New Residential zoning.</p> <p>2. Core Strategy/ Population growth: The core strategy sets out the projected population and household growth for Limerick in</p>
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and urban area, nor does it include sufficient amounts of zoned land for residential development. The submission refers to Chapter 10 Policy CSP P3 Availability of Land, noting that the Draft Plan is not ambitious enough in its overall proposed zoning of new residential.

3. Density: The submission requests that the proposed Density Zones as set out in Chapter 3 of the Draft Plan should be reviewed with those lands within the +35dph zones to be considered acceptable for developments of a density up to 45dph, given the provisions of National and Regional Policy in relation to densities, and the emerging proposed Bus Connects corridors, which will significantly improve the bus connections throughout the City and Environs.

accordance with the National Planning Framework (NPF) Implementation Roadmap and the Regional Spatial and Economic Strategy for the Southern Region (RSES) and also the Economic and Social Research Institute’s ‘Regional Demographics and Structural Housing Demand at a County Level’. The ESRI report sets out a forecast for an additional 15,591 residential units in Limerick, over the Plan period 2022 – 2028. The Draft Plan has zoned in excess of the amount of land required to facilitate the proposed population and household growth. Therefore sufficient lands have been zoned in the City and Environs to adequately cater for the allocated growth over the lifetime of the Draft Plan 2022 – 2028.

3. Density: Density policies in the Draft Plan have been prepared in accordance with current Section 28 Guidelines. Such guidelines include “Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities”, 2009, “Sustainable Urban Housing, Design Standards for new Apartments – Guidelines for Planning Authorities”, 2020 and “Urban Development and Building Height Guidelines”, 2018.

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.

		The Density Zones set out minimum density standards only and do not include maximum densities in a particular zone. In this regard, all planning applications will be assessed on a case by case basis on their merits and subject to compliance with all relevant planning criteria and Development Management Standards.
	Chief Executive’s Recommendations	
	1 - 3: No change.	
	SEA/ AA Response	
	N/A	

No. 162	Ref. & Name/ Group:	LCC-C62-162 MKO on behalf of Seabreeze/David Fitzgerald and Family
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Zoning: This submission relates to 33.4ha. at Ballysimon House, Commons Road, Ballysimon and requests the zoning of land or a site-specific objective for a Data Centre.</p> <p>This submission outlines the benefits of a data centre to the economy. The submission seeks a site-specific zoning objective for a Data Centre on Commons Road, Ballysimon and outlines the suitability of the site with respect to connectivity, infrastructure, topography, tree coverage, proximity to the City, and the absence of physical, heritage, environmental, landscape or visual constraints. The submission outlines the national, regional and local planning context for development of a data centre.</p>	<p>1. Zoning: The content of the submission received is noted.</p> <p>With respect to the request for the zoning of these lands for a Data Centre, it is noted that the OPR submission raises concerns in relation to the existing Enterprise and Employment Zones within the extremities of the settlement boundary, including at Raheen and Annacotty Business Parks, having regard to the ‘Guiding Principles to identify locations for Strategic Employment Development’ in the Draft Plan, and RPO 62 Locations for Employment Development of the RSES. On this basis the main issue in relation to the zoning of these lands relates to compact growth.</p> <p>-Compact Growth: Having regard to:</p>

		<p>-The National Planning Framework objectives to secure compact and sustainable growth under National Policy Objective 3and; -The Climate Action Plan 2019, which requires a reduction in car based transport and carbon emissions,</p> <p>The Planning Authority is required to take a sequential and compact approach to development, while increasing the integration of land use and sustainable modes of transport. This approach requires higher densities land uses within the established City and suburbs footprint and identification of strategically located greenfield sites, within walking distance of centres and accessible by public transport and other service infrastructure.</p> <p>The Draft Plan includes policies and objectives for compact growth, which require the development of brownfield and infill sites and the intensification of underutilised sites in accordance with Active Land Management Measures. This approach is essential to comply with the objectives of the National Planning Framework.</p> <p>Development on the edge of existing residential areas would not be sequential with the city first approach, exacerbating dependence on private based motorised transport and contributing to unsustainable patterns of development. Development of these lands would therefore be contrary to compact growth objectives, the Climate Action Plan objectives to reduce energy use, emissions and transition to a low carbon and climate resilient society and the requirements of Section 10(2)(n) of the Planning and Development Act in relation to climate action.</p>
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<p>2. Zoning Matrix: Data centres should be Generally Permitted on all land use zones.</p> <p>3. Objectives: It is requested that Objective ECON O24 is further expanded to include a <u>part C</u>, which would state: “c) Facilitate the development of Data Centres on <u>un-zoned lands</u> in appropriate locations and subject to normal planning, development and environmental controls and the assessment of the potential impact on such development on adjacent land uses”.</p> <p>The submission also requests including the following: Policy ECON O24-a: Ballysimon Data Centre:</p>	<p>Alternative zoned lands closer to the centre are available which comply with the compact growth, sustainable transport and climate mitigation objectives. On the basis of the above, it is recommended that these lands not be included for zoning.</p> <p>2. Zoning Matrix: The amendment of the Land Use Zoning Matrix for Data Centres to be Generally Permitted on all land use zones is not considered appropriate. In this regard, residential land is required for residential development in order to cater for projected population growth, while Education and Community lands are required to provide education and other supporting facilities for the growing population. The City Centre, District and Local Centres as well as Mixed Use zones are required to provide residential, retail, employment and service uses. The provision of data centres in every zone is therefore not considered appropriate.</p> <p>3. Objectives: It is not considered appropriate to expand ECON O24 Data Centres to permit such facilities on un-zoned lands. Such lands are usually removed from existing settlements, services and infrastructure and would be contrary to the objectives of the National Planning Framework to consolidate development through compact growth.</p>
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	<p>“It is an objective of Limerick City and County Council to facilitate the development of a data centre and all associated works on the lands at Ballysimon House in Ballysimon during the lifetime of this Development Plan”.</p>	
<p>Chief Executive’s Recommendations</p>		
<p>1 – 3. No change.</p>		
<p>SEA/ AA Response</p>		
<p>This is outside of the City and Environs Plan boundary and sets a poor precedent for the lack of coordinated orderly and compact development. They are not consistent with higher tier guidance, such as the NPF and the RSES, which seek to ensure that compact growth is achieved, in line with the principles of City first and also in compliance with the requirement of the NPF for the lands to be serviced or serviceable within the lifetime of the Plan. The lands are removed from the existing zoned lands and not served by sustainable transport options, which would lead to unsustainable traffic movements, which would be car dependent.</p>		

<p>No. 167</p>	<p>Ref. & Name/ Group:</p>	<p>LCC-C62-167 Healy Partners on behalf of Ceist</p>
<p>Submission/ Observation Summary</p>		<p>Chief Executive’s Response</p>
<p>1. Zoning: The submission requests the change of zoning of 0.75ha. from Open Space and Recreation to Education and Community at College Park, to accommodate expansion of Ardscoil Mhuire at its present location. The submission welcomes the zoning of the existing school site for Education and Community Infrastructure.</p> <p>The submission outlines previous efforts of the school to re-locate to build a new school, which was resisted due to the necessary for consolidated growth and the envisaged population growth of the City requiring associated education and community infrastructure. The submission</p>		<p>1. Zoning: The content of the submission received is noted.</p> <p>The provision of school infrastructure is supported through the objectives of Chapter 9, Sustainable Communities and Social Infrastructure of the Draft Plan. In particular, it is an objective (SCSI O9) of the Council to ‘a) Reserve lands to facilitate the delivery of new educational facilities, including extensions of existing schools in cooperation with the Department of Education’.</p> <p>The Local Authority will continue to collaborate with schools and the Department of Education and Skills to identify sites for future schools. The submission received from the Department as set out</p>

	<p>outlines current constraints to development on the existing site, including a flood zone, the adjacent SAC and lack of bus access from Pa Healy Road.</p>	<p>under the Community and Education theme, identifies the need to future proof the expansion of existing schools and provide for new schools. In this regard, the Department have identified a need for approximately 11 additional schools across the City and Environs.</p> <p>The change of zoning from Open Space to Education and Community is essential to future proof the expansion of the existing school and achieve the objectives for compact growth and sustainable communities. The lands have been identified at flood risk. A Justification Test for the proposed zoning has passed and is set out in Appendix I of this Chapter. The change of zoning of 0.75ha. from Open Space to Education and Community is therefore recommended.</p>
Chief Executive’s Recommendations		
<p>1. Change the zoning of 0.75ha. from Open Space to Education and Community at College Park.</p>		
SEA/ AA Response		
<p>The change in zoning does not encroach upon the nearby Lower River Shannon Special Area of Conservation site and is not regarded as having any significant ecological effects. The pattern of land use and any possible disturbance resulting from its long established in the area is not regarded as significant. The lands are located in close proximity to the residential areas, community facilities, public transport and contributes to compact growth in terms of its location. It is considered that the proposal is in line with national and regional policy in supporting the development of Limerick City and Environs and sustainable communities.</p>		

No. 169	Ref. & Name/ Group:	LCC-C62-169 Tom Philips & Associates on behalf of Snowvale Ltd.	
Submission/ Observation Summary		Chief Executive’s Response	
<p>1. Zoning: The submission seeks the inclusion within the Annacotty Business Park of an additional 40.15ha. of land comprising three parcels.</p>		<p>1. Zoning: The content of the submission received is noted. With respect to the request for the zoning of lands for Enterprise and Employment, it is noted that the OPR submission raises concerns in</p>	

<p>Annacotty Business Park is a Strategic Employment Location in the MASP of the RSES. The rationale put forward for the expansion of the park is as follows:</p> <ol style="list-style-type: none"> 1. All buildings and lands are fully let, with growing interest from investors and owners to secure additional accommodation, 2. The envisaged employment growth by the NPF and RSES for Limerick and the Southern Region, 3. The strategic location on the R506 and ease of access to M7, and 4. This business park is the only hub that caters for smaller businesses in Limerick. <p>The submission outlines the history, locational advantages and the range of uses and existing business types operating in the park employing 3,000 people in 54 companies. The submission outlines how the proposal satisfies the enterprise objectives of the NPF and RSES based on the principles of smart specialisation, clustering, place-making for enterprise, knowledge diffusion, and capacity building.</p> <p>The 7ha. expansion area allowed in the Draft Plan is fully let. The existing and additional lands sought would render the park only 84% the size of Askeaton Industrial Park. Annacotty Business Park should be the primary location for economic growth in Annacotty.</p>	<p>relation to the existing zoning at Annacotty Business Park, having regard to the ‘Guiding Principles to identify locations for Strategic Employment Development’ in the Draft Plan, and RPO 62 Locations for Employment Development of the RSES. The OPR have highlighted the potential of these lands to conflict with the principle of compact growth. On the basis of the above and having regard to undeveloped lands in the vicinity, the main issue with respect to the request to zone these lands outside of the settlement boundary for Enterprise and Employment relates to compact growth:</p> <p>-Compact Growth: Having regard to:</p> <ul style="list-style-type: none"> • The National Planning Framework objectives to secure compact and sustainable growth under National Policy Objective 3, including National Planning Objective 3b which aims to deliver at least 50% of all new homes within the existing built-up footprint of Limerick city and suburbs and the objectives to coordinate land use zoning, infrastructure and services under National Policy Objective 72a-c and; • The Climate Action Plan 2019, which requires a reduction in car based transport and carbon emissions, <p>The Planning Authority is required to take a sequential and compact approach to development, while increasing the integration of land use and sustainable modes of transport. This approach requires higher densities within the established City and suburbs footprint and identification of strategically located greenfield sites, within walking distance of centres and accessible by public transport and other service infrastructure.</p>
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	<p>The submission outlines the National, Regional and Local planning context in support of the request. The business park satisfies Objective ECO 013 Strategic Employment Location in the City and Environs.</p>	<p>The Draft Plan includes policies and objectives for compact growth, which require the development of brownfield and infill sites and the intensification of underutilised sites in accordance with Active Land Management Measures. This approach is essential to comply with the objectives of the National Planning Framework.</p> <p>Development on the edge of the city would not be sequential with the city first approach, exacerbating dependence on private based motorised transport and contributing to unsustainable patterns of development. Development of these lands would therefore be contrary to compact growth objectives, the Climate Action Plan objectives to reduce energy use, emissions and transition to a low carbon and climate resilient society and the requirements of Section 10(2)(n) of the Planning and Development Act in relation to climate action.</p> <p>Alternative zoned lands closer to the centre are available which comply with the compact growth, sustainable transport and climate mitigation objectives. On the basis of the above, it is recommended that these lands not be included for zoning.</p>
Chief Executive’s Recommendations		
1. No change.		
SEA/ AA Response		
N/A		

No. 193	Ref. & Name/Group	LCC-C62-193 Fehily Timoney & Co on behalf of John Hegarthy	
	Submission/Observation Summary		Chief Executive’s Response
	<p>1. Zoning: The submission seeks the Council to include 6.147ha. adjacent to and located to east of Annacotty Business Park within the boundaries of the Park.</p> <p>The submission sets out the objectives supporting the park under the current and draft Development Plans. The RSES and MASP identify Annacotty Business Park as a positive example of an enterprise cluster and a key employment location.</p> <p>To achieve the regional and local objectives to extend and enhance strategic employment areas, the lands should be zoned.</p>		<p>1. Zoning: The content of the submission received is noted. See response No. 1 to Submission No. 169 above.</p>
	Chief Executive’s Recommendation		
	1. No change.		
	SEA/AA Response		
	N/A		

No. 170	Ref. & Name/ Group:	LCC-C62-170 Garland on behalf of Laurence and Elizabeth Lahiff	
	Submission/ Observation Summary		Chief Executive’s Response
<p>1. Zoning: This submission is seeking the zoning of lands at Ballykeeffe, Mungret.</p>		<p>1. Zoning: The content of the submission received is noted. There are a number of issues in relation to the zoning of these lands as set out below:</p>	

<p>The submission refers to the Shannon CFRAMS maps which indicate the lands are in a “defended area” up to the 1/200 year event [0.5%AEP] and that these existing defences (embankments and sluices) protect hundreds of existing houses in the Ballykeeffe area, as well as the Crescent Shopping Centre. These defences are comprehensively maintained by the OPW under the Arterial Drainage Act. Since the construction of the embankments over 60 years ago, Lahiff lands have not flooded.</p> <p>The submission notes Strategic Flood Risk Assessment justification tests carried out as part of the Draft plan. Land subject of this submission are not dissimilar to Enterprise and Employment lands at Greenpark.</p> <p>The submission requests that those parts of Lahiff’s lands which are protected by the flood defences be subject of a Justification Test and zoned for development.</p> <p>The lands are located adjacent to the City boundary line, are serviced by water and drainage infrastructure and are located within a 10 minute cycle of Limerick City centre. This makes these lands ideally suitable for infill development thereby reducing urban sprawl. The lands are also located adjacent to a disused rail line, which has the potential for sustainable mass travel to the city centre and other areas of the City and County. The lands are located in</p>	<p>i. Flood Risk: The Planning and Development Act 2000 (as amended) requires the preparation of the Development Plan in accordance with Section 28 Ministerial Guidelines. In accordance with The Planning System and Flood Risk Management, Guidelines for Planning Authorities (the Guidelines), a Strategic Flood Risk Assessment (SFRA) has been prepared to assess flood risk within the plan area.</p> <p>In order to achieve the aims and objectives and comply with the requirements of the Guidelines, the Local Authority’s approach to the zoning of land is to avoid development in areas at risk, where possible and substitute less vulnerable uses, where avoidance is not possible. A precautionary approach will be applied, where necessary to reflect uncertainties in flooding datasets and assessment techniques and the ability to predict the future climate and performance of flood defences.</p> <p>In accordance with Section 2.25 of the Guidelines, the presence of flood protection structures should be ignored in determining flood zones. This is because areas protected by flood defences still carry a residual risk of flooding from overtopping or breach of defences and the fact that there may be no guarantee that the defences will be maintained in perpetuity. 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 benefitting areas cannot be considered as defended and cannot be relied upon to provide protection to the benefitting areas.</p>
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<p>close proximity to the Dock Road, an area identified for growth of employment.</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.</p> <p>The lands are located within Flood Zones A (high probability of flooding) and B (moderate probability of flooding). Section 3.5 of the Flood Guidelines indicates that development in this zone should be avoided and/or only considered in exceptional circumstances, such as in city and town centres, or in the case of essential infrastructure that cannot be located elsewhere and where the Justification Test has been applied.</p> <p>Highly and less vulnerable uses are only appropriate if a Justification Test is passed. In considering the Justification Test it should be noted that in order to achieve Compact Growth, the Draft Plan takes a City Centre first approach to the spatial development of Limerick City and Environs. The core is defined as the area zoned “City Centre”. Furthermore, Part 2 of the Justification Test requires the Local Authority to consider a number of factors, including whether the site is located within the core, or if there are suitable alternative lands, for the particular use or development type, in areas at lower risk of</p>
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		<p>flooding, within or adjoining the core of the urban settlement. The Draft Plan has zoned sufficient alternative residential and employment lands to meet the requirements of the Core Strategy, in areas that are not at risk of flooding and suitable for the provision of highly vulnerable uses in accordance with the sequential approach of the Guidelines. The Justification Test does not pass, it is recommended that these lands remain Agriculture/ Semi Natural Open Space.</p> <p>ii. 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>The existing noise levels are significantly in excess of the World Health Organisation's (WHO) recommendation that human exposure to road noise should be below 53 dB <i>Lden</i> and 45 dB <i>Lnight</i> for health and well-being. Additionally, the Council has experience of receiving complaints of annoyance from residents living near major roads where road noise is at these levels. There is strong evidence by the WHO Guideline Development Group (GDG) that noise levels above these thresholds are known to be associated with adverse impacts to human health and quality of life. The GDG strongly recommends policy-makers to implement measures to reduce noise exposure to</p>
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	levels below the guideline values. On the basis of the above, it is recommended that these lands not be included for zoning.
Chief Executive’s Recommendations	
1. No change.	
SEA/ AA Response	
N/A	

No. 174	Ref. Name/ Group: LCC-C62-174 Limerick Market Trustees
Submission/ Observation Summary	
<p>1. Milk Market: The submission sets out that the Council must remain cognisant that the Limerick Market Trustees (LMT), owner and operator of the flagship Limerick Milk Market, has Market Rights Under Statutory provisions within the Limerick Markets Act of 1852 and Common Law.</p> <p>In order to protect these established market rights, the submission requests additional text above Objective ECON 010 / Casual Trading Areas as follows: ‘that the establishment of markets within the Limerick City Metropolitan area shall also have due regard to the Limerick Markets Act 1852 and as amended Limerick Markets Act 1992 where there are restrictions on the establishment of markets within 10.72 Km / 6.66 miles of markets as operated by Limerick Market Trustees. The</p>	
Chief Executive’s Response	
<p>1. Milk Market: The content of the submission received is noted and the Local Authority recognises the importance of the Milk Market in supporting vitality and tourism in the City Centre.</p> <p>The provisions of the Draft Plan in relation to Casual Trading are set out under Chapter 4 A Strong Economy. Objective ECON 10 supports Casual Trading Areas and states ‘It is an objective of the Council to designate sites as Casual Trading Areas in suitable locations where deemed appropriate’. This objective relates to both Limerick City and County and therefore should be retained.</p> <p>-Public realm: Limerick City and County Council are currently preparing a Public Realm Strategy for the City as supported under Objective CGR O1 of Chapter 10 Compact Growth and Revitalisation of the Draft Plan. The Public Realm Strategy will consider the</p>	

<p>Limerick Markets Act, 1852 - Section XXXII 'The Markets to be provided and established under this Act shall be held within the Municipal Boundaries of the Said Borough; and, subject to the Provisions of this Act, no Market, other than the Markets to be provided and established under this Act, shall be held within the said Boundary and within a Circuit of One Mile therefrom'.</p> <p>Having regard to the legislation above, concerns are raised that there is the possibility of legal conflict with new markets under the Development Plan within 10.72 km of Limerick Market Trustee operated Markets. It is imperative that the Milk Market is protected and not diluted / oversaturated with imitations without due consideration to the likely economic, cultural and reputational damage. It is important that the legal concerns for increased casual trading zones are understood and that any proposed increases to causal trading / markets are only considered once benchmarked against the likely damage to the existing Milk Market and 80 traders, many of which have operated for 30 plus years, employing 250 people directly and indirectly.</p> <p>Public realm: The Casual Trading Area outside the Milk Market could be improved with regulation and infrastructure, including stall optimisation/ licences per category of trade, public realm improvements, pedestrian safety, waste management, lighting and signage.</p>	<p>enhancement of the City, including the area around the Milk Market. The Public Realm Strategy will also complement measures that will be contained in the final Limerick Shannon Metropolitan Area Transport Strategy (LSMATS) and Limerick City and County Council’s Limerick 2030 – An Economic and Spatial Plan for Limerick, which will allow opportunities to enhance public realm.</p> <p>The aim of the Public Realm Strategy will be to:</p> <ul style="list-style-type: none"> - Guide the enhancement, management, use and development of the public domain in collaboration with all stakeholders; - Strengthen and enhance the attributes which contribute to the distinctive physical and social character of Limerick City; - Ensure that the interests of all users are considered; - Set out co-ordinated projects/priorities that will enhance and improve the way the city functions; - Ensure that public realm design contributes to the overall liveability and sustainability of the city and embraces the concepts of urban greening and nature-based solutions.
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Chief Executive’s Recommendations	
1. No change	
SEA/ AA Response	
N/A	

No. 182	Ref. & Name/ Group:	LCC-C62-182 Cllr. Eddie Ryan
	Submission/ Observation Summary	
	1. Zoning: The observer supports the zoning of No. 1 Dooradoyle Road for Enterprise & Employment. This was approved by the Metropolitan Elected Members under the Southern Environs Local Area Plan. The owner is at pre planning stage with regards to an application for a health center/ orthodontist at this location. This small enterprise by local persons will create employment and should be supported.	
	Chief Executive’s Response	
	1. Zoning: The content of the submission received is noted.	
	Chief Executive’s Recommendations	
1. No change.		
SEA/ AA Response		
N/A		

No.186	Ref. & Name/ Group:	LCC-C62-186 Eamon Howard-Bowles
	Submission/ Observation Summary	
	1. Zoning: The observer supports the zoning of No. 1 Dooradoyle Road for Enterprise & Employment. This was approved by the Metropolitan Elected Members under the Southern Environs Local Area Plan. The owner is at	
	Chief Executive’s Response	
1. Zoning: The content of the submission received is noted.		

	pre planning stage with regards to an application for a health center/ orthodontist at this location. This small enterprise by local persons will create employment and should be supported.	
	Chief Executive’s Recommendations	
	1. No change.	
	SEA/ AA Response	
	N/A	

No. 185	Ref. & Name/ Group: LCC-C62-185 Eamon Howard-Bowles	
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Zoning Matrix: The observer recommends that Health Centre and Health Practitioner are Generally Permitted in the Enterprise and Employment areas.</p>	<p>1. Zoning Matrix: During the public display period of the Material Alterations to the Draft Southern Environs Local Area Plan 2021-2027, a submission was received from the OPR in relation to a proposed alteration of the zoning matrix for Health Centre and Health Practitioner to be Generally Permitted in the Enterprise and Employment zone. The Planning Authority were required under OPR Observation 5 of that submission to delete the proposed change (that Health Clinic and Health Practitioners be “Generally Permitted”) in the Enterprise and Employment zone.</p> <p>The Planning Authority considers that Health Clinic and Health Practitioner are uses which should be “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</p>

		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. On this basis No change to the zoning matrix is proposed.
Chief Executive’s Recommendations		
1. No change.		
SEA/ AA Response		
N/A		

No. 191	Ref. & Name/Group	LCC-C62-191 Cllr. Eddie Ryan	
	Submission/Observation Summary	Chief Executive’s Response	
	1. Zoning Matrix: The submission requests that ‘Health Centre’ and ‘Health Practitioner’ be considered as ‘generally permitted’ in Enterprise & Employment areas.	1. Zoning Matrix: See response No. 1 to Submission No. 185 above.	
	Chief Executive’s Recommendation		
	1. No change.		
	SEA/AA Response		
	N/A		

No. 187	Ref. & Name/ Group:	LCC-C62-187 Dwellings Developments Ltd. On behalf of Halpin Family	
	Submission/ Observation Summary	Chief Executive’s Response	

<p>1. Zoning: The observation refers to 0.8ha. of land in Mungret and requests changes to zoning as follows: A) From Open Space and Recreation to New Residential; B) Existing Residential to New Residential.</p> <p>The northern and eastern boundaries abut Pl. Ref. 20/1114 and 20/1115. The Sli na Manach estate is located to the northeast. The lands are located in a serviced area.</p> <p>A) Open Space and Recreation to New Residential: The lands at perceived flood risk (Flood Zone A) have never flooded as evident by the topography and mature grassland. A special zoning objective on the lands can be inserted as follows: The final design/layout of development within this zoning shall be guided by:</p> <ol style="list-style-type: none"> a. The preparation of a Site-Specific Flood Risk Assessment b. Views to/from the avenue to Mungret College/Gate lodge c. Creation of an attractive built edge/boulevard along the Regional Road. <p>This would allow sufficient scope to assign open space based on a SSFRA and a considered design/layout.</p> <p>At a minimum the observation requests consideration to a specific zoning objective that this parcel of land:</p> <ul style="list-style-type: none"> • Be accepted as part of any public open space calculations for any future residential application. 	<p>1. Zoning: The content of the submission received is noted. There are a number of issues in relation to the zoning of these lands as set out below:</p> <p>A) Open Space and Recreation to New Residential: The main issue in relation to the request to re-zone these lands relates to flood risk. The Planning and Development Act 2000 (as amended) requires the preparation of the Development Plan in accordance with Section 28 Ministerial Guidelines. In accordance with The Planning System and Flood Risk Management, Guidelines for Planning Authorities (the Guidelines), a Strategic Flood Risk Assessment (SFRA) has been prepared to assess flood risk within the plan area.</p> <p>In order to achieve the aims and objectives and comply with the requirements of the Guidelines, the Local Authority’s approach to the zoning of land is to avoid development in areas at risk, where possible and substitute less vulnerable uses, where avoidance is not possible. A precautionary approach will be applied, where necessary to reflect uncertainties in flooding datasets and assessment techniques and the ability to predict the future climate and performance of flood defences.</p>
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<ul style="list-style-type: none"> • That residential access from the Sli Na Manach Estate be permitted on the open space and recreation zoning. <p>-Site Specific Flood Risk Assessment: A Flood Risk Assessment prepared by Langan Consulting Engineers demonstrates that flood risk is negligible given that it is discharging to the Shannon Estuary. The proposed use of a small portion of the site classified as Flood Zone A and B for development is deemed acceptable as it meets the requirements of the Justification Test.</p>	<p>The lands are located within Flood Zones A (high probability of flooding) and B (moderate probability of flooding). The primary provision of residential development on these lands is not compatible with these flood zones. The Guidelines requires a Plan Making Justification Test to be carried out when zoning lands within Flood Zones A and B, prior to engineering or other solutions to manage risk being considered. Highly vulnerable uses including residential are only appropriate if a Justification Test is passed.</p> <p>In accordance with Section 2.25 of the Guidelines, the presence of flood protection structures should be ignored in determining flood zones. This is because areas protected by flood defences still carry a residual risk of flooding from overtopping or breach of defences and the fact that there may be no guarantee that the defences will be maintained in perpetuity.</p> <p>In considering the Justification Test it should be noted that in order to achieve Compact Growth, the Draft Plan takes a City Centre first approach to the spatial development of Limerick City and Environs. Within the Metropolitan Area, the area zoned as Limerick’s “City Centre” corresponds with the centre of the settlement. Furthermore, Part 2 of the Justification Test requires the Local Authority to consider a number of factors, including whether the site is located within the core, or if there are 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 Plan has zoned sufficient alternative residential lands to meet the requirements of the Core Strategy, in areas that are not at risk of flooding and suitable</p>
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	<p>b) Existing Residential to New Residential: The observation requests the lands zoned Existing Residential, consisting of agricultural outbuildings, be zoned New Residential to provide a sizeable land holding of New Residential.</p>	<p>for the provision of highly vulnerable uses in accordance with the sequential approach of the Guidelines. The Justification Test does not pass, it is recommended that these lands are not included for New Residential zoning.</p> <p>B) Existing Residential to New Residential: Given the substantial similarities of the zoning objectives and matrix set out in the Draft Plan, both zonings would allow residential development. In this regard, residential developments can be considered, on their merits, on both of these land zonings. The requested rezoning would effectively comprise a change in terminology and is not considered necessary to facilitate sustainable development. On this basis a change from Existing Residential to New Residential is not recommended.</p>
Chief Executive’s Recommendations		
1. No change.		
SEA/ AA Response		
N/A		

No. 188	Ref. & Name/ Group:	LCC-C62-188 Dwellings Developments Ltd. On behalf of the Estate of the late Patricia McCarthy	
Submission/ Observation Summary		Chief Executive’s Response	
<p>1. Zoning: The observation refers to 1.7ha. of land in Mungret. While welcoming the New Residential zone, the submission requests changes to the zoning from Open Space and Recreation to New Residential.</p>		<p>1. Zoning: The content of the submission received is noted. There are a number of issues in relation to the zoning of these lands as set out below:</p>	

<p>The northern and eastern boundaries abut Pl. Ref. 20/1114 and 20/1115. The Sli na Manach estate is located to the northeast. The lands are located in a serviced area.</p> <p>The submission indicates that a special zoning objective on the lands can be inserted as follows: The final design/layout of development within this zoning shall be guided by:</p> <ol style="list-style-type: none"> a. The preparation of a Site Specific Flood Risk Assessment b. Views to/from the avenue to Mungret College/Gate lodge c. Creation of an attractive built edge/boulevard along the Regional Road. <p>This would allow sufficient scope to assign open space based on a SSFRA and a considered design/layout.</p> <p>At a minimum the observation requests consideration to a specific zoning objective that this parcel of land:</p> <ul style="list-style-type: none"> • Be accepted as part of any public open space calculations for any future residential application. • That residential access from the Sli Na Manach Estate be permitted on the open space and recreation zoning. <p>-Site Specific Flood Risk Assessment: The lands at perceived flood risk (Flood Zone A) have never flooded as evident by the topography and mature grassland. A SSFRA</p>	<p>-Flood Risk: The Planning and Development Act 2000 (as amended) requires the preparation of the Development Plan in accordance with Section 28 Ministerial Guidelines. In accordance with The Planning System and Flood Risk Management, Guidelines for Planning Authorities (the Guidelines), a Strategic Flood Risk Assessment (SFRA) has been prepared to assess flood risk within the plan area.</p> <p>In order to achieve the aims and objectives and comply with the requirements of the Guidelines, the Local Authority’s approach to the zoning of land is to avoid development in areas at risk, where possible and substitute less vulnerable uses, where avoidance is not possible. A precautionary approach will be applied, where necessary to reflect uncertainties in flooding datasets and assessment techniques and the ability to predict the future climate and performance of flood defences.</p> <p>The lands are located within Flood Zones A (high probability of flooding). Section 3.5 of the Flood Guidelines indicates that development in this zone should be avoided and/or only considered in exceptional circumstances, such as in city and town centres, or in the case of essential infrastructure that cannot be located elsewhere and where the Justification Test has been applied.</p> <p>Highly vulnerable uses including residential are only appropriate if a Justification Test is passed. In considering the Justification Test it should be noted that in order to achieve Compact Growth, the Draft Plan takes a City Centre first approach to the spatial development of Limerick City and Environs. The core is defined as the area zoned “City</p>
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	<p>has been prepared by Langan Consulting Engineers, which indicates that flood risk is negligible. The proposed use of a small portion of the site classified as Flood Zone A and B for development is deemed acceptable as it meets the requirements of the Justification Test.</p>	<p>Centre”. Furthermore, Part 2 of the Justification Test requires the Local Authority to consider a number of factors, including whether the site is located within the core, or if there are 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 Plan has zoned sufficient alternative residential lands to meet the requirements of the Core Strategy, in areas that are not at risk of flooding and suitable for the provision of highly vulnerable uses in accordance with the sequential approach of the Guidelines. The Justification Test does not pass, it is recommended that these lands are not included for New Residential zoning.</p>
Chief Executive’s Recommendations		
1. No change.		
SEA/ AA Response		
N/A		

No. 189	Ref. & Name/ Group:	LCC-C62-189 Dwellings Developments Ltd. On behalf of the Estate of the late Patricia McCarthy	
Submission/ Observation Summary		Chief Executive’s Response	
<p>1. Zoning: The observation refers to 0.3ha. of land in Mungret and requests a change in zoning from Special Control Area (SCA) to New Residential.</p> <p>The northern and western boundaries abut the wider landholding zoned New Residential, while the eastern boundary abuts Sli na Manach estate. The lands are located in a serviced area.</p>		<p>1. Zoning: The content of the submission received is noted. Following consultation with the Executive Archeologist, it is considered that the Special Control Area at Mungret could be reduced to match the northern limit in the adjoining property to the east and the area re-zoned to New Residential.</p> <p>However, it would not be appropriate to remove the SCA from the front or south of the site. This site is directly visible from the grounds of the Abbey graveyard which itself has a pastoral setting and is</p>	

<p>The existing house is zoned SCA given the proximity to Mungret Abbey. Two storey dwellings are permitted on the adjoining scheme, whilst alterations are pending to omit the creche and replace with a two storey unit. A small infill scheme of two storey dwellings would not undermine the setting of the Abbey.</p> <p>The observation requests the zoning of these lands for New Residential. A special zoning objective on the lands can be inserted as follows: The final design/layout of development within this zoning shall be guided by:</p> <ul style="list-style-type: none"> a. Views to/from the avenue to Mungret College/Gate lodge; b. Creation of an attractive built edge/boulevard along the Regional Road. <p>This would allow the entire parcel of New Residential to be maximized and provide sustainable use of serviced, well-located lands in an existing suburban area.</p>	<p>almost on a level with the subject lands. There is currently good screening at the roadside and this should be maintained.</p> <p>2. Special Control Area: The purpose of the Special Control Area is set out under Chapter 12 Land Use Zoning Strategy. It is recommended that this purpose be amended to clarify the protection of views from the monastic complex in Mungret as set out under Recommendation 2 below.</p>
Chief Executive’s Recommendations	
<p>1. Reduce the Special Control Area to match the northern limit in the adjoining property to the east at Mungret and re-zone to New Residential.</p> <p>2. Change the purpose of the Special Control Area set out under Chapter 12 Land Use Zoning Strategy as follows: This zoning recognises the heritage importance of the area. The Special Control Area designation will facilitate the preservation in situ of the identified archaeological, including any subterranean remains. Within this area, new development will be prohibited in order to maintain the archaeological heritage of the area, <u>and in the case of Mungret, to protect views from the monastic complex/deserted settlement.</u></p>	
SEA/ AA Response	

The changes have taken place following consultation with the Local Authority Archaeologist. As noted above, it would not be appropriate to remove the Special Control Area from the front or south of the site. This site is directly visible from the grounds of the Abbey graveyard, which itself has a pastoral setting and is almost on a level with the subject lands. There is currently good screening at the roadside and this should be maintained.

No. 195	Ref. & Name/Group:	LCC-C62-195 Fehily & Timoney on behalf of Shannon Commercial Properties	
Submission/Observation Summary		Chief Executive’s Response	
<p>1. Zoning: The submission relates to 8.2ha. of lands at Towlerton and seeks the change of zoning from Agriculture to Enterprise and Employment as per the Castletroy LAP 2019 – 2025.</p> <p>The submission sets out the site location, accessibility and zoning history.</p> <p>The proposed zoning of the subject lands as Agriculture is inappropriate given the strategic importance of the site in terms of road connectivity and the mitigation design solutions to address concerns regarding Flood Zone A and B. Proposals can satisfy a justification test.</p> <p>Zoning with a site-specific requirement for a Flood Risk Assessment should be included. There is an under-supply of Enterprise and Employment lands in the wider metropolitan area.</p>		<p>1. Zoning: The content of the submission received is noted. There are a number of issues in relation to the zoning of these lands as set out below:</p> <p>-Flood Risk: The Planning and Development Act 2000 (as amended) requires the preparation of the Development Plan in accordance with Section 28 Ministerial Guidelines. In accordance with The Planning System and Flood Risk Management, Guidelines for Planning Authorities (the Guidelines), a Strategic Flood Risk Assessment (SFRA) has been prepared to assess flood risk within the plan area.</p> <p>In order to achieve the aims and objectives and comply with the requirements of the Guidelines, the Local Authority’s approach to the zoning of land is to avoid development in areas at risk, where possible and substitute less vulnerable uses, where avoidance is not possible. A precautionary approach will be applied, where necessary to reflect uncertainties in flooding datasets and assessment techniques and the ability to predict the future climate and performance of flood defences.</p>	

<p>Significant lands on the Dock Road zoned Enterprise and Employment are partly designated Flood Zones A and B. Lands zoned High Tech/Manufacturing in Raheen are also designated within the flood zone. The Dock Road site identified to support Marine related enterprise is a ‘niche’ zoning and precludes general enterprise and employment use. Additional lands in the flood zone in Raheen Business Park, more removed from the centre, have been included. The justification for the lands at Raheen is on the basis that the area comprises an existing industrial complex. A similar view should be taken of the subject site and a Justification Test included.</p> <p>Land adjacent to the subject site is identified in the Draft Plan as an opportunity site for mixed use. The subject site should have similar emphasis given the synergy and opportunities for clustering employment activities at this location in the context of the wider Castletroy area, Bloodmill Road developments and connectivity.</p>	<p>The lands are located within Flood Zones A (high probability of flooding). Section 3.5 of the Flood Guidelines indicates that development in this zone should be avoided and/or only considered in exceptional circumstances, such as in city and town centres, or in the case of essential infrastructure that cannot be located elsewhere and where the Justification Test has been applied.</p> <p>Highly and less vulnerable uses are only appropriate if a Justification Test is passed. In considering the Justification Test it should be noted that in order to achieve Compact Growth, the Draft Plan takes a City Centre first approach to the spatial development of Limerick City and Environs. The core is defined as the area zoned “City Centre”. Furthermore, Part 2 of the Justification Test requires the Local Authority to consider a number of factors, including whether the site is located within the core, or if there are 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 Plan has zoned sufficient alternative employment lands to meet the requirements of the Core Strategy, in areas that are not at risk of flooding and suitable for the provision of highly vulnerable uses in accordance with the sequential approach of the Guidelines. It is noted that these lands are not designated a Strategic Employment Location under the MASP. The Justification Test does not pass, it is recommended that these lands are not included for Enterprise and Employment zoning.</p>
Chief Executive’s Recommendation	
1. No change.	
SEA/AA Response	

N/A

No. 196	Ref. & Name/Group:	LCC-C62-196 Fehily & Timoney on behalf of Shannon Commercial Properties	
	Submission/Observation Summary		Chief Executive’s Response
	<p>1. Zoning Objective: The submission raises concerns regarding the restrictive nature of the ‘University’ zoning objective, which prohibits new businesses at the International Science Centre, unless the business is owned by, or operated for the benefit of the University.</p> <p>The submission suggests the following additional text to the University purpose: To support and facilitate expansion of the University and provide for purpose-built student and ancillary residential accommodation and research and development buildings, which facilitate the sustainable development of community, cultural, educational and ancillary needs, for the benefit of the University population and wider area. General Office, Business and Enterprise uses may be considered on a limited basis on lands not within the ownership or for the benefit of the University.</p> <p>Alternatively, the zoning matrix should be updated with the following: Office ancillary to the primary purpose only, or in exceptional cases where there is an established use not in the ownership or for the benefit of the University.</p>		<p>1. Zoning Objective: The content of the submission received is noted.</p> <p>The Planning Authority notes that the lands at the International Science Centre are not registered to the University of Limerick. In this regard, and in the interests of supporting the development of existing and new enterprises on university zoned lands, the amendment as suggested to the purpose of the zoning objective should be included as set out under Recommendation 1 below.</p>

<p>2. Zoning: The submission seeks the identification of 18ha. of lands in Rosbrien for Business and Enterprise or a ‘strategic reserve’.</p> <p>The subject lands are zoned Agriculture in the Southern Environs LAP. The lands are detached from the National Route and should be considered for zoning. The submission sets out the context of the strategic location, including key infrastructure, facilities and amenities serving the area of Rosbrien. The lands provide an opportunity for Enterprise and Employment uses.</p> <p>However, if the above is not appropriate, given the strategic location of the site it is requested that the lands be identified and safeguarded for future potential development. Therefore, SCP seek the following objective:</p> <p>‘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 the 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>2. Zoning: The content of the submission received is noted. The Local Authority also notes the need for a Data Centre in Limerick and acknowledges that the provision of a data centre requires a large land bank for development and creates low intensity traffic movements with a low number of employees. The zoning map and associated objectives for the City and Environs has been prepared with cognisance to flood mapping, in particular the identification of Flood Zones A and B as set out in the Draft Plan. This has resulted in large areas being identified for water compatible uses comprising Agriculture and Open Space zoning. As a result, and given the associated land requirements, the opportunities for development of lands within the City and Environs for a data centre are restricted. In addition, in order to facilitate employment growth over the lifetime of the plan in tandem with residential development, the lands already zoned for Enterprise and Employment and Industry have been earmarked for high intensity employment uses. On the basis of the above, it is considered appropriate to zone an 18.88ha. land bank subject of this submission for a Data Centre.</p> <p>-Flood Risk: The Planning and Development Act 2000 (as amended) requires the preparation of the Development Plan in accordance with Section 28 Ministerial Guidelines. In accordance with The Planning System and Flood Risk Management, Guidelines for Planning Authorities (the Guidelines), a Strategic Flood Risk Assessment (SFRA) has been prepared to assess flood risk within the plan area.</p>
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		<p>In order to achieve the aims and objectives and comply with the requirements of the Guidelines, the Local Authority’s approach to the zoning of land is to avoid development in areas at risk, where possible and substitute less vulnerable uses, where avoidance is not possible. A precautionary approach will be applied, where necessary to reflect uncertainties in flooding datasets and assessment techniques and the ability to predict the future climate and performance of flood defences.</p> <p>Part of the site is within Flood Zone A/B and there is an unmodelled watercourse flowing through the middle. This was not included in the CFRAM study so there is additional, unmapped, risk on site. This leads to uncertain flood risk with respect to the feasibility of developing these lands. On this basis, it considered necessary to include a site specific objective for a flood risk assessment.</p>
Chief Executive’s Recommendation		
<p>1. Amend the University Zoning Purpose as follows: To support and facilitate expansion of the University and provide for purpose-built student and ancillary residential accommodation and research and development buildings, which facilitate the sustainable development of community, cultural, educational and ancillary needs, for the benefit of the University population and wider area. <u>General Office, Business and Enterprise uses may be considered on a limited basis on lands not within the ownership or for the benefit of the University.</u></p> <p>2. Amend the Zoning Map to include an area of 18.88ha of land zoned for a Data Centre at Rosbrien.</p> <p>3. Amend the Land Use Zoning Objectives in Chapter 12 Land Use Zoning Strategy to include a Data Centre as follows: <u>Objective: To accommodate the provision of a Data Centre campus on the lands at Rosbrien and other appropriately zoned lands.</u> <u>Purpose: To enable the development of a data centre campus consisting of multiple structures and associated power generating infrastructure as necessary, subject to compliance with all relevant planning criteria. Any proposed development shall adopt sustainable practices in terms of building design, materials, construction and operation. Any planning application shall include a landscaping plan incorporating dense trees to the site boundaries.</u></p>		

Amend Objective CAF O21 Identified Flood Risk to include the following: <u>E) Any planning application shall include a comprehensive Site-Specific Flood Risk Assessment, which demonstrates that the flood risk can be mitigated and that access/egress, roads and water compatible uses can be accommodated without adversely impacting on the flood risk off site.</u>
SEA/AA Response
These uses may be considered ancillary to university uses or may indeed come about as result of campus activity. It is considered that these additional uses would complement the university zoning when carefully applied. These changes will apply only within the existing area zoned for University Purposes and will not be an encroachment into the nearby Special Area of Conservation site.

No.198	Ref. & Name/Group:	LCC-C62-198 HSE
	Submission/Observation Summary	Chief Executive Response
	<p>1. Zoning: The submission relates to lands south of Jetland District Centre and north of Condell Road and requests a change in zoning from Agricultural and Open Space and Recreation to Mixed Use.</p> <p>These lands have been the subject to assessment by the HSE as a location for a Primary Care Centre, having considered demography, site optimisation and accessibility to public transport. An application is imminent and a detailed Flood Risk Assessment will be submitted as part of the planning application. This assessment has been prepared as per 2009 Flood Risk Guidelines, OPW Flood Hazard maps, CFRAMs, and the JBA Consulting Strategic Flood Risk Assessment 2021. The conclusion of the assessment is a low risk of flooding,</p>	<p>1. Zoning: The content of the submission received is noted.</p> <p>The Draft Plan includes a limited number of Mixed Use zones to reflect specific site proposals only. In accordance with the Draft Development Plan Guidelines for Planning Authorities, the Draft Plan is moving towards a standardised national set of zoning objectives. In this regard, the provision of additional mixed use zoned sites is not recommended.</p> <p>The main issue in relation to the zoning of these lands to accommodate a Primary Care Centre is flood risk.</p> <p>-Flood Risk: The Planning and Development Act 2000 (as amended) requires the preparation of the Development Plan in accordance with Section 28 Ministerial Guidelines. In accordance with The</p>

	<p>given the mitigation measures proposed. The proposed Draft Plan will delay the delivery of the Slaintecare Implementation Strategy.</p>	<p>Planning System and Flood Risk Management, Guidelines for Planning Authorities (the Guidelines), a Strategic Flood Risk Assessment (SFRA) has been prepared to assess flood risk within the plan area.</p> <p>In order to achieve the aims and objectives and comply with the requirements of the Guidelines, the Local Authority’s approach to the zoning of land is to avoid development in areas at risk, where possible and substitute less vulnerable uses, where avoidance is not possible. A precautionary approach will be applied, where necessary to reflect uncertainties in flooding datasets and assessment techniques and the ability to predict the future climate and performance of flood defences.</p> <p>The lands are located within Flood Zones A (high probability of flooding). Section 3.5 of the Flood Guidelines indicates that development in this zone should be avoided and/or only considered in exceptional circumstances, such as in city and town centres, or in the case of essential infrastructure that cannot be located elsewhere and where the Justification Test has been applied. Table 3.1 of the Flood Guidelines makes a distinction between various land uses, where residential is considered a ‘highly vulnerable development’ and commercial is a ‘less vulnerable development’.</p> <p>Highly and less vulnerable uses are only appropriate if a Justification Test is passed. In considering the Justification Test it should be noted that in order to achieve Compact Growth, the Draft Plan takes a City Centre first approach to the spatial development</p>
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		<p>of Limerick City and Environs. The core is defined as the area zoned “City Centre”.</p> <p>Furthermore, Part 2 of the Justification Test requires the Local Authority to consider a number of factors, including whether the site is located within the core, or if there are 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 Plan has zoned sufficient alternative lands to meet the requirements of projected growth, in areas that are not at risk of flooding and suitable for the provision of highly vulnerable uses in accordance with the sequential approach of the Guidelines. The Justification Test does not pass, it is recommended that these lands are not included for Mixed Use zoning.</p>
	Chief Executive Recommendation	
	1. No change.	
	SEA/AA Response	
	N/A	

No. 204	Ref. & Name/ Group:	LCC-C62-204 HRA PLANNING on behalf of Valley Healthcare Infrastructure Investment Fund ICAV
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Zoning: The submission requests a change in zoning of 1.6 hectares from Agricultural and Recreation and Open Space to Mixed Use, commensurate with its location within the Jetland District Centre.</p>	<p>1. Zoning: The content of the submission received is noted. This submission relates to lands subject of Submission No. 198 above. See Response No. 1 to Submission No. 198 above.</p>

	<p>The submission sets out the site location, characteristics and policy context. The site is within a designated District Centre, within walking distance of services and facilities.</p> <p>The submission seeks to revert the zoning to District Centre Use and to extend this zoning to the full 1.6 hectares, whilst maintaining the public open space to the east. A planning application is due to be lodged for a Primary Care Centre (PCC) with a Tusla facility, acting as a headquarters for Ballynanty, Thomond and Westbury Community Healthcare Network serving 37,000 people.</p> <p>The land is accessible with adequate water services and facilities. An access road will open lands to the rear. The HSE has identified a demand and need for a PCC at this location. Zoning for mixed use will ensure that a portion of new development reflects the compact growth and town centres first agenda, a key dynamic in addressing climate change, through reducing dependence on car-based transport, the extent of green-field land consumption and costly and inefficient infrastructure provision and use.</p> <p>-Flood Risk Assessment: A detailed Site-Specific Flood Risk Assessment (SSFRA) has been undertaken by Punch Consulting. The JBA flood mapping is a preliminary set of mapping. The definition of the Flood Zones is based on an undefended scenario and does not take into account the</p>	
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	<p>presence of any flood protection structures. The flood extents are a worst-case scenario.</p> <p>A review of the OPW database indicated that there have been historical instances of flooding, but not within the site. The flood extents are coastal and the site is Flood Zone B for coastal flooding. The site is not subject to pluvial flooding. The site is elevated to Flood Zone A in an undefended scenario. As the development will not provide critical patient or overnight care, the development could be classified as “Less Vulnerable”.</p> <p>The lands would be in compliance with the Justification Test. The proposed development is at a low risk of flooding and is appropriate provided the residual risk of coastal flooding is addressed by implementing the mitigation measures, including providing a finished floor level of 5.50mAOD, a sufficient surface water drainage network, water compatible construction and an emergency plan for evacuation.</p>	
	Chief Executive’s Recommendations	
	1. No change.	
	SEA/ AA Response	
	N/A	

No. 199	Ref. & Name/Group:	LCC-C62-199 HRA Planning on behalf of Catherine Radcliffe
	Submission/Observation Summary	Chief Executive Response

1. Zoning: The submission relates to 1.4ha. of land at Rhebogue and requests a change in zoning from Groody Valley Green Wedge to Residential Development Area.

The submission sets out the site context and planning context to support the re-zoning request.

The site is serviceable with direct access to the Old Dublin Road. The site is greenfield and infill. Failure to zone as New Residential is contrary to planning policy of higher-level plans and Objective CGR 03 Urban Lands and Compact Growth of the Draft Plan.

Part of the site is located in Flood Zone B. A site –specific Flood Risk Assessment by Cronin Sutton Cotter demonstrates the rationale of the designation of the Groody Valley Wedge to the entire site is not justified. The purpose of the Groody Valley Wedge is to prevent the encroachment of the built-up area of the City and to retain its role as a wildlife corridor and flood management zone. The site is not located on the edge of the city, given the extent of the built environment in the immediate vicinity and is disconnected (circa 250m) from the ecological corridor of the Groody. This site does not have any ecological function or natural amenity link to the Groody or the Shannon.

1. Zoning: The content of the submission received is noted. There are a number of issues in relation to the zoning of these lands as set out below:

-Flood Risk: The Planning and Development Act 2000 (as amended) requires the preparation of the Development Plan in accordance with Section 28 Ministerial Guidelines. In accordance with The Planning System and Flood Risk Management, Guidelines for Planning Authorities (the Guidelines), a Strategic Flood Risk Assessment (SFRA) has been prepared to assess flood risk within the plan area.

In order to achieve the aims and objectives and comply with the requirements of the Guidelines, the Local Authority’s approach to the zoning of land is to avoid development in areas at risk, where possible and substitute less vulnerable uses, where avoidance is not possible. A precautionary approach will be applied, where necessary to reflect uncertainties in flooding datasets and assessment techniques and the ability to predict the future climate and performance of flood defences.

Part of the lands are located within Flood Zone B (moderate probability of flooding). Section 3.5 of the Flood Guidelines indicates that development in this zone should be avoided and/or only considered in exceptional circumstances, such as in city and town centres, or in the case of essential infrastructure that cannot be located elsewhere and where the Justification Test has been applied.

The development of the site for the residential use would satisfy the Draft Development Plan Guidelines 2021, specifically SPPR DGG 7 regarding the sequential approach to zoning, and can satisfy the Tier 1 serviced and density requirements (+45 units per ha) of Level 1 Limerick City – Density 2 Immediate Locations/Transport Corridors. Such development also satisfies Objective SCS104 10-Minute Neighbourhood and the Core Strategy.

The site with re-positioning of overhead power lines is of sufficient scale for residential development.

Highly vulnerable uses including residential are only appropriate if a Justification Test is passed. In considering the Justification Test it should be noted that in order to achieve Compact Growth, the Draft Plan takes a City Centre first approach to the spatial development of Limerick City and Environs. The core is defined as the area zoned “City Centre”. Furthermore, Part 2 of the Justification Test requires the Local Authority to consider a number of factors, including whether the site is located within the core, or if there are 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 Plan has zoned sufficient alternative residential lands to meet the requirements of the Core Strategy, in areas that are not at risk of flooding and suitable for the provision of highly vulnerable uses in accordance with the sequential approach of the Guidelines. The Justification Test does not pass, it is recommended that these lands are not included for New Residential zoning.

-Other: Further to the area of the site located within Flood Zone B, there are two parallel 110kv high voltage electricity pylons and cables trans-versing the site. Given the high voltage nature of the cables and pylons, the cost of repositioning the cables underground would be significant and may require the re-laying/ repositioning of other service infrastructure. Even if repositioned underground, the cables would require a separation distance of 20m. Having regard to the combination of the area outside of the flood zone and the separation distances required from the ESB lines, the ability to develop these lands is severely restricted and it is not considered viable to zone this

	land. On the basis of the above it is not recommended to change the zoning objective for these lands.
Chief Executive Recommendation	
1. No change.	
SEA/AA Response	
N/A	

No. 200	Ref. & Name/ Group:	LCC-C62-200 HRA PLANNING on behalf of Eastchester Real Estate Limited
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Zoning: This submission relates to lands at the East Way Retail Park, and requests a change in zoning of 0.8ha. from Groody Valley Green Wedge to Retail Warehousing.</p> <p>The Retail Park forms part of a large tract of land zoned retail warehouse in the Draft Plan. The retail park ownership extends beyond the existing retail warehouse zoning and includes a portion of the Groody Valley Green Wedge.</p> <p>The extended zoning of 0.8 hectares would ensure that 0.7 hectares of the observer’s land remains zoned as the Groody Valley Green Wedge. A change in zoning will facilitate completion of the retail park, will engage with the Groody Valley Green Wedge and provide for an attractive landscaped parkland with a walkway and cycle path linking back into the retail park.</p>	<p>1. Zoning: The content of the submission received is noted. There are a number of issues in relation to the zoning of these lands as set out below:</p> <p>-Retail Strategy: As set out under the Draft Retail Strategy for Limerick Shannon Metropolitan Area and County Limerick, and in accordance with the Retail Planning Guidelines there should be a presumption against the further development of out of town retail parks and a preference for sites in or adjacent to Town Centres, to ensure the potential for linked trips and commercial synergy. This is supported by Objective LCC14 which states ‘In accordance with the Retail Planning Guidelines (2012), there shall be a presumption against new out-of-town retail warehousing development’. The Draft Retail Strategy has concluded that there is no capacity for additional bulky retail floorspace. On the basis of the above and in order to re-establish Limerick City Centre at the top of the retail hierarchy and prevent further erosion of the vitality and viability of the centre the rezoning of these lands for Retail Warehousing is not recommended.</p>

<p>The proposal seeks to develop the remaining south-eastern boundary of the retail park with similar retail/commercial and leisure formats. Such development would achieve the following spatial development objectives, whilst still adhering to the retail strategy and retail planning guidelines:</p> <ul style="list-style-type: none"> • Maintain and promote the established character and function; • Present synergy with existing and established uses permitted; • Facilitate bulky goods, leisure uses and complementary services and activities; • Facilitate effective utilisation of serviced land; • Create development of high architectural, urban quality and attractive metropolitan ‘Gateway’ feature; and • Maintain the established conservation objectives of the Groody Valley Green Wedge. <p>At this location, the Groody Valley is not defined by any notable amenity or physical feature or attribute of significant ecological value. There is no explanation or spatial or ecological rationale in the Draft Plan to justify the irregular composition of the ‘Groody Valley Green Wedge’ zoning. Therefore, it would be reasonable to assume that it has been included as a measure to address residual undeveloped land at this location. The Draft Plan must re-examine this portion of the Groody Valley Green Wedge. A buffer of between 30-50m can still be maintained.</p>	<p>In the interest of clarity, the text in the plan shall be updated in Section 4.6.7 in relation to Retail Warehousing.</p> <p>-Groody Valley: The Groody Valley Wedge zoning objective aims “to preserve and protect the Groody Valley from development”. With respect to the purpose of the zone, the River Groody green wedge located in the eastern part of the metropolitan area, fulfils a number of valuable open space related functions. It is a valuable habitat for wintering wildfowl with species such as Lapwing encountered there. Otters are also present along this stretch of the river.</p> <p>In addition, it also serves a valuable flood residence function which will become increasingly important as part flood management initiatives in Limerick in the future. The Groody River Valley also has huge potential as an amenity area for the city as it would be possible to sensitively develop a park on part of the infilled lands.</p> <p>In terms of ecology, the site is part of the wider River Groody Green Wedge and its alteration could fragment the wider habitat. On this basis it is not recommended to alter the zoning of the lands.</p>
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	A Strategic Flood Risk Assessment was undertaken by JBA Consulting identified the lands are not subject to flooding.	
Chief Executive’s Recommendations		
<p>1. Remove the following text and replace with inserted text as follows:</p> <p>The Draft Plan will apply a cautionary approach to additional retail warehousing and will consider carefully any new proposals for additional retail warehouse floor space in terms of potential retail impact both on Limerick City, as well as on established retail warehousing cores. Applications for retail warehousing will be required to demonstrate that the proposal is accessible by public transport and that there is sufficient capacity in the local road network to accommodate the development.</p> <p><u>The Retail Strategy indicates that there is limited capacity for additional retail warehousing in the City and Environs.</u></p>		
SEA/ AA Response		
N/A		

No. 201	Ref. & Name/ Group:	LCC-C62-201 HRA PLANNING on behalf of Jamestown Properties Limited	
Submission/ Observation Summary		Chief Executive’s Response	
<p>1. Zoning: The submission relates to 0.2ha. of lands at Caherdavin Shopping Centre, Ennis Road and requests a change in zoning from Open Space and Recreation to Local/ Neighbourhood Centre.</p> <p>The change in zoning will facilitate the regeneration of the Caherdavin Shopping Centre, including appearance and functionality, comprising an upgrade to buildings, reorganisation of car parking and an overall improvement to the public realm. No new buildings shall be constructed on the 0.2 hectares of land, but this will be utilised to accommodate car parking and a public realm strategy.</p>		<p>1. Zoning: The content of the submission received is noted.</p> <p>The lands are located within Flood Zones A (high probability of flooding) and B (moderate probability of flooding). The primary provision of residential development on these lands is not compatible with these flood zones. However, it is noted that the lands will be used for car parking only. The Guidelines do not require a Plan Making Justification Test to be carried out when zoning lands for water compatible uses.</p> <p>The proposed rezoning to Local/ Neighbourhood Centre would represent sustainable development of underutilised greenfield lands. The proposed rezoning would not adversely impact on the quantity of</p>	

<p>There is circa 1.1 hectares of zoned open space and recreation use land located to the south and south west of the Shopping Centre, which is not effectively utilized and does not function as usable or practical open space.</p> <p>The site is well serviced by public transport and is capable of intensification of uses. Regeneration will provide for a mix of community and commercial neighbourhood facilities including residential / apartment living. The Local / Neighbourhood Centre is dominated by surface car parking. It is proposed to relocate the car parking to a landscaped park within the existing adjoining green area and to utilise the existing surface car parking area within the Local / Neighborhood Centre to facilitate further development.</p> <p>The submission would welcome a site-specific objective to ensure that a public realm enhancement plan is delivered in tandem with the regeneration proposals.</p>	<p>usable public open space in this particular area. The lands are located in close proximity to the LIT Campuses at Coonagh and Moylish and are served by public transport and accessible by active modes of transport. The proposed rezoning would facilitate an upgrade of the public realm at this location on a gateway route into the City. On the basis of the above, it is recommended that the 0.2ha. site be included as an Opportunity Site and be rezoned from Open Space to Local Centre to facilitate the provision of car parking only. Specific objectives for the Opportunity Site are recommended below.</p>
Chief Executive’s Recommendations	
<p>1(i) Include the Caherdavin Shopping Centre as an opportunity site, amend the Opportunity Sites map and include the following text under Limerick City Opportunity Sites: <u>Caherdavin Shopping Centre: These Local Centre lands comprise the Caherdavin Shopping Centre and will facilitate the upgrade and redevelopment of the existing Centre. The adjoining 0.2ha. of lands located within the flood zones will be utilised for ancillary car-parking and open space only. The principle use of the overall zone shall be for local level shops and services, commensurate with a local centre and residential development. The site has potential to provide professionally managed student accommodation given the proximity to the LIT Campuses at Coonagh and Moylish. Any development of these lands shall comprise the highest quality design and layout, including a landmark/ gateway building with dual</u></p>	

frontage onto the roadways and open space onto which it faces. Any development shall include proposals for improved connectivity and enhancement of the public realm.

Objective CSC O1 - Caherdavin Shopping Centre: It is an objective of the Council to:

A) Require the highest quality of landmark design and layout with dual frontage onto the adjoining roadways and open space;

B) Facilitate local level shops and services commensurate with a Local Centre;

C) Facilitate purpose built and managed student accommodation where deemed appropriate;

D) Require water compatible uses including car parking and open space within the flood zone, such car parking shall be adequately screened and sympathetically integrated;

E) Require connectivity for pedestrians and cyclists to the nearby bus stops and walking/cycling networks;

F) Require comprehensive proposals for the improvement of the public realm of the entire Local Centre development at this location. No occupation of any new development shall occur until upgrade of the public realm has taken place.

(ii) Change the zoning of 0.2ha of open space to local centre on City and Environs zoning map.

SEA/ AA Response

Caherdavin Shopping centre is a locally important site in this part of the metropolitan area. It is located in a central area within the suburb of Caherdavin, within easy distance of parts of the Technological University of the Shannon campus and has the potential to support the educational campuses through adoption of complementary uses, such as accommodation. This would be close to these facilities and important in terms of delivering compact growth. The site is somewhat run down and from point of view of urban amenity a revamp would be helpful. The suggested amendment, if implemented, at a suitable scale, would be considered to benefit this area.

No. 202	Ref. & Name/ Group:	LCC-C62-202 HRA Planning on behalf of John Hickey	
	Submission/ Observation Summary	Chief Executive’s Response	

<p>1. Zoning: The submission relates to 8.4ha. of lands at the south western extremity of the Clondrinagh Industrial Estate and requests a change in zoning from Agriculture to General Industry or Enterprise and Employment.</p> <p>The agricultural zoning in the context of the subject land is unclear. The subject land is not capable of being used for agricultural purposes, given its limited site area and the adjoining industrial uses. There is no necessity to protect and/or provide for agricultural use on the lands because it is commercially unviable. The land cannot be accessed independently of the industrial estate. The Crompaun River/ Meelick Creek demarcates the county boundary with Clare. This naturally controls the line of development and prevents urban sprawl. There is no other industrial zoned land within Metropolitan Limerick, save for Irish Cement. An alternative location within the city boundary must be identified for those uses, which do not sit comfortably with other uses, including residential, commercial and education.</p> <p>The site is sufficiently serviced by existing road infrastructure with direct accessibility from the R445 Ennis Road. The site would:</p> <ul style="list-style-type: none"> • Provide a location for heavy industrial uses in the city. • Facilitate effective utilisation of serviced land within the existing settlement boundary; 	<p>1. Zoning: The content of the submission received is noted. There are a number of issues in relation to the zoning of these lands as set out below:</p> <p>-Flood Risk: The Planning and Development Act 2000 (as amended) requires the preparation of the Development Plan in accordance with Section 28 Ministerial Guidelines. In accordance with The Planning System and Flood Risk Management, Guidelines for Planning Authorities (the Guidelines), a Strategic Flood Risk Assessment (SFRA) has been prepared to assess flood risk within the plan area.</p> <p>In order to achieve the aims and objectives and comply with the requirements of the Guidelines, the Local Authority’s approach to the zoning of land is to avoid development in areas at risk, where possible and substitute less vulnerable uses, where avoidance is not possible. A precautionary approach will be applied, where necessary to reflect uncertainties in flooding datasets and assessment techniques and the ability to predict the future climate and performance of flood defences.</p> <p>In accordance with Section 2.25 of the Guidelines, the presence of flood protection structures should be ignored in determining flood zones. This is because areas protected by flood defences still carry a residual risk of flooding from overtopping or breach of defences and the fact that there may be no guarantee that the defences will be maintained in perpetuity.</p>
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<ul style="list-style-type: none"> • Provide synergies with neighbouring and adjoining education and community zoned land; and • Facilitate infill development and compact growth, on land already adjoined by industrial uses. <p>-Flood Risk: A substantial part of the site appears to be situated within areas of potential flood risk (Flood zone A). Historical flooding and a review of the CFRAM maps suggest that the lands benefit from existing flood defences. The site is largely located within Flood Zone C when flood defences are taken into consideration, but are within Flood Zone A in an undefended scenario due to coastal flood risk. The completed Flood Relief Scheme will offer more reliable flood defence for the site in the future.</p> <p>Given the low probability of flooding, it is highly likely that less vulnerable uses such as Enterprise and Employment could be justified. Less vulnerable development can be provided within areas defined as Flood zone A subject to a Development Management justification test. The submission sets out that the site would pass the Justification Test.</p>	<p>The lands are located within Flood Zones A (high probability of flooding). Section 3.5 of the Flood Guidelines indicates that development in this zone should be avoided and/or only considered in exceptional circumstances, such as in city and town centres, or in the case of essential infrastructure that cannot be located elsewhere and where the Justification Test has been applied.</p> <p>Highly and less vulnerable uses are only appropriate if a Justification Test is passed. In considering the Justification Test it should be noted that in order to achieve Compact Growth, the Draft Plan takes a City Centre first approach to the spatial development of Limerick City and Environs. The core is defined as the area zoned “City Centre”. Furthermore, Part 2 of the Justification Test requires the Local Authority to consider a number of factors, including whether the site is located within the core, or if there are 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 Plan has zoned sufficient alternative employment lands to meet the requirements of the Core Strategy, in areas that are not at risk of flooding and suitable for the provision of highly vulnerable uses in accordance with the sequential approach of the Guidelines. The Justification Test does not pass, it is recommended that these lands are not included for Industry or Enterprise and Employment zoning.</p>
Chief Executive’s Recommendations	
1. No change.	
SEA/ AA Response	
N/A	

No. 203	Ref. & Name/ Group:	LCC-C62-203 HRA PLANNING on behalf of Terignum Properties Limited	
Submission/ Observation Summary		Chief Executive’s Response	
<p>1. Zoning: This submission relates to 5.04 ha. of land located in Mungret Village, comprising the Westward Ho public house and adjoining lands and requests a change in zoning of 4.2ha. (excluding the public house) from Enterprise and Employment to Education and Community, with a site-specific objective to accommodate Nursing Home/ Residential Care or Institution/ Retirement Village.</p> <p>The owners have entered into a legal contract to sell the lands to a nursing home provider. A change of zoning from enterprise and employment use to education and community facilities use is therefore required.</p> <p>The submission outlines the site location, context and planning history. Reference is made to national, regional and local policies and objectives.</p> <p>A review of existing nursing home and retirement facilities demonstrates a shortage of existing provision. It is the preference of elderly people to reside in nursing homes close to their existing place of residence and established family ties.</p> <p>One of the key constraints to delivery of additional nursing homes is the lack of available sites. It is impossible for</p>		<p>1. Zoning: The content of the submission received is noted.</p> <p>The inclusion of these lands for Education and Community use would future proof the provision of new schools and other supporting social and community infrastructure and services, in tandem with the substantial population growth envisaged for the City and Environs. However, it is not envisaged that this zone would be utilized primarily for a private nursing home.</p> <p>Chapter 12 Land Use Zoning Strategy of the Draft Plan, sets out the objective of the Education and Community Infrastructure zone, ‘to protect and provide for educational, training and adult learning, community, healthcare, childcare, civic, religious and social infrastructure’. The purpose of this zone is ‘to protect existing and allow for expansion of a wide range of educational facilities, services and related development. To facilitate sustainable development of community infrastructure and create an inclusive high quality of life. This land use will provide for community facilities, healthcare services, childcare, religious, social and civic infrastructure, ancillary purpose-built accommodation and other facilities’. On this basis, the purpose of the zone is not expressly for a Nursing Home, but for accommodation ancillary to the primary education or community/ charitable/ institutional use. Therefore, it is considered necessary to protect the Educational and Community zoned lands for public amenities / facilities such as schools. For this reason, it is not</p>	

	<p>nursing home providers to compete for residentially zoned land. There is a clear need for Local Authorities to identify specific locations for nursing homes.</p> <p>The Southern Environs area demographic profile indicates an ageing population. The site is located in Mungret, within 190m of existing services and facilities including the church, credit union, hairdressers, bar/restaurant and takeaway. The location of the site complies with Objective HO O10 in respect of the siting and appropriate location of nursing homes.</p>	<p>considered appropriate to zone these lands for Education and Community use.</p> <p>In order to facilitate a private nursing home, which would not be ancillary to an existing primary community use, New Residential zoning would be more appropriate. In this regard, and taking into account the aging population as set out in the submission and the proximity of the site to Mungret village, it is recommended to change the zoning from Enterprise and Employment to New Residential.</p>
Chief Executive’s Recommendations		
1. Change the zoning of 4.2ha. from Enterprise and Employment to New Residential at Mungret.		
SEA/ AA Response		
The change in zoning from Enterprise and Employment to New Residential would facilitate the development of a private nursing home, which given the age profile of the community in this part of the metropolitan area would be a necessary facility. These lands were previously in use as a pitch and putt course and there has been some disturbance on the site, the site is located in close proximity to the church and public house and will form an important part of the community facilities in Mungret village.		

No. 206	Ref. & Name/ Group:	LCC-C62-206 HRA PLANNING on behalf of Mr. Michael Gabbett	
Submission/ Observation Summary		Chief Executive’s Response	
1. Zoning: This submission relates to four plots of land (Plot A: 5.57ha. Plot B: 4.25ha. Plot C: 5.57ha. Plot D: 10.22ha.) in the Mungret area and requests a change of zoning from Agriculture and Semi Natural Open Space to Enterprise and Employment.		1. Zoning: The content of the submission received is noted. A portion of these lands that are located outside the flood zone are already zoned as Enterprise and Employment. The issue in relation to the remainder of the lands is flooding and is set out below.	

<p>The submission sets out the national, regional and local planning context for the requested re-zoning.</p> <p>The agricultural zoning is inappropriate and represents an underutilisation of serviced land within the Metropolitan area, contrary to the envisaged growth under the National Planning Framework, which seeks to achieve efficiencies in the use of serviced land, with immediate access to the strategic national road network. There is no necessity to protect and/or provide for agricultural use because it is commercially unviable.</p> <p>There is no current or planned open space, recreational or community health function that requires allocation of semi-natural open space zoning. An appropriate buffer can be maintained from the SAC at ca. 20m. The site is serviced by road infrastructure and is situated adjacent to the Dock Road, justifying ‘enterprise and employment’ use.</p> <p>-Flood Risk: Plot B, C and D appear to be situated within flood zones A and B. PUNCH Consulting Engineers have carried out a Site Specific Flood Risk Assessment.</p> <p>All three sites are located within the lands benefitted by the Shannon Embankments South Scheme. The land is also located within the OPW Ballynaclogh Arterial Drainage Scheme which drains into the Shannon Estuary. Actual</p>	<p>-Flood Risk: The Planning and Development Act 2000 (as amended) requires the preparation of the Development Plan in accordance with Section 28 Ministerial Guidelines. In accordance with The Planning System and Flood Risk Management, Guidelines for Planning Authorities (the Guidelines), a Strategic Flood Risk Assessment (SFRA) has been prepared to assess flood risk within the plan area.</p> <p>In order to achieve the aims and objectives and comply with the requirements of the Guidelines, the Local Authority’s approach to the zoning of land is to avoid development in areas at risk, where possible and substitute less vulnerable uses, where avoidance is not possible. A precautionary approach will be applied, where necessary to reflect uncertainties in flooding datasets and assessment techniques and the ability to predict the future climate and performance of flood defences.</p> <p>The defences referred to are part of the OPW arterial drainage scheme and are of unknown condition and standard of protection. In accordance with Section 2.25 of the Guidelines, the presence of flood protection structures should be ignored in determining flood zones. This is because areas protected by flood defences still carry a residual risk of flooding from overtopping or breach of defences and the fact that there may be no guarantee that the defences will be maintained in perpetuity.</p> <p>Much of the lands are located within Flood Zone A (high probability of flooding). Section 3.5 of the Flood Guidelines indicates that development in this zone should be avoided and/or only considered</p>
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	<p>flood risk to the site is currently low with no recorded instances of flooding by the OPW. However, the flood zones ignore the presence of defences. Therefore, each site has an area designated Flood Zone A.</p> <p>Given the low probability of flooding on the Flood Zone A designated site areas, it is highly likely that a less vulnerable use such as Enterprise and Employment could be justified. To mitigate against the residual risk of flooding, the finished floor levels should be 5.66mAOD. Appropriately zoned development on the Flood Zone A portions can be delivered at low risk of flooding and not increase the risk of flooding to adjacent or nearby areas, through the implementation of standard flood mitigation measures and specifically engineered development flood mitigation measures.</p>	<p>in exceptional circumstances, such as in city and town centres, or in the case of essential infrastructure that cannot be located elsewhere and where the Justification Test has been applied.</p> <p>Highly and less vulnerable uses are only appropriate if a Justification Test is passed. In considering the Justification Test it should be noted that in order to achieve Compact Growth, the Draft Plan takes a City Centre first approach to the spatial development of Limerick City and Environs. The core is defined as the area zoned “City Centre”. Furthermore, Part 2 of the Justification Test requires the Local Authority to consider a number of factors, including whether the site is located within the core, or if there are 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 Plan has zoned sufficient alternative employment lands to meet the requirements of the Core Strategy, in areas that are not at risk of flooding and suitable for the provision of highly vulnerable uses in accordance with the sequential approach of the Guidelines. The Justification Test does not pass, it is recommended that these lands located in Flood zone A are not included for Enterprise and Employment zoning.</p>
Chief Executive’s Recommendations		
1. No change.		
SEA/ AA Response		
N/A		
Ref. & Name/ Group:	LCC-C62-213 Sheehan Planning on behalf of Irish Life Assurance Plc	

	Submission/ Observation Summary	Chief Executive’s Response
No. 213	<p>1. Zoning: The submission relates to the zoning of the Limerick One Shopping Park, Childers Road. The current City Development Plan zones the site for Mixed Use, while the Draft Plan proposes to rezone the site to Retail Warehouse.</p> <p>The proposed rezoning will have a negative impact on the vitality and viability of the centre, value as a commercial holding, attractiveness for tenants and users, employment potential and viability of other retail warehouse facilities in the area.</p> <p>The submission refers to the zoning matrix and indicates that most of the current occupiers/uses would be ‘non-conforming’ under the Retail Warehouse zone. This is undesirable and leads to uncertainty about the life of the use and is a deterrent to new or continued investment.</p> <p>The Draft plan proposes removing the long established Mixed Use zone from Limerick One, but proposes two areas of Mixed Use in the vicinity - Parkway and Towlerton, previously Enterprise and Employment, at peripheral locations further removed from the city centre.</p> <p>Limerick One Shopping Park does not represent a challenge to the City Centre, it fills a niche not accommodated within retail warehouse developments and not readily</p>	<p>1. Zoning: The content of the submission received is noted. The Draft Plan includes a limited number of Mixed-Use zones to reflect specific site proposals only. In accordance with the Draft Development Plan Guidelines for Planning Authorities, the Draft Plan is moving towards a standardised national set of zoning objectives. In this regard, the provision of additional mixed use zoned sites, which could facilitate residential development is not recommended.</p> <p>The Draft Retail Strategy for the Limerick Shannon Metropolitan Area and County Limerick identifies appropriate locations for Retail Warehousing, including the subject lands. The primary objective of the Retail Strategy is to re-establish and protect the vitality and vibrancy of the City Centre at the top of the retail hierarchy for the Mid-West.</p> <p>Having regard to the planning history of the subject site, the parent permission Pl. Ref. 03/181 included a ‘Retail park including a convenience and comparison goods store, 6 retail warehouse units, a garden centre, 2 comparison goods outlets, a leisure and fitness centre incorporating a retail sports goods element, 2 restaurants, a petrol station and car parking etc.’. In this regard, the zoning of the site for Retail Warehousing reflecting the permission granted and Local Centre zoning reflecting the convenience element (Dunnes Stores) is considered appropriate.</p> <p>The Draft Plan allows for ‘Non-Conforming Uses’ which are uses that do not conform to the zoning objective. The alteration to the zoning</p>

	accommodated in the city core, with bulky goods, convenience shopping and lower order comparison and leisure use allowing for linked trips.	does not prevent the continuation of an existing use. In this regard, the objective states that “where legally established” (by an existing planning permission) an existing non-conforming use can be extended or improved subject to permission. The zoning of the lands for Retail Warehousing and Local Centre does not therefore preclude the continued use of the development in accordance with the planning permission granted. No change to the zoning objectives are recommended.
	Chief Executive’s Recommendations	
	1. No change.	
	SEA/ AA Response	
	N/A	

No. 218	Ref. & Name/ Group:	LCC-C62-218 +CityxChange
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Zoning: The Limerick City Exchange project, that has established Limerick as Ireland’s first EU Smart Cities – Lighthouse City, is seeking to increase energy security and assist in decarbonisation. As part of the +CityxChange project two Council owned sites have been identified as having potential to provide Renewable Energy generation and decarbonisation. The observation is requesting amendments to the zoning of the sites as follows:</p> <p>-Longpavement Landfill site: This is zoned Semi Natural Open Space. The observation requests that the area of the landfill cells, a narrow margin around the cells and the</p>	<p>1. Zoning: The content of the submission received is noted. The CityXChange Project is supported under the objectives of Chapter 8 Climate Action, Flood Risk and Transition to Low Carbon Economy of the Draft Plan.</p> <p>The requested amendments to the zoning objectives would facilitate decarbonisation and contribute to renewable energy production. Such amendment would contribute to the objectives to reduce carbon emissions and the transition to a low carbon economy. On this basis it is recommended that the zoning is amended.</p>

<p>compound including the gas and leachate management infrastructure be changed to Utilities zoning. This would reflect the purpose of the landfill and facilitate possible solar PV generation.</p> <p>-M7/M20 Motorway Junction: The site known as Barry’s Field is zoned Open Space and Recreation. The observation requests a change to Agriculture zoning.</p>	
Chief Executive’s Recommendations	
<p>1. Change the zoning from Semi Natural Open Space to Utilities in the area of the landfill cells, a narrow margin around the cells and the compound at Longpavement Landfill Site.</p> <p>2. Change the zoning from Open Space and Recreation to Agriculture at Barry’s Field (M7/M20 Motorway Junction).</p>	
SEA/ AA Response	
<p>The proposal to zone the lands from Semi Natural Open Space to Utilities, reflect the use of the site, this is a brownfield site, which is proposed to be re purposed. There is an area of the compensatory habitat in the south of the Longpavement site, which will remain untouched by the change in zoning. The potential use of renewable solar energy, will offer the potential for addressing climate action targets in line with national and regional policy.</p>	

No. 277	Ref. & Name/ Group:	LCC-C62-277 +CityxChange
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Introduction: The submission sets out the background to +Cx, which aims to enable the co-creation of a framework and supporting tools to enable a common energy market supported by a connected community and acknowledges</p>	<p>1. Introduction: The content of the submission received is noted.</p>

<p>that the plan provides policy support for the aims and objectives of the project.</p> <p>2. Monitoring and Evaluation: The plan does not contain a Key Performance Indicator (KPI) framework. An objective should be included to enable such a framework, addressing a range of indicators that evaluates the progress being made towards a sustainable society, key environmental and economic indicators. The U4SSC framework developed in partnership with the UN has developed a range of KPI’s to measure progress.</p> <p>3. Sustainable Communities and Infrastructure: The concept of community assets should be addressed to include for example car clubs, community energy assets such as small-scale river turbines and solar arrays etc.</p> <p>Objective SFO1a & f and EFO1b & k need to be connected to a clear target. The +CxC project is helping to develop the capacity capable of harnessing the infrastructure, frameworks and experience of this project’s engagement activity and make Limerick City and County Council a leader in engagement. The draft plan should be amended to include a commitment to develop a plan for active and</p>	<p>2. Monitoring and Evaluation: The Council recognise the importance of monitoring the implementation of the any plan or programme, the Development Plans, Guidelines for Planning Authorities, Consultation Draft (August 2021) sets out a comprehensive list of indicators to be monitored and reported on, on an annual basis, In accordance with response to submission no. 1, Chapter 13 will be amended to provide a comprehensive list of indicators to be monitored, in order to assess the success with which the development plan is being implemented. The Council is committed the establishment of a strong, frequent and ongoing monitoring system for the development plan.</p> <p>3. Sustainable Communities and Infrastructure: The process for public consultation during the preparation of the Draft Plan is set out under the Planning and Development Act 2000 (as amended). Public engagement is completed prior to the adoption of the Development Plan by the Elected Members. However, there are a number of strategies which will be prepared and reviewed during the lifetime of the Development Plan, including Local Area Plans, the Blue/Green Infrastructure Strategy, Public Realm Plans etc. The preparation of all these strategies will undergo public consultation, both statutory and non-statutory as appropriate. As part of the implementation and delivery of the Plan, it is also a policy (IM P2 Review) of the Council to ‘co-operate with the Office of the Planning Regulator, Southern Regional Assembly and National Audit and Oversight Committee as part of the monitoring and review procedure’.</p>
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	<p>continuous citizen engagement throughout the lifetime of the plan.</p> <p>The frameworks will be implemented and refined in the innovation lab located at UL’s city centre campus including The Citizen Participation Playbook, The Framework for Innovation Playgrounds, The Framework for a Positive Energy Champion Network, The Framework for DPEB Learning and Education.</p> <p>4. Land Zoning: The request for re-zoning is the same as under Submission No. 218 above.</p>	<p>4. Land Zoning: See response to Submission No. 218 above.</p>
Chief Executive’s Recommendations		
<p>1 - 3: No change.</p> <p>4. A) Change the zoning from Semi Natural Open Space to Utilities in the area of the landfill cells, a narrow margin around the cells and the compound at Longpavement Landfill Site; B) Change the zoning from Open Space and Recreation to Agriculture at Barry’s Field (M7/M20 Motorway Junction).</p>		
SEA/ AA Response		
See response to Submission No. 218 above.		

No. 219	Ref. & Name/ Group:	LCC-C62-219 Ballinacurra Residents Association
Submission/ Observation Summary		Chief Executive’s Response
<p>1. Draft Plan: The Draft Plan lacks specifics to each area and time limits.</p>		<p>1. Draft Plan: A new Spatial Strategy chapter has been prepared to set out more clearly the objectives for the development of the</p>

	Limerick Metropolitan Area. This chapter incorporates specific objectives and strategies for development over the lifetime of the Draft Plan, including LSMATS, LK2030, Colbert Quarter, Retail Strategy and Building Heights Strategy.
Chief Executive’s Recommendations	
1. In line with the OPR recommendation a new Spatial Strategy chapter shall be included.	
SEA/ AA Response	
Chapter 3 will set out a comprehensive and coordinated approach to the development of the Metropolitan Area.	

No. 223	Ref. & Name/ Group: LCC-C62-223 Limerick Twenty Thirty				
	<table border="1"> <thead> <tr> <th>Submission/ Observation Summary</th> <th>Chief Executive’s Response</th> </tr> </thead> <tbody> <tr> <td> <p>1. Mungret Masterplan: This submission proposes that the Mungret Masterplan is adopted to act as a Framework to guide future development in the Mungret area.</p> <p>The observer proposes that the LIHAF Road route become part of the Development Plan. The Masterplan has been updated with respect to the LIHAF road route and the relocation of the creche, retail and community facilities as per the Part 8 application Pl. Ref. 21/8000.</p> <p>By adopting the existing Masterplan as a framework for future development in the area, it will advocate a holistic approach to creating a vibrant neighbourhood that accommodates and facilitates a variety of uses and that nurtures a strong sense of community. It will promote a place that is safe, with people-friendly streets and spaces</p> </td> <td> <p>1. Mungret Masterplan: The content of the submission received is noted. It is considered that the Mungret Masterplan attached to the submission should not be adopted as a statutory part of the Development Plan, but instead act as a Framework to guide future development of the lands. The Masterplan which was prepared in 2018 includes details of density, number of units, type of units or housing mix. However, these have already been set out in the Draft Development Plan in accordance with the most up to date National and Regional planning policy, Section 28 Guidelines and other statutory requirements.</p> <p>The Local Authority considers that the draft plan should be amended to include a single map, based on the masterplan work, that will guide as a Framework to supplement the Development Management Standards and specific objectives for Mungret already included in the Draft Plan.</p> </td> </tr> </tbody> </table>	Submission/ Observation Summary	Chief Executive’s Response	<p>1. Mungret Masterplan: This submission proposes that the Mungret Masterplan is adopted to act as a Framework to guide future development in the Mungret area.</p> <p>The observer proposes that the LIHAF Road route become part of the Development Plan. The Masterplan has been updated with respect to the LIHAF road route and the relocation of the creche, retail and community facilities as per the Part 8 application Pl. Ref. 21/8000.</p> <p>By adopting the existing Masterplan as a framework for future development in the area, it will advocate a holistic approach to creating a vibrant neighbourhood that accommodates and facilitates a variety of uses and that nurtures a strong sense of community. It will promote a place that is safe, with people-friendly streets and spaces</p>	<p>1. Mungret Masterplan: The content of the submission received is noted. It is considered that the Mungret Masterplan attached to the submission should not be adopted as a statutory part of the Development Plan, but instead act as a Framework to guide future development of the lands. The Masterplan which was prepared in 2018 includes details of density, number of units, type of units or housing mix. However, these have already been set out in the Draft Development Plan in accordance with the most up to date National and Regional planning policy, Section 28 Guidelines and other statutory requirements.</p> <p>The Local Authority considers that the draft plan should be amended to include a single map, based on the masterplan work, that will guide as a Framework to supplement the Development Management Standards and specific objectives for Mungret already included in the Draft Plan.</p>
Submission/ Observation Summary	Chief Executive’s Response				
<p>1. Mungret Masterplan: This submission proposes that the Mungret Masterplan is adopted to act as a Framework to guide future development in the Mungret area.</p> <p>The observer proposes that the LIHAF Road route become part of the Development Plan. The Masterplan has been updated with respect to the LIHAF road route and the relocation of the creche, retail and community facilities as per the Part 8 application Pl. Ref. 21/8000.</p> <p>By adopting the existing Masterplan as a framework for future development in the area, it will advocate a holistic approach to creating a vibrant neighbourhood that accommodates and facilitates a variety of uses and that nurtures a strong sense of community. It will promote a place that is safe, with people-friendly streets and spaces</p>	<p>1. Mungret Masterplan: The content of the submission received is noted. It is considered that the Mungret Masterplan attached to the submission should not be adopted as a statutory part of the Development Plan, but instead act as a Framework to guide future development of the lands. The Masterplan which was prepared in 2018 includes details of density, number of units, type of units or housing mix. However, these have already been set out in the Draft Development Plan in accordance with the most up to date National and Regional planning policy, Section 28 Guidelines and other statutory requirements.</p> <p>The Local Authority considers that the draft plan should be amended to include a single map, based on the masterplan work, that will guide as a Framework to supplement the Development Management Standards and specific objectives for Mungret already included in the Draft Plan.</p>				

	and that relates well both to its surroundings and with Mungret Village and the adjacent neighbourhoods at Dooradoyle and Raheen.	
Chief Executive’s Recommendations		
	<p>1(i) Replace all references in the written statement to Mungret Masterplan with <u>Framework</u>.</p> <p>(ii) Incorporate a Mungret Framework Plan map in the new Chapter 3 Spatial Strategy.</p> <p>C) Amend Objective MM O1 to include the following:</p> <p>(j) Provide a mix of <u>dwelling sizes and types of the highest quality design, materials and energy efficiency</u>, homes that give the opportunity <u>for every stage of the life cycle and</u> to up or downsize within the neighbourhood.</p> <p><u>(k) Residential development shall be designed to create a streetscape along the main spine roads, with properties fronting onto the road where appropriate.</u></p> <p><u>(l) Higher density development e.g. apartment blocks are encouraged along the LIHAF Road and at block corners in particular.</u></p>	
SEA/ AA Response		
	The updated framework for Mungret will set out a comprehensive set of guiding principles for the development of Mungret, the detail of the design will be assessed as part of the Development Management process. The establishment of a Framework to guide development is considered a positive approach, from an environmental and ecological perspective, as it established the framework for the overall development of the area.	

No. 224	Ref. & Name/ Group: LCC-C62-224 Traders Group High Street	
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. High Street: The submission relates to the development of High Street and immediate surrounds.</p> <p>High Street is prominent in the cityscape and was historically vibrant. The street has undergone a commercial</p>	<p>1. High Street: The content of the submission received is noted. The Local Authority welcomes the participation of groups in the plan making process and encourages the preparation of specific plans by such groups.</p>

<p>resurgence with a diverse range of businesses, primarily focused on the hospitality/food experiences. The area is also home to over 110 apartments accommodating over 250 people.</p> <p>The submission outlines concerns regarding:</p> <ul style="list-style-type: none"> • The junction between Back Lane, High Street and Upper Denmark Street is a high-risk junction due to the competing flow of traffic. • The minimum footpath width has not been achieved at Roundhouse Apartments. • The road width on Back Lane at its minimum is not suitable for certain vehicular traffic. • The use of laneway intersecting high street and back lane for rubbish disposal, drug misuse and anti-social behaviour. <p>The submission proposes:</p> <ul style="list-style-type: none"> • Retention of disability parking (2 spaces) • Reduction of street parking (from 9 to 5 spaces). • One-way traffic flow with reduction of two way. • Increase footpath widths. • Transform areas directly outside hospitality businesses for outside dining. <p>The transformation has the potential to act as a roadmap for a longer-term transformation of High Street and Limerick City. With a minimum investment Limerick City</p>	<p>The Draft Plan supports the general land use and guides the development of the City and County. The Draft Plan also supports proposals for sustainable transport and development including LSMATS.</p> <p>The Draft Plan supports proposals for improvement of the public realm, including the forthcoming Public Realm Strategy, as supported under Objective CGR O1 of Chapter 10 Compact Growth and Revitalisation. The Public Realm Strategy will consider the enhancement of the City. The aim of the Public Realm Strategy will be to:</p> <ul style="list-style-type: none"> - Guide the enhancement, management, use and development of the public domain in collaboration with all stakeholders; - Strengthen and enhance the attributes which contribute to the distinctive physical and social character of Limerick City; - Ensure that the interests of all users are considered; - Set out co-ordinated projects/priorities that will enhance and improve the way the city functions; - Ensure that public realm design contributes to the overall liveability and sustainability of the city and embraces the concepts of urban greening and nature-based solutions. <p>The Strategy will complement measures that will be contained in the final Limerick Shannon Metropolitan Area Transport Strategy (LSMATS) and the City Centre Traffic Management Plan.</p> <p>All of the aforementioned plans and strategies will combine to improve the City Centre at a street level. Each of these plans will be</p>
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could develop/foster as an ethnically diverse tourism ‘Food’ destination.	placed on public display, providing opportunities for further consultation and input into street level detail. The Local Authority look forward to engagement with this group in the preparation of these plans.
Chief Executive’s Recommendations	
1. No change.	
SEA/ AA Response	
N/A	

No. 226	Ref. & Name/ Group: LCC-C62-226 MWP on behalf of John Moriarty
Submission/ Observation Summary	Chief Executive’s Response
<p>1. Zoning: The submission relates to 10.8ha., with 8.8ha. located to the west and 2ha. located to the east of Condell Road. The site is located to the north of the Clonmacken Roundabout. The submission seeks to:</p> <ul style="list-style-type: none"> Amend the proposed zoning to New Residential (retain the residential zoning from the existing 2010 City Development Plan); Support the Open Space and Recreation and Agriculture zoning of the remainder. <p>The submission sets out the site context including services, planning history and the national, regional and local level policy context. The site is within 10 minutes of the Jetland District Centre and community services.</p>	<p>1. Zoning: The content of the submission received is noted. There are a number of issues in relation to the zoning of these lands as set out below:</p> <p>-Flood Risk: The Planning and Development Act 2000 (as amended) requires the preparation of the Development Plan in accordance with Section 28 Ministerial Guidelines. In accordance with The Planning System and Flood Risk Management, Guidelines for Planning Authorities (Section 28 Guidelines), a Strategic Flood Risk Assessment (SFRA) has been prepared to assess flood risk within the plan area.</p> <p>In order to achieve the aims and objectives and comply with the requirements of the Guidelines, the Local Authority’s approach to the zoning of land is to avoid development in areas at risk, where possible and substitute less vulnerable uses, where avoidance is not possible. A precautionary approach will be applied, where necessary</p>

<p>The amendment from Agriculture to New Residential zoning is consistent with policy at a national, regional and local level. The site is currently zoned New Residential and a planning application will be considered in advance of the adoption of the Draft Development Plan.</p> <p>The site is within Flood Zone A but is protected by defences which are in the process of being upgraded by the OPW. The proposed development is subject to a Site-Specific Flood Risk Assessment and the proposal includes floor levels raised above the flood risk. There will be no loss of storage in a catastrophic event, while all highly vulnerable uses will be located above flood level. Bridge links to the Condell Road will provide emergency access above the flood level. The justification test can be applied.</p> <p>The retention of the Open Space and Recreation zone to the east of Condell Road is supported. The observer intends to provide playing pitches and car parking on the condition that the Residential zoning is maintained on lands to the west.</p>	<p>to reflect uncertainties in flooding datasets and assessment techniques and the ability to predict the future climate and performance of flood defences.</p> <p>Much of the lands are located within Flood Zone A (high probability of flooding). Section 3.5 of the Flood Guidelines indicates that development in this zone should be avoided and/or only considered in exceptional circumstances, such as in city and town centres, or in the case of essential infrastructure that cannot be located elsewhere and where the Justification Test has been applied.</p> <p>Highly vulnerable uses including residential are only appropriate if a Justification Test is passed. In considering the Justification Test it should be noted that in order to achieve Compact Growth, the Draft Plan takes a City Centre first approach to the spatial development of Limerick City and Environs. The core is defined as the area zoned “City Centre”. Furthermore, Part 2 of the Justification Test requires the Local Authority to consider a number of factors, including whether the site is located within the core, or if there are 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 Plan has zoned sufficient alternative residential lands to meet the requirements of the Core Strategy, in areas that are not at risk of flooding and suitable for the provision of highly vulnerable uses in accordance with the sequential approach of the Guidelines. The Justification Test does not pass, it is recommended that these lands are not included for New Residential zoning.</p>
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		The submission indicates that the site is within Flood Zone A but is protected by flood defences which are in the process of being upgraded by the OPW. In accordance with Section 2.25 of the Guidelines, the presence of flood protection structures should be ignored in determining flood zones. This is because areas protected by flood defences still carry a residual risk of flooding from overtopping or breach of defences and the fact that there may be no guarantee that the defences will be maintained in perpetuity.
Chief Executive’s Recommendations		
1. No change.		
SEA/ AA Response		
N/A		

No. 235	Ref. & Name/ Group:	LCC-O62-235 John Moran
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Introduction: This submission relates to the potential and future of Limerick, particularly the importance of harnessing the growth of the next development period. The impact of rapid growth cannot create unfair prices and infrastructure pressures. Periods of rapid growth tend to favor the incumbents, therefore a combination of better national policies and innovative local implementation will be required. The next period of growth is likely to see a lot of net migration and it is important that these newcomers are allowed to take full opportunity of our region.</p>	<p>1. Introduction: The National Planning Framework and the Regional and Spatial Economic Strategy for the Southern Region envisages Limerick as the principal focus within the Region with the potential to generate and be the focus of significant employment and housing growth. In this regard, the Draft Plan has been drafted to ensure that the policies and objectives allow for growth in line with the NPF and RSES in a compact sustainable manner that caters for the needs of all members of society.</p>

<p>2. Incorporation of Housing For All strategy and redraft of LSMATs: The Housing For All Strategy and re-drafted LSMATs are yet to be incorporated into the Development Plan. LSMATs requires identification of areas for Transport Orientated Development that is yet to be done. There is a lot of emphasis on zoned lands at peripheral locations such as Mungret and Annacotty rather than transport orientated development. This exercise will change the priority of locations closer to the city centre or major transport assets.</p> <p>3. Docklands: The submission also questions the identification of the Docklands as an area for mainly enterprise use rather than a mix of commercial and enterprise.</p>	<p>2. Incorporation of Housing for All strategy and redraft of LSMATs: Having regard to the recently published Housing For All Strategy, the housing strategy will be updated.</p> <p>A key focus of the Draft Plan is the integration of land-use and transport. Comprehensive analysis was undertaken to draft the three density zones across the City and Environs, which are based on proximity to existing public transport and the principles of Transport Orientated Development in accordance with the Section 28 Guidance. Furthermore, significant analysis was undertaken in preparing the land use zoning maps through the “TAZ” table to ensure that new residential zoned lands are located within walking distance of schools and amenities. The potential residential yield of each site in the “TAZ” table has been calculated on the basis of the area of the site within the various density zone. In relation to the comments regarding peripheral locations such as Mungret, this area has been identified under the MASP as a key transformative project. The MASP supports the sustainable development of Mungret, where there has been significant investment in recent years in developing community and educational facilities in advance of the development of residential units. The draft LSMATs has also considered how Mungret and Annacotty will be served by sustainable public transport. Therefore, these areas are considered adequately served to cater for the proposed growth.</p> <p>3. Docklands: It is acknowledged that the Docklands, given their proximity to the city centre, in theory should offer a greater mix of development. However, in preparing Development Plans the Local Authority must consider flood risk in line with the ‘Planning System and</p>
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4. Densities / LK2030 Update: The proposed density of 100+ units per hectare in the City Centre and 45+ in other key areas is inconsistent with the proposal in the Limerick 2030 Update Strategy of a true polycentric city, with interconnected neighbourhoods and county towns playing their role. There is a risk that the densities could be taken as maximum rather than minimum and the key growth centres should be clearly identified as areas capable of supporting much higher densities than 45+. This might mean that other areas identified for development at the outer edges of the city could be de-zoned and kept for future decades.

Flood Risk Management’ Guidelines for Planning Authorities. The Strategic Flood Risk Assessment that was undertaken to inform the Draft Plan has identified the various flood risk areas. Areas within the Docklands that are not at risk of flooding have been designated for mixed use type development and those at risk have been zoned for less vulnerable commercial type uses, in line with the Guidelines.

4. Densities / LK2030 Update: Density policies in the Draft Plan have been prepared in accordance with current Section 28 Guidelines in relation to higher density developments as required in accordance with the Planning and Development Act 2000 (as amended). Such Section 28 Guidelines include “Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities”, 2009, “Sustainable Urban Housing, Design Standards for new Apartments – Guidelines for Planning Authorities”, 2020 and “Urban Development and Building Height Guidelines”, 2018.

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 NPF and RSES. Table 2.6 Density Assumptions per Settlement Hierarchy in the Draft Plan clearly indicates that the net density requirements are minimum standards only and do not include maximum densities in a particular zone. In this regard, all planning applications will be assessed on a case by case basis

<p>-Densities / Towns: Some towns should be identified as “welcome” towns for disproportionate growth and others added if growth patterns exceed expectations. These towns should plan for larger scale and concentrate on higher density type accommodation near centrally located public transport hubs/retail.</p> <p>5. LNDR: Much of the document refers to and relies on the Northern Distributor Road as a key enabler of development in the northern parts of the city. It is unclear if this is referring to the section giving access to Moyross from Coonagh or the later proposal. It is an error to prioritise or assume the LNDR is an enabler at this stage in Limerick’s development, when there is enough brownfield capacity to accommodate the next phase of Limerick’s growth using existing infrastructure. Greater connectivity between Plassey and UL could be a substitute. The LNDR is</p>	<p>on their merits and subject to compliance with all relevant planning criteria and Development Management Standards.</p> <p>The observation that the draft plan is inconsistent with the LK2030 Update is incorrect. In fact, the polycentric urban structure proposed in the LK2030 Update is based on the proposed zoning plan, which was informed by in-depth analysis of available infrastructure and services. The polycentric urban structure for Limerick consists of a consolidated city centre containing the core area flanked by outlying urban neighbourhoods.</p> <p>-Densities / Towns: In setting out the growth targets for the settlements outside of the City and Environs, the Planning Authority had regard to the requirement to comply with National Policy Objective 9, which limits population growth outside of cities, regional growth centres and key towns to 30% by 2040.</p> <p>5. LNDR: The Limerick Northern Distributor Road (LNDR) is identified as a key infrastructure project for the city under the MASP of the Regional Spatial and Economic Strategy for the Southern Region. The Northside Business Campus, also identified as a key transformative project in the MASP will benefit from and be serviced through the construction of the LNDR. However, it is recognised that the overall development of Limerick is not dependent on this infrastructure project. Connectivity between areas across the City and Environs will be improved by sustainable modes of transport in accordance with LSMATS.</p>
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considered premature, including the SDZ project on the Clare side of the University.

6. Moyross: It is important that the growth of Moyross is prioritised before extending to the outer areas. There is potential for the Delmege Estate to become an urban parkland, with local amenities, sports facilities, educational facilities etc. surrounded by higher density apartment accommodation and office blocks.

7. Growth Projections: The growth projections allocated to Limerick are likely to prove very modest. The 33,000 Housing for All target will fall short of what is likely needed to keep ahead of demand and restore affordability. Limerick should only support higher density mixed use developments, including 5-6 storey apartments for any housing involving State sponsorship including LK2030. It should be part of this plan period that lands for perhaps double the expected growth should be given services and masterplanned earlier than required.

8. Heritage: The observer welcomes the continuing designation of heritage areas, but the Plan is cautious in its approach about how to bring those areas back to their former glory. The Georgian Area should seek UNESCO heritage status and be a catalyst for state and private sector development. Lower speed limits of 15km in the

6. Moyross: The objectives for the development of the Moyross area are set out on the draft Zoning Map, which includes sufficient lands for the provision of amenities, education and community infrastructure, employment and residential uses. The new Spatial Strategy chapter, incorporates the outstanding objectives of the Limerick Integration Regeneration Framework Plan.

7. Growth Projections: In preparing the Development Plan the Planning Authority is restricted to considering the growth set out in the Economic and Social Research Institute’s ‘Regional Demographics and Structural Housing Demand at a County Level’ which includes a forecast for an additional 15,591 households, or residential units, over the Plan period 2022 – 2028. The Core Strategy of the Draft Plan has been prepared in accordance with and fully complies with this growth forecast issued by the Department of Housing, Local Government and Heritage as required by the Planning and Development Act 2000 (as amended). The Local Authority therefore, cannot double the growth rates as suggested.

8. Heritage: The Council is committed to protecting the unique characteristics of the Georgian area and will examine additional ways of protection for future generations, including the potential designation as a UNESCO Heritage Site. A critical element of such a designation is the establishment of a strategic framework for the management and protection of the buildings and the public spaces that constitute this

core historic area, prime retail and residential area should be introduced for safety. Special care should be given to dissuade developments which propose the breaking up of ownership of the Georgian buildings. Structures which allow for single owner occupancy should be encouraged if not mandated, especially for smaller historic buildings on side streets. Efforts should be made to encourage the transformation of ground floors to residential instead of commercial. Similar focus should be given to the area of King’s Island and Old Irishtown neighbourhoods to encourage greater conversion of old buildings to residential homes.

9. Colbert Quarter: The Plan underestimates the potential for the area around Colbert Station Quarter and does not take into account the impact on development of the Opera, Arthur’s Quay and Debenham’s sites. Colbert is the key location for public transport connectivity. The vision for creating Limerick’s only inner city core retail area might therefore be out of date.

unique area. Through the Living Limerick City Centre URDF funded programme, the Council is developing new and innovative sustainable models of living and working, to ensure that these buildings are both preserved and actively used.

There is no legislative basis to enable the Council to consider a ban on multi occupancy / owner occupier buildings. The issue also raises concerns regarding management of these small developments and the need to ensure that these building have a management company structure in place, to address maintenance of the common areas, including the external façade.

The Draft Plan supports the residential re-use of existing buildings, “living over the shop” and mews type developments in the City Centre and Environs, subject to compliance with all relevant Development Management Standards and planning criteria.

9. Colbert Quarter: The Draft Plan acknowledges the potential and supports the development of the Colbert Quarter as a new urban quarter as set out under the objectives of Chapter 10 Compact Growth. In addition, in response to a submission received from the LDA, further amendments are proposed to the Draft Plan in relation to the LDA and the strategically important site at Colbert. An objective of the MASP is for the City Centre to be the primary commercial area at the heart of the region. The core retail area comprises Thomas Street/ Bedford Row, William Street/ Sarsfield Street, O’Connell Street/ Patrick Street, Cruises Street, Roches Street, Henry Street and Catherine Street. The Draft Retail Strategy for the Metropolitan Area and County Limerick and

<p>10. Consistency with LK2030 Update: There is tension between the objectives for compact growth and a polycentric city development for Limerick and the earlier LK2030 Plan’s idea of offices in the city centre. If there is a real desire to follow through on a Green carbon neutral Mid-West, then the plan needs to remove any legacy hangovers from the earlier LK2030 Plan’s ideas. It is submitted that a further effort to make the general documents more consistent with the LK2030 Update being the standard is needed now.</p> <p>11. Amenities: There is a missed opportunity to designate the riverfront as a public amenity which should not be privatised or built on. There should be a zero tolerance of developments on open land within 50-100 metres of the riverfront. The use of lands North of the Treaty Stone to Parteen should be maintained for the natural riverside park. Active mobility paths between Moyross/ Thomondgate/ King’s Island and the city should become a key part of those public areas.</p> <p>The lands to the estuary side of the Limerick Bridges to Barrington’s Pier and beyond should be carefully protected for amenities and developed for ebike/escooter transport and where possible not run alongside existing roads.</p>	<p>objectives of the Draft Plan protect, promote, support and enhance the role of this area at the top of the retail hierarchy in accordance with the objectives of the NPF and RSES.</p> <p>10. Consistency with LK2030 Update: In response to the OPR submission it is proposed to insert a new chapter into the draft plan clearly setting out the strategic plan for Limerick. This will incorporate the main proposals of the LK2030 Update.</p> <p>11. Amenities: A Blue Green Infrastructure Strategy for Limerick City and Environs is under preparation. This will inform the provision of green and blue infrastructure within the City and Environs. Implementation of the Strategy is supported in the Draft Development Plan.</p> <p>In relation to the comments on Arthur’s Quay, the text in both the Draft Plan and the LK2030 Update shall be revised to include the requirement of an overall framework plan for this area, including Arthur’s Quay / Debenhams (Roches Store) and potentially the UL site, in advance of making decisions on road location etc. The framework plan shall be supported by a survey of the existing area together with an options analysis.</p>
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<p>Linear parks such as those on Harvey’s Quay are appealing, but they do not have potential for amenities like the People’s Park/Arthur’s Quay. Commercial interests should not trump the people of Limerick in removing these valuable assets and public space.</p> <p>Proposals to redirect the street for cars in Arthur’s Quay, thereby removing this significant existing amenity should be revisited.</p> <p>12. Population Distribution beyond the City: The observer questions the distribution of population beyond the city. The observer uses Foynes as an example as it is a town that could have been the target for much more concentrated downtown development than envisaged. There is an opportunity to prepare Foynes during the term of this plan for significant residential and mixed-use development so that by 2028, the town already has serviced lands for growth.</p>	<p>12. Population Distribution beyond the City: As set out above, National Policy Objective 9, limits population growth outside of cities, regional growth centres and key towns to 30% by 2040. Also, in line with National Policy Objective 3c, 30% of all new homes targeted within Level 4 Large Villages are within their existing built-up footprints. Settlement boundaries have been identified to provide for consolidated compact growth to future proof the settlements in a sustainable manner. This is critical in terms of the ability to plan for the timely delivery of physical and social infrastructure in the right location to serve new housing and in the form of compact growth. The avoidance of flood risk areas for vulnerable uses also formed part of the process in the identification of appropriate zoned land. Flooding was a particular concern in Foynes.</p> <p>The Draft Plan, in accordance with the NPF, seeks to manage the planning and development process so that the right development</p>
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	occurs in the most suitable places and at the right time, ensuring sustainability and best use of resources. This is consistent with the Town Centre First Principle established under Our Rural Future - Rural Development Policy 2021-2025.
Chief Executive’s Recommendations	
<ol style="list-style-type: none"> 1. No change. 2. Update the Housing Strategy, having regard to the recently published Housing For All Strategy. 3. - 10: No change. 11. The text in both the draft plan and the LK2030 Update shall be revised to include the requirement of an overall framework plan for the area, including Arthur’s Quay / Debenhams (Roches Store) and potentially the UL site, in advance of making decisions on road location etc. The framework plan shall be supported by a survey of the existing area together with an options analysis. 	
SEA/ AA Response	
The Housing Strategy and Housing Need Demand Assessment operate within previously zoned land, the suitability for such zoning had been previously assessed. It is considered that the update to the housing strategy and the preparation of the Limerick 2020 framework plan have positive effects, as it will lead to more coordinated development within these areas as it will inform important decisions on Infrastructure provision such as the location of connecting roads and links.	

No. 250	Name/Group LCC-C62-250 Tiernan Properties
Submission/Observation Summary	
Chief Executive Response	
1. Office and Retail Accommodation: Over the past 30 years, there has been significant market failure in office and retail accommodation in Limerick City Centre due to sustained migration of office and retail business to the Environs. This coupled with vacancy in the city centre with	1. Office and Retail Accommodation: Office based employment is vital for the city’s economic development. The Council acknowledges that the availability of choice to cater for the various needs of different types of businesses is essential. In this respect, additional lands are required for office space over and above that provided at the Gardens

sites such as, the Opera Centre, vacant building on Liddy Street, vacant tourist office and under used linear park, as well as a significant loss of retail has had an impact on the city centre.

There has been significant investment in the majority of the District Centres surrounding the city, including: The Crescent Shopping Centre, Jetland Dunnes, the Castletroy Shopping Centre has resulted in a doughnut effect on the City Centre.

2. Strategies: There have been many strategies prepared over the years with limited effect, in 2008, the Limerick City Centre Strategy was prepared by the City Council and not implemented, in 2012, the Limerick 2030 Plan was

International and proposed in the Opera Site and Cleeves Riverside Quarter developments. It is therefore acknowledged that additional locations may become available and the Council recognises the need to be flexible to accommodate employment opportunities and the aims of revitalising and regenerating Limerick City.

An objective of the Limerick Shannon Metropolitan Area Strategic Plan as set out under the Regional and Spatial Economic Strategy, is to promote Limerick City Centre as the primary commercial area, supporting a range of retail, tourism, social and cultural activities. Limerick City Centre is to be repositioned at the top of the retail hierarchy, through improving the range and quality of shopping on offer and creating an enhanced customer experience of visiting the City Centre. Objective ECON 01 of the Draft Plan focuses on retail development within Limerick.

2. Strategies: The Council recognises the importance of a plan led approach to the development of Limerick; the Limerick 2030 Spatial and Economic Plan and the review of the City and County Development Plans also seek to support this plan led approach. In Limerick City, in particular, a number of the sites identified in the Limerick 2030 Plan

prepared by the joint Council, it identifies, high rise development for the city centre as a priority for the first time. It also identified some key sites, which need to be developed, which led to the end of the development feud between the city and county.

3. Vacancy and Dereliction: There is significant vacancy, underutilisation of sites and dereliction issues within the core of the city, there needs to be a significant sea change to right the ship.

have been realised, since its preparation. The Draft Plan and L2030 Update has identified a number of additional sites.

3. Vacancy and Dereliction: One of the Strategic Objectives of the Draft Plan is to address vacancy and dereliction to create compact attractive, vibrant and safe environments in which to live, work, visit and invest. A number of progressive steps have been taken to address dereliction and vacancy in the City Centre, with the establishment of a dedicated team to deal with property owners, also the appointment of a City Centre Revitalisation Manager in 2020 with a role of liaison between retailers/traders and the Local Authority.

Objective CGR O5 Vacant Site Levy provides the policy objective in relation to the provisions of the Urban Regeneration and Housing Act 2015 (as amended), including the continued maintenance of a Vacant Site Register to facilitate the appropriate re-use and development of vacant and underutilised sites on zoned lands in Limerick that are in need of renewal or revitalisation.

4. Special Designation – Central Core: The Plan should include a special designation of the City Centre core (stated as south bank of the River Shannon to Abbey River to Wickham Street and Cecil Street) in which appropriate incentives will be focused to stimulate private development and investment in the city. It is necessary to identify funding streams at national and EU level for incentives, including specific tax designations to encourage urban regeneration.

5. Living City Initiative: The Living City Initiative should be revisited to extend the maximum tax relief available, to support renovation of historic buildings, particular for Georgian buildings.

Objective CGR O6 of the draft Plan sets out policy support for dealing with derelict sites, under the relevant legislation, timelines are set out Derelict Sites Act 1990 for progressing action on property owners.

4. Special Designation – Central Core: The Limerick 2030 Economic and Spatial Plan for Limerick has the ambition to create a City Centre that can attract new inward business investment and encourage the formation of new local business by providing high quality, flexible space. The Draft Plan seeks to protect and promote the strategic employment locations identified in the RSES including Limerick City Centre. Identifying funding streams or tax designations to encourage urban regeneration is outside the remit of the Development Plan.

5. Living City Initiative: The Living City Initiative is a national tax relief scheme of property tax incentives designed to regenerate both historic buildings and other buildings in specified cities across Ireland. The tax incentive scheme is enabled by the Department of Finance and operated through the Revenue and outside the remit of the Draft Plan.

6. Commercial Rates: The Council has discretion to reform Commercial rates, to incentivise investment in the city, particularly for new business.

7. Investment: The submission outlines the need for the radical reform or the city will stagnate as it is and fall further into decline. In this context, the submission suggests that the re-introduction of tax incentives of the type that were used with success in the 1980s and 1990s should be considered. Investment in public realm and investment of public money in the city centre, such as in the UL site and Colbert quarter should be used as a springboard to attract private investment to bring new residential and employment opportunities.

8. Southside Connectivity: Direct connectivity into the City is inhibited by the lack of a direct access from the M20 at Childers Road area causing traffic issues elsewhere in the City, for example Rosbrien.

6. Commercial Rates: Commercial Rates are outside the remit of the proposed Development Plan process.

7. Investment: The observation is noted. This introduction of tax incentives is beyond the remit of the proposed Development Plan.

8. Southside Connectivity: This issue has been addressed in response to Submission No. 116. Policy support is provided for in the Draft Plan.

9. Data Centres: The Draft Plan must give effect to the Government Policy Statement on Data Centres in Ireland and offers opportunities for balanced regional development beyond Dublin.

10. LSMATS: The Draft Plan must integrate the transport provisions of the Draft LSMATS.

9. Data Centres: Objective ECON O24 outlines the Council’s objective on Data Centres as follows: It is an objective of the Council to facilitate the development of Data Centres on lands appropriately zoned for such purposes, subject to normal planning, development and environmental controls and the assessment of the potential impact on such development on adjacent land uses. The Council will zone lands specifically for the development of a data centre in Limerick as is outlined in response to Submission No. 196.

10. LSMATS: Objective TR O12 supports the implementation of LSMATS and the strategies objectives.

Chief Executive Recommendation

1- 8. No change;

9. [Include the zoning of lands specifically for development of a data centre in Limerick \(in response to submission 196\);](#)

10. No change.

SEA/AA Response

The inclusion of the date centre in lands in Rosbrien lies within the development boundary of the plan and in an area that can be easily serviced, is in line with good practice and should not have significant environmental effects.

No. 253	Ref. & Name/Group	LCC-C62-253 SLR Consulting on behalf of Irish Cement Ltd.	
Submission/Observation Summary		Chief Executive Response	
<p>1. Zoning: This submission requests the re-zoning of lands proposed as Enterprise and Employment, Agriculture and New Residential, to Enterprise and Employment and Industrial use at Mungret.</p> <p>The submission sets out the site location and planning policy context.</p> <p>The lands were zoned Enterprise and Employment and Industry under the Southern Environs Local Area Plan 2011 – 2017 and have been changed to Agriculture. The submission requests changes to zoning as follows:</p> <ul style="list-style-type: none"> -Lands to the south of the N69 opposite the Castlemungret Cement Factory zoned Enterprise and Employment should be re-zoned to Industry, to consolidate similar uses/zones. -Wider lands to the south of the N69 zoned Enterprise and Employment, New Residential and Agriculture should be 		<p>1. Zoning: The content of the submission received is noted.</p> <p>-Enterprise and Employment to Industry: The zoning of lands in this general area reflects Flood Zones A and B and the associated uses permissible under the Planning System and Flood Risk Management Guidelines. The lands zoned Enterprise and Employment are located outside of Flood Zones A and B.</p> <p>As set out under Chapter 12 Land Use Zoning Strategy, the purpose of the industry zoning is “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”. In this regard and with respect to the request to change the zoning from Enterprise and Employment to Industrial, concerns are raised in relation to the potential adverse impact on the amenities of existing and new residential zoned areas and existing office/ enterprise developments, which may arise as a result of</p>	

<p>re-zoned to Industry, to reinstate previous zoning, facilitate strategic synergies and consolidate similar uses/ zones.</p> <p>-Lands to the north of the Dock Road Junction zoned Agriculture should be re-zoned Enterprise and Employment to conform and consolidate with adjoining zoned lands.</p>	<p>industrial use of these lands. On the basis of the above, it is not recommended to change the zoning to Industry.</p> <p>-New Residential to Enterprise and Employment or Industry: The small area of New Residential zoned lands subject of this submission adjoins existing residential development. These lands are located outside of both Flood Zones A and B and are therefore suitable for highly vulnerable uses such as residential. The development of these lands for residential purposes would facilitate the creation of a streetscape along this section of roadway. Furthermore, concerns are raised in relation to the potential adverse impact on residential amenities arising from development of these lands due to the nature of industry permissible in the industry zone as outlined above. On the basis of the above, it is not recommended to change the zoning to Enterprise and Employment or Industrial.</p> <p>-Agriculture to Enterprise and Employment: The main issue in relation to the rezoning of these lands from Agriculture to Enterprise and Employment relates to flood risk. The Planning and Development Act 2000 (as amended) requires the preparation of the Development Plan in accordance with Section 28 Ministerial Guidelines. In accordance with The Planning System and Flood Risk Management, Guidelines for Planning Authorities (the Guidelines), a Strategic Flood Risk Assessment (SFRA) has been prepared to assess flood risk within the plan area.</p> <p>In order to achieve the aims and objectives and comply with the requirements of the Guidelines, the Local Authority’s approach to the zoning of land is to avoid development in areas at risk, where possible</p>
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		<p>and substitute less vulnerable uses, where avoidance is not possible. A precautionary approach will be applied, where necessary to reflect uncertainties in flooding datasets and assessment techniques and the ability to predict the future climate and performance of flood defences.</p> <p>The submission relates to two sites, one wholly within Flood Zone A and one partly within Flood Zone A. The use of agricultural zoning in the Draft Plan reflects the extents of Flood Zone A (high probability of flooding). Section 3.5 of the Flood Guidelines indicates that development in this zone should be avoided and/or only considered in exceptional circumstances, such as in city and town centres, or in the case of essential infrastructure that cannot be located elsewhere and where the Justification Test has been applied.</p> <p>Highly and less vulnerable uses are only appropriate if a Justification Test is passed. In considering the Justification Test it should be noted that in order to achieve Compact Growth, the Draft Plan takes a City Centre first approach to the spatial development of Limerick City and Environs. The core is defined as the area zoned “City Centre”. Furthermore, Part 2 of the Justification Test requires the Local Authority to consider a number of factors, including whether the site is located within the core, or if there are 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 Plan has zoned sufficient alternative employment lands to meet the requirements of the Core Strategy, in areas that are not at risk of flooding and suitable for the provision of highly vulnerable uses in accordance with the sequential approach of the Guidelines. The</p>
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	<p>2. Mungret Masterplan: The submission acknowledges the projections for growth of Mungret as part of the City Metropolitan Area and key growth enabler under the MASP. This is addressed through the Mungret Masterplan. The New Residential lands surrounding the observer’s lands should be moved into the Masterplan area, to ensure a holistic, co-ordinated approach to the development. Residential development at the locations proposed would represent urban sprawl and is inefficient with respect to provision of services and amenities.</p> <p>The undeveloped Enterprise and Employment lands to the south of the N69 should also be moved into the Masterplan Area to ensure business and employment opportunities are provided in tandem with population growth.</p>	<p>Justification Test does not pass, it is recommended that these lands are not included for Industry or Enterprise and Employment zoning.</p> <p>2. Mungret Masterplan: The submission appears to suggest that the capacity of the New Residential and Enterprise and Employment zones should be accounted for within the area of the Mungret Framework plan. However, it is considered that there are sufficient lands zoned for residential and employment uses within the Framework plan to cater for projected growth within the area.</p>
	Chief Executive Recommendation	
	1. - 2. No change.	
	SEA/AA Response	
	N/A	

No. 254	Ref. & Name/Group	LCC-C62-254 SLR Consulting on behalf of Belguard Estate Ltd.	
	Submission/Observation Summary	Chief Executive Response	

<p>1. Zoning: This submission requests the re-zoning of lands from Agriculture, New Residential and Enterprise and Employment to Industrial at Mungret.</p> <p>The submission sets out the site location and planning policy context.</p> <p>The lands were zoned Enterprise and Employment, Residential Development Area and Industry under the Southern Environs Local Area Plan 2011 – 2017. Parts of these lands have been zoned Agriculture, New Residential and Enterprise and Employment under the Draft Plan. The submission requests a change in zoning of all of these lands to Industry, to consolidate similar land use zones with potential synergies in a continuous block.</p>	<p>1. Zoning: The content of the submission received is noted.</p> <p>-Enterprise and Employment to Industry: The zoning of lands in this general area reflects Flood Zones A and B and the associated uses permissible under the Planning System and Flood Risk Management Guidelines. The lands zoned Enterprise and Employment are located outside of Flood Zones A and B.</p> <p>As set out under Chapter 12 Land Use Zoning Strategy, the purpose of the industry zoning is “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”. In this regard and with respect to the request to change the zoning from Enterprise and Employment to Industrial, concerns are raised in relation to the potential adverse impact on the amenities of existing and new residential zoned areas and existing office/ enterprise developments, which may arise as a result of industrial use of these lands. On the basis of the above, it is not recommended to change the zoning to Industry.</p> <p>-New Residential to Industry: The large area of New Residential zoned lands subject of this submission adjoins existing and proposed residential development. These lands are located outside of both Flood Zones A and B and are therefore suitable for highly vulnerable uses such as residential. The development of these lands for residential purposes would facilitate the creation of a streetscape</p>
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		<p>along this section of roadway. Furthermore, concerns are raised in relation to the potential adverse impact on residential amenities arising from development of these lands due to the nature of industry permissible in the industry zone as outlined above. On the basis of the above considerations, it is not recommended to change the zoning to Enterprise and Employment or Industrial.</p> <p>-Agriculture to Industry: The main issue in relation to the rezoning of these lands from Agriculture to Industry relates to flood risk. The Planning and Development Act 2000 (as amended) requires the preparation of the Development Plan in accordance with Section 28 Ministerial Guidelines. In accordance with The Planning System and Flood Risk Management, Guidelines for Planning Authorities (the Guidelines), a Strategic Flood Risk Assessment (SFRA) has been prepared to assess flood risk within the plan area.</p> <p>In order to achieve the aims and objectives and comply with the requirements of the Guidelines, the Local Authority’s approach to the zoning of land is to avoid development in areas at risk, where possible and substitute less vulnerable uses, where avoidance is not possible. A precautionary approach will be applied, where necessary to reflect uncertainties in flooding datasets and assessment techniques and the ability to predict the future climate and performance of flood defences.</p> <p>The submission relates to lands within Flood Zone A. The use of agricultural zoning in the draft Plan reflects the extents of Flood Zone A (high probability of flooding). Section 3.5 of the Flood Guidelines</p>
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	<p>2. Mungret Masterplan: The submission acknowledges the projections for growth of Mungret as part of the City Metropolitan Area and key growth enabler under the MASP. This is addressed through the Mungret Masterplan. The New Residential lands within the observer’s lands should be moved into the Masterplan area, to ensure a</p>	<p>indicates that development in this zone should be avoided and/or only considered in exceptional circumstances, such as in city and town centres, or in the case of essential infrastructure that cannot be located elsewhere and where the Justification Test has been applied.</p> <p>Highly and less vulnerable uses are only appropriate if a Justification Test is passed. In considering the Justification Test it should be noted that in order to achieve Compact Growth, the Draft Plan takes a City Centre first approach to the spatial development of Limerick City and Environs. The core is defined as the area zoned “City Centre”. Furthermore, Part 2 of the Justification Test requires the Local Authority to consider a number of factors, including whether the site is located within the core, or if there are 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 Plan has zoned sufficient alternative employment lands to meet the requirements of the Core Strategy, in areas that are not at risk of flooding and suitable for the provision of highly vulnerable uses in accordance with the sequential approach of the Guidelines. The Justification Test does not pass, it is recommended that these lands are not included for Industry or Enterprise and Employment zoning.</p> <p>2. Mungret Masterplan: The submission appears to suggest that the capacity of the New Residential and Enterprise and Employment zones should be accounted for within the area of the Mungret Framework plan. However, it is considered that there are sufficient lands zoned for residential and employment uses within the Framework plan to cater for projected growth in this area.</p>
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	<p>holistic, co-ordinated approach to the development. Residential development at the locations proposed would represent urban sprawl and is inefficient with respect to provision of services and amenities. The undeveloped Enterprise and Employment lands should also be moved into the Masterplan Area to ensure business and employment opportunities are provided in tandem with population growth. The moving of these lands should be replaced with an Industry zone.</p>	
Chief Executive Recommendation		
1. - 2. No change.		
SEA/AA Response		
N/A		

No. 255	Ref. & Name/Group	LCC-C62-255 HRA Planning on behalf of Luke O’Halloran
Submission/Observation Summary		Chief Executive Response
<p>1. Zoning: The submission seeks the re-zoning of lands from Open Space and Recreation to Mixed Use and Enterprise and Employment to support Objective BM 01 at The Bays Moyross.</p> <p>The submission sets out the locational context of the site. A key challenge for the Moyross Regeneration Area, is the poor connectivity and accessibility resulting in physical, economical and socially isolation.</p>		<p>1. Zoning: The content of the submission received is noted. The main issue in relation to the zoning of these lands relates to Flood Risk:</p> <p>-Flood Risk: The Planning and Development Act 2000 (as amended) requires the preparation of the Development Plan in accordance with Section 28 Ministerial Guidelines. In accordance with The Planning System and Flood Risk Management, Guidelines for Planning Authorities (the Guidelines), a Strategic Flood Risk Assessment (SFRA) has been prepared to assess flood risk within the plan area.</p>

<p>In the absence of a definite Open Space and Recreation Strategy the purpose of this zoning is unclear. There is extensive Open Space and Recreation zoning in this area. The submission disputes that zoning of these lands will contribute to Objectives SCS1 018 to SCS1 028.</p> <p>Flood risk management is not an impediment to certain development types. There is nothing in the Guidelines stating that land within areas at flood risk must be non-development type open-space or other amenity function.</p> <p>The lands pass the Justification Test. A Site-Specific Flood Risk Assessment (SSFRA) indicates the potential area of flood risk may not be as extensive as illustrated in the Draft Plan.</p> <p>The lands are serviced and have access to the LNDR and connectivity of Draft LSMATS. Section 2.6 of the Core Strategy recognises the obligation to ensure sufficient land for employment purposes. Such zoning should have regard to the Draft LSMATS and the availability of infrastructure.</p> <p>Zoning these lands as Mixed Use and Enterprise and Employment will satisfy Objectives M01 Moyross, MB01 The Bays Moyross as well as economic objectives ECON O13 Strategic Employment Locations City and Environs, ECON O19 Clustering and Innovation, ECON O24 Data</p>	<p>In order to achieve the aims and objectives and comply with the requirements of the Guidelines, the Local Authority’s approach to the zoning of land is to avoid development in areas at risk, where possible and substitute less vulnerable uses, where avoidance is not possible. A precautionary approach will be applied, where necessary to reflect uncertainties in flooding datasets and assessment techniques and the ability to predict the future climate and performance of flood defences.</p> <p>The submission relates to lands within Flood Zone A (high probability of flooding). The use of Open Space zoning in the draft Plan reflects the extents of Flood Zone A. Section 3.5 of the Flood Guidelines indicates that development in this zone should be avoided and/or only considered in exceptional circumstances, such as in city and town centres, or in the case of essential infrastructure that cannot be located elsewhere and where the Justification Test has been applied.</p> <p>Highly and less vulnerable uses are only appropriate if a Justification Test is passed. In considering the Justification Test it should be noted that in order to achieve Compact Growth, the Draft Plan takes a City Centre first approach to the spatial development of Limerick City and Environs. The core is defined as the area zoned “City Centre”.</p> <p>Furthermore, Part 2 of the Justification Test requires the Local Authority to consider a number of factors, including whether the site is located within the core, or if there are 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 Plan has zoned sufficient alternative lands to meet the</p>
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Centres, and ECON O35 Limerick Food Strategy for example.	requirements of the Core Strategy, in areas that are not at risk of flooding and suitable for the provision of highly vulnerable uses in accordance with the sequential approach of the Guidelines. The Justification Test does not pass, it is recommended that these lands are not included for Mixed Use or Enterprise and Employment zoning.
Chief Executive Recommendation	
1. No change.	
SEA/AA Response	
N/A	

No. 256	Ref. & Name/Group: LCC-C62-256 James Corbett Architects on behalf of Bothar Bui Group				
	<table border="1"> <thead> <tr> <th>Submission/Observation Summary</th> <th>Chief Executive’s Response</th> </tr> </thead> <tbody> <tr> <td> <p>1. Wickham Street/High Street and adjacent streets: This submission consists of a community-led plan for the Wickham Street/High Street and adjacent streets.</p> <p>Despite LCCC capital investment in roads, paths and cycleways, this has not improved the general environment including traffic congestion, air pollution, declining business, poor lighting, street clutter, lack of outdoor space for residents to congregate, vacancy, dereliction, anti-social behavior and loss of sense of place. The above needs to be addressed.</p> <p>The submission seeks the inclusion of Wickham Street/High Street area as an Opportunity Site. Opportunities identified</p> </td> <td> <p>1. Wickham Street/High Street and adjacent streets: The content of the submission received is noted. The Local Authority welcomes the participation of groups in the plan making process and encourages the preparation of specific plans by such groups.</p> <p>The Draft Plan supports the general land use and guides the development of the City and County. The Draft Plan also supports proposals for sustainable transport and development including LSMATS.</p> <p>-Public Realm: The Draft Plan supports proposals for improvement of the public realm, including the forthcoming Public Realm Strategy, as supported under Objective CGR O1 of Chapter 10 Compact Growth and Revitalisation. The Public Realm Strategy will consider the</p> </td> </tr> </tbody> </table>	Submission/Observation Summary	Chief Executive’s Response	<p>1. Wickham Street/High Street and adjacent streets: This submission consists of a community-led plan for the Wickham Street/High Street and adjacent streets.</p> <p>Despite LCCC capital investment in roads, paths and cycleways, this has not improved the general environment including traffic congestion, air pollution, declining business, poor lighting, street clutter, lack of outdoor space for residents to congregate, vacancy, dereliction, anti-social behavior and loss of sense of place. The above needs to be addressed.</p> <p>The submission seeks the inclusion of Wickham Street/High Street area as an Opportunity Site. Opportunities identified</p>	<p>1. Wickham Street/High Street and adjacent streets: The content of the submission received is noted. The Local Authority welcomes the participation of groups in the plan making process and encourages the preparation of specific plans by such groups.</p> <p>The Draft Plan supports the general land use and guides the development of the City and County. The Draft Plan also supports proposals for sustainable transport and development including LSMATS.</p> <p>-Public Realm: The Draft Plan supports proposals for improvement of the public realm, including the forthcoming Public Realm Strategy, as supported under Objective CGR O1 of Chapter 10 Compact Growth and Revitalisation. The Public Realm Strategy will consider the</p>
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<p>include built and cultural heritage e.g. a Food Quarter on High Street with synergy with the Milk Market.</p> <p>The submission seeks a revised transport approach and suggests a trial period for limited access to measure the impact of same on local businesses and the community. Businesses trialed outdoor eating during the Pandemic, but traffic pollutants are not conducive to outdoor dining.</p> <p>The submission includes comparative improvements in other cities, and analysis/appraisal of vacancy and the built heritage of the area.</p> <p>The submission requests the following actions:</p> <ul style="list-style-type: none"> -Include An Bothar Bui as an Opportunity Site; -Provide a high-quality shared surface for promotion of pedestrianisation, with access for local deliveries, resident or business vehicles and low speed cycling; -Promote pedestrianisation at agreed times; -Develop a lighting strategy; -Develop a Shopfront Façade Design Code; -Undertake a post Covid 19 study to identify an economic strategy that further enhances An Bothar Bui as a gateway to the City Centre and a strategic diverse cultural route. <p>Low-cost interventions that should be considered include:</p> <ul style="list-style-type: none"> -Targeted removal of street clutter at key locations; -Replace or upgrade lighting; 	<p>enhancement of the City. The aim of the Public Realm Strategy will be to:</p> <ul style="list-style-type: none"> - Guide the enhancement, management, use and development of the public domain in collaboration with all stakeholders; - Strengthen and enhance the attributes which contribute to the distinctive physical and social character of Limerick City; - Ensure that the interests of all users are considered; - Set out co-ordinated projects/priorities that will enhance and improve the way the city functions; - Ensure that public realm design contributes to the overall liveability and sustainability of the city and embraces the concepts of urban greening and nature-based solutions. <p>The Strategy will complement measures that will be contained in the final Limerick Shannon Metropolitan Area Transport Strategy (LSMATS) and the City Centre Traffic Management Plan.</p> <p>All of the aforementioned plans and strategies will combine to improve the City Centre at a street level. Each of these plans will be placed on public display, providing opportunities for further consultation and input into street level detail. The Local Authority look forward to engagement with this group in the preparation of these plans.</p>
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	<ul style="list-style-type: none"> -Rebrand these streets as An Bothar Bui cultural route; -Reorganise traffic at agreed times on a trial basis and quantify the impact; -Provide temporary street furniture; -Liaise with service providers to rationalise above ground cables; -Promote appropriate development of the various brownfield sites. 	
	Chief Executive’s Recommendation	
	1. No change.	
	SEA/AA Response	
	N/A	

No. 257	Ref. & Name/Group:	LCC-C62-257 HRA Planning on behalf of Courtbrack Land Ltd.
	Submission/Observation Summary	Chief Executive’s Response
	<p>1. Zoning: The submission relates to 2.84ha. at Courtbrack Avenue and seeks a change in zoning from Enterprise and Employment to New Residential.</p> <p>The Enterprise and Employment zoning is not responsive to market conditions and fails to take into account the quantum of similarly zoned lands in the vicinity.</p> <p>The submission sets out the locational context demonstrating the suitability of the site to satisfy the</p>	<p>1. Zoning: The content of the submission received is noted. The main issue in relation to this request relates to flood risk:</p> <p>-Flood Risk: The Planning and Development Act 2000 (as amended) requires the preparation of the Development Plan in accordance with Section 28 Ministerial Guidelines. In accordance with The Planning System and Flood Risk Management, Guidelines for Planning Authorities (the Guidelines), a Strategic Flood Risk Assessment (SFRA) has been prepared to assess flood risk within the plan area.</p>

<p>principles of compact growth, 10-minute neighbourhoods, sustainable settlement and the Core Strategy. A lapsed permission previously permitted 47 residential units.</p> <p>The development of the site for residential use would satisfy the Draft Development Plan Guidelines 2021, specifically SPPR DGG 7 regarding the sequential approach to zoning, and can satisfy the density requirements (+45 units per ha) of Level 1 Limerick City – Density 2 Immediate.</p> <p>The Draft Plan fails to provide clear, evidence-based analysis to support the Enterprise and Employment zoning. Current market conditions determine that the site is unlikely to be developed for Enterprise and Employment. The absence of such analysis is contrary to Section 6.2.3 of the Draft Development Plan Guidelines 2021.</p> <p>A Flood Risk Assessment has been submitted outlining an engineering opinion that the lands can accommodate residential development, avoiding flooding issues on site and displacing floodwater elsewhere. Residential uses would be positioned at minimum finished floor level of 5.87m OD. The site can pass the Justification Test.</p>	<p>In order to achieve the aims and objectives and comply with the requirements of the Guidelines, the Local Authority’s approach to the zoning of land is to avoid development in areas at risk, where possible and substitute less vulnerable uses, where avoidance is not possible. A precautionary approach will be applied, where necessary to reflect uncertainties in flooding datasets and assessment techniques and the ability to predict the future climate and performance of flood defences.</p> <p>The lands are located within Flood Zones A (high probability of flooding) and B (moderate probability of flooding). Section 3.5 of the Flood Guidelines indicates that development in this zone should be avoided and/or only considered in exceptional circumstances, such as in city and town centres, or in the case of essential infrastructure that cannot be located elsewhere and where the Justification Test has been applied. Table 3.1 of the Flood Guidelines makes a distinction between various land uses, where residential is considered a ‘highly vulnerable development’ and commercial is a ‘less vulnerable development’.</p> <p>Highly vulnerable uses including residential are only appropriate if a Justification Test is passed. In considering the Justification Test it should be noted that in order to achieve Compact Growth, the Draft Plan takes a City Centre first approach to the spatial development of Limerick City and Environs. The core is defined as the area zoned “City Centre”. Furthermore, Part 2 of the Justification Test requires the Local Authority to consider a number of factors, including whether the site is located within the core, or if there are suitable alternative</p>
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	Chief Executive’s Recommendation	
	1. No change.	
	SEA/AA Response	
	N/A	

No. 258	Ref. & Name/Group:	LCC-C62-258 Land Development Agency
	Submission/Observation Summary	Chief Executive Response
	1. Introduction: The submission outlines that Colbert Quarter is made up almost entirely of state-owned land and offers the potential to transform underutilised brownfield areas into a vibrant, liveable, mixed use and compact urban quarter. The LDA is working in partnership with Limerick City and County Council, CIE and the HSE to deliver the Colbert Quarter, a key driver of this delivery is a Spatial Framework for the Colbert Quarter. The submission indicates that the strategic vision and key strategic objectives of the Draft Plan are supported by the LDA.	1. Draft Plan: The content of the submission received is noted.

<p>2. Role of LDA: Since the publication of the Draft Development Plan, the LDA legislation has now been enacted, the text should be amended to reflect the current legislation status and role of LDA.</p> <p>3.1 Settlement and Housing Strategy: To ensure the importance of the delivery of state land facilitated by the LDA the following amendment (in red) is suggested: Objective SS O1 Compact Growth: It is an objective of the Council to strengthen the core of settlements and encourage compact growth, through the development of infill sites, brownfield lands, under-utilised land/buildings, state-owned sites, vacant sites and derelict sites, within the existing built-up footprint of the settlements and develop outwards from the centre in a sequential manner.</p> <p>3.2 Urban Redevelopment: The potential for state lands to contribute to urban redevelopment and compact growth through the facilitation and promotion of sites through the LDA should also be recognised. The following amendments are suggested:</p> <p>-Policy CGR P1 Compact Growth and Revitalisation - It is a policy of the Council to achieve sustainable intensification and consolidation, in accordance with the Core Strategy,</p>	<p>2. Role of LDA: In general, the draft Housing Strategy has attempted to capture the important role of the Land Development Agency in delivering regeneration and new social and affordable housing in Limerick. This content will be reviewed and updated in light of the LDA’s consultation response, the publication of plans for Colbert Quarter and the passing of the Land Development Agency Act 2021.</p> <p>3.1 Settlement and Housing Strategy: The Local Authority supports the delivery of development of state-owned lands facilitated by the LDA. On this basis it is recommended to include an amendment to Objective SS O1 Compact Growth as set out under Recommendation 3 below.</p> <p>3.2 Urban Redevelopment: The Local Authority acknowledges the contribution of the LDA to facilitate to urban redevelopment and compact growth utilising state lands. On this basis it is recommended to include amendments to Policy CGR P1 Compact Growth and Revitalisation and Objective CGR O3 Urban Lands and Compact Growth as set out under Recommendation 3 below.</p>
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<p>through an emphasis on revitalisation and the delivery of more compact and consolidated growth, integrating land use and transport, with the use of higher densities and mixed-use developments at an appropriate scale on brownfield, infill, backland, state-lands and underutilised sites within the existing built footprint of Limerick’s City, Towns and Villages.</p> <p>-Objective CGR O3 Urban Lands and Compact Growth: c) Continue to work proactively with key state agencies, such as the LDA to bring forward, brownfield urban underutilised state land which can contribute to the delivery of compact growth within an urban context, subject to Development Management Standards set out under Chapter 11 of this Draft Plan.</p> <p>Phasing: The approach to urban redevelopment, utilising and optimising relevant brownfield and infill development and the compact growth strategy is welcomed and supported. However, the phasing of the sites should be included. It is also recommended that there is a priority focus for regeneration of key centrally located and underutilised infill or brownfield sites.</p> <p>Urban Development Zones: Housing for All strategy includes proposals to integrate regeneration and development through Urban Development Zones to enable public authority-led master planned areas which are</p>	<p>Phasing: The Tiered Approach to Zoning as set out in Volume 1 of the Draft Plan, only identifies lands that are serviced and therefore developable subject to investment within the life of the plan. This approach is in accordance with the requirements of the National Planning Framework and has informed the zoning plan. Therefore, there is no phasing within the plan.</p> <p>Urban Development Zones: The Planning Authority notes the content of the ‘Housing for All A new Housing Plan for Ireland’, in particular in relation to Urban Development Zones (UDZ). Having regard to Housing Policy Objective 12 “Deliver a new approach to active land</p>
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<p>identified as having significant capacity for growth in advance of planning applications. This could support proposals for Colbert Station Quarter.</p> <p>3.3 Housing Mix & Tenure: The policy does not offer flexibility in terms of delivery of targets for large scale residential schemes. The policy could be applied to a single element of a large scheme or indeed the whole scheme itself. The following additional text is suggested:</p> <p>-PO12: To ensure that new social and affordable turnkey housing delivery promotes social and tenure mix. New large-scale turnkey housing (of more than 10 units) built for the Council or AHBs shall ensure target a tenure mix of 30% Social Rented (including general social homes and specialist provision), 20% Private (for ownership or rental), and 50% Affordable (including homes for Affordable Purchase, Cost Rental, and New Build Incremental Scheme).</p> <p>Regarding Housing Strategy table 4.27, the occupancy level should calibrate with a suggested bed type as set down by the Department of Housing: -1 bed = 1 person; -1 bed = 2</p>	<p>management”, the Department of Housing, Local Government and Heritage is the lead with respect to developing proposals for new Urban Development Zones. The Local Authority recognise the potential of Colbert Station Quarter to be designated as an Urban Development Zone. Support for the designation of the area as an Urban Development Zone will therefore be included in the Draft Plan.</p> <p>3.3 Housing Mix & Tenure: The HNDA’s projections on household size, tenure, and dwelling type are indicative and based on continuation of historic trends rather than a set target and provide flexibility for the Council to provide for changing housing needs as necessary. Text will be added to the relevant HNDA section to clarify this and Policy Objective 12 will be amended as set out under Recommendation 3 below.</p> <p>It is not necessarily the case that particular household sizes align with particular dwelling sizes, as direct data on bedrooms does not exist and the HNDA cannot directly project this in its absence. This will be clarified in the text of Section 4 of the HNDA as set out under Recommendation 3 below.</p>
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<p>person; -2 bed = 3 person; -2 bed = 4 person; -3 bed = 4 person; and 3 bed = 5 person.</p> <p>The Housing Strategy notes an evidential need for 55% 1 bed units. This mix is interpreted by a yearly requirement. However, it is suggested that the housing mix is interpreted cumulatively and flexibly over the lifetime of the plan, 2022-2028.</p> <p>It is requested that the figures for “new build” and those “previously owned” within the Housing Strategy are disaggregated to ensure there is an accurate measurement of affordability. Further information on the cohort of households which can afford a new build house, based on transactions and levels of disposable income should be included. If this disaggregation cannot be disseminated from the data, then a reliable method is required to provide a realistic view of the market rental valuations.</p> <p>3.4 Density: A minimum density target in appropriate locations is welcomed and supported. The approach should take into account distances from public transport nodes, such as Colbert Station, to allow sites on the edge of zones to deliver higher density subject to viability.</p> <p>4. Development Management</p> <p>4.1. Building Height: The character area approach is supported. The reference to the Colbert Quarter site is</p>	<p>The HNDA’s measure of affordability is in line with national guidelines on assessing housing need including the older ‘Louth Model’ and the new HNDA Guidelines. Detailed data on new and second-hand prices have been provided in the Housing Strategy’s housing market analysis in Section 3. Greater disaggregation of new-second hand prices in the HNDA itself may not accurately represent housing market dynamics.</p> <p>3.4 Density: The proposed density standards and zones have been prepared in accordance with the requirements of the relevant Section 28 Guidelines and have taken into account distances from public transport.</p> <p>4. Development Management</p> <p>4.1. Building Height: The content of the submission received is noted.</p>
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<p>welcomed. The location of proposed tall buildings and the building heights suggested in the Draft Framework have been informed by the emerging policy.</p> <p>4.2. Active Land Management: The LDA seek further information regarding funding to bring forward development. The Urban Regeneration Development Funding (URDF) has been utilised on development projects through the Living Limerick City Centre Initiative. Further clarity on the funding available through both the URDF and Local Infrastructure Housing Activation Fund (LIHAF) would be welcomed.</p> <p>4.3. Open Space: The LDA supports and welcomes the approach to Open Space.</p> <p>5. Transport: The approach to land use, transport and promotion of sustainable travel is welcomed and supported.</p> <p>5.1. Rail Transport: The LDA is supportive of the Rail network objectives. However, there is no clarity on the timescale for the delivery of the Foynes Rail Line. The LDA suggest that the Council, Irish Rail and other relevant stakeholders work closely to deliver the necessary infrastructure in a manner that will allow for the protection of potential development sites along its corridor but also protect the delivery of the rail line.</p>	<p>4.2. Active Land Management: The Local Authority actively seeks funding under the various funding schemes in place at the time of application. Such funds include the Urban Regeneration Development Fund, the Infrastructure Housing Activation Fund and the Rural Regeneration Development Fund as referenced in the Draft Plan. The management of these funds is however a matter for the Department of Housing, Local Government and Heritage.</p> <p>4.3. Open Space: The content of the submission received is noted.</p> <p>5. Transport: The content of the submission received is noted.</p> <p>5.1. Rail Transport: The Draft Plan includes Objective TR O22 in support of the Limerick to Foynes Line. Timelines for the delivery of the Foynes to Limerick Rail Line is outside the control of the Local Authority.</p> <p>5.2. Parking Standards: The submission by the National Transport Authority also recommended that bicycle parking standards are</p>
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<p>5.2. Parking Standards: The policy objective with regard to car and cycle parking (Objective TR O45 Car and Cycle Parking) is supported. However, the cycle parking standards are conservative and an increase is suggested.</p> <p>6. Site Specific: Colbert Quarter: The LDA, in conjunction with Limerick City and County Council, CIE and HSE are actively promoting the redevelopment of Colbert Quarter as a new high-quality neighbourhood. A Draft Spatial Framework is being finalised and will set out a plan and vision for this strategic landbank for the next 20 years.</p> <p>6.1. Land Use Zoning: The City Centre zoning is supported and welcomed. The redevelopment of this strategic area requires a partnership approach rather than being sole responsibility of one agency. Draft Plan text “the LDA is responsible for overseeing the development of the Colbert Quarter area”, should be amended to reflect the partnership approach.</p> <p>The principles outlined within the policy objectives are supported by the LDA, but given the scale of the proposal and the strategy of creating 8 separate districts a further objective and additional text to activate the site and put</p>	<p>revisited with a view to a more ambitious level of provision being required. It is recommended to revise the Bicycle Parking Standards to include minimum standards of 20-25% for all locations for employment uses.</p> <p>6. Site Specific: Colbert Quarter: The content of the submission received is noted.</p> <p>6.1. Land Use Zoning: Having regard to the scale of the proposed development at Colbert Quarter and the proposal for 8 distinct districts, the inclusion of an additional objective is considered reasonable as set out under Recommendation No. 6 below.</p> <p>In order to activate the site and facilitate early activation, the inclusion of the additional text is recommended as set out under Recommendation No. 6 below.</p>
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focus on the early activation is suggested (as set out under Chief Executive’s Recommendation 6 below).

Chief Executive Recommendation

1. No change.

2. Change text in the Housing Strategy as follows: ‘the ~~LDA is due to be placed on a stronger statutory footing through pending legislation. Among other powers, this legislation will~~ Land Development Agency Act 2021 provides the legislative basis to strengthen the LDA’s goal of increasing the supply of social and affordable housing, with a set percentage of housing provided on relevant public land being reserved for social and affordable housing including new and emerging affordable tenures’.

3. -Change Objective SS O1 Compact Growth in Chapter 3 Settlement and Housing Strategy as follows: It is an objective of the Council to strengthen the core of settlements and encourage compact growth, through the development of infill sites, brownfield lands, under-utilised land/buildings, state-owned sites, vacant sites and derelict sites, within the existing built-up footprint of the settlements and develop outwards from the centre in a sequential manner.

-Change Policy CGR P1 Compact Growth and Revitalisation in Chapter 10 Compact Growth and Revitalisation as follows: It is a policy of the Council to achieve sustainable intensification and consolidation, in accordance with the Core Strategy, through an emphasis on revitalisation and the delivery of more compact and consolidated growth, integrating land use and transport, with the use of higher densities and mixed-use developments at an appropriate scale on brownfield, infill, backland, state-lands and underutilised sites within the existing built footprint of Limerick’s City, Towns and Villages.

-Change Objective CGR O3 Urban Lands and Compact Growth in Chapter 10 Compact Growth and Revitalisation to include the following: c) Continue to work proactively with key state agencies, such as the LDA to bring forward, brownfield urban underutilised state land which can contribute to the delivery of compact growth within an urban context, subject to Development Management Standards set out under Chapter 11 of this Draft Plan.

-Amend Policy Objective 12 of the Housing Strategy as follows:

To ensure that new social and affordable turnkey housing delivery promotes social and tenure mix. New large-scale turnkey housing (of more than 10 units) built for the Council or AHBs shall ~~ensure~~ target a tenure mix of 30% Social Rented (including general social homes and specialist provision), 20% Private (for ownership or rental), and 50% Affordable (including homes for Affordable Purchase, Cost Rental, and New Build Incremental Scheme).”

-Add text in Section 4 of the HNDA as follows: The household size projections in the HNDA are not intended as a target, but are a demographic projection based on historic and existing trends that provides an evidence base for the Development Plan in the absence of specific Census data on bedrooms. These are not intended as prescriptive housing mix targets, or to contradict national housing standard guidelines in any way.

-Add text in Colbert Station Quarter, Chapter 10 Compact Growth and Revitalisation as follows: The potential for designation of the Colbert Station Quarter as an Urban Development Zone in accordance with the Housing For All strategy is recognised and supported by the Local Authority.

4. No change.

5. Change the Bicycle Parking Standards in Chapter 11 Development Management Standards to include minimum standards of 20-25% for all locations for employment uses.

6. Add Objective CSQ O1b Colbert Quarter in Chapter 10 Compact Growth and Revitalisation as follows: It is an objective of the Council to:

Support the implementation of the Colbert Quarter Spatial Framework along with its principles, which include:

The creation of 8 distinctive Neighbourhoods which form the Colbert Quarter and include:

a. Station District – The Colbert Station area is a key transport hub surrounded by the Colbert Plaza. There is potential to enclose and intensify the area, to optimise and enhance its functionality as a gateway and key sustainable travel hub. The District has the potential to provide for new Civic/community uses, workplaces, new homes, hotel and leisure uses, the starting point for the Limerick Link and landmark buildings all around the plaza and station;

b. Sexton District – The Sexton District’s character builds upon the existing education uses, allowing for expansion and infill to suit future demands. Other proposed uses could include higher education, student homes and workplaces, together with new high quality public realm, rail crossing points and links between Parnell Street and Roxboro Road.

c. Roxboro District –The Roxboro District considers existing healthcare and community uses, the chapel and other hospital protected structures. The District has the potential to develop as a new sustainable neighbourhood comprising new homes including age friendly homes, enhanced accessibility, and community space for this district;

d. Ballysimon District – This District incorporates proposed development plots to address HSE priorities with flexibility for review, adaptation and expansion depending on future needs and priorities. Proposals seek to enhance accessibility and the public realm around the buildings and site and provide for research and innovation space;

e. Careys District – The Carey’s District has the potential to provide a high-quality urban living environment with access to expansive green spaces and local services, amenities and public realm. There is the opportunity to integrate the proposed reinstated Foynes Line to create a retail/leisure destination in the heart of the district and to utilise and activate the railway infrastructure to ensure vibrancy and safety and to create better connections across the railway line. The area has significant potential to provide a new mixed tenure residential neighbourhood;

f. Caledonian District – The Caledonian District can provide a high quality and varied residential neighbourhood with well-integrated pedestrian and cycling routes with access to generous green spaces and public park. There is an opportunity to create a civic heart with the provision of a new Central Park and the People’s Pavilion. New primary and nursery school uses are integrated into the surrounding neighbourhood to support existing and new families.

g. Kennedy District – The Kennedy District is currently an operational bus depot with plans for further expansion. However, further to additional future study the area has the potential to become an exciting and creative district with Community and recreation uses paired with creative and light industrial industries could inform a creative character that integrate with the bus depot use. Taller buildings aligned with or constructed over existing operational uses, could be a draw for light industrial/ creative uses;

h. Janesboro District – The Janesboro District has the potential to become a vibrant sport and activity zone through enhancing and aligning recreational facilities and with the existing clubs as the anchors for the area. The addition of a municipal hall with cafe could provide much needed recreational facilities for the wider community.

Add the following text to Section 10.4.2.6 Colbert Quarter in Chapter 10 Compact Growth and Revitalisation as follows: In order to achieve the key objectives for Colbert Station Quarter, the Council supports the activation of state-owned lands and other key

	<p><u>opportunity sites as relevant which seek to achieve the key objectives as part of proposals for early-stage developments which includes the Guinness Site, HSE lands and the areas closest to Colbert Station. Furthermore, the Council will work with the LDA and partners to progress implementation of key infrastructure requirements where appropriate through working collaboratively and seeking out appropriate funding paths.</u></p>
	<p>SEA/AA Response</p>
	<p>All of the changes above are intended to promote compact development and cooperation between various agencies. This is considered beneficial as it will result in increased efficiencies both from an administrative and land use planning perspective, which should benefit urban development in Limerick. It should be noted that compact development and orderly urban developments are considered, internationally, to be one of the best responses to resource use and climate action.</p>

No. 260	Ref. & Name/ Group:	LCC-C62-260 Dwellings Development Ltd.
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Zoning: This submission relates to 3.5ha of lands in Mungret, which were re-zoned from Industrial to Agricultural at the Material Alterations Stage of the Southern Environs Local Area Plan 2021-2027. The Draft Plan has reiterated this zoning and sterilized serviced land. The submission requests:</p> <ul style="list-style-type: none"> -Plots A and D: Reinstate the Residential zone; -Plot B: Reinstate Enterprise and Employment zone; -Plot C: 1.5ha. for New Residential, with Community and Enterprise and Employment zoning on the remainder. 	<p>1. Zoning: The content of the submission received is noted. The main issue in relation to the requested change in zoning is flood risk.</p> <p>-Flood Risk: : The Planning and Development Act 2000 (as amended) requires the preparation of the Development Plan in accordance with Section 28 Ministerial Guidelines. In accordance with The Planning System and Flood Risk Management, Guidelines for Planning Authorities (the Guidelines), a Strategic Flood Risk Assessment (SFRA) has been prepared to assess flood risk within the plan area.</p> <p>In order to achieve the aims and objectives and comply with the requirements of the Guidelines, the Local Authority’s approach to the zoning of land is to avoid development in areas at risk, where possible</p>

<p>Planning Permission was granted under Ref 20/114 and 20/115. The Draft LDP should be amended to reinstate the full extent of residential zoning on Plots A and D to reflect the permitted development/pending development. The matrix of residentially zoned sites in Volume 2 should be updated to reflect the 195 units permitted on Plots A and D.</p> <p>A pedestrian and cycle route has been permitted to connect the housing and crèche under Reg. Ref 20/1114, raised above the flood level. The Site-Specific Flood Risk Assessment (SSFRA), Justification Test and an Abridged Flood Risk Analysis conclude that this location is suitable for residential development. The Draft Plan should include c.1.5ha zoned for New Residential on Plot C.</p> <p>The Masterplan proposed a nursing home on these lands, constructed above Flood Zone A by adopting the construction method of piling. A community zoning would be more appropriate on Plot C. Agricultural uses which bisect Plots A and D will detract from viability. A community zoning will: -Allow a use for which there is significant demand; -Extend a compatible use; -Allow an innovative construction method; -Allow access off a permitted street which is above the flood level; -Provide a sustainable solution to flood risk.</p>	<p>and substitute less vulnerable uses, where avoidance is not possible. A precautionary approach will be applied, where necessary to reflect uncertainties in flooding datasets and assessment techniques and the ability to predict the future climate and performance of flood defences.</p> <p>In accordance with Section 2.25 of the Guidelines, the presence of flood protection structures should be ignored in determining flood zones. This is because areas protected by flood defences still carry a residual risk of flooding from overtopping or breach of defences and the fact that there may be no guarantee that the defences will be maintained in perpetuity.</p> <p>Although a FRA has been submitted, it does not demonstrate that the flood zones are other than shown in the SFRA. The lands are located within Flood Zones A (high probability of flooding) and B (moderate probability of flooding). Section 3.5 of the Flood Guidelines indicates that development in this zone should be avoided and/or only considered in exceptional circumstances, such as in city and town centres, or in the case of essential infrastructure that cannot be located elsewhere and where the Justification Test has been applied.</p> <p>Highly vulnerable uses including residential are only appropriate if a Justification Test is passed. In considering the Justification Test it should be noted that in order to achieve Compact Growth, the Draft Plan takes a City Centre first approach to the spatial development of Limerick City and Environs. The core is defined as the area zoned “City Centre”. Furthermore, Part 2 of the Justification Test requires the Local Authority to consider a number of factors, including whether the site is</p>
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<p>These lands have been the subject of an Abridged Supplementary Strategic Flood Risk Assessment and Justification Test that demonstrated they are suitable for a community-based use.</p> <p>The submission requests that the Enterprise and Employment zoning is reinstated for the remaining lands on Plots B and C as: -It is prime land serviced by infrastructure; -adjacent to a permitted development; - subject of a Justification Test. The Flood Risk Planning Guidelines is not prescriptive against all uses, this would allow certain compatible uses.</p> <p>-Flood Risk: LAGAN Consulting Engineers have prepared a Site-Specific Flood Risk Assessment, which indicates that the majority of the lands are in Flood Zone C, with a portion in Flood Zones A and B. The site passes the Justification Test. The Finished Floor Levels will be +5.56mOD. Minimal infilling of the site will be required. The development would have negligible impact on flood storage in the area.</p>	<p>located within the core, or if there are 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 Plan has zoned sufficient alternative residential lands to meet the requirements of the Core Strategy, in areas that are not at risk of flooding and suitable for the provision of highly vulnerable uses in accordance with the sequential approach of the Guidelines. Adequate alternative lands have also been zoned for Enterprise and Employment use. The Justification Test does not pass, therefore it is recommended that these lands are not included for New Residential, Community or Enterprise and Employment zoning.</p>
Chief Executive’s Recommendations	
1. No change.	
SEA/ AA Response	
N/A	

No. 266	Ref. & Name/ Group:	LCC-C62-266 Joe Pond	
Submission/ Observation Summary		Chief Executive’s Response	
<p>1. Serviced Building Sites in Environs of the City: The submission highlights the difficulty many people have in finding suitable sites in the environs of the city and its immediate hinterland to build their own homes. No serviced sites are provided for people to buy, design and build their own homes.</p> <p>Many companies are trying to attract workers from other counties, but they would be giving up a large house to move to a smaller house in the city.</p> <p>Lack of access to serviced sites is forcing many people to move out to the countryside and commute long distances. The observer welcomes the proposed changes to the one-off rural housing policy. However, it does not do anything for people living in the environs of the city and its immediate hinterland, where sites are difficult to find and people will not be eligible to build their own home.</p> <p>The observer requests provision for a small percentage of each new development site be reserved for serviced sites.</p> <p>The Council could develop policy that would ensure these sites are sold to eligible people trading up, local people</p>		<p>1. Serviced Building Sites in Environs of the City: The content of the submission received is noted.</p> <p>In accordance with Section 10 (1a) of the Planning and Development Act 2000 (as amended), the Development Plan must be consistent with the objectives of the higher tier plans of the National Planning Framework (NPF), the Regional Spatial and Economic Strategy for the Southern Region (RSES) and Guidelines issued by the Minister under Section 28.</p> <p>Under Section 28 of the Planning and Development Act 2000 (as amended) Planning Authorities, Regional Assemblies and An Bord Pleanala shall comply with Section 28 ministerial guidelines in the performance of their functions. When considering densities, the relevant Section 28 Guidelines are as follows:</p> <ul style="list-style-type: none"> - Sustainable Urban Housing, Design Standards for new Apartments – Guidelines for Planning Authorities, 2020; - Urban Development and Building Height Guidelines, 2018; - Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities, 2009. <p>Although each new residential scheme is required to provide a mix of dwelling sizes and types, the provision of serviced sites in the Environs is contrary to the aforementioned Guidelines. In accordance with the</p>	

	<p>building their first home, or new settlers after securing employment. The 10 year ownership rule could be applied.</p> <p>The observer proposes the following policy: Provide serviced building sites in all new suitable housing developments in Limerick City for people to build their own homes. These should be provided at a rate of around 5% of the overall number of units in the Development and should be sold to approved persons to develop their own homes.</p>	<p>Guidelines, an increase in residential densities is essential to achieve the projected population and household growth targets for Limerick City and Environs in a sustainable and compact manner. Increased densities will optimise the use of serviced lands and maximise the viability of investment in social and physical infrastructure, in particular public transport. Consolidating the built environment, through the reuse of underutilised, infill and brownfield sites will address dereliction and contribute to place making in the city and environs, while preventing urban sprawl and loss of biodiversity on the edges of the settlement. A more compact and intensified city will also enable a reduction in travel and energy demands, thus alleviating climate change.</p>
Chief Executive’s Recommendations		
1. No change.		
SEA/ AA Response		
N/A		

No. 271	Ref. & Name/ Group:	LCC-C62-271 Cunnane Stratton Reynolds on behalf of Kieran Wallace Receiver of KPMG over certain assets of Gail Murphy, Michael Murphy (Jnr), Michael Murphy, Thomas Murphy and Margaret Murphy	
Submission/ Observation Summary		Chief Executive’s Response	
<p>1. Zoning: The submission relates to five plots of lands at Old Cratloe Road, Clonconane. The zoning of lands for residential and/or mixed use on sites A, B, C and E is supported and the designation as Tier 2 acknowledged. A change of zoning is requested as follows:</p> <ul style="list-style-type: none"> - Site D (1.7ha.) from Enterprise and Employment to Residential. 		<p>1. Zoning: The content of the submission received is noted.</p> <p>(a) In relation to the request to re-zone Site D from Enterprise and Employment to Residential, given that the site will not be accessed via the LNDR and is accessed via an existing residential estate only and represents an infill greenfield site within walking distance of local</p>	

<p>- Site F (5.5ha.) from Agriculture to Residential, or Enterprise and Employment.</p> <p>The submission outlines the location, context, characteristics, planning and zoning history of the sites, along with the relevant National and Regional policy and the need for housing. The submission sets out justification for the change of zoning as follows:</p> <p>-Site D (1.7ha) accessed off Galtee Avenue, is not within an area of flood risk. A previous planning permission permitted 45 no. units. The Enterprise and Employment zone is incompatible with the established residential area, the uses would negatively impact on residential amenity. No access will be capable of being provided from the LNDR. Access is only available through the established housing estates and Galtee Avenue. When a 2m landscape buffer is provided as per Objective ECON O13, there is insufficient land remaining for the Northside Business Campus. Zoning for Enterprise and Employment is contrary to Section 3.7.5 Protecting Existing Residential Amenity and Objective HO O3 Protection of Existing Residential Amenity.</p> <p>Infill development complies with the NPF and RSES and constitutes a compact urban form. Rezoning is contrary to Section 3.7.5 and HOO3. Residential and support services would provide greater regenerative benefits and be served by the Local Centre. The site is 500m from a bus stop. The</p>	<p>centres and the LIT Moylish campus, the proposed re-zoning is considered acceptable.</p> <p>(b) Following consultation with the Regeneration team it is considered that the change of zoning is not appropriate. The submission cites connectivity as a key obstacle in development of the land as Enterprise and Employment. The Review of the Limerick Regeneration Framework Implementation Plan notes ‘The development of key infrastructural projects such as the Northern Distributor Road,....will be instrumental in opening up new economic development areas that will have an immediate impact on the surrounding regeneration areas.’ With Limerick Northern Distributor Road works currently on site, once delivered it will promote balanced regional development in Limerick County and South Clare. Upon completion of the proposed road, economic development will be encouraged as improved access attracts investment to the area. The fundamental objective of the scheme is to provide a transport link between the eastern and western fringes of Limerick City and a link to South County Clare to facilitate economic development in the region.</p> <p>Initial signs of the LNDR’s enterprise incentivising ability are visible in the recent Expression of Interest submission request, in relation to lands to the Western end of Moyross. The Expression of Interest indicates potential for positive land development on Mixed Use zoned lands and are located a c.370metres distance from site D. It is an ambition of the Regeneration Department through the fulfilment of the LRFIPs Movement and Connections Strategy to connect these two sites and progress the objective of increased connectivity within</p>
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<p>loss of employment zoning does not compromise the remainder of Employment Site 2 being developed and the employment objectives being achieved.</p> <p>-Site F is only capable of being accessed through Site E. Site F is located within Flood Zone B, but does not provide a commercial agriculture prospect. Site F is land locked, but prospects are improved by the progression of phase 1 of LNDR. Agriculture presents an underutilisation of the carrying capacity of infrastructure.</p> <p>Lands are within Flood Zone B. The content of the SFRA has been outlined. Enterprise and Employment zoning is less vulnerable to flood risks. The adjoining Education lands have passed the Justification Test. Site F can accommodate the proposed Enterprise and Employment yield that will be lost at Site D in accordance with the Core Strategy.</p> <p>The client is willing to accept a requirement to undertake a flood risk assessment within the emerging plan.</p>	<p>Moyross in line with the LRFIP ‘Section 2.4.1 Movement and Connectivity Strategy:</p> <p>4. Provide new and improved connections to improve permeability throughout Moyross at the following locations:</p> <p>b) improved existing access from Moyross to Cratloe Road’.</p> <p>Achieving the LRFIPs Movement and Connectivity objectives will facilitate increased connectivity to site D, with primary access from the north, in turn creating a viable Enterprise and Employment location.</p> <p>One of the instigators for the developing the LRFIP was the economic status of the regeneration areas: ‘the unemployment rate in the four areas has consistently been among the highest in the country (Moyross (57%))’.</p> <p>Limited economic activity and a poor mix of land use with an over-concentration of standard house types were among the issues contributing to the unemployment rate. Within the LRFIP, priority themes were established to address these issues. Under the economic pillar the following were included:</p> <ul style="list-style-type: none"> • ‘Fostering a culture of social innovation and enterprise in regeneration areas; • Creation of a programme of civic and economic interventions that help attract, support and grow micro and community enterprise; • Development of niche economic activities that will leverage existing enterprise expertise within Limerick’s higher education sector;
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- Create employment opportunities in the local areas through the regeneration process itself as well as through promoting sustainable enterprises’.

The above themes and their implementation were reemphasised in the Review of the LRFIP 2016:

‘The next phase of economic development to meet the objectives of the Limerick Regeneration Framework:

4. Private sector - Create platforms for increased levels of private sector engagement in enterprise, training, work experience and employment development.’

Taking account of the above LRFIP themes and priorities, the encouragement of appropriate Enterprise and Employment opportunities on the Northside of Limerick is essential to achieving the LRFIPs priorities. To support the provision of opportunity for private sector engagement in enterprise on the Northside it is not recommended to change the zoning from Enterprise and Employment.

(c) Further to the above and in order to maximise the area of lands available for Enterprise and Development, to facilitate opportunities in the vicinity of the Regeneration Area of Moyross and enable the progression of the Northside Business Campus as identified in the MASP, it is recommended to include additional lands around the Delmege Estate for Enterprise and Employment outside of Flood Zones A and B.

	<p>(d) With respect to the request to rezone Site F from Agriculture to Residential or Enterprise and Employment, the main issue in relation to this request is flood risk.</p> <p>-Flood Risk: The Planning and Development Act 2000 (as amended) requires the preparation of the Development Plan in accordance with Section 28 Ministerial Guidelines. In accordance with The Planning System and Flood Risk Management, Guidelines for Planning Authorities (the Guidelines), a Strategic Flood Risk Assessment (SFRA) has been prepared to assess flood risk within the plan area.</p> <p>In order to achieve the aims and objectives and comply with the requirements of the Guidelines, the Local Authority’s approach to the zoning of land is to avoid development in areas at risk, where possible and substitute less vulnerable uses, where avoidance is not possible. A precautionary approach will be applied, where necessary to reflect uncertainties in flooding datasets and assessment techniques and the ability to predict the future climate and performance of flood defences.</p> <p>Much of the site is located within Flood zone A (high probability of flooding). Section 3.5 of the Flood Guidelines indicates that development in this zone should be avoided and/or only considered in exceptional circumstances, such as in city and town centres, or in the case of essential infrastructure that cannot be located elsewhere and where the Justification Test has been applied.</p>
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<p>-Remainder of Draft Plan: Objective HO O3 should give further protection to the amenity of existing residents from all proposed development and not just proposed residential. The following rewording is requested: It is an objective of the Council to ensure a balance between the protection of existing residential amenities, the established character of the area and the need to provide for sustainable new residential development. is achieved in all new developments.</p>	<p>Highly and less vulnerable uses are only appropriate if a Justification Test is passed. In considering the Justification Test it should be noted that in order to achieve Compact Growth, the Draft Plan takes a City Centre first approach to the spatial development of Limerick City and Environs. The core is defined as the area zoned “City Centre”. Furthermore, Part 2 of the Justification Test requires the Local Authority to consider a number of factors, including whether the site is located within the core, or if there are 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 Plan has zoned sufficient alternative lands to meet the requirements of the Core Strategy, in areas that are not at risk of flooding and suitable for the provision of highly vulnerable uses in accordance with the sequential approach of the Guidelines. The Justification Test does not pass, it is recommended that these lands are not included for New Residential or Enterprise and Employment zoning.</p> <p>-Remainder of Draft Plan: The content of the submission received is noted. The amendment to Objective HO O3 is considered reasonable and would facilitate protection of existing residential amenities from all forms of new development. On this basis it is recommended to amend Objective HO O3 Protection of Existing Residential Amenity as set out below.</p>
<p>Chief Executive’s Recommendations</p>	
<p>1. (a) - (b) No change.</p>	

(c) Change the zoning of lands from Agriculture to Enterprise and Employment outside of Flood Zone A and B at Delmege Estate to enable the Northside Business Campus.

(d) No change.

2. Amend Objective HO O3 Protection of Existing Residential Amenity as follows:

It is an objective of the Council to ensure a balance between the protection of existing residential amenities, the established character of the area and the need to provide for sustainable new residential development.’ ~~is achieved in all new developments.’~~

SEA/ AA Response

In the case of the re-zonings, the change from agriculture to enterprise and employment facilitates the establishment of local business units which would serve the local community, minimising travel and adding to the stock of local infrastructure. The changing of land from agriculture to Enterprise and Employment is compliant with the flood risk guidance as it relates within Flood Zone C, where the risk is least likely. For changes to HO O3, which seeks to protect residential amenity, this would have a positive contribution to make to human health.

Theme 2: Economic

No. 14	Ref. & Name/ Group:	LCC-C62-14 Tammy Darcy, Social Enterprise Republic of Ireland (SERI)	
Submission/ Observation Summary		Chief Executive’s Response	
<p>1. Introduction: SERI is a representative group for social enterprises. The submission outlines that the following items should be included as key commitments of the Limerick Development Plan. A commitment to facilitate, enable and support the development of a vibrant Social Enterprise sector, as a valuable and important component of the overall Economic Development vision. Social Enterprise is responsible for a significant level of service delivery, employment and facilities across many sectors. It is an essential pillar in the regeneration of communities, with many people dependent on Social Enterprises for essential supports. The Local Authority should ensure that relevant staff have knowledge of the challenges faced by Social Enterprises and that they have access to support structures.</p>		<p>1. Introduction: The Council acknowledge the importance of the Social Enterprise sector in the development of Limerick. The Urban and Rural Community Development Section of the Council provides supports for Social Enterprises, including administration of the Social Enterprise Development Fund. Further policy support will be included in the proposed plan to support social enterprises.</p>	
<p>2. Working with Social Enterprises: Social Enterprises require access to facilities to grow and develop business services and products. Lacking access to capital to facilitate self-funded development, Social Enterprises require Local Authorities to have a greater awareness of their needs and incorporate Social Enterprises into local regeneration and other plans. Proactive approaches to provide infrastructural and service</p>		<p>2. Working with Social Enterprises: The Draft Development Plan identifies various zoning objectives for different purposes including enterprise, employment and economic development opportunities. The Economic Development objectives as set out under Chapter 4 A Strong Economy of the Draft Development Plan support and facilitate the growth and development of enterprises. The objectives for Regeneration, including those of the Regeneration Areas support</p>	

<p>supports to facilitate Social Enterprises will create synergies, networking and the potential for collaboration.</p> <p>3. Social Clauses: A commitment to include Social Clauses in Public Procurement. Social Enterprises require more accessible forms of Public Procurement in order to participate and benefit from state funded contracts. Local Authorities can facilitate this in their public procurement exercise when delivering investments. Social Clauses can be introduced making Public Procurement tenders more accessible for Social Enterprises.</p> <p>4. Disseminate best practice local examples of Social Enterprises: A commitment to identify and disseminate best practice local examples of Social Enterprises and increase public understanding of their contribution to society and the economy: SERI will communicate the Social Enterprise agenda in a co-ordinated way; however, it is important that the Local Authority underpins the messaging to ensure coherence and improve public understanding of Social Enterprise as a whole, and its contribution to society and the economy. This can provide ideas and inspiration for communities in meeting identified community services and product needs.</p>	<p>the growth of enterprises, which includes social enterprise, in deprived areas of the city.</p> <p>3. Social Clauses: While this issue is beyond the remit of the proposed Development Plan, Limerick City and County Council already implement a social clause on the majority of contracts.</p> <p>4. Disseminate best practice local examples of Social Enterprises: The observation is noted. This issue is beyond of the remit of the proposed Development Plan. However, this observation has been referred to the relevant section of the Local Authority for their consideration.</p>
<p>Chief Executive’s Recommendations</p>	
<p>1. Include addition policy support and text for the development of social enterprise in Chapter 4 as follows: <u>New section:</u> Social Enterprise</p>	

	<p><u>A social enterprise is an enterprise whose main objective is to achieve a social impact. Social enterprises can have a positive social impact on the people working and living in their communities through fostering inclusive growth, shared prosperity, social inclusion, training and job creation.</u></p> <p>Insert new Objective as follows: <u>It is an objective to promote the development of social enterprise in Limerick.</u></p> <p>2 – 4. No change.</p>
	SEA/ AA Response
	The emphasis on social enterprise is expected to have positive benefits on the population it serves. Such an emphasis is in line with the contents of Table 4A of the SEA Guidelines (2004).

No. 84	Ref. & Name/ Group:	LCC-C62-84 HRA on behalf of Shannon Foynes Port Company
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Introduction: The submission welcomes the extensive reference to Shannon Foynes Port Company (SFPC) and the notes that Tier 1 and Ten-T Core Port designations includes both Foynes Port and Limerick Port under the management of SFPC. SFPC welcomes Section 4 of Chapter 4.0 which solely focuses on promoting and further developing the Marine Economy and in particular the Shannon Estuary. Reference is made to the National Planning Framework (NPF) and the effectiveness of Ireland’s ports and airports as being vital drivers of Ireland’s competitiveness and future prospects. This submission is broken into two parts, including (i) Port of Foynes and (ii) Limerick Docks.</p>	<p>1. Introduction: The Council recognises the importance of both Foynes Port and Limerick Docklands for the development of Limerick and the wider region. The Draft Development Plan sets out policy support to facilitate the development of both Foynes Port and Limerick Docklands.</p>

2. Port of Foynes: SFPC’s plans for growth are set out in its 30-year masterplan, Vision 2041, which is supported in the Draft Plan with an appropriate Objective ECON O44. The expansion of Foynes Port, includes initiatives such as building additional berthage, accommodating large ships in the Port by developing infrastructure on Foynes Island, reinstating the rail connection to the Port and upgrading the N69 road from Limerick to Foynes.

Shannon-Foynes Port Company has recently been awarded over €2.3 million in co-funding under the European Union’s Connecting Europe Facility (CEF). CEF funding supports projects on the EU’s Trans-European Networks. The funding awarded will support a feasibility study to prepare for future development of a new deep-water berth and associated infrastructure at Foynes Port, Limerick. The required infrastructure includes the construction of a bridge to link the new deep-water berth to the existing port area on the mainland. It will also consider internal rail infrastructure.

Objective ECON O43 Map 4.3 in the Draft Plan seeks to safeguard the Strategic Development Locations at Foynes Port, Foynes Island and Aughinish Island for the sustainable growth and development of marine related industry and industrial development at Askeaton. This Objective is supported by Map 4.3 which provides a map of Foynes Island, with a clearly defined blue line boundary. Whilst the

2. Port of Foynes: It is an objective of the Council to support the expansion of the Port at Foynes and promote the economic and industrial development of the Shannon Estuary as a strategic transport, energy and logistics Hub, serving Limerick and the wider region by utilising naturally occurring deep water characteristics and by identifying and safeguarding existing and future strategic transportation links, subject to fulfilling the requirements of the safeguarding the designated sites that exist in the vicinity of the site. The area outlined in blue in Map 4.3 of the Draft Development Plan, is as set out in the Strategic Integrated Framework Plan for the Shannon Estuary (SIFP). The development location is included in a Natural Heritage Area designation as well as being part of the River Shannon & Fergus Estuary SPA, and the Lower Shannon SAC. The area is also one where numerous structures have been identified in the study of underwater heritage potential.

The SIFP outlines that the “existing commercial jetty will require upgrading to accommodate larger vessels and some civil works to link the lands into the existing Port facilities. Development works are restricted to the western part of the island to minimise the impact of any such works, on the natural environment”. Extensive environmental assessments were carried out to support the SIFP and accordingly the proposal set out here would be contrary to the SIFP. Accordingly, it not proposed to extend the zoning on Foynes Island.

The current area of zoning was selected in part because no annex species were present within the boundaries of the area that were incorporated into the then Limerick County Development Plan in 2015. This might not be the case with the current proposal as part of the proposed area is

purpose of the blue line demarcation is not referenced or explained in the Draft Plan, it is assumed that the blue line boundary represents an area of future development potential. It is requested that the blue line boundary as defined on Foynes Island is extended as illustrated in Figure 1.0, thereby ensuring that a permanent means of access to the island can be accommodated to enable marine related development.

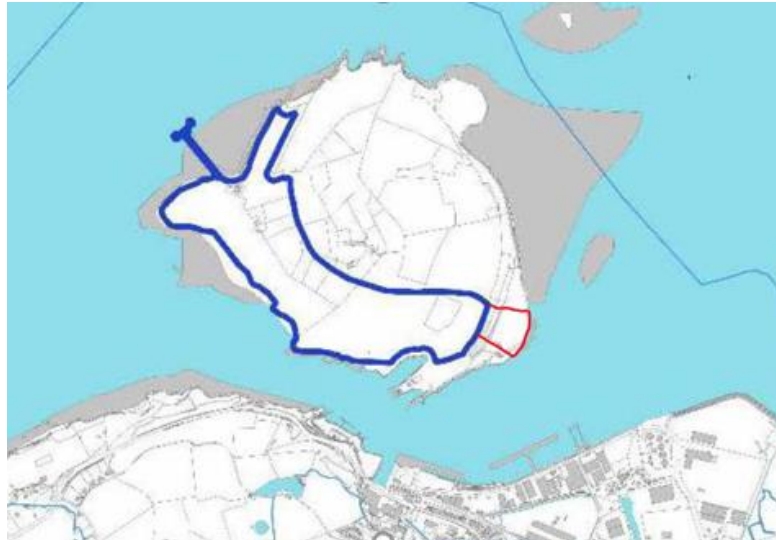


Figure 1.0 Area defined in red represents extension sought to blue line boundary

3. Limerick Docks The strategy for the future use and development of Limerick Docks is set out in the Limerick Docklands Framework Strategy (LDFS). Section 4 of Chapter 4.0 in the Draft Plan references the fact that Limerick City

within the SAC part of which has links with the Annex Habitat Oak woodland. In addition, the effects of moving zoning further to east would also cause disturbance further to the east.

3. Limerick Docks: The maintenance of the city’s existing working port and associated industries are supported in the Draft Plan. These lands represent an invaluable asset for the future maritime related economic

and County Council recognises the importance of the LDFS. The importance of the Framework Strategy is further referenced in appendices in Volume 6 including the Building Height Strategy for Limerick City and in the Interim Review and Update of the Limerick 2030 Plan.

Having regard to the significance of the Docklands as an opportunity to deliver transformational change in the city, it is submitted to the planning authority that the current Enterprise & Employment zoning afforded to our non-core land referenced in the Docklands, is not reflective of the future development potential of this non-core land. The Enterprise & Employment zoning promoted in the Draft Plan is restrictive in its scope of uses and this is of particular concern given the extensive regeneration required to transform the non-core port areas in accordance with the LDFS. It is set out that transformational projects generally require flexibility to succeed along with a mix of diverse uses. Enterprise & employment zoning does not afford such flexibility. The submission states that there is a need to broaden the mix of uses that can be permitted within the non-core areas specified in Figure 2.0, including the provision of residential use at appropriate development locations.

It is requested that the Enterprise & Employment Use zoning currently afforded to Limerick Docklands in the Draft Plan is changed to a mixed-use zoning.

development of the City Centre. The NPF supports extending the ambition of the Limerick 2030 plan to include extension of the City Centre towards Limerick Docks, however the zoning of these lands at this stage for mixed use development is considered inappropriate, having regard to the range of uses supported in this zoning, including residential. The lands within Limerick Docks are identified as being at risk of flooding and accordingly the zoning of lands for mixed use would be contrary to the Section 28 The Planning System and Flood Risk Guidelines for Planning Authorities. Enterprise and Employment zoning has been justified at this location, to support the development of the Docklands, given its proximity to the City Centre.

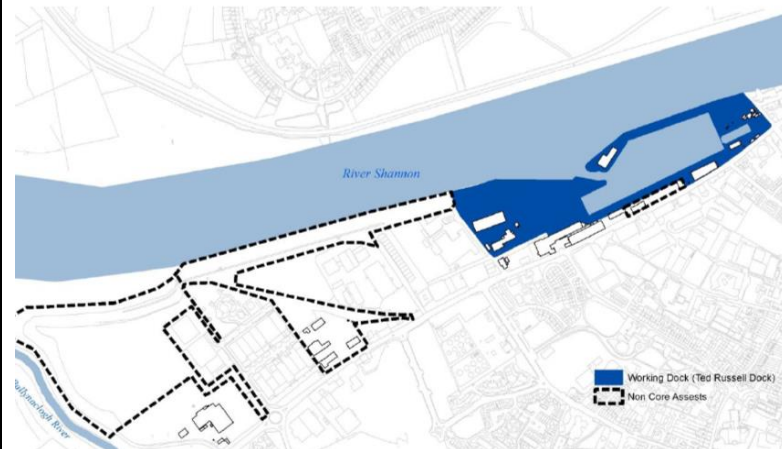


Figure 2.0 Extract from LDFS illustrating the demarcation between the operational area for port activities and our non-core areas available for port or other alternative development

4. Atlas Avenue and Dock Road Junction: SFPC welcomes the commitment of the Council to support the operation of the existing Limerick Docks and the sustainable redevelopment of the adjacent lands as detailed in Section 6.6.2 of the Draft Plan (Objective TR 032) and the support that the Council will provide in facilitating improved connectivity with the city centre. Central to achieving this connectivity is the Part 8 consent for proposals to upgrade the junctions of Atlas Avenue and Courtbrack Avenue with the Dock Road, Limerick. SFPC would welcome reference to

4. Atlas Avenue and Dock Road Junction: The Council have progressed a Part 8 development to progress the upgrade of Atlas Avenue and Courtbrack Avenue on the Dock Road and are currently progressing a Compulsory Purchase Order on the lands. It is not considered necessary to include the proposed works in the proposed Development Plan at this stage as there are a number of objectives in the plan that support the port including objective TRO32 in chapter 6.

these road improvement works in the Draft Plan and an objective supporting their delivery.

5. Barrington’s Pier Pedestrian and Cyclist Bridge

Whilst the general approach and intention set out in the Interim Review and Update of the Limerick 2030 Plan is supported by SFPC, the proposed development of a new pedestrian bridge from Barrington Pier and Ted Russell Park to Atlas Avenue as a longer-term aspiration to create new connections between the north and south sides of the river, cannot be supported by SFPC. This would compromise the movement of ships to and from the port. Ted Russell Docks within Limerick Docklands shall remain as a fully functional and operational port as long as it is commercially viable to do so and requires unhindered access to ensure its continued operation. The construction of a bridge, west of Ted Russell Docks will hinder and restrict access to the port. The impact of a bridge must be considered in tandem with the other operational restrictions currently faced by the port.

It is for these very reasons that SFPC request that proposals for a bridge downstream of the access to Ted Russell Dock is removed from any proposal in the Interim Review and Update of the Limerick 2030 Plan and by association in the Draft Plan.

5. Barrington’s Pier Pedestrian and Cyclist Bridge: The Council fully support the operations at Limerick Port as a key trade route for Limerick and the region and acknowledge the importance of the Port for direct and indirect employment, business and economic growth. The Local Authority also recognises the importance of the Marine Economy as set out under Chapter 4 A Strong Economy of the Draft Plan. In order to ensure the continued free flow of marine traffic and accessibility of the Port for shipping, it is considered that the proposed pedestrian bridge at Barrington’s Pier should be removed from the Interim Review and Update of the Limerick 2030 Plan.

Chief Executive’s Recommendations

1. – 3. No change;
4. [Remove the proposal for a pedestrian bridge at Barrington’s Pier in the Interim Review and Update of the Limerick 2030 Plan.](#)

SEA/ AA Response

The removal of the proposal for the pedestrian bridge at Barrington’s Pier from the Limerick 2030 document, will eliminate any potential impact on designated sites at this location. See also response to 103, 118 and 181. Triangular Club Rush, a Flora Protection Order species, is also present in this location. The removal of the potential for the development of a pedestrian helps avoid damage to this species.

The current area of zoning for Marine Use on Foynes Island, was selected in part, because no annex species were present within the boundaries of the area, that were incorporated into the Strategic Integrated Framework Plan for the Shannon Estuary, following extensive environmental consideration and assessment. This might not be the case with the current proposal as part of the proposed area is within the SAC part of which has links with the Annex Habitat Oak woodland. In addition, the effects of moving zoning further to east, could result in disturbance, where extensive mudflats lie in the lee of the island, which are feeding grounds for wintering wildfowl. See also the NIS.

No. 122	Ref. & Name/ Group: LCC-C62-122 Limerick Enterprise Development Partnership (LEDP)	
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Introduction: The LEDP welcome the opportunity to comment of the Draft Development Plan and highlight serious concerns with regard to Limerick City Centre. There has been total market failure in Limerick City Centre since 2000 in relation to private sector Residential, Retail and Commercial property development and refurbishment. Schemes such as The Living City Initiative (LCI) have not delivered. In 2019 there were only 19 applications to LCI in Limerick to encourage people to live in historic areas such as the Georgian Quarter. A new range of measures is required to deliver fresh investment to counteract the ‘doughnut effect’.</p>	<p>1. Introduction: The Council recognise the challenges that are currently being experienced within Limerick City Centre, exacerbated by the Covid – 19 pandemic and have been working proactively with stakeholders to address some of the challenges. The Draft Development Plan seeks to build on the work the Council is already progressing. It is policy of the Draft Plan to strengthen and consolidate Limerick City Metropolitan Area as a key driver of social and economic growth in Limerick and become a vibrant living, retailing and working City. In accordance with national and regional policy, it is a requirement that at least 50% of all new homes will be located within the existing built-up footprint of the settlement, in</p>

<p>2. Fiscal and Tax Policies: The regulation of fiscal and tax policies is an imperative prerequisite for improving regional private capital investment. There are undeniable facts that allude to market failure in Limerick City. A key barrier is a degree of uncertainty, particularly returns on investment. Private firms have no incentive to proceed and public policy is required. Fiscal incentives, including tax policies, should be directed at specific barriers, impediments, or synergies, to facilitate Capital investment. International best practice successful stimuli include: -the ‘City Deals’ initiative in the UK, with packages of funding and decision-making powers to stimulate investment (31 deals since 2012); -Northern Powerhouse initiative to achieve balanced regional development for the northern cities in the UK, as a counter to London, devolving powers to achieve potential, which could be implemented through the Elected Mayor.</p> <p>The Council needs to consider the four pre requisites for development by investors, which include fiscal environment, investment and credit environment, regulation and regulation, legal and policy environment and the institutional environment.</p> <p>3. City Centre Regeneration: By driving the development of second tier cities such as Limerick, we can relieve the pressure on Dublin’s infrastructure, and finally deliver on the</p>	<p>order to deliver compact growth and reduce unsustainable urban sprawl. This will support Limerick in becoming a city of scale.</p> <p>2. Fiscal and Tax Policies: Fiscal and tax policies are outside the remit of the proposed Development Plan process.</p> <p>3. City Centre Regeneration: In March 2021, €116 million was awarded to Limerick City and County Council under the Urban</p>
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	<p>balanced growth all stakeholders agree is in the best interest of our country. The submission requests a policy to stimulate investment in Limerick City Centre.</p>	<p>Regeneration Development Fund, to progress City Centre projects, such as the World Class Waterfront, the Living City Initiative and enabling works to facilitate development in the City Centre. The proposals are all aimed at revitalising Limerick’s City Centre, making it a more desirable place to live, work and visit. The Draft Development Plan seeks to address the growth of Limerick in a planned and co-ordinated manner in line with the NPF and the RSES, with policy support for the growth of the core of the city.</p>
Chief Executive’s Recommendations		
1 – 3. No change.		
SEA/ AA Response		
N/A		

No. 140	Ref. & Name/ Group:	LCC-C62-140 HW PLANNING on behalf of IDA Ireland
Submission/ Observation Summary		Chief Executive’s Response
<p>1. Introduction: The IDA are currently actively seeking a new employment node for greenfield manufacturing FDI in the Limerick region, arising from the fact that Raheen Business Park and the National Technology Park have limited remaining capacity and potential to support new greenfield manufacturing. While it is acknowledged that the Draft Plan does provide for some expansion of the existing lands, the IDA have reviewed these lands and concluded that these lands are not suitable for their requirements of a campus style strategic employment hub based on a number of constraints. These lands will not</p>		<p>1. Introduction: The Draft Plan seeks to protect and promote the strategic employment locations identified in the RSES. Chapter 10: Compact Growth and Revitalisation identifies opportunity sites for future development. In line with the Core Strategy, the Draft Plan considers how best to ensure that there are sufficient zoned lands available in appropriate locations, to support the range of future employment needs for Limerick.</p> <p>The Council will continue to support investment in and build on the success of the High Tech/Manufacturing zoned lands, which have contributed significantly to the economic growth of Limerick. The Draft</p>

address the long-term strategic need for a significant landbank for large scale manufacturing FDI of the type and scale required to provide sustainable and high value employment to underpin Limerick’s projected future growth as set out in the NPF and RSES. It is clear that, to achieve the NPF targets for population growth, Limerick’s future employment profile will rely heavily on its ability to capitalise on the success of the established cluster of Lifesciences and related manufacturing sectors and attract new greenfield manufacturing investment. Fundamental to achieving this will be the availability of sufficient zoned, serviced and accessible land in strategic locations. The availability of land zoned for industrial and enterprise development in advance of demand is a key element of IDA’s strategy to attract foreign direct investment.

2. Existing and Proposed Employment Provision: The RSES states in Table 3 that there is 71 hectares of capacity in the National Technological Park (NTP), 57.5 hectare of capacity in Raheen Business Park and c. 54.6 hectares of capacity in Ballysimon. On closer review, it is considered that there is more limited capacity remaining in the NTP to attract, host and sustain large scale industrial development investment this is exacerbated by the Draft Development Plan proposal to dezone 35 hectares of land in NTP due to flood risk and attenuation concerns in the southern section of the site. Furthermore, as outlined below there are limited

Plan has considered the issue of availability of adequate amounts of employment lands in line with national and regional policy and it proposes additional zoned land, for high tech/manufacturing uses, adjoining the existing Raheen Industrial Estate. The draft Development Plan also proposed additional zoning in Crossagalla, the Northside of Limerick City and also seeks to retain and zone significant lands along the Dock Road.

In zoning these lands the Planning Authority has considered the various constraints to development including flooding, archaeology, and infrastructure and has concluded that there are sufficient lands zoned to meet the economic and employment needs over the life time of the plan.

2. Existing and Proposed Employment Provision: The Council recognise that there have been a number of investments in Limerick since the preparation of the RSES and the Council continue to work with key stakeholders, such as the IDA, to deliver on these Strategic Employment Locations for Limerick.

Submissions 128 and 270 have considered the lands at the National Technology Park. For the reasons set out in response to these submissions it is recommended that part of these lands are zoned for Enterprise and Employment use, subject to flood mitigation measures.

remaining unreserved lands at Raheen Business Park and Ballysimon.

3. Proposed Provision: It is set out that while Figure 3.1 indicates that there is a range of areas zoned for employment use across 38 land parcels in the Draft Development Plan, the vast majority of these are small, fragmented sites with only 4 sites with an area of 30 hectares or greater, of a scale that when aggregated could be able to meet the IDA Ireland size criteria of between 50 to 100 hectares. Having reviewed the proposed additional employment zoning contained within the Draft Development Plan, the IDA concludes that none of the existing or proposed zoned sites are suitable for their requirements for a strategic employment campus based on size or the presence of constraint.

Referenced sites in the submission include:

(i) Dock Road: The Dock Road land parcel no. 20 in Figure 3.1 at 33.47 hectares falls below our client's 50 to 100 hectares requirement. Alongside this the suitability of the site is undermined by its location within a Flood Zone A area, by the presence of a national monument and proximity to the Lower River Shannon SAC.

3. Proposed Provision: The Enterprise and Employment Tiered Approach to zoning identifies all employment lands including an examination of the servicing of these lands in line with national policy, consideration has also been had to access to the lands via sustainable modes of travel in accordance with section 10 (2)(n) of the Act. The Draft Development Plan has been prepared with compact growth as the central premise for the growth of employment and residential lands, in accordance with the NPF and the RSES. The IDA reference the need for 50 – 100 acres in the Limerick Region. 4 of the proposed development sites referenced in the submission are in excess of 30 hectares, therefore it is considered that there is sufficient land to cater for the employment growth of Limerick within the lifetime of the proposed Plan.

(i) The zoning of the lands at the Dock Road, including the lands at the former Greenpark Racecourse, have been zoned and justified for development having regard to their strategic location on the Dock Road. There has been a historic pattern of Enterprise and Employment development along the Dock Road and the NPF identifies the location for expansion of the City Centre towards the Docklands, in addition to the identified quantum of zoned lands, there are significant lands, which are brownfield and underutilised, which could accommodate significant employment development at this location.

(ii) Raheen Business Park is identified as a Strategic Employment location in the RSES and is a key employment centre for Limerick with

<p>(ii) Lands to the west of Raheen Business Park: The existing zoned greenfield lands to the west of the IDA Business Park are privately owned Lands zoned for industry in the 2011-2017 South Environs Area Plan. It is considered that as these lands are constrained by (i) flood risk (ii) archaeology, (iii) buffers required to established residential development. The developable area is limited to about 15-20 hectares only. Similarly, IDA Ireland have evaluated the proposed zoned lands in the vicinity of Raheen Business Park comprising an area of approximately 46 hectares. Again, the local geography is constrained by flood risk, archaeology and extensive residential ribbon development which precludes the identification of a viable land bank of sufficient size at this location.</p> <p>(iii) Ballysimon: The existing 16 hectares comprised of the 12 hectare and part of the 36-hectare parcel of unfragmented zoned lands that are not within a flood zone are predominantly earmarked for development by Irish Water. The Draft Development Plan proposes to zone an additional 24 hectares of lands for employment use. However, the development of these lands is also compromised by a number of factors including the permitted residential development for 52 no. housing units</p>	<p>over 5,000 jobs (2016 Census). The Raheen Business Park consists of 170 hectare/c.420-acre park, located 5km south of Limerick City Centre, there are approximately 33 hectares available for development, in the existing park. The Park is identified as a High Tech/Manufacturing site and is home to a number of large employers, such as Regeneron Pharmaceutical, Analog Devices, Dell, Banta, and Stryker Corp. Having regard to the level of existing infrastructure, including active sustainable travel infrastructure connecting the Park to the adjoining residential areas, an extension of these lands to the west would appear the most appropriate approach from a planning perspective, to support the existing Strategic Employment Location and to ensure sufficient zoned lands are available to accommodate such uses, which cannot be accommodated in the City Centre. The lands identified for the extension of the park are largely located outside the flood zone and buffers can be established to protect residential and archeological features.</p> <p>(iii) Ballysimon: The lands identified to the east of the Delta Retail Park, are located at Crossagalla. These lands are an extension of the Ballysimon lands on the east side of the city and have been identified due to demand for large land banks on this side of the city. These lands can connect to the Castletroy/Ballysimon area, via a bridge which would need to be constructed over/under the rail line. There are existing cycling and walking facilities, which would readily connect back to the adjoining areas, as well as serving the communities of the Old Cork Road. Similar to the above, buffers can be provided along residential properties.</p>
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in adjacent land to the west. This in conjunction with the existing residential development to the south and east, a rail line to the north for which a buffer would be required and the national monument located within the site, in conjunction with its size limitation, all undermine the site's suitability for strategic employment development.


3. Alternative Location: The Local Authority are asked to consider alternative locations with lands of a scale of 50 - 100 hectares to support a new campus for high tech industrial sectors that would support clustering and compact growth in proximity to existing employment hubs. It is set out that a strategic employment location at Ballysimon offers the opportunity for cluster growth with the nearby existing Ballysimon strategic employment areas, the NTP, and the University of Limerick. Alongside this, it presents an opportunity to leverage knowledge diffusion and capacity building with UL. The location is in line with the RSES guiding principles for Local Authorities in terms of identifying locations for strategic employment development. The strategic employment location is set to benefit from the proposed enhancements to sustainable transport in the draft LSMATS and is highly accessible by alternative modes of travel, with good pedestrian, cyclist and public transport links. The area is served by the 220KW Kilonan Substation.

3. Alternative Location: The lands identified in this submission would conflict with the principle of compact growth and would result in leap frogging of existing greenfield development lands, located in closer proximity to the City Centre, the lands are removed from the Strategic Employment Locations identified in the RSES, being located outside the Metropolitan Area boundary. In addition to the above there are deficiencies in terms of public transport access and accessibility in terms of walking and cycling distances to residential areas, would result car-based development, which would run counter to the requirements under section 10(2)(n) of the Act in relation to climate action. It is considered that the proposed location is unsuitable for zoning for high tech manufacturing.

Chief Executive’s Recommendations

	<ol style="list-style-type: none"> 1. No change; 2. Change of zoning of lands at National Technology Park in line with Submission No’s 128 and 270; 3. No change.
	SEA/ AA Response
	<p>See Response to Submission No’s 128 and 270. It would be essential that only the portion of the lands that are referred to as a Strategic Employment location are zoned. This would ensure compliance with higher tier plans and the Section 28 guidance, as set out in The Planning System and Flood Risk Management Guidelines 2009. A Plan Making Justification Test has been prepared and a site specific flood risk assessment should be carried out.</p>

Theme 3: Record of Protected Structures

No. 4	Ref. & Name/ Group:	LCC-C62-4 Ailish Kennedy
Submission/ Observation Summary		Chief Executive’s Response
<p>1. Record of Protected Structures: Ref. RPS No. 3396 and NIAH No. 215 11020 at Rose’s Avenue, Limerick</p> <p>The observer is not interested in having her house designated as a Protected Structure.</p>		<p>1. Record of Protected Structures: RPS No. 3396 is listed on the National Inventory of Architectural Heritage under NIAH Reg. Ref. No. 21511020 and is considered to be of regional importance for its Architectural, Artistic and Historical value.</p> <p>Description: The NIAH describes Tudor House as a detached three-bay two-storey house, built c. 1880, with gable-fronted attic second floor. Formerly incorporating an attached section, which is now demolished.</p> 

	<p>Appraisal: As this structure is a NIAH structure its inclusion of the RPS is recommended by the Minister under Section 53 of the Planning and Development Act 2000 (as amended).</p> <p>The property retains its original character and represents a finely detailed experiment in mock Tudor style with every detail intact, an impressive glasshouse and accompanying yard and walled garden. Owing to the architectural merit of the property and the unique site context reflecting a country house in a city suburb. It is considered that “Tudor House” should be retained of the Record of Protected Structures.</p>
	Chief Executive’s Recommendations
	1. No change.
	SEA/ AA Response
	N/A

No. 5	Ref. & Name/ Group:	LCC-C62-5 Jane Harris
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Record of Protected Structures: There is an inconsistency in the RPS for St. Munchins Girls School (now Thomond Primary School). The school is RPS No. 338 in the current Limerick City Development Plan and is included in the NIAH under No. 21503001. The Draft Plan lists the structure as RPS No. 3338 and also RPS No. 4323.</p>	<p>1. Record of Protected Structures: The Draft Plan includes RPS No. 3338 - Saint Munchin's Girls Primary School (now called Thomond Primary School), Moylish Road. The Council acknowledge that this structure is also listed in the Draft Plan under RPS No. 4323, with reference to NIAH Reg. Ref. No. 21503001. RPS No. 3338 and RPS No. 4323 represent a duplication on the Record of Protected Structures. In this regard and owing to the fact that RPS No. 3338 is incomplete and does not include reference to NIAH Reg. Ref. No. 21503001, RPS No. 3338 should be deleted from the RPS.</p>

Chief Executive’s Recommendations
1. Delete RPS No.3338 from the Record of Protected Structures to remove duplication.
SEA/ AA Response
None. The decision to add or remove individual buildings or structures to or from the Record of Protected Structures is based on individual merit and circumstances, rather than decisions at a strategic level. In situations such as alterations to an Architectural Conservation Area this may be of sufficient scale to be considered at strategic level, but this is not the case for individual structures. The deletion of the structure is proposed following a detailed assessment by the Council’s Conservation Officer, who has determined that the features that warranted the protection in the first instance no longer exist.

No. 6	Ref. & Name/ Group:	LCC-C62-6 Paul Callan and Audrey Hehir-Callan
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Record of Protected Structures: Ref. RPS No. 5069 and NIAH Ref. No. 21901327, Ballysimon, Limerick</p> <p>The criteria for selection is questioned. The description does not correspond to an inspection. There are a number of errors: -The Shed has never been called ‘The Fog’; -There are no corrugated plastic roof lights anywhere; -This is not the original site of the Ballysimon Dance Hall known as Faughabaille Hall.</p> <p>The Shed has been used as an animal feed store, bed and mattress storage unit, engineering works and now DIY household storage over the last 40 to 45 years. There have been extensive changes including: -Installation of a roller shutter door; -Multiple additions to the rear; -Security bars</p>	<p>1. Record of Protected Structures:</p> <p>History and Context: ‘The Faugh’ dance hall was originally built in 1926 around 50 meters away from where the current building stands today. Its full name, the Faughabaille Hall, draws its name from the Irish phrase Faugh an Beallach, meaning ‘Clear The Way’. The Faugh closed as a dancehall, when it was bought in the late 50s/early 60s and was used as a space to make machine parts.</p> <p>Description: The current structure is a detached six-bay single-storey corrugated-iron outbuilding, built c. 1940. Pitched corrugated-iron roof with roof lights. Painted corrugated iron walls. Square-headed window openings with timber framed casement windows. Square-headed door opening with corrugated-iron door. Square-headed later garage door opening with red brick surround and rolling garage door.</p>

over windows; -Complete change of internal layout; -
Construction of partition walls to create an office area.

The Shed currently has: -A leaking roof; -Toilets which flush onto the road or into the Groody River; -Collapsing ceilings; - Broken windows and frames; -Rotting floors; -Bowing walls and windows; -Multiple electrical wiring issues, including a bad earth.

The aforementioned defects would need to be addressed to return the Shed to a maintainable state, which would cost tens or hundreds of thousands of euros, given the requirement for installation of a main line sewer. The observers do not have the resources to maintain or develop the property which is intended to be put on the market. The observers request the Shed be removed from the RPS and NIAH.



Appraisal: Site inspection and review of historic maps determined that the structure was indeed relocated to the current site from a previous position to the west along Old Ballysimon Road and later extensions added. The structure was used for various commercial/manufacturing activities for a number of years, but has been vacant for some time and is currently in use for domestic storage.

No maintenance works have been carried out and the roof of the building is evidently sagging and elements of the corrugated wall sheeting corroding. The original symmetry of the front of the building has been altered by the introduction of a large opening and roller

	shutter door. A number of the original windows have been replaced. Damp is evident throughout. Having regard to the failure to carry out maintenance or consolidation works to maintain the structural integrity of the building and owing to the fact that the structure was originally located elsewhere, moved and reconstructed at this present location, it is considered that the architectural merit, including context has been diluted overtime, negating the merit of the structure.
Chief Executive’s Recommendations	
1. Delete RPS No. 5069 ‘The Faugh’ dance hall from the Record of Protected Structures.	
SEA/ AA Response	
See SEA/ AA Response to Submission No. 5 above.	

No. 7	Ref. & Name/ Group:	LCC-C62-7 Cllr. Catherine Slattery
	Submission/ Observation Summary	
	1. Record of Protected Structures: Submission fully supports the submission (No. 6 above) made by Paul Callan and Audrey Hehir-Callan.	
	Chief Executive’s Response	
	1. Record of Protected Structures: The content of the submission received is noted. See Response No. 1 to submission No. 6 above.	
	Chief Executive’s Recommendations	
1. Delete RPS No. 5069 ‘The Faugh’ dance hall from the Record of Protected Structures.		
SEA/ AA Response		
See SEA/ AA Response to Submission No. 5 above.		

No. 9	Ref. & Name/ Group:	LCC-C62-9 Limerick Tutorial College (Donough McCrann)
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Submission/ Observation Summary	Chief Executive’s Response
<p>1. Record of Protected Structures: In respect of Limerick Tutorial College building located at the corner of Newenham Street and The Crescent, the observer requests that this building not be included on the RPS register or as part of RPS No. 276 for no. 12, 13 and 14 The Crescent. The following supporting information has been submitted:</p> <p>a) Letter dated 15th February 2010 appealing the proposal to have the building (the corner of The Crescent and Newenham Street) separately listed in the RPS. The structure is within an ACA but no longer a protected feature within RPS No. 276.</p> <p>b) Letter dated 11th February 2009 enclosing an NIAH Feedback Form (Reg. No. 21517111) and an Historical Assessment by Judith Hill, Architectural Historian, concluding that the building is not worthy of Protected Structure Status, while suggesting appropriate future development guidelines. Requests the building not be included in the RPS.</p> <p>c) An Historical Assessment by Judith Hill, Architectural Historian dated February 2007. Limerick Tutorial College comprises four buildings converted and amalgamated. Three are terraces built in c. 1810 as residences, the corner building was built in 1946 as a hall and classrooms for the Crescent School. The structure forms the edge of a focal point within the Georgian Newtown area and is important in defining the character of the ACA to those arriving from the south. The</p>	<p>1. Record of Protected Structures: Context: Limerick Tutorial College comprises four buildings converted and amalgamated. Three are terraces built in c. 1810 as residences (listed separately on the RPS Ref. No. 3248). The corner building was built in 1946 as a hall and classrooms for the Crescent School and is located on the corner of Newenham Street and The Crescent.</p> <p>This submission relates to proposed RPS No. 4024, NIAH Reg. Ref. No. 21517111 on the corner of Newenham Street and The Crescent.</p> <p>This structure is not currently listed as a Protected Structure in the Limerick City Development Plan 2010 (as extended).</p> <p>Description: The NIAH describes the building as a corner-site attached three-bay three-storey over basement former secondary school, built between 1945-46, with the entrance elevation breaking forward of the building line of The Crescent, and having a five-bay three-storey south-facing side elevation.</p>

structure is highly visible within the fabric of the ACA given its location.

The history of the building has been outlined. All elements of the structure have been examined to assess their historical nature and a description of the materials, condition and originality or otherwise detailed.

The Crescent, a focal point within Newtown Pery was never completed. No four storey over basement was constructed at the corner site. The first permanent building was the 1946 hall and school extension. The building has some interest as an example of its type, it is not for several reasons a good building for this site. It does not complete the Crescent by continuing the façade or parapet line or by maintaining the rhythm of the façade of the existing terrace, all of which are vital to the character. It does not make up for these failures by being an outstanding building or acting as a magnet at the corner. For these reason the protected structure status should not be attached.



Appraisal: The Historic Assessment Report submitted as part of the previous 2010 City Development Plan review process and resubmitted as part of this submission, determined the structure was built in 1946 as a hall and classrooms for the Crescent School. The report outlines that overtime the building has been adapted and associated internal alterations carried out.

The NIAH determined the building to be of regional importance for Archaeological, Architectural and Artistic interest. In this regard, it must be acknowledged that the structure forms the edge of a focal point within the Georgian Newtown area and is important in defining the character of the Newtown Pery ACA to those arriving from the south. The structure is highly visible within the fabric of the ACA given its location. Accordingly, the building envelop merits recognition. However, the retention of the original building envelop, facade/streetscape character does not alone merit the continued inclusion on the RPS.

		Site inspection determined that the structural composition and external finishes do not warrant Protected Structure recognition. Having regard to the institutional nature of the structure and the lack of any defining architectural features internally, it is accepted that greater flexibility to internal works is also considered acceptable while respecting the plan form. The location in the ACA will ensure adequate protection is afforded to the protection of the character of the building within the streetscape and the identifiable features of interest, in particular, the carved limestone plaque with lettering bearing date '1634' applied above basement level on entrance elevation. Additional polished marble plaque reads: 'AD MAJOREM DEI GLORIAM 1946'.
	Chief Executive’s Recommendations	
	1. Delete RPS No. 4024 from the Record of Protected Structures.	
	SEA/ AA Response	
	See SEA/ AA Response to Submission No. 5 above.	

No. 10	Ref. & Name/ Group:	LCC-C62-10 Phil O’Shea
	Submission/ Observation Summary	Chief Executive’s Response
	1. Record of Protected Structures: The observer does not wish that their property (6 Greenpark Villas, Ballinacurra Road) be added to the Record of Protected Structures.	1. Record of Protected Structures: RPS No. 5043 is listed on the National Inventory of Architectural Heritage NIAH Reg. Ref. No. 21525021 and is considered to be of regional importance for its Architectural and Artistic value. Description: The NIAH describe the property as an end-of-terrace two-bay two-storey red brick house, built c. 1890, with a centrally-

placed red brick half-dormer window flush with façade at second floor level, and a single-storey red brick three-sided canted bay window. Two-storey return to rear. Pitched artificial slate roof with terracotta ridge comb tiles. Decorative timber bargeboard and original timber finial to apex of half-dormer, with upper section missing.



Appraisal: The property retains its original character and forms one of a terrace of seven uniform houses, except for the last in the terrace to the west. The fine pre-cast detailing gives instant character to these houses. The house contributes to and forms an integral part of the architectural character and the uniformity of the terrace with a level of intactness complimentary to the uniformity, resulting in an architecturally pleasing streetscape despite the loss of original windows at first floor and dormer second floor level.

Owing to the architectural merit of the property and the site context, in particular, the contribution to the uniformity of the terrace, it is considered that No. 6 Greenpark Villas, Ballinacurra

	Road should be retained on the Record of Protected Structures in accordance with Section 53 of the Planning and Development Act 2000 (as amended).
Chief Executive’s Recommendations	
1. No change.	
SEA/ AA Response	
N/A	

No. 12	Ref. & Name/ Group: LCC-C62-12 Joe McCarthy	
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Record of Protected Structures: In relation to No. 53 Thomas Street, the observer wishes to appeal the inclusion on the Record of Protected Structures for the following reasons:</p> <p>(i) The building may be of regional significance but there are many similar granary buildings in the Limerick area;</p> <p>(ii) Inclusion as a Protected Structure may cause devaluation of the property;</p> <p>(iii) Tenants may be restricted by planning regulations if they require internal or external alterations.</p>	<p>1. Record of Protected Structures: RPS No. 3586 is listed on the National Inventory of Architectural Heritage NIAH Reg. Ref. No. 21518001 and is considered to be of regional importance for its Architectural, Artistic, Historical and Technical value.</p> <p>Description: The NIAH describes the building as an attached corner-sited three-bay five-storey stone and brick former granary building, built c. 1870, with a ten-bay side elevation and a shopfront inserted at ground floor level.</p>



Appraisal: As this structure is a NIAH structure its inclusion of the RPS is recommended by the Minister under Section 53 of the Planning and Development Act 2000 (as amended). In addition, the Planning Authority notes the following:

- i.** The property is a significant former granary building with a decorative street frontage. The fine stone masonry and gabled cornice reflects an attractive addition to the local streetscape and is a formidable reminder of the city’s industrial past. Whilst, there are a number of former granary buildings in the city this does not negate the merit of this structure. This structure greatly enhances the architectural character of the area and is unique in the context of Thomas Street;
- ii.** The concerns raised with respect to the impact on the market value of the property are noted. However, market value on any structure following designations on the RPS is not a relevant planning consideration;
- iii.** Any future works to the retail unit on site will be subject to normal planning criteria and any material alterations will require

		<p>planning permission irrespective of whether the structure is protected or not.</p> <p>Owing to the architectural merit of the property and the site context, it is considered that No. 53 Thomas Street should be retained on the Record of Protected Structures.</p>
	Chief Executive’s Recommendations	
	1. No change.	
	SEA/ AA Response	
	N/A	

No. 17	Ref. & Name/ Group:	LCC-C62-17 Patrice Kennedy
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Record of Protected Structures: The observer is the owner of No. 3, New Wellington Terrace, O’Connell Avenue. The building is currently leased to John Battles and Co. Solicitors. The observer does not want the building listed.</p>	<p>1. Record of Protected Structures: RPS No. 4093 is listed on the National Inventory of Architectural Heritage NIAH Reg. Ref. No. 21521023 and is considered to be of regional importance for its Architectural and Artistic value.</p> <p>Description: The NIAH describes the building as a terraced two-bay two-storey over raised basement red brick house, built c. 1880, forming part of a uniform terrace of five houses, distinguished by shared entrance porch and bipartite window composition at ground level. Shared return to rear.</p>




Appraisal: The property is the third in a terrace of four. The terrace is set back some distance from the street and the original front gardens have been amalgamated to form a large shared hard surface area used for vehicular parking. The house contributes to and forms an integral part of the architectural character and the uniformity of the terrace with a level of intactness complimentary to the uniformity, resulting in an architecturally pleasing streetscape. The finely carved limestone and granite detailing of this terrace are considered to be of very fine quality. This terrace reflects a unique suburban character to the southern perimeter of the Georgian core.

Owing to the architectural merit of the property and the site context, in particular, the contribution to the uniformity of the terrace; it is considered that No. 3, New Wellington Terrace, O’Connell Avenue should be retained on the Record of Protected Structures in accordance with Section 53 of the Planning and Development Act 2000 (as amended).


Chief Executive’s Recommendations

1. No change.

	SEA/ AA Response
	N/A


No. 21	Ref. & Name/ Group:	LCC-C62-21 Thomas O’Malley	
	Submission/ Observation Summary		Chief Executive’s Response
	<p>1. Record of Protected Structures: Regarding a Protected Structure at Killeenagarriff, Lisnagry, the observer requests that this structure is not deleted from the RPS. The observer wishes to retain the protected status for the time being and is hoping to do up the building sometime soon. The observer will be cleaning up all the drains and wishes to retain the building on the RPS.</p>		<p>1. Record of Protected Structures: This submission relates to the proposed deletion of RPS No. 494 an unnamed outhouse at Killeenagarriff, Lisnagry, Co. Limerick from Limerick City and County Council’s Record of Protected Structures (Volume 3, Limerick County Development Plan 2010 -2016).</p>  <p>Appraisal: Site inspection carried out in May 2021 established that as a result of years of neglect, the building fabric and structural condition has deteriorated and very little of the original structure remains upstanding. In this regard, it is considered that the architectural merit has been diluted over time. Significant structural work is required to restore the structure, which for the most part would need to be rebuilt. Continued preservation of the structure on the RPS is no longer justifiable.</p>
	Chief Executive’s Recommendations		

	1. No change.
	SEA/ AA Response
	N/A

No. 26	Ref. & Name/ Group:	LCC-C62-26 Michael Portley
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Record of Protected Structures: The submission refers to RPS No. 3469/NIAH No. 21513032 Portley’s Bar and outlines the observer’s opposition to its inclusion on the RPS:</p> <p>(i) The observer is not aware of any proposed development plan for that particular area of the city. The proposed protection of the structure is not supported by a significant plan to develop the Charlotte Quay/Broad Street Area.</p> <p>(ii) The building is not of any particular historical, architectural, artistic, cultural, scientific, technical, or any otherwise benefit to warrant protection. The observer is willing to provide a detailed architect’s report to support this.</p> <p>(iii) A very successful and viable commercial entity has been operating for twenty years and the building has acquired a significant value on the open market. The addition would severely damage and reduce the market value and cause difficulties to sell. This is a prejudice and infringement on rights to operate freely.</p>	<p>1. Record of Protected Structures: RPS No. 3496 is listed on the National Inventory of Architectural Heritage NIAH Reg. Ref. No. 1513032 and is considered to be of regional importance for its Architectural and Artistic value.</p> <p>Description: The NIAH describe the structure as a corner end-of-terrace two-bay three-storey brick building, built c. 1890, with a four-bay side elevation and modern traditional style timber shopfront. Hipped artificial slate roof with brick chimneystack having clay pots and cast-iron rainwater goods on moulded brick eaves course. Raised rendered parapet wall with moulded brick cornice and coping. Red brick walls laid in English garden wall bond.</p> 

		<p>Appraisal:</p> <p>i. The overall development of the area is supported by the relevant zoning and policy objectives set out in the Draft Plan.</p> <p>ii. With respect to architectural merit, the building represents a modest, corner and visually attractive, well-maintained building forming an integral part of the architectural character of the area and combined with its neighbour, form a pleasant backdrop to Baal's Bridge resulting in an architecturally pleasing streetscape.</p> <p>There has been no deterioration in the structure, since the NIAH assessment in 2005. The structure remains in active use as a public house and has been maintained to a good standard with no material changes carried out. As this structure is a NIAH structure its inclusion of the RPS is recommended by the Minister under Section 53 of the Planning and Development Act 2000 (as amended).</p> <p>iii. The concerns raised with respect to the impact on the market value of the property are noted. However, the market value of any structure following designations on the RPS is not a relevant planning consideration.</p> <p>Owing to the architectural merit of the property and the site context, in particular, the contribution to the character of the area, it is considered that RPS No. 3469 Portley’s Bar, Broad Street should be retained on the Record of Protected Structures.</p>
Chief Executive’s Recommendations		

	1. No change.
	SEA/ AA Response
	N/A

No. 27	Ref. & Name/ Group: LCC-C62-27 Caroline Mac Curtain on behalf of Maureen O’Sullivan				
	<table border="1"> <thead> <tr> <th>Submission/ Observation Summary</th> <th>Chief Executive’s Response</th> </tr> </thead> <tbody> <tr> <td> <p>1. Record of Protected Structures: In relation to RPS No. 3457/NIAH No. 21512017, the observer requests that the building at Ard Lui, Clancy Strand is delisted and not included in any updated list of the RPS.</p> <p>The submission sets out that in 2009 the structure was removed from the Draft 2010 City Development Plan RPS because of the considerable difficulty in “recreating the façade as the time from when it was constructed suggests that there are no moulds to replicate the imitation brick work which was the reason for the interest in listing the building”.</p> </td> <td> <p>1. Record of Protected Structures: RPS No. 3457 is listed on the National Inventory of Architectural Heritage under Reg. Ref. No. 21512017 and is considered to be of regional importance for its Architectural and Artistic value.</p> <p>Description: The NIAH describes the structure as a detached three-bay two-storey house, built c. 1910, built on a raised platform, with a centrally-placed three-sided entrance bay having bay window above, and a two-storey return. Rock-faced composite block faced walls at ground floor level and side elevation.</p> </td> </tr> </tbody> </table>	Submission/ Observation Summary	Chief Executive’s Response	<p>1. Record of Protected Structures: In relation to RPS No. 3457/NIAH No. 21512017, the observer requests that the building at Ard Lui, Clancy Strand is delisted and not included in any updated list of the RPS.</p> <p>The submission sets out that in 2009 the structure was removed from the Draft 2010 City Development Plan RPS because of the considerable difficulty in “recreating the façade as the time from when it was constructed suggests that there are no moulds to replicate the imitation brick work which was the reason for the interest in listing the building”.</p>	<p>1. Record of Protected Structures: RPS No. 3457 is listed on the National Inventory of Architectural Heritage under Reg. Ref. No. 21512017 and is considered to be of regional importance for its Architectural and Artistic value.</p> <p>Description: The NIAH describes the structure as a detached three-bay two-storey house, built c. 1910, built on a raised platform, with a centrally-placed three-sided entrance bay having bay window above, and a two-storey return. Rock-faced composite block faced walls at ground floor level and side elevation.</p>
	Submission/ Observation Summary	Chief Executive’s Response			
<p>1. Record of Protected Structures: In relation to RPS No. 3457/NIAH No. 21512017, the observer requests that the building at Ard Lui, Clancy Strand is delisted and not included in any updated list of the RPS.</p> <p>The submission sets out that in 2009 the structure was removed from the Draft 2010 City Development Plan RPS because of the considerable difficulty in “recreating the façade as the time from when it was constructed suggests that there are no moulds to replicate the imitation brick work which was the reason for the interest in listing the building”.</p>	<p>1. Record of Protected Structures: RPS No. 3457 is listed on the National Inventory of Architectural Heritage under Reg. Ref. No. 21512017 and is considered to be of regional importance for its Architectural and Artistic value.</p> <p>Description: The NIAH describes the structure as a detached three-bay two-storey house, built c. 1910, built on a raised platform, with a centrally-placed three-sided entrance bay having bay window above, and a two-storey return. Rock-faced composite block faced walls at ground floor level and side elevation.</p>				
					

		<p>Appraisal: The NIAH assessment noted that the house has an individualistic identity hidden away from the streetscape, employing innovative materials giving the effect of a traditional rock-faced stone finish. The house has been well maintained and retains its original early twentieth-century character including the rock-faced finish. This has been identified as a significant and unusual architectural feature of the house and worthy of recognition. While, as set out above, this feature alone does not define the architectural character of the property, the potential difficulty in recreating the façade remains unknown. Notwithstanding, the Conservation Officer has viewed the site and determined that the structure has evolved and been adapted through use and that although façade treatment remains intact and in good condition, this alone does not merit the inclusion of the structure of the RPS. It is considered that this structure be removed from the proposed Record of Protected Structures.</p>
	Chief Executive’s Recommendations	
	1. Delete RPS No. 3457 Ard Lui, Clancy Strand from the Record of Protected Structures.	
	SEA/ AA Response	
	See SEA/ AA Response to Submission No. 5 above.	

No. 36	Ref. & Name/ Group:	LCC-C62-36 HSE Capital and Estates Manager on behalf of Health Service Executive
	Submission/ Observation Summary	Chief Executive’s Response

1. Record or Protected Structures: Record of Protected Structures No. 3421 and NIAH Ref. No. 21506005 Unit 4 St. Camillus – former Limerick Union Work House Nursery.

Prior to the review of the current Limerick City Development Plan 2010-2016 (as extended), a detailed submission was made including a full architectural assessment by the HSE to support the exclusion of the building from the RPS.

Unit 4 likely dates back to circa 1865 but is not part of the pre-famine development. The building’s use and form has changed over time with additions being made to both the east and west gables and to the rear. Unit 4 is a three-storey stone building with a ‘T’ shaped plan form, the roof is pitched slate with parapet type gables.

The submission describes the current status of the building with an in-depth description of all additions or changes to its original form. Very few original features survive. The Architect’s report previously submitted concludes that the building is fundamentally different to the original and has lost its historic relevance from an architectural and social perspective. Therefore, it is requested that the building should not be registered as a protected structure.

The observer notes their surprise as to the notice received for the building to be added to the RPS without any consultation.

1. Record or Protected Structures: Proposed RPS No. 3421 is listed on the National Inventory of Architectural Heritage Reg. Ref. No. 21506005 and is considered to be of regional importance for its Architectural and Artistic value.

This structure is not currently listed as a Protected Structure in the Limerick City Development Plan 2010 (as extended).

Description: The NIAH describes the structure as an attached multiple-bay three-storey limestone former nursery, built c. 1865, on a T-shaped plan.

This building is marked as 'Married Nursery' on the 1872 Ordnance Survey series for Limerick City. An identical block across the grounds was named 'Single Nursery'. Neither building appear, however, on the first edition OS which dates from 1840-41.



August 2021

Appraisal: This T-shaped building is currently vacant but has operated as part of the hospital complex. The original structure has been altered over time, amended, refurbished and extended to the extent that its original design features have been lost or masked by

		<p>these later additions eroding much of the original architectural character and significance of the structure.</p> <p>Having regard to the fact that many features of architectural significance have been eroded over time owing to the evolution of use, it is considered that this structure be removed from the proposed Record of Protected Structures.</p>
	Chief Executive’s Recommendations	
	1. Delete RPS No. 3421 from Record of Protected Structures.	
	SEA/ AA Response	
	See SEA/ AA Response to Submission No. 5 above.	

No. 37	Ref. & Name/ Group:	LCC-C62-37 HSE Capital and Estates Manager on behalf of Health Service Executive	
	Submission/ Observation Summary		Chief Executive’s Response
	<p>1. Record of Protected Structures: Record of Protected Structures No. 3422 and NIAH Ref. No. 215060006 H-Block building, which is a former workhouse and currently in use as a community nursing home.</p> <p>Prior to the review of the current Limerick City Development Plan 2010-2016 (as extended), a detailed submission was made outlining how public policy was committed to achieving significant improvement in long term residential care, which would afford the HSE an opportunity to prioritise the replacement of its most inappropriate building stock, namely</p>		<p>1. Record of Protected Structures: Proposed RPS No. 3422 is listed on the National Inventory of Architectural Heritage Reg. Ref. No. 21506006 and is considered to be of regional importance for its Architectural and Social value.</p> <p>This structure is not currently listed as a Protected Structure in the Limerick City Development Plan 2010 (as extended).</p> <p>Description: The NIAH describes the structure as an attached multiple-bay two and three-storey rendered block, built between 1839-41, on a H-block plan forming part of the original workhouse complex. Subjected to many later alterations from the 1860s and the 1950s, though early elements are clearly discernible.</p>

the remaining 19th century workhouse, for the provision of healthcare.

Following submission of a full architectural assessment, the building was not added to the RPS. Significant funds were invested.

The observer met with Tom Cassidy, Conservation Officer with Limerick City and County Council and Dr. Nessa Roche, Department of Arts and Heritage, where it was concluded that there was nothing of noteworthy historical significance that needed to be retained.

A full heritage report accompanied a planning application in 2018, which outlined how the existing buildings have been modified to such an extent that they no longer reflect the historical setting in which they were constructed. The submission includes an in-depth description of these amendments and changes to the original form.

The proposed development, including the demolition of part of the H Block would not impact on the historical significance of the site. The HSE received full planning permission under P18/1145 and the project is currently under construction with the first phase due for completion in Q1 2022.

Concerns are raised regarding the observer’s plan and investment of significant funds in a healthcare campus. Such



NIAH ca. 2005

August 2021

Appraisal: The building designed by Thomas and Kearns Deane forms the single largest element retained from the original structures within the original workhouse complex. The structure is a very simple form of significant scale and evokes the austerity of the workhouse institution, which was constructed with little architectural relief. The original H-block has been altered over time, amended and refurbished to the extent that its original design features have been lost. Modern structures such as external fire escapes and steel balconies have been installed. Ground floor entrance canopies, single storey entrance lobbies and chimneys have been removed. Some windows have been altered so that they no longer reflect the original vertical emphasis layout and hierarchy. Whilst noting that the main block form remains, the architectural significance of the structure has been further eroded by the loss of the original courtyards.

In addition, the structure was the subject of a recent grant of planning permission reg. ref. 18/1145. This permission includes elements of demolition, refurbishment and ancillary works. As such, this planning permission provides for material amendments to the structure. The conservation, architectural and archaeological

	<p>an inclusion will have a significant impact on ensuring that the site has a viable long-term future for development as a modern health hub.</p>	<p>implications were assessed and supported by relevant supporting documentation submitted as part of the planning application and considered acceptable in a conservation context owing to the merits of the remaining structure and the nature of the work proposed. Work has commenced on site pursuant to this planning permission.</p> <p>Having regard to the permitted redevelopment of the site under reg. ref. 18/1145 and in light of the extensive works proposed as part of the redevelopment and the fact that many features of architectural significance have been eroded overtime owing to the evolution of use, it is considered that this structure be removed from the proposed Record of Protected Structures.</p>
Chief Executive’s Recommendations		
1. Delete RPS No. 3422 from Record of Protected Structures.		
SEA/ AA Response		
See SEA/ AA Response to Submission No. 5 above.		

No. 40	Ref. & Name/ Group:	LCC-C62-40 University of Limerick
Submission/ Observation Summary		Chief Executive’s Response
<p>1. Record of Protected Structures: The submission acknowledges receipt of notice with respect to the proposed inclusion of the east gate entrance walls/gates/railings as a ‘Protected Structure’ in the proposed Limerick Development Plan 2022-2028.</p>		<p>1. Record of Protected Structures: Noted.</p> <p>The Planning Authority notes that the letter issued refers to the structure as a ‘dwelling’. The Planning Authority accepts that this is an error and the letter should have read ‘dwelling/structure’. Notwithstanding, the structure of relevance i.e., the east gate –</p>

<p>The notice indicates that the structure is a ‘dwelling’, the observer queries whether this was an error.</p> <p>2. NIAH Ref. No. 21818001: The NIAH structure is considered ‘of regional significance and of special artistic and architectural interest’ and the piers are described as ‘limestone-built c. 1890’ and that the entrance gates are indicated as ‘formerly an entrance to Plassey House’. The description in the main record is not correct.</p> <p>3. History of East Gate Entrance/Railings/Wall: The submission provides a history of the east gate entrance/railing wall which accompanied Pl. Ref. 14/572 for the ‘re-modelling of the east gate entrance piers to facilitate increasing the width of the existing cycle path/footpath’. The historical study indicated that the eastern entrance was created in 1984/1985 and was never an entrance to Plassey House. The entrance to Plassey house was the main UL entrance (the western entrance). The piers that were installed at the eastern entrance in 1984/85 were made of mass concrete designed to mimic the original main entrance. Subsequently, 3 of the original piers and associated railings from the main entrance were relocated to the eastern entrance. It was proposed that 3 of the existing concrete piers at the east entrance be replaced by original cast iron piers removed from the main entrance.</p>	<p>entrance walls, gates/railings has been referenced correctly in the letter.</p> <p>2. NIAH Ref. No. 21818001: The submission received is noted. This is a matter for the Department of Arts, Heritage and the Gaeltacht.</p> <p>3. History of East Gate Entrance/Railings/Wall: The NIAH survey carried out in 2007 describes the gates as a pair of “painted square-profile monolith limestone piers, built c. 1890. Comprising carved rounded caps with recessed panels, recessed panels to piers and acanthus-headed cast-iron railings terminating in carved limestone piers”.</p> <p>A review of planning reg. ref. 14/572 determined that the east gate entrance was constructed in 1984/1985 of mass concrete to mimic the original main entrance (western entrance). The main entrance was redesigned in 1996 (planning ref. 96/1636) and the piers and railing removed and stored. Three of the original piers and associated railings were subsequently used to facilitate a pedestrian entrance at the east gate entrance on the east side of the avenue. This information was assessed and determined to be accurate by the Conservation Officer in 2014. A full archival photographic study</p>
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<p>Planning permission was granted in 2014, but the permission has now expired and the concrete piers were not replaced.</p> <p>4. RPS Description: The description of RPS No. 7013 in the Draft Plan is inaccurate. The entrance can be described as follows:</p> <ul style="list-style-type: none"> • The eastern access was created in 1984/85; • The access was not ‘formerly an access to Plassey House’; • The piers are not limestone and are not c.1890 - 3 are of cast iron and the remainder are of concrete; • The access is similar to many modern imitation entrances; • The access does not have any historic or specific distinguishing features although it is accepted that it is an attractive entrance to the University. 	<p>was undertaken at this time and this information has been recorded.</p> <p>In light of the above, it is recognised that the east gate is not the original entrance to Plassey House and represents elements of the original and pastiche replicas of the original western entrance. Owing to the fact that the structure was originally located elsewhere, moved and partially reconstructed at this present location, it is considered that the architectural merit including context has been diluted overtime negating the merit of the structure.</p> <p>4. RPS Description: The submission received is noted.</p> <p>5. Requests:</p>
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42	5. Requests:	<p>1. The observer requests that the contents of their submission be forwarded to the Minister for observation and correction of the NIAH record.</p> <p>2. The University lands are part of an Architectural Conservation Area (ACA). This would satisfy any requirements regarding conservation of the character.</p> <p>The submission requests that the Local Authority not include the east entrance features in the RPS as any inclusion would:</p> <ul style="list-style-type: none"> • Continue the confusion around the history and composition of the features presented; • Bring the NIAH record into disrepute; • Put unnecessary legal and administrative burden on the landowner. 	<p>1.RPS recommendations will be forwarded to the Department for Arts, Heritage and the Gaeltacht.</p> <p>2.The gates are located within the Architectural Conservation Area (ACA) Castletroy/Dromore. The east gates are highly visible within the fabric of the ACA given its location and the Council acknowledge the gate’s merit. In this regard, it is considered that the location in the ACA will ensure adequate protection is afforded to the protection of the imposing and ornate character of the entrance, which provides an important context to the locality and forms an attractive roadside feature and entrance to the university campus.</p> <p>Having regard to the above, it is recommended that this structure be deleted from the Record of Protected Structures for Limerick City and County. The location in the ACA will ensure adequate protection is afforded to the protection of the exterior of the structure within the streetscape.</p>
	Chief Executive’s Recommendations		
	1. Delete RPS 7013 from the Record of Protected Structures.		
	SEA/ AA Response		
See SEA/ AA Response to Submission No. 5 above.			

No. 42	Ref. & Name/ Group:	LCC-C62-42 Daphne Greene
Submission/ Observation Summary		Chief Executive’s Response
1. Record of Protected Structures: The observer is requesting that No's 29-35 Mallow Street Lower (RPS		1. Record of Protected Structures: No 29, 30 - 31, 32 and 35 Mallow Street are listed on the RPS under No's 3103/ 3104/ 3105/ 3106 as follows:

No's 3103/ 3104/ 3105/ 3106) be removed from the Record of Protected Structures. The observer does not consider that these buildings merit inclusion on the RPS on architectural grounds.



29 Mallow Street - RPS 3103



30 – 31 Mallow Street – RPS 3104



32 Mallow Street - RPS 3105



35 Mallow Street – RPS 3106

It is noted that RPS No. 3105 is duplicated with No. 3286.

**Appraisal:**

(i) Nos. 29-34 Mallow Street evolved from the rear garden of No. 64 O’Connell Street, with No. 29 being the original coach house structure. A review of the OSI historic maps establishes the evolution of building forms at this location and establishes building alignment and building line variations over the years.

Recent works to No. 29 including the replacement of the original natural slate roof with artificial slate and other incremental works to Nos. 29, 30-31 and no. 32 have resulted in the loss of original architectural features. For this reason, it is considered that Nos. 29 (RPS 3103), 30-31 (RPS 3104) and no. 32 (RPS 3105/3268) should be removed from the Record of Protected Structures.

Notwithstanding, the terrace represents a unique combination of architectural forms and shopfronts in a City Centre context and as such warrant's recognition. Nos. 29, 30-31 and no. 32 are located within the Newtown Pery Architectural Conservation Area. The location within an ACA will ensure adequate protection is afforded to the protection of the character of the terrace within the streetscape.

		(ii) RPS 3106 No. 35 Mallow Street forms the rear return of Protected Structure No. 64 O’Connell Street, a corner-sited end-of-terrace three-bay four-storey over basement brick former house, built c. 1830 and represents a two-storey two-bay return attached to rear, with a traditional timber shopfront return fronting onto Mallow Street, flanked by simple timber pilasters and timber fascia above. No. 35 Mallow Street forms part of an almost intact terrace. No. 35 Mallow Street combined with No. 64 is an important part of the uniformity of both streetscapes. No. 35 Mallow Street retains much of its original architectural character. Accordingly, it is considered that No. 35 Mallow Street be retained on the Record of Protected Structures.
Chief Executive’s Recommendations		
1.(i) Delete RPS Nos 3103, 3104 and 3105/3286 (RPS duplication) from the Record of Protected Structures; (ii) No change, retain RPS No. 3106 on the Record of Protected Structures.		
SEA/ AA Response		
1. (i) See SEA/ AA Response to Submission No. 5 above. (ii) N/A		

No. 43	Ref. & Name/ Group:	LCC-C62-43 Eibhleann Cassidy
	Submission/ Observation Summary	Chief Executive’s Response
	1. Record of Protected Structures Henry Street/O’Connell Street: RPS No. 3548/ NIAH Reg. Ref. No. 21517158 and RPS No. 3536/ NIAH Reg. Ref. No. 21517077 on Henry Street are no longer in existence and have been replaced by a recently constructed 6 Storey building. RPS No. 3536/ NIAH Reg. Ref. No. 21517077 was a coach house converted to office use	1. Record of Protected Structures Henry Street/O’Connell Street: A site inspection on 23 rd August 2021 confirmed that proposed RPS No. 3548/ NIAH Reg. Ref. No. 21517158 and proposed RPS No. 3536/NIAH Reg. Ref. No. 215170077 have been demolished pursuant to the grant of planning permission reg. ref. 04/770521 granted on 14/06/2005 for the demolition of the existing buildings, out-buildings and structures.

for the former Limerick County Council as part of its former offices on O’Connell Street.

2. Record of Protected Structures Cleeves Complex: Photographs in relation to the Cleeves complex (RPS No. 3664/ NIAH Reg. Ref. No. 21512056 and RPS No. 3665/ NIAH Reg. Ref. No. 21512055) are inaccurate. RPS No. 3665/ NIAH Reg. Ref. No. 21512055 refer to the factory building according to the NIAH and RPS No. 3664/ NIAH Reg. Ref. No. 21512059 and not as presented in the Draft Plan.

3. Consideration to Contemporary Architecture and Design: The Council should consider examples of



RPS 3548



RPS 3536

Having regard to the fact that proposed RPS No. 3548 and proposed RPS No. 3536 have been demolished, it is considered that both structures be deleted from the Record of Protected Structures.

2. Record of Protected Structures Cleeves Complex: The contents of the submission are noted and the error made in the numbering records.

- RPS 3265 reflects NIAH 21512053 – Factory
- RPS 3264 reflects NIAH 21512059 – Chimney Stack

The RPS will be updated accordingly and owners notified.

3. Consideration to Contemporary Architecture and Design: The Record of Protected Structures includes in excess of 3,000 properties/structures considered to be of special interest from an architectural, historical, archaeological, artistic, cultural, scientific,

	<p>contemporary architecture and design in Limerick to be included on the RPS. Many examples in Limerick are found on educational campuses, nominations and winners of awards officiated by the RIAI, and St. Lelia’s Roman Catholic Church, Ballynanty as designed by the internationally renowned Limerick architect Andy Devane.</p>	<p>social or technical point of view. The RPS includes historic and period properties in addition to contemporary modern buildings.</p> <p>The draft plan also includes a number of Architectural Conservation Areas. An ACA is defined as a place, area, group of structures or townscape either which is of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest in its own right, or which contributes to the appreciation of protected structures. For example, the University of Limerick campus is located in the Castletroy/Dromore ACA. Similarly, Mary Immaculate campus is located in the South Circular Road, New Street and University of Limerick Mary Immaculate College Campus ACA, in recognition of the architectural merit of both campuses.</p> <p>The preparation of the Development Plan is a transparent process involving public consultation, at which stage the inclusion of additional structures brought to the attention of the Planning Authority will be considered for inclusion on the RPS.</p> <p><u>St. Lelia’s Roman Catholic Church, Ballynanty</u></p>
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St. Lelia’s Church was designed ca. 1976 by Limerick born architect Andy Devane of the Dublin-based firm Robinson Keefe & Devane. The building is mass concrete reflecting a simple rectangular form and cruciform in plan. The design emphasis was on the use of materials and developments of organic form. Devane designed this church originally with a brick façade but in order to reduce costs, had to change his material to low-cost concrete. The brick façade has since been erected.

Natural daylight is provided by the clerestory windows in the nave walls over the roofs of the side aisles of the church. The ceiling is low and made of timber as is the wall behind the altar. The use of the stained timber highlights the light colour of the stone tabernacle set within the back wall. The layout adheres to the traditional central nave plan even though this is a post-Vatican II church. The main feature of this church that any spectator cannot fail to notice is the slender tower finished with a bell-cote.

		St. Lelia’s Church is a modern innovative church design reflecting an original minimalist architectural character. The design demonstrates how the traditional symbolism of church building can be harmonised with modern times. This reduced construction style and clear design language is evident in the design of St. Lelia’s. For this reason, it is considered that St. Leila’s should be included in the record Protected Structures.
	Chief Executive’s Recommendations	
	<ol style="list-style-type: none"> 1. Delete RPS No. 3548 and RPS No. 3536 from the Record of Protected Structures; 2. Update the Record of Protected Structures to state that RPS No. 3265 refers to NIAH Reg. Ref. No. 21512053 – Factory and RPS No. 3264 refers to NIAH Reg. Ref. No. 21512059 – Chimney Stack; 3. Add St. Lelia’s Roman Catholic Church, Ballynanty to the Record of Protected Structures. 	
	SEA/ AA Response	
	None. The decision to add or remove individual buildings or structures to or from the Record of Protected Structures is based on individual merit and circumstances, rather than decisions at a strategic level. In situations such as alterations to an Architectural Conservation Area this may be of sufficient scale to be considered at strategic level, but this is not the case for individual structures. The deletion and addition of the structures is proposed following a detailed assessment by the Council’s Conservation Officer. The Officer has determined with respect to the structures to be deleted that the features that warranted the protection in the first instance no longer exist.	

No. 48	Ref. & Name/ Group:	LCC-C62-48 Mary Leonard
	Submission/ Observation Summary	Chief Executive’s Response
	1. Record of Protected Structure: The submission is requesting the removal of RPS No. 229 ‘Leonard’s’ Thatched Cottage from	1. Record of Protected Structure:

the Record of Protected Structures. ‘Leonard’s – is a thatched building in Castle-Erkin North, Pallasgreen.

The observer made a submission in September 2020 at Pre-Draft Issues Paper stage and has noted its inclusion at Draft Stage.

Following an FOI request in 2014, the documents received stated that the retention of the structure on the RPS was on the basis that the building ‘served as a small local creamery operated by the farm with produce sold directly to customers. The observer outlines that this is factually incorrect. The building never operated as a creamery and produce was never sold. The roof of all other out-offices and part of the thatched cottage, already have slate roofs. The observer wishes to make the remainder of the building compatible with the other buildings within the courtyard.

Description: Detached single-cell outbuilding, built c. 1800. Partial pitched thatched roof, partial whitewashed random rubble walls. Square-headed door opening with corrugated door inserted. Forms part of an enclosed traditional farmhouse courtyard.



Appraisal: The survival of thatched vernacular outbuildings is unusual, making this a particularly rare example of the type. While it is accepted that the building has been altered and partially re-roofed in slate, the remaining thatched element’s scale and architectural integrity contribute to the historic character of the traditional rural farm complex. The building is shown on the Ordnance Survey first edition six-inch map of c. 1830.



Owing to the unique architectural merit of the property and the site context, it is considered that RPS No. 229 should be retained of the Record of Protected Structures.

Chief Executive’s Recommendations

1. No change

SEA/ AA Response

N/A

No. 51	Ref. & Name/ Group:	LCC-C62-51 Thomas and Cora Cliffe	
Submission/ Observation Summary		Chief Executive’s Response	
<p>1. Record of Protected Structures: The observer is requesting that RPS No. 360 (proposed RPS No. 6360), forge at Elm Park, Clarina, be removed from the Record of Protected Structures.</p> <p>The observer does not consider that these buildings merit inclusion on the RPS, as a grant of planning permission (Ref. 09/698) for a two-storey extension, has altered the existing structure to such an extent that it is not worthy of inclusion. Continued inclusion will create a burden on the observers.</p>		<p>1. Protected Structure: RPS No. 6360 is listed on the National Inventory of Architectural Heritage NIAH Reg. Ref. No. 21901231 and is considered to be of regional importance for its Architectural and Social value.</p> <p>Description: The NIAH describes the structure as a detached two-bay single-storey forge, built c. 1910 and renovated c. 1993, now disused.</p> <div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;">  <p>NIAH 2008</p> </div> <div style="text-align: center;">  <p>August 2021</p> </div> </div> <p>Appraisal: The structure has been subject to substantial alterations as a result of the grant of planning permission 09/698, including the removal of the winged boundary walls, internal adaptation to residential use and significant rear extension. In light of the extensive works carried out pursuant to 09/698, many features of architectural significance have been lost by the scale of the extension, which dwarfs and subsumes part of the forge, resulting in the loss of the social and cultural heritage of the standalone</p>	

		original forge. It is considered that the architectural merit, including context has been diluted over time, negating the merit of the structure. It is considered that this structure be deleted from the Record of Protected Structures.
	Chief Executive’s Recommendations	
	1. Delete RPS No. 6360 from the Record of Protected Structures.	
	SEA/ AA Response	
	See SEA/ AA Response to Submission No. 5 above.	

No. 52	Ref. & Name/ Group:	LCC-C62-52 Feran & Co. Solicitors on behalf of Height for Hire Limited
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. (i) Protected Structure: The submission is in relation to Record of Protected Structures No. 5051 and NIAH Reg. Ref. No. 21900608. The structure is located in Ballyclough.</p>	<p>1. (i) Protected Structure: Proposed RPS No. 5051 is listed on the National Inventory of Architectural Heritage NIAH Reg. Ref. No. 219000608 and is considered to be of regional importance for its Architectural and Technical value.</p> <p>Description: The NIAH describes the structure as a detached multiple-bay four-storey former mill, built c. 1760, having two-bay two-storey extension to north elevation and single-storey extension to rear (west) elevation. Six-bay three-storey outbuilding to west having three-bay three-storey block to west elevation. Hipped corrugated-iron roof. Hipped and pitched artificial slate roof to west block. Painted rubble stone walls with cast-iron ties.</p>

(ii) The submission outlines that insufficient time has been afforded to consider the impact of listing the structure and requests a copy of the grounds upon which the Council made the decision to issue a Section 12 notice.

(iii) The structure is not in use and it is not proposed to demolish the structure, but the owners are actively repairing the roof and attempting to keep trespassers out at significant expense. The Council should clarify what financial assistance will be provided to assist in upkeep and development.



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(ii) Section 12 (3) of the Planning and Development Act 2000 (as amended) establishes statutory timelines relating to any addition to, or deletion from, the record of protected structures. The Section 12 notice issued was in accordance with these statutory requirements. The Council has no recourse to amend these statutory timelines. As this structure is a NIAH structure its inclusion of the RPS is recommended by the Minister under Section 53 of the Planning and Development Act 2000 (as amended).


(iii) Owners or occupiers of Protected Structures are legally required to make sure that the structure does not become endangered through neglect, decay, damage or harm. There are many measures to assist owners and occupiers to preserve a historic structure. There are two schemes, which are funded by the Department of Housing, Local Government and Heritage. The Historic Structures Fund and the Built Heritage Investment Scheme. Applications can only be made via the Local Authority

<p>(iv) The client is eager to work with the Council to find a commercially viable use for the structure.</p> <p>(v) The submission seeks clarification on the extent of the structure to be protected.</p> <p>(vi) The submission indicates that the notice references a ‘dwelling’, stating that there is no structure capable of ‘habitation’ on the site.</p>	<p>with applications accepted by Local Authorities up to the end of January each year.</p> <p>(iv) Noted.</p> <p>(v) A Protected Structure, unless otherwise stated, includes the interior of the structure, the land lying within the curtilage of the structure, and other structures lying within that curtilage and their interiors. The protection also extends to boundary treatments.</p> <p>There is a mechanism to check if minor works can be undertaken on, or in, a protected structure. This process is known as a Section 57 Declaration. Where such a declaration is sought, the Planning Authority can clarify which, if any, parts of the structure or its surrounding curtilage are not of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest, and therefore do not require special protection.</p> <p>Should the declaration confirm that any interior or exterior features are not part of the protected structure status, then planning exemptions in accordance with the Planning and Development Act 2000 (as amended), and the Planning and Development Regulations 2001 (as amended) will apply to these features.</p> <p>(vi) The Council note that the letter issued refers to the structure as a ‘dwelling’. The Council accepts that this is an error and the</p>
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	<p>(vii) As the Development Plan is currently under review, the submission requests the Council clarify what guidance and support will be provided by the Council.</p>	<p>letter should have read ‘dwelling/structure’. Notwithstanding, the structure of relevance i.e., Ballyclough Mill has been referenced correctly in the letter.</p> <p>(vii) Within the Development Plan review process the onus is on the individual interested parties to review the contents of the Draft Plan and engage with the Council. The owners/occupiers may contact the Local Authority should they require guidance.</p>
	Chief Executive’s Recommendations	
	1. No change	
	SEA/ AA Response	
	N/A	

No. 53	Ref. & Name/ Group:	LCC-C62-53 Noel Collins	
	Submission/ Observation Summary		Chief Executive’s Response
	<p>1. Record of Protected Structures:</p> <p>(i) The submission notes that RPS No. 112 is incorrectly referred to as ‘Merchant House’ and should be ‘Blossom’s Gate’.</p> <p>(ii) RPS No. 114 is incorrectly referred to as ‘Sarsfield House’ and should be called ‘Merchant’s House’.</p>		<p>1. Record of Protected Structure</p> <p>The submission refers to RPS No. 112 and RPS No. 114. A review of the RPS determined that RPS 112 and RPS 114 have been incorrectly referenced and are not applicable to Kilmallock in the context of the Draft Development Plan.</p> <p>The Draft Plan includes RPS 1401 –Blossom's Gate and RPS 1369 ‘Sarsfield House’ as follows:</p>

(iii) The submission also requests the inclusion of ‘Poet’s House’ on Wolfe Tone Street, Kilmallock on the RPS.

1401	Record of Monument and Places	Blossom’s Gate	Emmet Street Kilmallock	Medieval Structure:- Town Defences- Gate	
1369	21813007	Not named	Sarsfield Street Kilmallock	“The Sarsfield House”	

(i) Further to the above RPS 112 is not a relevant RPS reference number. The Draft Plan includes RPS 1401 which correctly relates to Blossom's Gate.

(ii) *Naming - RPS 1369 (incorrectly referenced RPS 114)*

Analysis and discussions with the County Archaeologist determined the RPS 1369, located on the west side of Sarsfield St. is a late medieval merchant's house undoubtedly constructed by one or more of the wealthy merchants who traded and/or lived in Kilmallock.

Having regard to the notable history of the structure the more appropriate title for the property is “Merchants House” and not “The Sarsfield House”. It is recommended that RPS 1369 be amended and “the Sarsfield House” replaced with “Merchants House”

(iii) *Inclusion of “Poets House” Wolfe Tone Street on the RPS*

Description: The “Poets House” is so called because the 18th Century poet Aindrais MacGraith is believed to have resided here. A review of historic 6” and 25” maps establishes that the original building form on the site evolved towards the mid/end of the 19th Century. The existing cottage reflects an end of terrace

	<p>single-cell, four bay traditional cottage with pitched corrugated roof, square-headed door opening with half door inserted.</p> <p><i>Appraisal:</i> The building retains the overall form, massing and scale to the street frontage. However, the original cottage has been extended to the rear, re-rendered, new windows inserted, new chimney and remodelled internally and now operates as an Air B&B. Whilst elements of the traditional cottage remain intact, these elements alone do not merit the inclusion of the cottage on the RPS. The site is located in an Architectural Conservation Area. The location is the ACA will ensure adequate protection is afforded to the protection of the character of the cottage within the streetscape.</p>
Chief Executive’s Recommendations	
<p>1. (i) No change; (ii) Amend RPS 1369 title from “the Sarsfield House” to “Merchants House”; (iii) No change.</p>	
SEA/ AA Response	
N/A	

No. 64	Ref. & Name/ Group:	LCC-C62-64 Michael Bourke and Imelda Gallagher
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Record of Protected Structures: The observers are requesting that RPS 4057, NIAH Ref 21521075 not be included in the Record of Protected Structures and that their home remain as a structure within the Architectural Conservation Area (ACA). The observers believe that this is the correct course of action based on the following:</p>	<p>1. Record of Protected Structures: RPS 4057 is listed on the National Inventory of Architectural Heritage NIAH Reg. Ref. 21521075 and is considered to be of regional importance for its Architectural and Artistic value.</p> <p><i>Description:</i></p>

(i) True Conservation: The submission sets out that many ordinary private householders lack such resources and cannot be expected to bear the cost of the numerous restrictions. Support of a practical, technical and financial nature must be provided. Given the funds for ‘Heritage and Conservation’ available to the Council, it is clear that no meaningful provision of support to householders is currently possible.

The NIAH describes the structure as terraced two-bay two-storey over basement red brick house, built c. 1910, with oriel three-sided canted bay window and square-headed rendered doorcase. Single-bay two-storey return to rear. Arrived at by a flight of concrete steps with only cast-iron railing posts surviving. Front site enclosed by rendered plinth wall supporting cast-iron railing panels. Rendered pier and cast-iron gate post with cast-iron gate.



(i) True Conservation: Current legislation stipulates that owners or occupier of Protected Structures are legally required to make sure that the structure does not become endangered through neglect, decay, damage or harm. There are measures to assist owners and occupiers to preserve a historic structure. There are two schemes, which are funded by the Department of Housing, Local Government and Heritage. The Historic Structures Fund and the Built Heritage Investment Scheme. Applications can only be made via your local authority with applications

	<p>(ii) Destruction instead of Protection: In requiring householders to bear the cost of a specific type of maintenance and repair, for the ‘public good’ is an unfair burden result in neglect and deterioration. As a consequence, rather than ‘protecting’ the structures, which is the intended purpose, the opposite may result. The submission refers to the ‘Georgian’ core and how this part of the city has fallen into disrepair. Much of this is as a direct result of policies, which severely limit the work that is allowed on these buildings. The submission queries if we are about to repeat these mistakes on the Victorian/Edwardian resources.</p> <p>(iii) Equity: An essential principle that should inform all aspects of public policy is fairness. Reference is made to a terrace of twelve identical houses on O’Connell Avenue where one group of owners is subjected to restrictions and costs while their neighbours are not.</p>	<p>accepted by local authorities up to the end of January each year. These schemes are available to Protected Structures only and not buildings located within Architectural Conservation Areas. The removal of the structure from the RPS will reduce the potential for financial assistance when undertaking any works to the property.</p> <p>(ii) Destruction instead of Protection: Noted. See (1) above. The Council further notes that the recently published <i>Housing for All - A New Housing Plan for Ireland</i> recognises that in order to resolve the housing crisis we need to give consideration to every viable and sustainable options at our disposal. The Government recognise that our built heritage and in particular the tens of thousands of older houses and properties in our cities, towns and villages, can contribute to <i>Housing for All</i>. The implementation of <i>Housing for All - A New Housing Plan for Ireland</i> will stimulate the rejuvenation of Limericks historic Georgian core.</p> <p>(iii) Equity: As this structure is a NIAH structure its inclusion of the RPS is recommended by the Minister under Section 53 of the Planning and Development Act 2000 (as amended). The property and its immediate neighbour to the south are distinguished by a basement level and red brick faced façade and both retain their original character and represent finely detailed properties with every detail intact. Unlike the rest of the terrace to which it is attached, the unique detailing of the house contributes to the</p>
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	<p>(iv) Social and Financial Implications: A hugely significant consequence of placing private houses on the ‘RPS’ is that only a limited number of potential owners would be willing to take on the onerous restrictions associated with ‘listed’ status including maintenance as unlike other countries such as the UK, where there are supports in place and ownership of protected homes is regarded positively. The submission outlines that by placing such restrictions on some private home dwellers, LCCC are discriminating against this particular section of the community, thereby forcing some into either living in unsuitable conditions or taking a reduced sale price for their home. The submission outlines that the property was bought with the legitimate expectation of being able to sell it at full market value at some point in the future and if this restriction is imposed the property will be severely devalued.</p>	<p>architectural heritage of O’Connell Avenue, giving added variety to the hugely varying typologies of domestic architecture on the Avenue.</p> <p>(iv) Social and Financial Implications: The Council note the contents of the submission and reiterate that grant aid is available to individuals to accommodate necessary works to maintain and protect Protected Structures as set out in (2) above.</p> <p>Owing to the architectural merit of the property and the unique character of the property, it is considered that this structure should be retained of the Record of Protected Structures.</p>
Chief Executive’s Recommendations		
1. No change.		
SEA/ AA Response		
N/A		

No. 82	Ref. & Name/ Group:	LCC-C62-82 Carla Henebry
Submission/ Observation Summary		Chief Executive’s Response

1. Protected Structure: The observer does not wish that their property RPS 5059 /NIAH 21807036 added to the list of Record of Protected Structures.

The submission outlines that since occupying Spa House in 1995, it has undergone extensive internal alterations and renovations; prior to this it had been run as a B&B for many years with significant owner DIY alterations. While the property has been upgraded and maintained there is, internally, nothing of architectural or historical value.

1. Protected Structures: RPS 5059 is listed on the National Inventory of Architectural Heritage NIAH Reg. Ref. 21807036 and is considered to be of regional importance for its Architectural and Artistic value.

Description:

The NIAH survey carried out in 2007 describes the structure as a detached five-bay two-storey former assembly room, built c. 1771. Spa well to south-east comprising ashlar limestone surround with impost course supporting cast-iron tympanum over square-headed door opening. Pair of square-profile roughcast rendered piers having double-leaf cast-iron gates.



Spa House



The Spa

Historical Context

Castleconnell became renowned as a spa in the 18th Century. Large assembly rooms were built for dance, public breakfasts and other

		<p>entertainments. The spa waters still flow unhindered but with changing fashions interest dried up ca. 1800. The Spa Assembly rooms fell into disrepair ca. 1900</p> <p><i>Appraisal</i></p> <p>As this structure is a NIAH structure its inclusion of the RPS is recommended by the Minister under Section 53 of the Planning and Development Act 2000 (as amended).</p> <p>While the Council note that the structure has been altered both externally and internally when adapted to residential use including the loss of the original coach houses on the ground floor. The external character of the structure has not altered significantly since the 2007 NIAH survey and this former assembly room retains much of its attractive and well-proportioned façade distinguished by the finely cut limestone walls and dressings, which are indicative good craftsmanship.</p> <p>The site also retains the former spa well (spring and well-house) with ornate limestone surround and cast-iron plaque, a reflection of Castleconnell's former position as a popular holiday and spa resort in Ireland during the eighteenth and nineteenth centuries.</p> <p>Protected Structure designation extends to all parts of the structure, including its exterior and interior, and potentially to the exterior and interior of any structures within the curtilage of the structure in this case the former spa well. Having regard to the architectural merit of the structure and structures in its curtilage, it is considered that RPS 4059 should be retained of the Record of Protected Structures.</p>
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	Chief Executive’s Recommendations
	1. No change.
	SEA/ AA Response
	N/A

No. 91	Ref. & Name/ Group:	LCC-C62-91 Declan Gilleece on behalf of Mullock & Sons (Shipbrokers) Ltd.
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Protected Structure: The submission has been prepared by Declan Gilleece on behalf of Mullock & Sons (Shipbrokers) Ltd.</p> <p>Introduction The subject property is located at Dock Road, 8 St Alphonsus Street, Limerick.</p> <p>Outline History Section 2.0 of the assessment sets out the history of Mullock & Sons Shipbrokers established in 1778 by John Mullock in his family home and shipbroker office on Merchants Quay in Limerick city. From its beginning on Merchants Quay Mullock & Sons moved its premises to Arthurs Quay in 1800, to 97/98 Henry Street in 1838</p>	<p>1. Protected Structures: RPS 3560 is listed on the National Inventory of Architectural Heritage NIAH Reg. Ref. 21517007 and is considered to be of regional importance for its Architectural and Artistic value. The building is not located in an Architectural Conservation Area.</p> <p><i>Description:</i> The NIAH survey carried survey carried out in 2007 describes the building as a single storey rendered building, built c. 1900, with a five-bay side elevation to Dock Road.</p>

to St Alphonsus Street/Dock Road in 1956 and its Foynes branch, Herriott House, opened in the 1960s.

Architectural Description & Character Area Assessment

Section 3.0 establishes that it is the second edition of the Ordnance Survey of Limerick Map (1900) where we see the Mullock & Sons building.

Modern Interventions

The submission states that although Mullock & Sons retained its external character, internally the building has been altered considerably. The majority of these interventions took place in 1991 including the remodelling of entrance with the entrance door being moved from the Dock Road elevation to the St Alphonsus Street entrance.

Conclusions

The survey of Mullock & Sons, consists of a written external and internal description, accompanied by photographs, together with historical research. The criteria have been derived to accord with the best practice for the listing of a building under Part IV of the Planning and Development Act (2000).



Appraisal:

The external character of the structure has not altered significantly since the 2007 NIAH survey and remains a handsome corner building and forms a pleasant element on the Dock Road while connecting the streetscape of Saint Alphonsus Street. However, the architectural features contributing to this character are pastiche replicas erected in 1991 including the square-headed door opening flanked by a pair of rendered pilasters, and railings both at roof and window level. Internally the structure has been completely refurbished with only the structural walls remaining. Accordingly, it is not justifiable to retain this structure of the RPS.

Chief Executive’s Recommendations

1. Delete RPS 3560 from the Record of Protected Structures.

SEA/ AA Response

See SEA/ AA Response to Submission No. 5 above.

No. 112	Ref. & Name/ Group: LCC-C62-112 Pat Mitchell	
	Submission/ Observation Summary	Chief Executive’s Response
	<p>Protected Structure: The observer requests the removal of RPS Reg. No. 581, <i>Millough House</i>, Milltown, Pallaskenry from Record of Protected Structures.</p> <p>The submission outlines that the property be removed from the Record of Protected Structures as it is believed it was entered erroneously in the first instance; and that it is of no significant historical value. It is set out that the majority of Milltown House was demolished in the 1940’s and the stone sold, primarily for the construction of Foynes Pier. The remaining part was demolished in the early 1980’s.</p> <p>The present structure, which was built in the early 1980’s consists of a main central 3 storey block situated between the remains of the groom’s quarters which were roofed and pebble dashed. The main house and subsequently the smaller annex were demolished, we believe the existing structure, having been constructed in the 1980’s.</p>	<p>1. Protected Structures: RPS 581 includes reference to the National Inventory of Architectural Heritage NIAH Reg. Ref. 21901108. A further review of the NIAH determined that the structure is not listed on the NIAH. Accordingly, reference to the NIAH shall be removed from the RPS.</p>  <p><i>Appraisal</i></p> <p>Site inspection determined that a large gable fronted two-storey structure was inserted in the centre of the original coach house buildings. The combined structures were remodelled to accommodate a single residential unit. As part of this redevelopment windows and doors were replaced and the internal structure completely re-worked. The combination of works has resulted in the loss of the original coach</p>

		house character. Accordingly, it is not justifiable to retain this structure of the RPS.
	Chief Executive’s Recommendations	
	1. Delete RPS 581 from the Record of Protected Structures.	
	SEA/ AA Response	
	See SEA/ AA Response to Submission No. 5 above.	

No. 142	Ref. & Name/ Group:	LCC-C62-142 Cllr. Jerome Scanlon on behalf of Hugh and Aodan Brennan
	Submission/ Observation Summary	Chief Executive’s Response

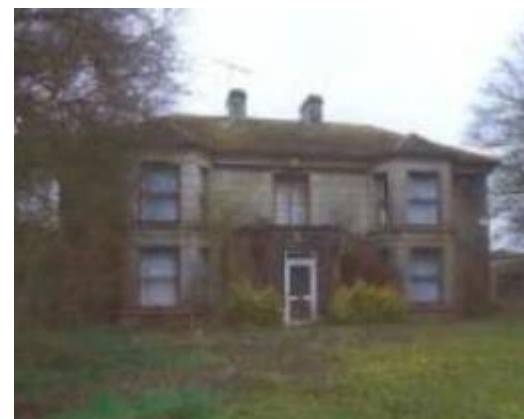
1. Protected Structure: The submission requests the removal of RPS No. 1162 /NIAH 21835004 Woodfield House, Woodfield, Dromcolliher, Co. Limerick from the Record of Protected Structures.

A structural report accompanied the submission. The report states that the original building square in general seems to be structurally sound with no major structural movement issues in the walls or roof structure. Cladding issues and structural issues to the annexes were identified. The report states that the main external walls of the original rectangular footprint have good quality stone and can be restored. Cracking was detected internally & externally, including substantial cracking detected on the external bay window areas which in large were crumbling and these require rebuilding from foundation up. Water ingress was recorded and the roof was inaccessible due to safety concerns. The report stipulates that the dwelling requires a complete new mechanical and electrical fit out. The conclusion offers a number of comments regarding works to the structure.

1. Protected Structure: RPS 1162 is listed on the National Inventory of Architectural Heritage NIAH Reg. Ref. 21835004 and is considered to be of regional importance for its Architectural and Artistic value.

Description:

The NIAH survey carried out in 2009 describes Woodfield as a “detached three-bay two-storey house, built c. 1870. Canted front porch with balcony to roof flanked by two-storey canted bays to front (south-east) elevation. Three-bay two-storey lean-to addition to rear (north-west) having two-bay single-storey extension.



Appraisal

Woodfield is set within its own grounds surrounded by mature trees. The house has been vacant for a number of years with the rear utilised as storage associated with the adjacent active farm complex. No maintenance or consolidation works have been carried out on site resulting in the deterioration of the building through neglect, and associated water and moisture ingress. As a result, the building fabric

	<p>has substantially deteriorated such that significant structural work is required to restore the property. It is recommended that this structure be deleted from the Record of Protected Structures for Limerick City and County.</p> <p>The gate lodge and entrance gates are located within the Architectural Conservation Area which will afford these a level of protection. However, it is noted that the ACA does not extend to include the house or former dispensary building.</p>
Chief Executive’s Recommendations	
1. Delete RPS 1162 from the Record of Protected Structures.	
SEA/ AA Response	
See SEA/ AA Response to Submission No. 5 above.	

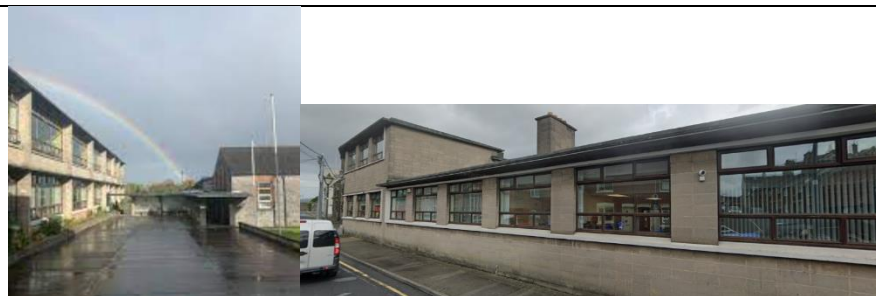
No. 180	Ref. & Name/ Group: LCC-C62-180 Brian Thompson				
	<table border="1"> <thead> <tr> <th>Submission/ Observation Summary</th> <th>Chief Executive’s Response</th> </tr> </thead> <tbody> <tr> <td> <p>1. Record of Protected Structures: St. Mary’s National School, Bishop St., King’s Island is not mentioned on the draft Register of Protected Structures.</p> <p>This is one of the most important modernist buildings in Ireland, manifesting the emerging talent in the late 1940’s of Limerick Architect Andy Devane, after he returned from studying with Frank Lloyd Wright.</p> </td> <td> <p>1. Record of Protected Structures: St Mary’s Girls’ National School, King’s Island, Limerick which began in 1949 and was completed in 1951. This was the first of many Devane national schools in the working-class areas of Limerick city. There is a striking similarity between the drawing room of Taliesin West and the auditorium of St Mary’s with its exterior ‘knuckles’ and sloped roof. As a true disciple of Wright, he wanted to showcase concrete as the perfect building material.</p> </td> </tr> </tbody> </table>	Submission/ Observation Summary	Chief Executive’s Response	<p>1. Record of Protected Structures: St. Mary’s National School, Bishop St., King’s Island is not mentioned on the draft Register of Protected Structures.</p> <p>This is one of the most important modernist buildings in Ireland, manifesting the emerging talent in the late 1940’s of Limerick Architect Andy Devane, after he returned from studying with Frank Lloyd Wright.</p>	<p>1. Record of Protected Structures: St Mary’s Girls’ National School, King’s Island, Limerick which began in 1949 and was completed in 1951. This was the first of many Devane national schools in the working-class areas of Limerick city. There is a striking similarity between the drawing room of Taliesin West and the auditorium of St Mary’s with its exterior ‘knuckles’ and sloped roof. As a true disciple of Wright, he wanted to showcase concrete as the perfect building material.</p>
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The tight configuration of the footprint within the context of the streetscape and the relationship of the Hall façade, the principal architectural feature, to the small urban space called Peter’s Cell is masterful and reminiscent of the very best of mainstream European urban design. This was not recognised when Social Housing defaced this space in the mid-1980’s. It should be an objective of the Development Plan to restore and enhance this space by removing these houses and replacing them in the adjacent site of Bishop St. Health Centre.

The importance of the building was recognised by the School of Architecture in UL (SAUL) when it carried out a major survey and reassessment of the building in 2011.

Devane went on to design other schools and churches in Limerick and the Residential Block for Mary Immaculate College, many of these buildings are Protected Structures. St. Munchin’s Girls’ School (Thomond Primary School) is on the register and described in the NIAH as ‘a building of national significance’, and is a direct development of the design for Bishop St. but architecturally is inferior to St. Mary’s.

The observer proposes that St. Mary’s National School be added to the Register to safeguard the architectural integrity of this very important building.




The school is attached to the original seven-bay two-storey limestone school, built c. 1870, with polychrome brick dressing. Pitched slate roof with cast-iron rainwater goods, the gutters of which rest on a polychrome brick eaves course. This structure is listed on the RPS No. 3343 and NIAH Reg. Ref. 21508011

The school complex is part of Saint Mary's Convent, whose establishment dates back to 1812 and is an important part of the City's history. The Andy Devane modernist design can be identified as two no. blocks being the L-shaped general classroom block and GP Hall. Similar to Thomond Primary School St Mary’s is a multiple-bay single and two-storey school building. The main entrance comprises a double-height entrance elevation fronting Bishops Street characterised by an over-sailing pre-cast concrete canopy with pre-cast concrete crucifix overhead the door, a feature reflected on other elevations. The entrance is flanked both sides by large horizontal window openings. The staggered roof levels and varying projections, frame the horizontal glazing elements of the main school and the architectural character and uniqueness of the structure which is further enhanced by and the contradiction in the form and sloping roof of the GP hall. The site is

	currently in use as a part primary school, pre-school, adult education and by Barnardos Limerick. St. Mary’s School is a modern innovative design reflecting an original minimalist architectural character. This reduced construction style and clear design language is evident in the design of the school in this tight urban form. For this reason, it is considered that St. Mary’s should be included in the record Protected Structures.
Chief Executive’s Recommendations	
1. Add St Mary’s Girls National School, Bishops Street to the Record of Protected Structures.	
SEA/ AA Response	
None. The decision to add or remove individual buildings or structures to or from the Record of Protected Structures is based on individual merit and circumstances, rather than decisions at a strategic level. In situations such as alterations to an Architectural Conservation Area this may be of sufficient scale to be considered at strategic level, but this is not the case for individual structures. The addition of the structure is proposed following a detailed assessment by the Council’s Conservation Officer. The Officer has determined that the structure to be added has features that warrant protection.	

No. 215	Ref. & Name/ Group:	LCC-C62-215 Geraldine Hughes
	Submission/ Observation Summary	Chief Executive’s Response
	1. Record of Protected Structures: The observer requests to have the original Duhig Family Homeplace, Killilagh Cottage, at R515 Mount Plummer, Limerick, included on the RPS within the Social and Cultural Category, due to the prominence which the Duhig family has held within the Broadford community for over 150 years. The Duhig family originated at Ballyduhig townland 5km northwest of the cottage in Cromwellian times. The continuing prominence	1. Record of Protected Structures: Comments noted. However, an analysis of the architectural merit of the structure determined that the cottage has undergone extensive renovation works including a replacement roof and chimneys with the loss of original barges. Replacement windows and doors and re-rendering. While it is noted that the cottage retains an element of traditional character and history there are no distinctive architectural features to warrant inclusion on the Record of Protected Structures.

	<p>of the Duhig family has been confirmed by the Broadford Heritage Association arranging to have both the local GAA Sportsground named after the Archbishop and the Sportsground and Duhig Cottage celebrated with historical plaques.</p> <p>The observation is accompanied by photos, documentation including a map, various articles and other publications.</p>	
Chief Executive’s Recommendations		
1. No change		
SEA/ AA Response		
N/A		

No. 217	Ref. & Name/ Group:	LCC-C62-217 Sibeal O’Sullivan on behalf of Mrs. Anne O’Sullivan	
Submission/ Observation Summary		Chief Executive’s Response	
<p>1. Record of Protected Structures: This observation is in relation to the proposed addition of RPS Ref. No. 3386/ NIAH Reg. Ref. 21501001, Cnoicin, Mill Road, Corbally.</p> <p>There is inconsistency in extent of the curtilage identified in the maps. The map received attached to the Section 12 notice excludes the structure described as a 3 bay 2 storey semi-detached stable house to the south whereas the map identified as 2019 /AAD (7) in the documentation on file in the Council includes this structure.</p>		<p>1. Record of Protected Structures: A Protected Structure, unless otherwise stated, includes the interior of the structure, the land lying within the curtilage of the structure. The obligation to preserve a protected structure applies to any exterior or interior fixtures and fittings of a protected structure, or of any structure on land within its curtilage (this means any land or outbuildings which are/were used for the purposes of the structure). The structure is located within the curtilage of the Protected Structure.</p> <p>There is a mechanism to check if minor works can be undertaken on, or in, a protected structure. This process is known as a Section 57 Declaration. Where such a declaration is sought, the Planning Authority</p>	

This semidetached structure is in a seriously dilapidated state and has not been inhabited since before the current owners bought the property circa 1970. The semidetached property to the south of the ‘stable house’ is also in a dilapidated condition but was inhabited until recent years.

The observation requests that these semidetached structures are excluded from the curtilage as it is not reasonable that the owner is now legally required to make sure these structures are kept in a habitable condition. These structures do not materially affect the character of the principal house.

The observation requests that the curtilage excludes the concrete block stable building identified as Structure B. These stables were built circa 1985 and are not original to the principal house.

The observation welcomes the addition of the principal house to the Record of Protected Structure, but request that the protection extends to the exterior of the house only and not the interiors. The observation also requests that the curtilage is re-defined as set out above.

can clarify which, if any, parts of the structure or its surrounding curtilage are not of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest, and therefore do not require special protection.

Should the declaration confirm that any interior or exterior features are not part of the protected structure status, then planning exemptions in accordance with the Planning and Development Act 2000 (as amended), and the Planning and Development Regulations 2001 (as amended) will apply to these features.

A Section 57 declaration is the mechanism to define the elements of the protected Structure that do not required special protection including the curtilage definition.



Chief Executive’s Recommendations

1. No change

SEA/ AA Response

N/A

No. 232	Ref. & Name/ Group:	LCC-C62-232 Cllr. Jerome Scanlan on behalf of Mr. Daniel Gayer	
	Submission/ Observation Summary		Chief Executive’s Response
	Record of Protected Structures: This observation supports the delisting of RPS 1174, NIAH 21904508 owned by Mr. Daniel Gayer of Gortalassa, Feenagh, Co. Limerick.		Record of Protected Structures: Noted
	Chief Executive’s Recommendations		
	1. No change		
	SEA/ AA Response		
	N/A		

No. 267	Ref. & Name/ Group:	LCC-C62-267 Margaret Cunningham	
	Submission/ Observation Summary		Chief Executive’s Response
	<p>1.Record of Protected Structures RPS 7008 and NIAH 21807043, Bloomfield House, Castleconnell.</p> <p>The observer would not like to have her house designated as a Protected Structure. The house has no historical significance that they are aware of. Approximately ten years ago a gentleman called from Limerick County Council. He inspected the property and informed the observer that there were too many alterations to the property and</p>		<p>Record of Protected Structures: RPS 7008 is listed on the National Inventory of Architectural Heritage NIAH Reg. Ref. 21807043 and is considered to be of regional importance for its Architectural and Artistic value.</p> <p><i>Description</i></p> <p>The NIAH survey carried out in 2007 describes the structure as a detached three-bay two-storey U-plan house, built c. 1800, having</p>

advised that he would not recommend it as a Protected Structure. The observer has been informed that some County Councils (Tipperary being one) are delisting properties at present.

portico to front (west) elevation and three-bay two-storey blocks to rear (east) elevation with lean-to to north elevation.



Appraisal

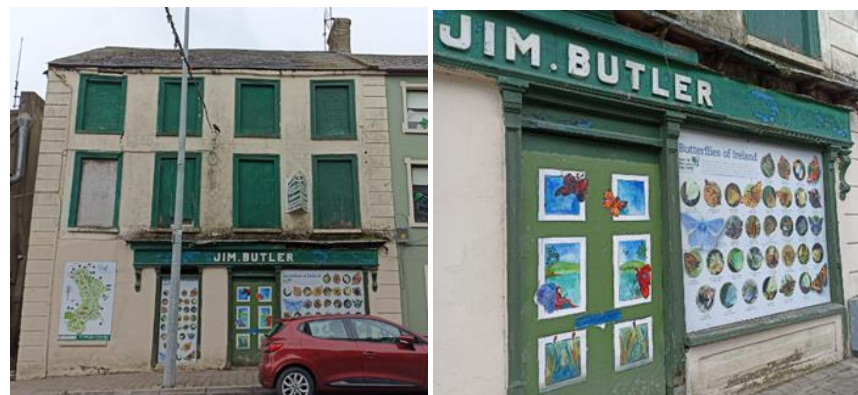
Bloomfield House is set within its own grounds surrounded by mature trees. The building has retained much of its historic form and character through the retention of key features including rendered chimneystacks, overhanging eaves and timber brackets, square-headed openings having painted stone sills and replacement aluminium windows, moulded cornice over segmental-headed opening having spoked fanlight over timber panelled door with sidelights having timber

	risers and decorative portico, although possibly a later addition this enhances the picturesque value of the composition, and incorporates well executed render detailing that augments the architectural quality of the site. This well composed, middle-size house of reserved Georgian appearance retains most of its original form and character, together with important salient features and materials. The structure is well maintained and has not deterioration in architectural character since the NIAH survey in 2007. It is considered that RPS 7008 is retained on the Record of Protected Structures.
Chief Executive’s Recommendations	
1. No change	
SEA/ AA Response	
N/A	

No 274	Ref. & Name/ Group: LCC-C62-274 Ger Barron and Eamon O’Dea
Submission/ Observation Summary	Chief Executive’s Response
1. Record of Protected Structures: In relation to Butlers Building, Main Street Bruff Reg. No. 1010, the observers request the structure be delisted from the Record of Protected Structures.	1. Record of Protected Structures: RPS ref. 1010 and is listed on the National Inventory of Architectural Heritage NIAH Reg. Ref. 21803016 <i>Description</i>

Plans for a car park to the rear did not go ahead. Delisting the building will be a big step in how development takes place, as it is an obstacle to progress, opening up backlands and off-street parking as per Objective ECON O8 “It is an objective of the Council to strongly support the strengthening of the vitality and viability of town and village centres to enhance economic growth, enterprise and employment opportunities”

The NIAH survey carried out in 2007 describes the structure as an end-of-terrace four-bay three-storey house and former shop, built c. 1820, having timber shopfront to ground floor. Now in disuse.



Appraisal

This building is currently vacant and has been so for a number of years resulting in neglect and deterioration. The building retains the overall form, massing and scale to the street frontage. However, the notable features, such as the decorative moulded render window surrounds and the original traditional shopfront have eroded significantly and would require replacement rather the restoration to restore the original character. Structurally there are a number of significant large cracks on the side elevation, the rear elevation is overgrown and inaccessible. Continued preservation of the Record of Protected Structures is no longer justifiable.

	The site is located in an Architectural Conservation Area. The location in the ACA will ensure adequate protection is afforded to the protection of the character of the building and the contribution it makes to the streetscape.
Chief Executive’s Recommendations	
1. Delete RPS 1010 from the Record of Protected Structures.	
SEA/ AA Response	
See SEA/ AA Response to Submission No. 5 above.	

No. 280	Ref. & Name/ Group: LCC-C62-280 Greg and Joanne Meaney
Submission/ Observation Summary	Chief Executive’s Response
<p>1. Record of Protected Structures: The observers’ home Kilbride, Ballinacurra Road has been recommended to be added to the Record of Protected Structures. The observers did not ask for the house to be protected. The house was purchased in January 2020 and the character restored internally and externally. Windows were replaced with bespoke sash. Shutters have been restored.</p> <p>The Conservation Officer has photographic evidence of change, following planning permission.</p>	<p>1. Record of Protected Structures: The structure is listed on the RPS ref. 5037 and is listed on the National Inventory of Architectural Heritage NIAH Reg. Ref. 21525015.</p> <p>The works carried out pursuant to planning permission 20/1433 are noted and the contemporary rear extension and sensitive restoration of elements of the original structure have been deemed acceptable in the context of the architectural heritage of the site.</p>



Appraisal

The structure has retained its architectural character and significance since the NIAH survey was carried out in 2005 and there has been no deterioration in the architectural quality of the structure to warrant the structure not being included on the RPS for Limerick, in accordance with Section 53 of the Planning and Development Act 2000 (as amended).


This house forms the last house to the west end of a terrace of seven similarly scaled late nineteenth-century houses. The house contributes to the uniformity of the terrace while being enriched by details including the two-storey bay window and round-arched door opening, which are rendered differently on each other house on the terrace. It is

<p>The submission outlines the following queries:</p> <p>(i) If the house becomes protected does this allow a request from Limerick City and County Council to evoke changes at the observers’ expense?</p> <p>(ii) Do improvements completed in 2021 not be included given the Plan is 2022 – 2028?</p>	<p>considered that RPS 5037 is retained on the Record of Protected Structures.</p> <p><i>Queries Raised</i></p> <p>(i) The onus is on the owner/occupier to ensure the elements that contribute to the character of the structure are protected. There are mechanisms in place to ensure structures are protected from endangerment. Similarly, there are grants in place for works to protected structures.</p> <p>(ii) A Section 57 declaration is the mechanism to define the elements of the protected Structure that do not required special protection including the curtilage definition.</p>
<p>Chief Executive’s Recommendations</p>	
<p>1. No change</p>	

SEA/ AA Response
N/A

No. 282	Ref. & Name/ Group:	LCC-C62-282 John Clery
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Record of Protected Structures: The observer would like to make some corrections to the detail provided in their Section 12 Notice.</p> <ul style="list-style-type: none"> -The house name is Rhorkee (not Rhokee) -The property owners are John and Jane Clery (not Cleary). 	<p>1. Record of Protected Structures: The structure is listed on the RPS ref. 3400 and is listed on the National Inventory of Architectural Heritage NIAH Reg. Ref. 21511007.</p> <p>The Section 12 notice issued incorrectly spelled the property as Rhokee. Details regard ownership will be updated on file.</p>
	Chief Executive’s Recommendations	
	1. Update records to include relevant information including ownership and correct name of the property.	
	SEA/ AA Response	
	N/A	

No	Ref. & Name/ Group:	LCC-C62-283 Patrick J. Leyden
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283	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Record of Protected Structures: RPS Reg. No. 3476 and NIAH Reg. Ref. 21514009</p> <p>It is not appropriate to issue a declaration without inspecting the interior of the structure and request all information available.</p> <p>The appraisals received have a number of inconsistencies:</p> <ul style="list-style-type: none"> -Appraisal dated 2017 received on 3rd of August notes the following “one of a terraces of 3 houses of vertical massing although it has lost most of its features this house along with the terrace forms an important component of the streetscape”. There is no record of the internal structure. -Further site inspection dated 3/07/3019. -The original appraisal is dated 20/11/2008, nine years later it is dated 2017. The appraisals are essentially the same except for the dates. The observer had issued a detailed declaration for the structure previously, dated 2008 and June 24th 2021, dated 2017. <p>Proposed addition No. 3476 has a different brief description with a survey dated 03/07/2019. The report differs from the two previous identical reports. The last paragraph is not in accordance with the Guidelines for Planning Authorities 4.34 and 4.32. The Conservation Officer’s recommendation on the basis of the features are intact is grossly incorrect.</p>	<p>Record of Protected Structures: RPS 3476 is listed on the National Inventory of Architectural Heritage NIAH Reg. Ref. 21514009 and is considered to be of regional importance for its Architectural and Artistic value.</p> <p>Description</p> <p>The NIAH survey carried out in 2005 describes the property as an end-of-terrace two-bay three-storey over basement house, built c. 1845, given a decorative render finish, c. 1900. Built facing north with front railed area to basement and flight of steps to front entrance.</p>  <p><i>Appraisal</i></p> <p>One of a terrace of three houses of pronounced vertical massing. The terrace is an imposing element, unique in the context of Clare Street</p>

<p>The submission includes a photo of the structure from 1985 showing the gutted and decaying state of the structure. The original structure was constructed prior to the 1840 map. The external walls were rendered with cement plaster and faced at party wall and at eastern edge gable edge, no return, with vermiculated quoin stone image.</p> <p>In 1985 the structure was totally demolished and in need of reinstatement with modern mechanical services. A planning report from a Grade II Conservation Architect under 17/949 states “Without any remaining joinery or plaster mouldings it is impossible to date this building, but it is pre-1840, it lacks the size and finesse of the Georgian buildings ...”</p> <p>The structure is not worthy of inclusion in the RPS not being of sufficiently high intrinsic quality or importance in the context of the National Heritage.</p>	<p>and contributes significantly to the character of the streetscape. The structure is not located within an ACA.</p> <p>A site inspection was carried out with the Conservation Officer on 28/10/21. Site inspection determined that the internal structural composition has been rebuilt including all internal walls, floors, stairs etc. with no original features being retained. Similarly, the structure has been re-roofed, the windows replaced and the original entrance walls replaced with railings. Owing to the extensive works carried out on site, it is considered that the structure does not warrant Protected Structure recognition.</p> <p>It is considered that this structure be removed from the Record of Protected Structures.</p>
<p>Chief Executive’s Recommendations</p>	
<p>1. Delete RPS 3476 from the Record of Protected Structures.</p>	
<p>SEA/ AA Response</p>	
<p>See SEA/ AA Response to Submission No. 5 above.</p>	

<p>No. 284</p>	<p>Ref. & Name/ Group:</p>	<p>LCC-C62-284 Roger O’Brien</p>
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Submission/ Observation Summary	Chief Executive’s Response
<p>1. Record of Protected Structures:</p> <p>(i) RPS 3264 NIAH Reg. No. 21512053: Correctly lists the former Golden Vale chimney stack. Is this to be restored to its former height?</p> <p>(ii) RPS 3265 NIAH Reg. No. 21512053: Incorrectly lists former Golden Vale chimney stack whilst showing a picture of the iconic former flax mill building. Can you confirm the flax building is a protected structure?</p> <p>(iii) The observer notes the absence from the Protected Structure list:</p> <ul style="list-style-type: none"> • The derelict cottages at the top of Stonetown Terrace; • The cut stone wall at the perimeter of the site, particularly the Stonetown Terrace section; • Other 19th Century buildings on the site. 	<p>1. Record of Protected Structures:</p> <p>(i) The current masterplan programme at Cleeves involves the preparation of a Stage 1 Master Plan for the development, to be completed this year. Following the completion of the Stage 1 Master Plan, the Project Team will move onto formal design stage and planning.</p> <p>(ii) Contents of the submission are noted, an error was made in the numbering of records.</p> <p>RPS 3265 reflects NIAH 21512053 – Factory</p> <p>RPS 3264 reflects NIAH 21512059 – Chimney Stack.</p> <p>The Record of Protected Structures shall be updated accordingly.</p> <p>(iii) Planning legislation gives protection to buildings, included in the ‘Record of Protected Structures’, and the wording of the legislation extends to the protection to include its ‘Curtilage’, the area of ground that is directly connected with the functioning or inhabitation of the structure. This protection recognises ‘Curtilage’ is the area of ground directly connected with the functioning or inhabitation of the structure, such as ancillary buildings, yards etc. This affords protection to those places along with the primary</p>

The observation seeks clarification in relation to the above	structure on the site. All features which contribute to the character and special interest of a protected structure are protected.
Chief Executive’s Recommendations	
<p>1. Update the Record of Protected Structures to reflect the following NIAH References:</p> <ul style="list-style-type: none"> • RPS 3265 -NIAH 21512053 – Factory • RPS 3264 - NIAH 21512059 – Chimney Stack 	
SEA/ AA Response	
None	

Theme 4: Population and General Settlement Issues

No. 20	Ref. & Name/ Group:	LCC-C62-20 Eamonn Baker
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Measuring Successful City Growth: Population growth compared to the City’s peers is a measure which can be used to measure successful growth, including relative economic success of the City and ability to attract investment, create jobs and attractiveness as a place to live.</p> <p>As the population grows so does the economic footprint of the City’s and the region’s economy. The 2016 Census indicates population change since 2011 as 1.6% for Limerick, 4.2% for Galway and 5.4% for Cork. Limerick is falling behind its peers in its ability to attract investment, jobs and people, as well as grow its economy. This is a key metric.</p> <p>Limerick is being out competed by Galway and Cork. This needs to be examined carefully when developing future plans for the development of the City, to understand the reasons and put in place focused plans to ensure Limerick can turn this negative trend around.</p>	<p>1. Measuring Successful City Growth: At a national planning policy level, the National Planning Framework sets out parameters for growth of the regions, cities, towns and rural areas across the Country. These parameters are further developed in the Regional Spatial and Economic Strategy for the Southern Region. The NPF’s Strategy focuses on supporting ambitious growth targets to enable the four cities of Cork, Limerick, Galway and Waterford to each grow by at least 50% to 2040 and to enhance their significant potential to become cities of scale. The NPF recognises the Limerick City region as a key asset, that will play a major role in both driving and accommodating a significant proportion of the proposed national population growth and will act as an effective complement to the economic strength of Dublin.</p> <p>The National Planning Framework (NPF) Implementation Roadmap and the Regional Spatial and Economic Strategy for the Southern Region (RSES) set out a population projection of between 246,000 and 256,500 in Limerick to 2031. The estimated population growth allocation is an additional 41,661 persons over the plan period to 2028. The Economic and Social Research Institute’s ‘Regional Demographics and Structural Housing Demand at a County Level’ sets out a forecast for an additional 15,591 households, or residential units, over the Plan period 2022 – 2028.</p>

		The draft Plan in line with national and regional planning policy sets out ambitious growth for Limerick, which in conjunction with the other regional cities, will act as a counter balance to Dublin. The draft Plan established the policy context to enable this growth with the development in tandem with appropriate levels of infrastructure and services to support the growth.
	Chief Executive’s Recommendations	
	1. No change	
	SEA/ AA Response	
	N/A	

No 130	Ref. & Name/ Group:	LCC-C62-130 Stephen Ward on behalf of Xanthe
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Position of Rathkeale in the Settlement Hierarchy: The submission seeks the re-positioning of Rathkeale from a Tier 3 settlement to a Tier 2 settlement in the Settlement Hierarchy and that there is explicit policy recognition of settlements, such as Rathkeale being promoted for further employment and investment beyond being ‘purely self-sufficient’. The designation as a Tier 2 Settlement is more ambitious in terms of promoting enterprise and employment.</p> <p>2. Opportunity for Enterprise and Employment Development in Rathkeale: The submission identifies land</p>	<p>1. Position of Rathkeale in the Settlement Hierarchy: The settlement typology of the RSES for the Southern Region (Table 3.2) sets out the settlement hierarchy to be followed in the Core Strategy. Newcastle West is the only settlement defined as the Key Town for County Limerick in the RSES, which defines the roles of certain county settlements in an overall regional context as Key Towns based on variety of criteria, including size and wider service functions. The Council do recognise the role that Rathkeale performs in County Limerick, as a market town, servicing a wide community, however, in line with regional policy, it will remain a Level 3 settlement.</p> <p>2. Opportunity for Enterprise and Employment Development in Rathkeale: The Council acknowledge the submission in relation to</p>

<p>circa 25 hectares within the boundary of the Rathkeale Local Area Plan 2012 – 2018 (as extended), presently zoned agricultural and partly subjected to flooding as suitable for enterprise and employment development. The rationale presented to promote these lands includes: access to the R523 within the 50kph zone and potential access to the R518; opportunities to divert associated traffic from the town centre; accessibility to the Shannon Foynes Port, to the upgraded N69 and the N21 and to Newcastle West. Other benefits will include the reduction in commute between work and home, enabling Rathkeale to ‘catch-up’ in terms of investment in local employment, and leveraging long-term high skilled employment opportunities aligned with RSES economic growth principles of smart specialization, clustering, place-making, place-making, knowledge diffusion and capacity building. The submission acknowledges awareness that the specifics of land use zoning will be addressed in the review of the Local Area Plan.</p>	<p>zoning in Rathkeale and the comments from the OPR, in terms of the inclusion of zoning objectives for areas that have Local Area Plans in place, to ensure consistency with the Development Plan on adoption. The Council have commenced the review of the existing Rathkeale Local Area Plan 2012 – 2018 (as extended), with the publication of an Issues Paper on November 6 2021, the Council will progress this review in tandem with the completion of the Limerick Development Plan 2022 – 2028. The Council will consider the zoning objectives and quantum of zoned lands as part of the review of the existing Local Area Plan.</p>
<p>Chief Executive’s Recommendations</p>	
<p>1 – 2. No change.</p>	
<p>SEA/ AA Response</p>	
<p>N/A</p>	

Theme 5: Retail

No. 68	Ref. & Name/ Group:	LCC-C62-68 Avison Young on behalf of Tesco Ireland Ltd.
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Introduction: Tesco is one of the primary convenience retailers in Ireland and welcomes the opportunity to make a submission. The Local Authority are encouraged to continue to engage with stakeholders to ensure appropriate policies and objectives in the new Development Plan will attract new investment and protect vitality and viability of retail premises in towns and villages.</p> <p>2. Background: Tesco has over 150 stores nationwide, comprising grocery, home shopping and click and collect services, with a supporting distribution network. Tesco operates 6 no. stores in Limerick. Given the projected population growth, proposed in Limerick, there is scope to provide additional stores at appropriate locations. It is important that the Development Plan accommodates growth through supportive policies and objectives to provide for residential and employment lands, but also supporting infrastructure and services such as education, commercial, retail and specifically new convenience retail floorspace at suitable locations. Of equal importance is to support established retail facilities that provide an important service to their communities, through supportive zoning objectives and general retail</p>	<p>1. Introduction: The Council acknowledge the contribution that retailing makes to the economy in Limerick and are committed to consultation with all stakeholders in the preparation of Local Area Plans and Development Plans for Limerick.</p> <p>2. Background: The Council acknowledge that the growth identified for Limerick in the NPF and RSES are ambitious. The Draft Retail Strategy has been developed taking account of the projected growth and has identified a requirement for generous growth in retail up to 2028. The Draft Development Plan includes policies and objectives, which seek to safeguard the vitality and viability of the city centre, town centres and existing retail provision. The Draft Development Plan also supports the implementation of the Draft Retail Strategy in terms of future retail provision. The Draft Retail Strategy has been prepared for the Limerick – Shannon Metropolitan Area and for County Limerick in line with the requirements of the RSES.</p>

<p>policy to ensure these facilities can continue to provide for the needs of expanding catchment areas.</p> <p>3. Planning and Vision: The Planning and Development Act 2000 (as amended) requires policies and objectives relating to the management of retail development, which should accord with the Section 28 guidelines, including the Retail Planning Guidelines 2012.</p> <p>There are some settlements that are underserved by convenience retail floorspace and in some instances trade may be lost to neighbouring larger settlements. There is potential for additional convenience retail in some settlements, given their projected population growth.</p> <p>The Draft Retail Strategy for the Limerick Shannon Metropolitan Area and County Limerick sets out a requirement for an additional c.18,583m² of convenience retail floorspace to 2028. As per the Guidelines, the Draft Retail Strategy recognises that the estimates provided will act as broad guidelines on the allocation of additional floorspace and not as ‘caps’. This is welcomed as quantitative limitations can be undermined by a range of factors changing over the short to medium term.</p> <p>It is requested that clarity is provided within the new Development Plan so that the floorspace figures are considered as estimates and that future convenience retail</p>	<p>3. Planning and Vision: Noted, the Draft Development Plan and Draft Retail Strategy have been prepared in line with the Planning and Development Act 2000 (amended) and Section 28 Guidelines.</p> <p>Additional retail floorspace shall be provided in line with the requirements identified within the Draft Retail Strategy for the Metropolitan Area and for Limerick.</p> <p>The Draft Retail Strategy has been formulated following robust assessment of existing, pipeline and future retail demand. The Retail Strategy has been prepared in the extraordinary and unique context of the COVID-19 Pandemic, with unparalleled challenges for the economy and services sector in particular. Objective LCC03 of the Draft Retail Strategy sets out that it is an objective of the Council to ensure that all retail development permitted accords with the relevant requirements and criteria as established within the Retail Planning Guidelines for Planning Authorities 2012 and the Retail Strategy for Limerick Shannon Metropolitan Area and County Limerick 2022-2028. Furthermore, Objective LCC09 outlines that when assessing retail planning applications, it will be the objective of the Council to have regard to the findings of the capacity assessment contained in the Retail</p>
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<p>proposals will be assessed on their merits. It is imperative that a prescriptive cap is not placed on additional retail convenience floorspace over the plan period.</p> <p>4. Strategic Narrative: The projected population growth will continue at a rapid rate, bringing increased demand for services including housing, education, community and retail. The new Plan must ensure policies and objectives are sufficiently strategic and robust to appropriately accommodate the increasing population and provide for the increasing demand for services.</p> <p>Tesco is suitably positioned to bring forward an increased level of convenience retail floorspace that could serve the population rise over the lifetime of the plan and beyond. Tesco is reviewing opportunities to sustainably grow at appropriate locations within the County across a range of formats, which would positively contribute to the overall development of the County in relation to positive planning and economic growth and regeneration, in accordance with national and regional policy. New convenience retailing can help enhance vitality and viability of town centres, by</p>	<p>Strategy for the Limerick Shannon Metropolitan Area and County Limerick 2022- 2028, including the ability to counteract expenditure leakage. The onus will be on any applicant to demonstrate in a Retail Impact Assessment that the proposed floorspace is appropriate, having regard to the quantum of floorspace required within that specific urban centre or settlement, in addition to evidencing all other relevant variables, as specified within the Retail Planning Guidelines</p> <p>4. Strategic Narrative: The Council acknowledge that the significant growth identified will require growth in services to support this population increase. The Draft Development Plan sets out an array of policies and objectives, which support the development of services and facilities to support the growth of Limerick. National and regional planning policy identifies significant growth for Limerick and the Draft Plan recognises that in order to support this population growth, services will be required and sufficient zoned lands have been provided in the relevant settlements to support this growth.</p> <p>The Draft Development Plan promotes the concept of the 10-minute City/Town and the Council is committed to the implementation of the concept, whereby a community can walk short distances from home to destinations that meet their daily needs, including work, retail, education, sports etc. Which can all be catered for utilising sustainable transport modes and reducing the need to travel, with clear benefits for quality of life and for climate change.</p>
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<p>complementing the overall business mix, physical regeneration through redevelopment of vacant and/or underutilised sites, contributing to compact urban forms and providing attractive townscapes. Larger format stores have the advantage of offering a greater product range, provision of grocery home shopping hubs, Click and Collect facilities and a range of shopping channels. These also promote sustainable modes of transport such as electric vehicle charge points and cycle parking.</p> <p>5. Supportive Retail Policies: Future provision of retail and enhancement of existing centres should be considered and facilitated as part of the new Plan. New residential growth areas should be adequately served by retail facilities. It is requested that flexibility is provided with regard to zoning policies to facilitate the provision of scale appropriate retail floorspace at appropriate locations. When sites are not available in town centre locations, consideration must be given to edge of centre sites. Town centres cannot always accommodate new retail development due to site constraints such as plot size, site layout, parking requirements, delivery access etc. Edge of centre sites must then be considered with flexible zoning objectives to accommodate a modern convenience retail store with appropriately sized floorplate.</p> <p>The Coonagh Cross Shopping Centre is referred to as a ‘District Centre’ at Section 4.6.4 ‘District Centres’ with Policy</p>	<p>5. Supportive Retail Policies: The Draft Development Plan supports the development of sites, which offers regeneration opportunities for the city and towns centres and supports revitalisation of vacant sites and promotes job creation. Any applications outside of city centre/town centre will only be considered on a sequential basis and subject to an appropriate level of retail impact assessment and the principles of compact sustainable compact growth.</p> <p>Coonagh Shopping Centre is a local centre and the Council notes the error in section 4.6.4 of the plan. This section will be amended to</p>
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<p>ECON O3 applicable. However, the Land Use Zoning Map designates Coonagh Cross as a Local Centre. Tesco supports designated of Coonagh Cross as a District Centre and requests the Land Use Zoning Map to be amended.</p> <p>6. Supporting Existing Retailers: Supporting existing retail operators must be considered in the new Plan. This includes the safeguarding of delivery and access routes and spaces to undertake deliveries.</p> <p>Tesco supports urban renewal, public realm and transport improvement schemes and encourages sustainable modes of transport, from customer and staff journeys to HGV deliveries. Deliveries, particularly early in the morning are an important aspect of the central distribution system and must be protected. These deliveries ensure consistent product quality and availability and reduce the number of trucks on the road at peak times of congestion. Restrictions on deliveries must be avoided. It is requested that no policies are introduced which could lead to any restrictions on deliveries as part of the new Plan and the Local Authority engage with retailers as part of any future public realm or transportation strategies.</p> <p>7. Requirements of Retailers: Retailers have very specific requirements relating to access, servicing, shape, size and</p>	<p>reflect the appropriate zoning on the Coonagh Centre in line with the Draft Retail Strategy.</p> <p>6. Supporting Existing Retailers: The Draft Development Plan seeks to safeguard existing retail provision, objective ECON O1 seeks to protect, promote, support and enhance the role of Limerick City as the primary retail centre in the metropolitan area. The Draft Development Plan contains similar objectives to safeguard district centres, Newcastle West and other town and village centres, in accordance with the Draft Retail Strategy and national and regional policy.</p> <p>Noted. Objective TR O42 sets out the proposal for the Limerick City Centre Traffic Management Plan, in accordance with the Draft LSMATS, which will consider the issue of HGV’s in the City Centre and the issue of the ‘last mile’ delivery. Objective TR O43 seeks to identify specific lorry routes and/or restrictions, which may impact on deliveries specifically in the City Centre. Local Transport Plans may consider similar issues should they exist in towns in County Limerick.</p> <p>7. Requirements of Retailers: The Development Management Standards set out in Chapter 11, Section 11.6.2 of the Draft</p>
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<p>morphology of sites. Typically, convenience retailers will require extensive open areas of floorspace with associated car parking. Many of Limerick’s primary settlements comprise historic buildings often with irregular floor layouts, or changes in floor level. These buildings are not consistent with modern retail convenience layout requirements, which require large unobstructed and level floorplates.</p> <p>Convenience retail stores require a large quantum of car parking spaces to serve customers doing their weekly shop.</p> <p>The changing nature of retailing with the move towards more online shopping is highlighted. This has accelerated in recent months. Convenience retailers have experienced a significant increase in online sales over the last 12 months, with Tesco anticipating further growth in this area.</p> <p>8. Click and Collect and Grocery Home Shopping: Convenience shopping continues to be focused on in person shopping due to the nature of the service being provided, however the role of Click and Collect and home deliveries has increased. Click and Collect usually have small footprint requirement and are located reasonably close to the shop door. Retail is developing at a rapid pace and it is crucial to Tesco that they can keep pace with the rate of change.</p> <p>It is requested that the new Plan has due regard to the recent growth in these services and provide support for</p>	<p>Development Plan provide the basis for the assessment of Planning applications for retail developments. The Council recognise that City/Town Centre sites may provide challenges specifically with historic buildings, however, it is considered that many of the challenges maybe overcome subject to appropriate design/innovation and consideration by the applicants.</p> <p>The Development Management Standards also set out the standards for reduced car parking in line with national policy.</p> <p>The Council recognise the changing nature of retailing and are committed to working with retail providers to embrace technology to keep pace with change.</p> <p>8. Click and Collect and Grocery Home Shopping: The Council acknowledge the move toward click and collect and home deliveries for retail and the requirements for additional space to accommodate this type of shopping. An objective will be included to support click and collect as requested.</p>
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	these. Tesco would welcome the addition of a policy ‘To support and accommodate the growth of ‘Click and Collect’ retail services and grocery home shopping’.	
Chief Executive’s Recommendations		
<p>1 – 4. No change;</p> <p>5. Amend section 4.6.4 to accurately reflect district centres: “There are also a number of other Tier 2, Level 2 District Centres throughout the Environs, including the Jetland Shopping Centre, Castletroy Shopping Centre, <u>Watch House Cross</u> Coonagh Shopping Centre, the Parkway Shopping Centre, the Childers Road complex and Roxboro Shopping Centre”;</p> <p>6 - 7. No change;</p> <p>8. Include an objective in Chapter 4 Section 1 and the Retail Strategy as follows: <u>It is an Objective of the Council to support and accommodate the growth of ‘Click and Collect’ retail services and grocery home shopping as appropriate.</u></p>		
SEA/ AA Response		
The amendment to reflect the current District Centres serves to clarify this part of the Development Plan and would not have any environmental effects. The District Centres are located within appropriately zoned areas of the City and Environs. The growth of “click and collect” shopping and the promotion of on-line grocery shopping has to be viewed in a positive context with respect to human health and welfare in the midst of the current Covid 19 pandemic, as well as a reduction in the number of trips by private vehicle and associated carbon emissions.		

No. 134	Ref. & Name/ Group:	LCC-C62-134 UGP Castletroy Shopping Centre Limited	
Submission/ Observation Summary		Chief Executive’s Response	
<p>1. Introduction: UGP has a long-term commitment to Limerick and wishes to contribute to its sustainable development of Limerick. However, there are opportunities for Limerick as articulated in Project Ireland 2040, the Southern Regional Spatial and Economic Strategy and the Limerick Shannon Metropolitan Area Spatial Plan. Limerick can prosper, but only if its development is guided by clear,</p>		<p>1. Introduction: The Council note the contents of the submission and welcome the commitment of the UGP Company to Castletroy and the significant investment, which has been brought to the revitalisation of the district centre over the last number of years, despite challenging retail circumstances.</p>	

<p>evidenced-based policies that deliver opportunities for sustainable living, business and learning, coupled with an excellent quality of life. The submission outlines that the Castletroy Town Centre currently has a net area floorspace of 7,800m² with 6,200m² of retail with ancillary uses such as fitness use, services and offices.</p> <p>2. Core Concerns: The submission states its core concerns as follows:</p> <p>(i) The Draft Plan and the Draft Retail Strategy do not give sufficient weight to the potential for growth in the catchment of Castletroy Town Centre, UGP consider that there are systemic short comings in the draft Plan and the draft Retail Strategy, it is considered that there is insufficient detail in terms of allocation of individual floorspace in particular to district centres. They outline that planning policies must give sufficient detail for individuals or companies to have sufficient information to organise their activities.</p> <p>(ii) UGP requests that the growth potential of Castletroy should be specifically referenced in the Core Strategy of the Draft Plan and in amendments to the Draft Retail Strategy. These omissions are currently systemic shortcomings in the Draft Plan and Draft Retail Strategy which invalidate both.</p>	<p>2. Core Concerns: Key concerns are addressed below:</p> <p>(i) Table 6.22 outlines the breakdown Future Retail Floorspace Potential (Cumulative) - Adjusted for Vacancy and Pipeline by catchment areas. The plan also provides polices and recommendations to guide future development. The inclusion of potential retail floorspaces and the policies/recommendations illustrates that there is no ‘significant systemic shortcoming’ within the draft plan or the draft Retail Strategy. The Council consider that providing specific allocations to district centres is an overly prescriptive interpretation of the guidelines intent; presupposing development potential, whereas needs have been identified at retail catchment level and are more appropriately addressed for district centres and other locations via the strategy’s policies and recommendations.</p> <p>(ii) The draft Retail Strategy provides scope for growth potential within Castletroy district centre. Objective MASPO6: Castletroy Shopping Centre supports reinvestment, upgrading and consolidation of retail floorspace within the Castletroy Shopping Centre, where it does not alter its role and function with respect to Limerick City Centre and the retail hierarchy. The Council contends</p>
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<p>UGP requests Limerick City and County rectify these shortcomings in the final versions of both documents.</p> <p>(iii) UGP requests that District Centres should be allowed to expand significantly above the 10,000 sqm. Subsequently they request to remove this Section of MASP04: District Centres (Tier 2, Level 2).</p> <p>(iv) UGP contends that the “Retail Planning – Guidelines for Planning Authorities” give further support to:</p> <ul style="list-style-type: none"> - the expansion of Castletroy Town Centre; - the to the Core Strategy of the Draft Plan and to the Draft Retail Strategy already requested above. <p>(v) UGP requests that the entirety of its landholding, as set out in Figure 1, is zoned as a District Centre. The boundary outlined in the Draft Retail Strategy and the Draft Plan differ.</p> <p>(vi) UGP requests that the Draft Plan and Draft Retail Strategy be consistent in their designation of District Centres.</p>	<p>that there is no significant systemic shortcoming within the draft plan.</p> <p>(iii) The Council must consider policies and objectives to ensure that any expansion of districts centres will have no adverse impact on Limerick City Centre. Having regard to the objective of the council to support and enhance the role of Limerick City Centre as the primary retail centre in the Metropolitan area it is not considered appropriate to remove the section as suggested.</p> <p>(iv) The 2012 Retail Planning Guidelines note the following with regard to the retail parks, <i>“The development of very large single retail warehouse units in excess of 5,000 M² (and sometimes of 10,000 M² or more) focused upon a specific market segment, can have an unacceptable local monopoly effect on smaller shops in town centres”</i>. In this regard the removal of this part of MASP04 is not justified. Due to the location of Castletroy, the Council can only consider expansion, where it can be demonstrated that the proposal does not have an adverse impact on Limerick City Centre.</p> <p>(v) The extent of District Centre doesn't need to follow landholding boundary, but a reflection of uses on the ground. The Retail Strategy outlined the retail study, which was assessed for the purposes of the Draft Retail Strategy, these are different areas and there is no need for these to match.</p> <p>(vi) This request is welcomed to provide consistency. The submission outlines the need to update the text within Section 4.6.4 of the draft</p>
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	<p>(vii) UGP requests that the Draft Plan and Draft Retail Strategy be explicit on the criteria used in their designation of District Centres. Furthermore, designated District Centres should have the requisite scale and growth potential in the period to 2028.</p>	<p>Development Plan, No change is envisaged within the draft Retail Strategy.</p> <p>(vii) Table 6.22 outlines the breakdown Future Retail Floorspace Potential (Cumulative) - Adjusted for Vacancy and Pipeline by catchment areas. 31,258 sqm. is envisaged for the Limerick Catchment – MASP which provides for potential expansion of district centres, subject to policies/objectives contained in the Draft Plan and Draft Retail Strategy.</p>
Chief Executive’s Recommendations		
<p>1(i) - (v) No change;</p> <p>(vi) Update Section 4.6.4 of the Draft Plan to comply with the Retail Strategy, in terms of the designation of the District Centres.</p>		
SEA/ AA Response		
The updating of Section 4.6.4 ensures that this element of the plan is consistent with the Retail Strategy.		

No. 136	Ref. & Name/ Group: LCC-C62-136 Coakley O’Neill on behalf of Circle K Energy Group Ltd.	
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Introduction: The submission addresses the proposed development management standards set out for services stations in Chapter 11 of the Draft Plan and raises concern over a clear misinterpretation of the Retail Planning Guidelines provisions relating to ancillary retail development at service stations. The Submission highlights particular concern with the limit placed on the retail floor area of service stations.</p>	<p>1. Introduction: The Council acknowledge the evolving nature of retail, including service stations and the role they play in providing retail services throughout Limerick. However, the Council priority is to safeguard the retail cores of the city centre/town centres, in line with national and regional policy.</p>

	<p>2. Key Issues: The submission requests the following be considered.</p> <p>Recognition that the nature of the service station market has evolved considerably and acceptance of their various forms and locations. Support for the important local service function performed by urban stations and the sustainability of those established in residential neighbourhoods.</p> <p>Acknowledgement of the expectations and requirements of the modern consumer in determining appropriate policies for this type of retailing. Incorporation of reference in accordance with the Retail Planning Guidelines to development in excess of 100sqm net retail sales area being acceptable in principle, subject to normal planning and development considerations.</p>	<p>2. Key Issues: The Council recognise the evolving nature of retail; however, the Draft Plan seeks to safeguard city/town centres in line with national and regional guidelines. The Retail Planning Guidelines (2012) outline where applications are made with a floorspace in excess of 100m², the sequential approach to retail development shall be applied, in the same manner, as if the application didn't include motor fuel sales. In accordance with the Draft Retail Strategy and Section 4.6.6 of the Draft Plan, the Development Management Standards set out in Chapter 11 shall be amended in the interest of clarity.</p>
Chief Executive’s Recommendations		
<p>1. No change;</p> <p>2. Amend Table DM 5 Design Guide for Service Stations – Retail Unit to clarify and to comply with the Retail Planning Guidelines and the Draft Retail Strategy as follows: <u>Where applications are made for retail units associated with a petrol station, with a retail unit in excess of 100m², the sequential approach to retail development will apply.</u></p>		
SEA/ AA Response		
<p>No SEA / AA impact. The proposed amendment to Table DM 5 will clarify the position in relation to service stations and associated retail facilities, in order to comply with the provisions of the Retail Planning Guidelines and Draft Retail Strategy. This is to ensure compliance with Section 28 planning guidance.</p>		

No. 166	Ref. & Name/ Group:	LCC-C62-166 John Spain Associates on behalf of Aldi	
Submission/ Observation Summary		Chief Executive’s Response	

1. Introduction: Aldi has been actively seeking to develop additional stores to serve the city for the past 15 years. Aldi’s existing stores in Limerick City are located at the Dublin Road near the Parkway Centre, and at Roxborough. A further store exists at the Newcastle West town centre. Aldi has also recently secured planning permission for a new store within the city centre on Roches Street. Aldi is seeking to provide additional stores within the south and north of the city in order to help meet convenience retail needs in these areas, where there is an identified shortfall in provision and lack of consumer choice.

2. Conflict in Plans: A discrepancy between the Southern Environs LAP and the Draft Plan is identified by the submission. An Aldi discount foodstore would be classified as “Retail – Convenience” under the Southern Environs LAP 2021-2027 land-use zoning matrix. The matrix states that “Retail – Convenience” would be “generally permitted” in “Local Centre” land-use zonings. However, an Aldi discount foodstore would be classified as “Retail – Convenience” under the draft plan land-use zoning matrix within the comparable “Local/Neighbourhood Area” land-use zone. Furthermore, the land-use matrix within the draft plan notes that convenience retail with a net floor area of >1,800 sqm is “generally not permitted” in such zoned lands, while a convenience retail store with a net floor space of <1,800 sqm is “open for consideration”. The submission requests that the draft plan be amended to

1. Introduction: The Council acknowledge the contribution that the development Aldi’s Stores brings to Limerick. The development of additional retail shall comply with the Draft Retail Strategy in terms of safeguarding the retail core of Limerick City Centre and other town centres.

2. Conflict in Plans: The approach taken in relation to the development of retail in the neighbourhood centres is an update as a result of the outcomes of the Draft Retail Strategy and is not a discrepancy. In the interest of safeguarding the City Centre and development of Local Centres to an appropriate scale to serve local communities, it is recommended that the net retail floor area within Local Centres shall not exceed 1,800m², as retail development in excess of this floor area is not considered appropriate in Local Centres. The use of ‘Open for Consideration’ in the matrix, is deemed the appropriate classification as each application will be considered on a case-by-case basis, rather than being generally permitted.

	<p>reflect the newly published Southern Environs LAP 2021-2027 identifying ‘retail convenience’ as generally permitted in a local centre. For consistency, it is requested that a convenience retail store with a net floor space of <1,800 sqm are “generally permitted” within the “Local/Neighbourhood Area” land-use zone.</p> <p>3. Retail Caps: The submission considers the quantum of 4,845sqm of convenience retail floorspace to 2024 as insufficient given the envisaged population growth, and the restrictions to district centres in the 2010 – 2016 Plans and the narrow definitions of local/neighbourhood centres in same. The submission seeks clarification in the Draft Plan/Retail Strategy that the 4,845sqm figure is guidance only and not a ‘cap’.</p> <p>4. Retail Centres: It is requested that the Retail Strategy recognise that Limerick City and Shannon as retail centres have different retail catchments with no overlap of convenience retail catchments.</p>	<p>3. Retail Caps: The quantum of floor space identified in the Draft Retail Strategy is quantified following extensive analysis and modelling to determine the demand for retail floorspace in line with population growth to 2024. This figure is not for guidance but rather the quantum required to cater for the population growth to 2024.</p> <p>4. Retail Centres: As defined in the RSES for the Southern Region, Limerick and Shannon are interlinked. It is noted in the RSES that although these two settlements are in different counties, they are both interdependent, with complimentary functions contributing to a combined strength – a primary economic driver for growth. The catchment areas have been defined using an assessment of driving time accessibility, extending outwards from the key towns in each of the catchment areas. It is not possible recognise that Limerick City and Shannon as retail centres have different retail catchments with no overlap of convenience retail catchments, as this is not the case.</p>
<p>Chief Executive’s Recommendations</p>		
<p>1 – 4. No change</p>		

	SEA/ AA Response
	N/A

Theme 6: Rural Settlement and Rural Housing

No. 1	Ref. & Name/ Group:	LCC-C62-1 Michael King
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Zoning: Requests the re-zoning of land from Agriculture to Residential at Foynes.</p> <p>The re-zoning of the lands would allow for additional residential development in the future. Permission has been granted to construct two dwellings and rezoning would provide an opportunity for other dwellings.</p>	<p>The subject lands are zoned for Agriculture use under the Draft Plan as they have been identified as being at risk of flooding, given their location within Flood Zone A. The zoning of these greenfield lands located within Flood Zone A for residential purposes (vulnerable use) is not acceptable in accordance with the ‘Planning System and Flood Risk Management Guidelines for Planning Authorities’ (2009).</p> <p>Therefore, zoning of these lands is not considered appropriate.</p>
	Chief Executive’s Recommendations	
	1. No change.	
	SEA/ AA Response	
	N/A	

No. 13	Ref. & Name/ Group:	LCC-C62-13 Breda Gleeson	
	Submission/ Observation Summary		Chief Executive’s Response
	<p>1. Planning Permission Criteria for site on substandard road: The observer is selling a 1.26-acre site at Buffanoka, Cappamore. The observer is unable to build a house themselves and works 25.6 miles away. A local person, living within 10km of the site all of his life, is interested in buying the site. The observer has been told by Development Management that this person will not get planning permission as the site is located on a substandard road. Only people on the road will be granted permission. The observer is not in a position to build and live in the house for 7 years before selling it and lives in rented property close to work. It is unfair and unreasonable that a local person cannot buy this site. If planning rules are not changed there will always be a shortage of houses and people will never own their own homes.</p>		<p>1. Planning Permission Criteria for site on substandard road: This observation relates to a specific Development Management issue; details of specific planning applications are outside the remit of the Development Plan process and would benefit from pre planning discussions.</p>
	Chief Executive’s Recommendations		
	1. No change.		
	SEA/ AA Response		
	N/A		

No. 19	Ref. & Name/ Group:	LCC-C62-19 Adam Kearney, AK Planning	
	Submission/ Observation Summary		Chief Executive’s Response

<p>1. Loughill Settlement Boundary: A site in Loughill opposite the National School has planning permission for 11 no. serviced sites (Ref. 17/1152 and 20/401). The red line settlement boundary should be revised to include this 1.4ha. site. It is requested to include this inside the settlement boundary for Loughill.</p> <p>2. Effluent Disposal: There are two treatment plants, a basic septic tank serving a few houses and a larger plant, which has capacity and connection permitted for these permitted dwellings.</p>	<p>1. Loughill Settlement Boundary: The Council recognise the dispersed nature of the settlement of Loughill along the N69 National Road and onto the local roads. The site to be included is located adjoining the National School and comprises of Serviced Sites and offer a real alternative to rural housing, having regard to the location of the site in proximity to the school, the connection to the wastewater network and the benefit of planning permission. Therefore, it is considered appropriate to include the site in the settlement boundary for Loughill.</p> <p>2. Effluent Disposal: Connection to serve the permitted development was approved by Irish Water.</p>
Chief Executive’s Recommendations	
1. Amend the settlement boundary of Loughill to include the lands identified in the submission.	
SEA/ AA Response	
No effects. The development boundary is being altered to facilitate a granted permission, which has undergone its own assessment process.	

No. 23	Ref. & Name/ Group:	LCC-C62-23 AK Planning on behalf of Eddie Guiney
	Submission/ Observation Summary	Chief Executive’s Response
	1. Zoning: The quantum of land zoned Residential in the Draft Plan for Foynes is substantially less than what is currently zoned. The submission proposes two additional sites to be considered for residential zoning to increase the potential	The designation of Foynes as a Tier 1 Port and the future plans for the town are acknowledged. Each settlement in the hierarchy has an important function at a local level and some at a regional level with respect to employment, services, housing and communities.

<p>yield for housing. Site 1 is 1.0 hectares and is not within a flood zone and could accommodate 10 to 20 dwellings. Site 2 is 2.4 hectares and could be suitable for up to 20 serviced sites.</p> <p>2. Development of Foynes: The submission notes the designation of Foynes as a Tier 1 Port, the Foynes to Limerick Road project, the plans to reopen the freight line and the plans for Irish Water to upgrade the wastewater infrastructure for the town in the next 2 years, which will accommodate future population growth. The susceptibility to flooding and the flood defences are acknowledged.</p> <p>The town and port are destined for expansion, coupled with large scale transport improvements, the quantum of residentially zoned lands falls short with respect to commercial expansion. 100+ hectares of land zoned for marine related industry in the Foynes Plan will facilitate increased employment. Insufficient housing provision in the town will lead to unsustainable car dependency for those employed in Foynes.</p> <p>The submission requests that the population growth forecasts for the town are revisited and realigned with the overarching strategic vision for the town.</p>	<p>The settlement hierarchy has been developed to take account of the role and function of each settlement, aligned to the hierarchy set out in the Regional Spatial and Economic Strategy. The settlement hierarchy correlates to the Core Strategy and is underpinned by a Housing Strategy and Housing Need Demand Assessment as required under the National Planning Framework.</p> <p>In this regard, 28% growth above the 2016 Census figure is allocated for Foynes as set out in the Core Strategy under Chapter 2 of the Draft Plan and sufficient lands are zoned to accommodate this growth. However, having regard to the potential for significant economic growth in Foynes, due to its status as a Tier 1 port, it is considered appropriate to zone an additional 1.0 hectares of land as proposed in the submission, i.e., site 1.</p> <p>Zoning of site 2 is not acceptable as the allocation of population growth targets seeks to ensure that population growth is sustainable and consistent with the scale of the settlement. It also ensures the settlement can accommodate the additional growth in a compact manner without damage to the character of the settlement and the carrying capacity of its environment and supporting infrastructure. The removal of a significant number of trees on site 2 would be a concern.</p>
Chief Executive’s Recommendations	
<p>1. Change zoning map to zone an additional 1 ha of land in Foynes.</p>	
<p>2. Update Core strategy to reflect this change.</p>	
SEA/ AA Response	

The proposed development is located in close proximity to the village, within the development boundary and seeks to consolidate the village of Foynes, which can support local development close to work, school and amenities. It is also in line with Core Strategy figures. This is consistent with higher tier plans and EPO HTP1.

No. 29	Ref. & Name/ Group:	LCC-C62-29 AK Planning on behalf of Paul and Michelle Mulcaire	
	Submission/ Observation Summary		Chief Executive’s Response
	<p>1. Zoning: The observation requests the zoning of lands (3.3ha. /8ac.) in Foynes for Tourism/Leisure/Recreation.</p> <p>The observers run a B&B and are exploring options to extend the short stay accommodation offer comprising glamping and wood cabins, subject to permission. There is also scope for an equestrian component with stables, trekking and wellness spa.</p>		<p>1. Zoning: The observation requests the zoning of lands for Tourism/Leisure/Recreation. The subject lands comprise a greenfield site outside of the settlement boundary of Foynes, in relative proximity to the village centre.</p> <p>Access to the land is restricted by reason of the substandard road from the village. Substantial road improvement works would be required to accommodate any increase in traffic movements at this location. In addition, there is no designated pedestrian or cycle connections along this stretch of road linking the lands to the village. The works required to facilitate such development would appear to be in third party ownership and as such outside of the ownership of the applicant and the Local Authority. There are no proposals for the upgrade of the carrying capacity of this local road. In the absence of existing or planned services over the lifetime of this plan, these lands are unsuitable for tourism development.</p> <p>Having regard to the lack of infrastructure connecting the site to the village and the location of the site on a narrow substandard road, it</p>

		<p>is considered that the zoning of lands at this location is not appropriate.</p> <p>Should the above issues be overcome, the amendment proposed to Objective ECON O40 to include all types of tourism accommodation including campsites and clarification that tourist accommodation should be located on lands within or adjoining existing settlements, would facilitate this development.</p>
	Chief Executive’s Recommendations	
	1. No change.	
	SEA/ AA Response	
	N/A	

No. 49	Ref. & Name/ Group:	LCC-C62-49 Tim Ryan on behalf of Galbally Tidy Towns Committee	
	Submission/ Observation Summary		Chief Executive’s Response
	<p>1. Galbally: Level 5 Small Village: The submission notes the inclusion of Galbally as a Level 5 Small Village and supports some of the policies with regard to the sustainable development of Galbally and ensure it remains a viable and thriving place into the future.</p> <p>2. Dereliction: Section 3.7.6 ‘Re-use of Buildings’ and Chapter 10 ‘Compact Growth and Revitalisation’ are noted. The Council needs to strengthen policy on active land management and dealing with derelict sites. A derelict property in the village was taken over by the Council and</p>		<p>1. Galbally: Level 5 Small Village: The content of the submission received is noted.</p> <p>2. Dereliction: The Council envisages that effective approaches to revitalisation will facilitate and encourage the mobilisation of development land in private ownership, to generate housing supply and create high quality neighbourhoods in the settlements. The provisions of the Local Authority in relation to Active Land</p>

<p>since sold. Other properties need to be acquired to give the example that it is not acceptable to allow properties to lie idle for years. The submission notes the psychological effect of having properties occupied and in good condition in encouraging people to remain in and come to live in the village.</p> <p>3. Encouraging Village Living: The observer notes the advantages of living in a village and proposes that one of the main aims of the plan should be to encourage people back to living in the village, through the reuse of existing buildings or living over business premises. The observer proposes including a reduction in electricity charges, bin collection charges, reduced property tax, more grants for house repair/renovation, reduced broadband charges, maintain public transport. Local businesses should be encouraged by reducing rates and water charges.</p> <p>4. Climate Action: The submission welcomes the actions proposed under Chapter 8, Climate Action, Flood Risk and</p>	<p>Management are set out under Chapter 10, Compact Growth and Revitalisation of the Draft Plan. Legislative mechanisms available to the Local Authority in this respect include the Vacant Site Levy, Derelict Sites Levy and Unfinished Estates. Objectives in relation to these measures have been included accordingly. Through the functions of the Community and Housing Directorates in relation to paint schemes, vacant homes, dereliction, vacancy and re-use initiatives, the Local Authority will continue to actively pursue the revitalisation of settlements across Limerick.</p> <p>3. Encouraging Village Living: The Draft Plan is centred around the concept of compact growth and revitalisation of towns and villages in accordance with the provisions of the NPF and the RSES. Objective SS 01 Compact Growth which states ‘It is an objective of the Council to strengthen the core of settlements and encourage compact growth, through the development of infill sites, brownfield lands, under-utilised lands/buildings, vacant sites and derelict sites, within the existing built-up footprint of the settlements and develop outwards from the centre in a sequential manner’. Objective HO 04 states ‘It is an objective of the Council to encourage redevelopment and reuse, including energy retrofitting, of existing housing stock’. The observer’s suggestions in relation to utility charges, taxes and grants etc. are noted, however these are outside of the remit of the Local Authority and are a matter for national government and utility providers.</p>
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Transition to Low Carbon Economy, but suggests that more practical methods mentioned need to be taken to encourage people to live in the most sustainable locations by supporting residential populations in towns and villages.

5. Galbally Village Square: Galbally Village Square is important from an architectural heritage perspective and outlines how more consideration may need to be given to protect this. If an Architectural Conservation Area designation is not needed, then a lower level of protection may be considered. Many of the shopfronts and building facades are original, dating pre-1841, with one local shop recently celebrating 200 years in business.

4. Climate Action: The resettlement of populations in the core of towns and villages is essential for vitality, vibrancy and sustainable development and is supported in the Draft Plan.

5. Galbally Village Square: Galbally is in a picturesque location at the foot of the Galtee Mountains and at the western approach to the Glen of Aherlow. The Aherlow River, flowing down from the Galtee mountains, runs by the village. Galbally has medieval origins and today's form of the town is defined in the latter half of the nineteenth century by the market square. Today the market space continues to act as the core of the town. The square retains its original nineteenth century streetscape and includes seven NIAH structures located immediate to the Square. There are 11 Protected Structures in the town. The numerous Recorded Monuments reflect the antiquity of Galbally's origins.

The core of the village encapsulates aspects of our history. Its centre is dominated by a War of Independence memorial. The stables of the 19th century Bianconi coaches occupied the north side of the square, while on the south side was a Famine poor house. Each exit from the square is an important route way, the southeast exit leads to Moor Abbey, a 15th century Franciscan monastery, albeit in Co. Tipperary. However, the main walls of the medieval church still stand, surrounded by the 13th century graveyard has headstones with names of old English settlers such as Blackburn and Samson.

	<p>6. Sustainable Communities and Social Infrastructure: With regards to Chapter 9, Sustainable Communities and Social Infrastructure, Galbally has a vibrant community, with services and community facilities including two grocery stores, a post office, 2 hairdressers, butchers, coffee shop, health clinic, GAA, soccer and rugby clubs, athletics, cycling, walking, Men’s Shed, playground, tennis court, national and pre-school. The potential for water and walking resources and associated tourism development is noted. Encouraging people to live in the village is key to sustaining and promoting the 10-minute neighbourhood concept.</p> <p>7. Broadband Services: Another way to promote the village is to ensure the provision of a good broadband service. The</p>	<p>While the location of the medieval castle which is no longer extant is known.</p> <p>The design of the buildings within the Square reflects that of a traditional Irish townscape from the 19th Century. The buildings are generally terraced, with natural slate roofs, doors and windows having vertical proportions, smooth rendered, painted or stone facades, with some retaining timber doors and timber windows. The Square retains its original plan form as evident from the historical 25-inch maps.</p> <p>Having regard to the above the Council consider that the Square in Galbally and a portion of the southern approach to the Square along the R663 should be designated an Architectural Conservation Area (ACA) as this area represents a place, area, group of structures/ townscape that is of special architectural, historical, archaeological, social, artistic and cultural interest, or that contributes to the appreciation of a Protected Structure.</p> <p>6. Sustainable Communities and Social Infrastructure: The content of the submission received is noted. The Draft Plan sets out policies and objectives to support community development and the concept of the 10 minute town or village.</p>
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	<p>community center could be promoted as a ‘rural hub’ in Objective ECON O22. Rural enterprise and employment is very important and locations where people can work remotely with high-speed broadband connections is key.</p> <p>8. Chapter 5: Environment, Heritage, Landscape and Green Infrastructure and Chapter 7 Infrastructure: Galbally had an issue with flooding which has been resolved. Inland Fisheries have advised on the protection of river life, local Lamprey species and when to clean the stream. To protect water quality and ensure future sustainable development, upgrading the local wastewater treatment plant is urgently required to increase capacity and improve the quality of outflow into the Aherlow River, a dedicated Salmon and Trout spawning river. A wetland (reedbed) system could be considered.</p>	<p>7. Broadband Services: The Local Authority acknowledges that high speed, cost-competitive and reliable broadband is essential for the continued economic growth of Limerick. While the implementation of the National Broadband Plan comes under the remit of the Department of Communications, Energy and Natural Resources, the Draft Plan supports the delivery and implementation of the National Broadband Plan, WiFi zones, and associated infrastructure as set out under Objective IN O3 of Chapter 7 Infrastructure.</p> <p>The Draft Plan includes objectives to support rural enterprise and employment including home working as set out under Chapter 4 A Strong Economy, Objective ECON O34 which states ‘It is an objective of the Council to facilitate home-based economic activities where, by virtue of their nature and scale, can be accommodated without detriment to the amenities of residential areas’.</p> <p>8. Chapter 5: Environment, Heritage, Landscape and Green Infrastructure and Chapter 7 Infrastructure: Comment Noted. However, investment in water services is an issue for Irish Water. Irish Water is Ireland’s national water utility responsible for providing and developing water services throughout Ireland. The Council will continue to work with Irish Water to deliver critical infrastructure for Limerick.</p>
<p>Chief Executive’s Recommendations</p>		
<p>1 – 4. No change;</p>		

	<p>5. Designate the Square in Galbally and a portion of the southern approach to the Square an Architectural Conservation Area (ACA) as this area represents a place, area, group of structures/ townscape that is of special architectural, historical, archaeological, technical, social, cultural, or scientific, interest, or that contributes to the appreciation of a Protected Structure.</p> <p>6 – 8. No change.</p>
	SEA/ AA Response
	The designation of an ACA would be beneficial from a built heritage perspective.

No. 57	Ref. & Name/ Group: LCC-C62-57 Rob Shanahan Architects on behalf of Ciaran Ryan	
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Zoning: The observation is requesting the zoning of 3.2ha. of lands in Galbally for Residential or Village Centre.</p> <p>The observer’s client owns approximately 13.4ha. of lands at Galbally, none of which are within the settlement boundary. The lands are in agricultural use and accessed via the Graveyard access road to the south. The site is located behind the Village Square/ Main Street. The site is supported by the local school, retail units, church and sports clubs.</p> <p>Potential access to the site would be via a bridge over the river adjacent to the village church. Good visibility is available and the potential creation of a park/ riverwalk would be advantageous to the village. Pedestrian access could be provided at a later stage from the village square.</p>	<p>1. Zoning: The observation requests the zoning of lands for Residential or Village Centre Use. The subject lands comprise agricultural lands to the rear of the eastern streetscape of The Square in Galbally. Analysis of the lands including a site inspection, determined that the lands identified to the rear of The Square rise significantly in an easterly direction and there is not the depth of flat lands available to construct housing, or any other significant development to the rear of the established pattern, except in a linear format, which would not lend itself to quality or appropriate design and may represent a detrimental impact on the established pattern of development. Any other form of development will be elevated and would detract from the character of Galbally and would be visually prominent as you approach the village from all directions.</p> <p>The natural growth of the village, having particular regard to the local topography and established land uses, is along the R663 (old Road, Aherlow Road) as identified in the Draft Plan. The Council is satisfied</p>

	<p>The lands would allow for the orderly growth of Galbally in a sustainable manner and consolidate the existing village core. The proximity to existing village services suggests these lands are a more sustainable development option than peripheral settlement sites proposed in the Draft Plan. Development of these lands for housing would facilitate a more integrated and compacted approach to future growth.</p>	<p>that the boundary proposed adequately caters for the growth of the village within suitable infill development lands.</p> <p>Galbally is identified as a Level 5 settlement with the assumption of 22% growth over the lifetime of the plan, it is considered that there is sufficient lands identified within the boundary of Galbally to accommodate this growth.</p>
Chief Executive’s Recommendations		
1. No change.		
SEA/ AA Response		
N/A		

No. 59	Ref. & Name/ Group:	LCC-C62-59 HRA Planning on behalf of OMC Homes Limited
Submission/ Observation Summary		Chief Executive’s Response
<p>1. Zoning: The observer is seeking the rezoning of 0.6ha. of land from Open Space and Recreation to Residential at The Grove, Bruff.</p> <p>The land is located immediately adjoining the town core, bound by the Morningstar River to the south and buildings fronting Chapel Street to the north. The site is within the central core of the village, concentrated on Main Street, most of the local economic activity is located on Main Street.</p>		<p>1. Zoning: The Economic and Social Research Institute’s ‘Regional Demographics and Structural Housing Demand at a County Level’ sets out a forecast for Limerick for an additional 15,591 households, or residential units, over the Plan period 2022 – 2028. The Planning Authority were required to distribute these household units across the settlement hierarchy having regard to National and Regional policy and the principles of compact growth.</p> <p>Bruff is identified as a Level 4 Settlement in the Draft Plan. The core strategy provides a housing allocation of 83 units to Bruff over the plan period, with a requirement for 4.68 ha of residential zoned lands. The</p>

<p>Planning permission was previously granted for a residential scheme on the entirety of the lands (P04/950) comprising 29 no. dwellings and 8 no. apartments. This permission was partially implemented. The site now comprises four separate parts:</p> <ol style="list-style-type: none"> 1) The area developed for 9 no. units adjoining the town centre within walking distances of all services and amenities. Permission was regularised for these units under P12/837; 2) The area which has been changed from Recreation to Residential. Permission was previously withdrawn on these lands for a one-off house under P20/1315; 3) The 0.4ha. area zoned for Open Space and Recreation proposed to be retained as such; 4) The 0.6ha. area zoned for Open Space and Recreation seeking a change in zoning to facilitate Residential use. <p>2. Flood Risk Assessment: A Site-Specific Flood Risk Assessment has been undertaken by Ryan Hanley Consulting Engineers. The site on the right bank of the Morning Star River, ranges from 66.5mOD to 62mOD and lower at the riverbank. The Mill Bridge and Kilmallock Road Bridge are located downstream of the lands. The Morning Star River is part of the Mague River catchment. The Mague Arterial Drainage Scheme, undertaken between 1973 and 1986, is reported to have significantly relieved</p>	<p>draft plan provides 5.32 ha of residential zoned land, which represents an excess of zoned land. Therefore, sufficient lands have been zoned to adequately cater for the allocated growth of the town over the lifetime of the Draft Plan 2022 – 2028.</p> <p>Furthermore, a review of extant planning permissions within the village has determined that there are 67 committed units. The building out of these residential permissions will largely meet the housing projections for Bruff over the lifetime of this plan and will provide a mix of traditional detached, semi-detached and terraced homes and serviced sites for individually designed one off type housing within the settlement boundary. This is in line with The NPF National Policy Objective 3c which seeks to target the delivery of at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints. The zoning proposed as part of the Draft Plan provides for a consolidated approach to development prioritising the most accessible sites, consistent with the natural growth of the town.</p> <p>2. Flood Risk Assessment: With respect to the subject lands the Morningstar River runs along the southern site boundary. As part of the preparation of this Draft Development Plan, a Strategic Flood Risk Assessment has been prepared and a large area of flooding has been identified mostly in the southern end of the village and along the path of the river including part of the lands in question. The precautionary approach has been adopted, in line with the Planning System and Flood Risk Management Guidelines for Planning Authorities (2019), with the exception of brownfield sites, all other lands at risk of flooding,</p>
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flood risk at Bruff. A channel survey of the Morning Star was undertaken including the channel characteristics and structures. -During an extreme flood event which exceeded the capacity of the bridge, flood water could back up against the face of the bridge to a maximum height of 64.5mOD. It would then overtop the wall on the left bank opposite the site and flow down the road. The existing wall is not a flood defence wall capable to undertake the water loading and it may fall. Water would then flow through the breach at a lower level presenting a further reduced risk to the site. There are no reports of pluvial flooding at the site. Development should provide sufficient space to allow access to the open drain for inspection and maintenance, provide access for authorities to the Morning Star River for channel and bridge maintenance and be designed to have appropriate surface water drainage to mitigate pluvial flood risk.

3. Provisions of the Draft Plan: The lands subject of the submission comprising 0.6ha. are proposed to be zoned for Open Space and Recreation. The submission sets out:
 -Open Space Objective ‘To protect, provide for and improve open space, active and passive recreational amenities’;
 -Objective BR O6 ‘To maintain and protect the lands adjoining the Morningstar River from inappropriate development in order to maintain its significance as an important ecological site, as a natural wildlife corridor, as a

including the subject lands have been zoned for open space and agricultural use only in accordance with proper planning and sustainable development. This approach is consistent with proper planning practice. The FRA submitted which shows flood extent is smaller than in the SFRA based on modelling and site-specific levels. The SFRA has been reviewed and updated to take account of more up to date information and accordingly the Flood Map for Bruff has been amended accordingly. The amended Flood Map does allow for an additional area of lands to be removed from the flood zone.

3. Provisions of the Draft Plan: Noted, the Draft Plan policy supports the development of walkways and enhanced public realm, the Council would encourage the developer to enhance the public realm at this location.

<p>flood management zone and as a natural amenity area. High quality looped walkways and cycleway with connectivity between the two parks should be considered at this location’;</p> <p>-Objective BR O2 ‘To support and facilitate the delivery of projects for improvement of the public realm in the village, especially along the Main Street, the former FCJ school site and along the banks of the Morning Star River and in line with any future public realm plan’.</p> <p>4. Proposal: The observer is seeking 0.6ha. of land be zoned for Residential use to provide for 7 no. two bed retirement type residential units. The remaining 0.4ha. of land will remain zoned for Open Space and Recreation and be developed as an ecologically orientated recreational space to increase biodiversity. A pathway along the river’s edge in light permeable surfacing will preserve the floodplain and allow recreational access. There are a number of material considerations put forward including:</p> <p>(i) Compact Growth: The NPF sets targets for brownfield/ infill housing in settlements of 30% to support regeneration of existing urban areas. The site adjoins the town centre of Bruff, within walking distance of services and facilities.</p> <p>(ii) Sequential Approach: The NPF strategy incorporates National Strategic Objectives which seek to address urban sprawl. Zoned lands must be consistent with sequential</p>	<p>4. Proposal: The lands in question reflect a linear parcel of land with limited development depth which reduces the development potential, scale and future layout of any development. The existing scheme adjacent to the site fails to address the river and to continue this pattern would reflect poor quality design and would detract from the character of the village. It is assumed that the proposal for retirement units is proposed based on the assumption that these units will allow for reduced provision of private amenity space and unit size, which the site can then accommodate owing to the flooding constraints. The Council consider that the proposed development would provide for a poor layout and would be in appropriate given the limited area outside of the flood zone.</p>
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	<p>development patterns, town centre first principles, proximity to services and facilities and the need to reduce carbon emissions. The Draft Plan allocates an additional 83 no. residential units in Bruff. The Plan does not identify where or how the 12 no. units are to be delivered within the Town Centre lands. A significant portion of Town Centre lands comprise backlands, most of this cannot be accessed. The subject lands can satisfy some of the requirements through the delivery of c.7 no. units. Zoning of the lands for Residential use would comply with the sequential approach and ensure compliance with the Draft Development Plan Guidelines SPPR DPG 7.</p> <p>(iii) Environmental Considerations: A Site-Specific Flood Risk Assessment confirms that the 0.6ha. lands are not subject to flooding.</p>	
Chief Executive’s Recommendations		
<ol style="list-style-type: none"> 1. No change; 2. Update Flood Map for Bruff in Volume 2; 3. – 4. No change. 		
SEA/ AA Response		
<p>The updating of the flood map ensures that plan making and the assessment of future planning applications will be in accordance with the Flood Risk Management Guidelines for Planning Authorities, 2009.</p>		

No. 74	Ref. & Name/ Group:	LCC-C62-74 Irish Creamery Milk Suppliers Association (ICMSA)	
Submission/ Observation Summary		Chief Executive’s Response	

<p>1. Housing and Services: Limerick ICMSA believes there should be no restrictions to rural one-off housing. It is essential that planning permission for one off housing in the countryside is not restricted, particularly for family members and those local to a region.</p> <p>Services to rural areas must be improved including roads, water services and waterway maintenance. Rural broadband is a priority, the poor availability of which was highlighted during lockdown. To sustain rural communities, people must be able to work from home. It is crucial that internet services are enhanced throughout the county immediately.</p> <p>Vacant units in the city and towns should be prioritised for development to increase housing availability in urban areas and bring back economic activity.</p> <p>2. Climate Change: Farmers should be encouraged to install solar panels on their sheds and the relevant infrastructure so that surplus energy can be put back into the grid. This would provide additional income and reduce dependence on fossil fuels. Planning laws should exempt</p>	<p>1. Housing and Services: In terms of sustainable housing in rural areas, the Draft Plan is required to reflect consistency with the National Planning Framework (NPF) and fully supports the concept of the sustainable development of rural areas. It recognises the distinction between growth and decline by encouraging growth and arresting decline in areas that have experienced low population growth or decline in recent decades, while also highlighting the need to manage certain areas around cities and towns that are under strong urban influence and under pressure from unsustainable overdevelopment. The Draft Plan aligns with NPO19, whereby considerations of social (intrinsic part of the community) or economic (persons working full or part time) need may be applied by planning authorities in rural areas under strong urban influence.</p> <p>The NPF also recognises that in rural Ireland many people seek to have an opportunity to build their own homes. Under National Policy Objective 18b the Government is committed to developing a programme with local authorities, public infrastructure agencies such as Irish Water and local communities for the provision of serviced sites for housing to attract people to build their own homes and live in small towns and villages and this is also reflected in the Programme for Government and in the Draft Plan.</p> <p>2. Climate Change: Planning exemptions exist for the installation of solar panels in accordance with the Planning and Development Regulation 2001 (as amended). The Planning Authority will be supportive of larger arrays that would require planning permission, subject to fulfilling planning and environmental criteria.</p>
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<p>solar panels on farm sheds from requiring planning permission.</p> <p>3. Flooding and River Maintenance: A river maintenance programme should be included in the Development Plan, to positively impact flood management, water quality and prevent water damage to homes in proximity to rivers. Landowners should be notified prior to any river maintenance works beginning near their land. A dedicated budget should be available annually for this programme.</p> <p>4. Sustainability Goals: Farming is a large employer in rural Limerick, commercial and sustainable farming should be supported by addressing the social and economic aspects of sustainability in addition to the environmental aspects of the Plan.</p> <p>5. Economy and Employment: Specific initiatives are required to strengthen the rural economy and communities. There is a significant number of people commuting from rural Limerick for work. Employers should be encouraged to allow staff work from home or at local community hubs. This would contribute positively to climate change and combat rural decline.</p> <p>Limerick has the third highest number of dairy cows in the country. Dairy farming directly and indirectly is a significant</p>	<p>3. Flooding and River Maintenance: River maintenance is separate from Planning Legislation and is governed by the Arterial Drainage Acts amongst others. The OPW is the lead Authority in this regard and accordingly is outside the remit of the Development Plan.</p> <p>4. Sustainability Goals: The economic and social importance of agricultural activity in the county and spin off industries in more built-up areas is recognised by the Draft Plan, including Objective ECON O9 Rural Retail, Objective ECON O30 Farm Diversification and 11.6.8 Agricultural Buildings, Re-use of Redundant Farm Buildings, Farm Diversification.</p> <p>5. Economy and Employment: The Draft Plan sets out policy support for the development of hubs in rural towns and villages to support remote working, the Council have been actively progressing the development of hubs through Innovate Limerick.</p> <p>The existing Development Contribution Scheme and the draft Development Contribution Scheme which is currently on display</p>
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<p>employer. It is essential that farmers are exempt from the standard development charges on any investments on farm that contribute positively to the environment.</p> <p>6. Retail Strategy: There needs to be a focus on making the environment in town centres more attractive to encourage business and for people to live and visit. Specific units should be eligible to pay lower rates if they are beneficial to raise the profile of the town centre.</p> <p>7. Infrastructure: Given the recent water shortage in parts of rural Limerick and the lack of capacity of current water and wastewater infrastructure, investment in this area must be prioritised. To encourage people to live in rural Limerick and combat rural decline, infrastructure such as roads needs to be greatly improved and maintained.</p>	<p>contains exemptions for agricultural developments, as well as for horticultural polytunnels, glasshouses and mushroom tunnels. Agricultural developments as defined in the Planning and Development Act 2000 (as amended) including Anaerobic Digesters.</p> <p>6. Retail Strategy: The Draft Plan supports the role of Limerick’s City, towns and villages as vibrant centres, which provide a range of services for the community. Chapter 4 establishes that the retail sector is central to strong mixed-use commercial cores, throughout the network of settlements and can play a key role in regeneration, vitality and viability of the core area. This is reinforced through a number of specific policies and objectives.</p> <p>The strategic framework for a co-ordinated and sustainable approach to retail growth in Limerick and the wider region are set out in:</p> <ul style="list-style-type: none"> • Regional Spatial and Economic Strategy for the Southern Region; • Draft Retail Strategy for Limerick Shannon Metropolitan Area and County Limerick; • The 2012 Retail Planning Guidelines for Planning Authorities (RPGs), with its companion document, Retail Design Manual. <p>The issue of rates is not within the remit of the Development Plan.</p> <p>7. Infrastructure: Comment noted. Irish Water is responsible for the delivery of water and wastewater infrastructure, the Council will continue to work with Irish Water on the delivery of infrastructure for Limerick.</p>
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	<p>8. Transport and Mobility: Public transport in rural areas needs to improve to encourage people who work in nearby towns/cities and who do not drive or would like the option of public transport to take up residency in rural villages and areas.</p>	<p>8. Transport and Mobility: Noted. Limerick City and County Council will support the Government’s commitment to rural transport, including piloting sustainable transport schemes in towns and villages as set out in Policy TR P10 Sustainable Transport in Rural Areas and Policy TR P11 Rural Transport for all ages and abilities living in rural areas.</p>
	<p>9. Heritage: Grants should be provided to farmers to restore traditional farm buildings. Grants under GLAS are limited and few farmers have received them. Many old farm buildings need to be restored and the Council should play a role in this regard.</p>	<p>9. Heritage: The Draft Plan recognises the importance of conservation and restoration of historic buildings; however, the administration of grant aid is outside the remit of the Development Plan.</p>
	Chief Executive’s Recommendations	
	1. – 9. No change.	
	SEA/ AA Response	
N/A		

No. 76	Ref. & Name/ Group:	LCC-C62-76 AK Planning on behalf of O’Connell Family
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Zoning: The observation is requesting the zoning of 3ha. of land on the north side of Ballingarry village adjacent to the Church and Cemetery for Residential.</p> <p>Ballingarry is a large Tier 4 village of c.520 people, approximately 30km southwest of Limerick City and 10km</p>	<p>1. Zoning: Ballingarry is a Level 4 Settlement as identified in the Draft Plan. The core strategy provides a housing allocation of 55 units to Ballingarry over the plan period and sufficient lands have been zoned to adequately cater for the allocated growth of the town over the lifetime of the Draft Plan 2022 – 2028.</p>

<p>south of Adare. The village has various local amenities and facilities, but there is a high vacancy and dereliction rate and constraints in wastewater treatment. The Core Strategy allocates 55 units over the plan period. To achieve the housing output 2.7ha. are proposed to accommodate the need, equating to 48.5 units, with the balance assumed to be delivered through regeneration of vacant/ derelict properties. This strategy is fundamentally inconsistent as there is a declared short to medium term wastewater constraint in the village that will materially impact on housing delivery during the plan period. The infrastructure deficit is demonstrated at the 8 no. Laurel Hill Serviced Sites where a compromise and interim solution provided for on average 0.15ha. of serviced sites to facilitate on site treatment options, pending connection to the village WWTP once upgraded.</p> <p>Reliance on derelict and vacant properties to make up the shortfall is not realistic. Many properties are in serious disrepair and require demolition, others have no known owners and others who do not have the financial means to refurbish. Refurbishment often requires permission and works can become protracted.</p> <p>Taking the Irish Water constraints into consideration the area defined as New Residential cannot be delivered as development would be premature pending adequate municipal wastewater treatment. The Serviced Sites area</p>	<p>The primary focus of the development strategy is to support the proportionate growth of Ballingarry and to strengthen and consolidate the village in accordance with national policy to promote compact growth. The settlement hierarchy correlates to the Core Strategy and is underpinned by a Housing Strategy and Housing Need Demand Assessment as required under the National Planning Framework. The settlement boundary is in line with the NPF National Policy Objective 3c which seeks to target the delivery of at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints.</p> <p>The lands the subject of this request, although served by a footpath are removed from the core village area and the wider services and amenities of the village and reflects the extension of the village in a linear pattern, contrary to the concept of compact growth. The residentially zoned lands and serviced sites within the Draft Plan are sequentially located adjacent to the core, and, the development of these lands will consolidate the core area in line with the principle of compact growth, prevent overdevelopment and sprawl. The zoning of lands the subject of this request removed from the core area would be contrary to proper planning and sustainable development.</p> <p>The Council note the wastewater constraints within the village and accordingly acknowledges the development of houses with individual treatment systems may occur in the short to medium term, in line with Objective SS O12 in Chapter 3.</p>
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can only deliver 5 no. 0.15ha. sites accounting for public open space of 15%. This equates to 5 no. units out of the stated 55 no. Units needed, with the balance from regeneration.

The 1.05ha. plot assigned for Serviced Sites does not currently benefit from all services with no footpath or public lighting and frontage between two bends with a questionable road safety profile. However, the subject lands are well served by footpaths and public lighting and has excellent sightlines. The Laurel Hill development was extremely successful and oversubscribed scheme of serviced sites. A letter from GVM Auctioneers attests to this.

The development of this backland site for low density residential development would consolidate development and not result in village sprawl. The development boundary extends beyond this site in the Draft Plan and includes the Rylands residential development further north. The footpath, public lighting and drainage infrastructure extend to the Rylands site.

An additional Serviced Sites allocation would obviate the Irish Water constraints that threatens the expansion of the village. Ballingarry is a service hub and additional dwellings will serve to deliver critical mass to sustain amenities and services and mitigate the requirement for rural one-off housing.

Chief Executive’s Recommendations	
1. No change.	
SEA/ AA Response	
N/A	

No. 79	Ref. & Name/ Group: LCC-C62-79 Cllr. Catherine Slattery			
	<table border="1"> <thead> <tr> <th>Submission/ Observation Summary</th> <th>Chief Executive’s Response</th> </tr> </thead> <tbody> <tr> <td> <p>1. Level 6 Settlement: The observation proposes inclusion of Drombanna as a Level 6 Settlement in the Draft Plan. Level 6 Settlements are Rural Clusters, which comprise largely of areas with limited essential infrastructure and services. They generally have one or more existing community or other local facilities. Drombanna meets the criteria to be included.</p> <p>Drombanna is situated 7.5km south of Limerick City on the R512, it is a linear settlement extending c.2km. There are approximately 34 dwellings with access from the R512, in addition to an extensive pattern of development on local roads approaching the settlement from the southwest and northeast.</p> <p>Drombanna provides services including a day care centre, voluntary housing units, a public house, two car sales enterprises, car repairs and recovery, furniture store, storage facility and Shannonside Galvanising.</p> </td> <td> <p>1. Level 6 Settlement: Level 6 settlements are ‘Rural Clusters’ which are generally settlements with limited essential infrastructure and services and do not have a settlement boundary. They generally have one or more existing community or other local facilities. Development within Rural Clusters will be limited to incremental local growth appropriate to their size and character. The Draft Plan anticipates that each rural cluster can cater for a small population increase from their current population base over the period of the Draft Plan. In deciding to designate Drombanna as a settlement the Council must have regard to the extent of infrastructural deficits, water services, transport and community facilities immediate to the area. Such amenities are key factors when considering additional population/housing growth. Drombanna is thriving in a commercial context with numerous commercial businesses operating within the speed limits of the settlement in addition to a pubic house and bus connection to limerick city. Consolidating and balancing this commercial development with limited residential development is considered appropriate in this instance.</p> </td> </tr> </tbody> </table>	Submission/ Observation Summary	Chief Executive’s Response	<p>1. Level 6 Settlement: The observation proposes inclusion of Drombanna as a Level 6 Settlement in the Draft Plan. Level 6 Settlements are Rural Clusters, which comprise largely of areas with limited essential infrastructure and services. They generally have one or more existing community or other local facilities. Drombanna meets the criteria to be included.</p> <p>Drombanna is situated 7.5km south of Limerick City on the R512, it is a linear settlement extending c.2km. There are approximately 34 dwellings with access from the R512, in addition to an extensive pattern of development on local roads approaching the settlement from the southwest and northeast.</p> <p>Drombanna provides services including a day care centre, voluntary housing units, a public house, two car sales enterprises, car repairs and recovery, furniture store, storage facility and Shannonside Galvanising.</p>
Submission/ Observation Summary	Chief Executive’s Response			
<p>1. Level 6 Settlement: The observation proposes inclusion of Drombanna as a Level 6 Settlement in the Draft Plan. Level 6 Settlements are Rural Clusters, which comprise largely of areas with limited essential infrastructure and services. They generally have one or more existing community or other local facilities. Drombanna meets the criteria to be included.</p> <p>Drombanna is situated 7.5km south of Limerick City on the R512, it is a linear settlement extending c.2km. There are approximately 34 dwellings with access from the R512, in addition to an extensive pattern of development on local roads approaching the settlement from the southwest and northeast.</p> <p>Drombanna provides services including a day care centre, voluntary housing units, a public house, two car sales enterprises, car repairs and recovery, furniture store, storage facility and Shannonside Galvanising.</p>	<p>1. Level 6 Settlement: Level 6 settlements are ‘Rural Clusters’ which are generally settlements with limited essential infrastructure and services and do not have a settlement boundary. They generally have one or more existing community or other local facilities. Development within Rural Clusters will be limited to incremental local growth appropriate to their size and character. The Draft Plan anticipates that each rural cluster can cater for a small population increase from their current population base over the period of the Draft Plan. In deciding to designate Drombanna as a settlement the Council must have regard to the extent of infrastructural deficits, water services, transport and community facilities immediate to the area. Such amenities are key factors when considering additional population/housing growth. Drombanna is thriving in a commercial context with numerous commercial businesses operating within the speed limits of the settlement in addition to a pubic house and bus connection to limerick city. Consolidating and balancing this commercial development with limited residential development is considered appropriate in this instance.</p>			

	<p>Drombanna village is also served by neighbouring rural parish amenities, including schools, churches and sporting amenities. The village supports considerable employment in the local community and there is a strong sense of community. There are also a number of voluntary groups.</p> <p>It is important that Drombanna is recognised in the Development Plan to enable enhancement of the village and to enable further development of limited services and residential development.</p>	<p>The development reflects a dispersed linear pattern of development with significant ribbon development on adjacent local roads. This is driven by the proximity to Limerick City. The NPF establishes that it will be necessary to protect some rural areas from unsustainable growth pressures as experienced in the recent past, whilst ensuring that there are attractive alternatives to urban generated rural development in the hinterland of cities and larger towns. There is a need to curtail this unsustainable pattern of ribbon development and concentrate new development to the core of the settlement only. This is reinforced under Objective SS O15 <i>Development in Level 6 Settlements</i>.</p>
Chief Executive’s Recommendations		
<p>1. Amend Level 6 of the Settlement Hierarchy to include Drombanna as a Level 6 Settlement and the following text and include map into Volume 2: <u>Drombanna: Drombanna is a rural village, located approximately 8km south of Limerick City on the R512. There are approximately 34 dwellings within the village, along with a number of services including a day care centre, voluntary housing units, a public house, two car sales enterprises, car repairs and recovery, furniture store, storage facility and Shannonside Galvanising. There is public water supply, however the settlement has no sewerage scheme. Drombanna reflects a dispersed linear pattern of development with significant ribbon development on adjacent local roads. Consolidation of any development shall be located within or contiguous to the settlement core.</u></p>		
SEA/ AA Response		
<p>Drombanna is close to the Metropolitan Area and is subject to development pressure. The inclusion of Drombanna within the Level 6 settlement tier will ensure that the policies applicable to those settlements will also apply to Drombanna. This would offer greater clarity in guiding development in a settlement close to the Metropolitan Area. This will also be consistent with the content of higher tier plans and is expected to have environmental benefits.</p>		

No. 211	Ref. & Name/ Group:	LCC-C62-211 Residents and Businesses in Drombanna and surrounding area
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Submission/ Observation Summary	Chief Executive’s Response
<p>1. Drombanna: The observation proposes inclusion of Drombanna as a Level 6 Settlement in the Draft Plan.</p> <p>The observers aim to make the community a safer place for residents. The strong committee’s top priority would be the provision of footpaths in the area. There are many older people, Drombanna housing (11 houses) and day care centre. A footpath would make a huge difference to the quality of life.</p> <p>Level 6 Settlements are Rural Clusters, which comprise largely of areas with limited essential infrastructure and services. They generally have one or more existing community or other local facilities. Drombanna meets the criteria to be included.</p> <p>Drombanna is situated 7.5km south of Limerick City on the R512, it is a linear settlement extending c.2km. There are approximately 34 dwellings with access from the R512, in addition to an extensive pattern of development on local roads approaching the settlement from the southwest and northeast.</p> <p>Drombanna provides services including a day care centre, voluntary housing units, a public house, two car sales enterprises, car repairs and recovery, furniture store, storage facility and Shannonside Galvanising.</p>	<p>See response to submission No. 79 above.</p>

	<p>Drombanna village is also served by neighbouring rural parish amenities, including schools, churches and sporting amenities. The village supports considerable employment in the local community and there is a strong sense of community. There are also a number of voluntary groups.</p> <p>It is important that Drombanna is recognised in the Development Plan to enable enhancement of the village and to enable further development of limited services and residential development.</p>	
Chief Executive’s Recommendations		
<p>1. Amend Level 6 to include Drombanna as a Level 6 Settlement and the following text and map included into Volume 2: Drombanna is a rural village, located approximately 8km south of Limerick City on the R512. There are approximately 34 dwellings within the village, along with a number of services including a day care centre, voluntary housing units, a public house, two car sales enterprises, car repairs and recovery, furniture store, storage facility and Shannonside Galvanising. There is public water supply, however the settlement has no sewerage scheme. Drombanna reflects a dispersed linear pattern of development with significant ribbon development on adjacent local roads. Consolidation of any development shall be located within or contiguous to the settlement core.</p>		
SEA/ AA Response		
Sea SEA/ AA Response to Submission No. 79 above.		

No. 216	Ref. & Name/ Group:	LCC-C62-216 Cllr. Sarah Kiely, Cllr. Michael Sheahan, Cllr. Michael Murphy, Cllr. Michael Collins
Submission/ Observation Summary		Chief Executive’s Response
<p>1. Drombanna: The observation proposes inclusion of Drombanna as a Level 6 Settlement in the Draft Plan.</p>		<p>1. See response to submission No. 79 above.</p>

<p>Level 6 Settlements are Rural Clusters, which comprise largely of areas with limited essential infrastructure and services. They generally have one or more existing community or other local facilities. Drombanna meets the criteria to be included.</p> <p>Drombanna is situated 7.5km south of Limerick City on the R512, it is a linear settlement extending c.2km. There are approximately 34 dwellings with access from the R512, in addition to an extensive pattern of development on local roads approaching the settlement from the southwest and northeast.</p> <p>Drombanna provides services including a day care centre, voluntary housing units, a public house, two car sales enterprises, car repairs and recovery, furniture store, storage facility and Shannonside Galvanising.</p> <p>Drombanna village is also served by neighbouring rural parish amenities, including schools, churches and sporting amenities. The village supports considerable employment in the local community and there is a strong sense of community. There are also a number of voluntary groups.</p> <p>It is important that Drombanna is recognised in the Development Plan to enable enhancement of the village and to enable further development of limited services and residential development.</p>	
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Chief Executive’s Recommendations	
<p>1. Amend Level 6 Settlement Hierarchy to include Drombanna as a Level 6 Settlement and the following text and map in Volume 2: <u>Drombanna is a rural village, located approximately 8km south of Limerick City on the R512. There are approximately 34 dwellings within the village, along with a number of services including a day care centre, voluntary housing units, a public house, two car sales enterprises, car repairs and recovery, furniture store, storage facility and Shannonside Galvanising. There is public water supply, however the settlement has no sewerage scheme. Drombanna reflects a dispersed linear pattern of development with significant ribbon development on adjacent local roads. Consolidation of any development shall be located within or contiguous to the settlement core.</u></p>	
SEA/ AA Response	
Sea SEA/ AA Response to Submission No. 79 above.	

No. 81	Ref. & Name/ Group:	LCC-C62-81 Connellan and Associates on behalf of J.P. Ryan, U-Stores	
	Submission/ Observation Summary	Chief Executive’s Response	
	<p>1. Drombanna, Access to Roads: The submission notes how Policy IN O15 prevents the expansion and infill of the residential heart of the village and expansion of the main commercial properties or the provision of additional commercial businesses on vacant land.</p> <p>The observer’s submission to the Issues Paper drew attention to the inherent conflict between road and rural settlement location policy along regional routes. The response to the relevant submissions, including the observer’s was as follows <i>‘The contents of the submissions are noted. Policy in relation to access onto National Roads</i></p>	<p>1. Access to Roads: Drombanna is located on a Strategic Regional Road, due to the high volume of traffic utilising this road network. There are restrictions on accesses onto Strategic Regional Roads in order to maintain the efficiency and functionality of the road network. The R512 is considered an essential network link, which provides an important link to South Limerick, including the town of Kilmallock. The Draft Development Plan’s Objective TR O37 Strategic Regional Roads, to which the R512 relates, provides the policy support in the improvement, management and maintenance of the strategic regional road network in Limerick. The designation of the settlement as a Level 6 settlement may warrant a reduction in the speed limit, which is an operational matter, and would need to be considered outside the Development Plan.</p>	

will be in accordance with the DOECLG – Spatial Planning and National Roads Guidelines’.

This response/ recommendation was misleading with respect to the observer’s specific submission for the following reasons:

- a) The road through Drombanna is not a national route, yet the answer relates to national route policy;
- b) Even if it was a national route, Section 1.1 of the Spatial Planning and National Roads Guidelines specifically states that the guidelines set out policies relating to development ‘affecting national primary and secondary roads, including motorways and associated junctions, outside the 50-60kmh speed limit zones for cities, towns and villages. The Guidelines mention regional and local roads. However, development within the 60kph speed limit zone is not guided by these Guidelines, but is a matter solely for the Planning Authority;
- c) The response to the observer’s submission does not address the issue of the inherent conflict between the Council’s road policy and rural settlement policy.

The submission refers to the Draft Plan’s Objective TR O37 which prohibits development unless within a 50kph limit. The limit in Drombanna is 60kph and the Council policy therefore effectively prevents development requiring direct access to the road running through the heart of the village. The submission notes the Council in its settlement location/

<p>employment policies promote residential and commercial development in villages and towns contradicts the road policy. The observer acknowledges that the regional routes are important, but so is the survival and development of the towns and larger villages along such routes.</p> <p>The submission requests that Objective TRO37 should be re-examined to amend the restriction to lands within 60kph and not 50kph, or include an exceptional clause relating to Drombanna that will allow further development having regard to its existing size, exceptional nature and location within the MASP area.</p> <p>2. Settlement Hierarchy: Drombanna is not included, although the observer considers it should be listed as a settlement. It has local village services and is more diverse than a rural cluster. Drombanna is located within the MASP area. Settlements within the MASP area are likely to be looked on more favourably for development and can benefit from allocation of population. Drombanna is already a substantial size with a large population and could be registered as a Tier 4 or 5 village and should be included in the settlement hierarchy.</p>	<p>2. Settlement Hierarchy: This issue is addressed in Rural Settlement and Rural Housing Theme under Submission No. 79 Cllr. Catherine Slattery, which recommends the inclusion of Drombanna as a level 6 settlement.</p>
<p>Chief Executive’s Recommendations</p>	
<p>1. No change;</p> <p>2. Amend the Settlement Hierarchy Level 6 to include Drombanna as a Level 6 Settlement and include the following text and map included in Volume 2, Level 6 Settlements: Drombanna: Drombanna is a rural village, located approximately 8km south of Limerick City on the R512. There are approximately 34 dwellings within the village, along with a number of services including a day care</p>	

	<p><u>centre, voluntary housing units, a public house, two car sales enterprises, car repairs and recovery, furniture store, storage facility and Shannonside Galvanising. There is public water supply, however the settlement has no sewerage scheme. Drombanna reflects a dispersed linear pattern of development with significant ribbon development on adjacent local roads. Consolidation of any development shall be located within or contiguous to the settlement core.</u></p>
	<p>SEA/ AA Response</p>
	<p>See SEA/ AA Response to Submission No. 79 above.</p>

No.194	Ref. & Name/Group	LCC-C62-194 Fehily Timoney & Co on behalf of John Hegarty	
	Submission/Observation Summary	Chief Executive’s Response	
	<p>1. Settlement and Housing Strategy: The submission seeks the inclusion of Drombanna in the Settlement Hierarchy as a Level 4 or a Level 5 settlement considering the number of residences, businesses in Drombanna, the day-care centre and retirement homes and its location in MASP. It is suggested that within the MASP Drombanna has a role as a ‘satellite’.</p> <p>2. Sustainable Mobility and Transport: The submission requested re-examine of policy TR037, amending the restriction to lands within 60kmh and not 50 kph or include an exceptional clause relating to Drombanna, that will allow further development having regard to its existing size, its exceptional nature and its location within the MASP area.</p>	<p>1. Settlement and Housing Strategy: See response to Submission No. 79 in this regard.</p> <p>2. Sustainable Mobility and Transport: Drombanna is located on a Strategic Regional Road, due to the high volume of traffic utilising this road network. There are restrictions on accesses onto Strategic Regional Roads in order to maintain the efficiency and functionality of</p>	

	<p>the road network. The R512 is considered an essential network link, which provides an important link to South Limerick including the town of Kilmallock. The Draft Development Plan’s Objective TR O37 Strategic Regional Roads, to which the R512 relates, provides the policy support in the improvement, management and maintenance of the strategic regional road network in Limerick. The designation of the settlement as a Level 6 settlement may warrant a reduction in the speed limit, which is an operational matter, and would need to be considered outside the Development Plan.</p>
Chief Executive’s Recommendation	
<ol style="list-style-type: none"> 1. Amend the Settlement Hierarchy Level 6 to include Drombanna as a Level 6 Settlement – see recommendation to submission 79 2. No change. 	
SEA/AA Response	
See SEA/ AA Response to Submission No. 79.	

No. 83	Ref. & Name/ Group: LCC-C62-83 Dean Lillis
Submission/ Observation Summary	Chief Executive’s Response
<p>1. Pedestrian Infrastructure: Castleconnell’s population has been continuously expanding, resulting in an expansion eastward of residential development and community facilities. This has consumed the R525 Regional Road (connecting South East Clare to Limerick City via the R445 old N7 Dublin Road), which previously served in a limited</p>	<p>1. Pedestrian Infrastructure: The provision of enhanced pedestrian infrastructure is provided for in the Draft Plan under Objective TR O14 Walking and Cycling Infrastructure. The Council note the comments of the observer; however, the Draft Plan provides for overarching policies and objectives only. Detail on specific footpath extension is not within the remit of the Development Plan.</p>

	<p>capacity as a regional arterial traffic route. The growth of Castleconnell’s population necessitates a paradigm shift in how the R525 operates, so that it can start serving as an inclusive, accessible and active transport local arterial route for the residents of Castleconnell, by way of the addition of a footpath along the R525 from Daly’s Cross to Castleconnell Scout Campsite.</p> <p>Construction of an extension of a footpath from Daly’s Cross to Castleconnell Scout Campsite on the western side of the R525 would minimise vehicle use and carbon levels, while facilitating active travel and connectivity with increased sustainable mobility and transport, by building sustainable communities and infrastructure, which would help achieve Key Ambition 1 of the Draft Plan. There are a new of benefits for the development of this infrastructure outlined in the submission.</p>	
Chief Executive’s Recommendations		
1. No change.		
SEA/ AA Response		
N/A		

No. 94	Ref. & Name/ Group:	LCC-C62-94 Patrick Heffernan
	Submission/ Observation Summary	Chief Executive’s Response

<p>1. Zoning: The observer is the owner of c.75 acres of farm land at Barnakyle, Patrickswell. The observer is requesting that one of the fields be zoned for Residential to allow some additional residential development in the future. The field is adjacent to (north of) lands zoned Residential.</p> <p>Garland Consulting Engineers carried out a technical review on Pl. Ref. 18/10 and permission has been granted. The zoning would align with the Government’s new housing plan and would allow the continuation of farming on the remainder.</p>	<p>1. Zoning: Patrickswell is identified as a Level 4 Settlement in the Draft Plan and has a Local Area Plan that governs planning policy for Patrickswell. The existing Local Area Plan is the Patrickswell Local Area Plan 2015 – 2021 (as extended), this plan will be reviewed following the adoption of the Limerick Development Plan 2022 – 2028.</p> <p>The growth identified for Patrickswell in the Draft Plan was of the order of 287 additional housing units, which would result in population growth of approximately 97%, since the 2016 Census. This exceptional growth was proposed based on the number of extant permissions that exist currently within the Patrickswell Local Area Plan boundary. However, having regard to the submission from the OPR the population growth for the town has been amended.</p> <p>The OPR, Recommendation 4 stated the following in relation to Patrickswell - “Having regard to National Policy Objectives NPO 3c and NPO 9 of the NPF, the requirements of section 10(2)(n) of the Planning and Development Act 2000 (as amended), and the housing unit allocations to Patrickswell, a Level 4 (large villages) settlement, the planning authority is required to:</p> <ul style="list-style-type: none"> (i) review the assumptions upon which this very high allocation was based; and (ii) reconsider the housing and population allocation having regard to the potential for adverse impacts on the settlement arising from such rapid growth due to inadequate services and infrastructure and car dependent development”.
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		<p>The Core Strategy is developed around a framework of high-level population and household targets that are set out in the NPF, the NPF Implementation Roadmap, the RSES for the Southern Region and Section 28 guidance document ‘Housing Supply Target Methodology for Development Planning’, (DHLGH, December 2020). Housing allocations housing and population allocation are provided having regard to the potential of the settlement to absorb increased residential density and ensure no adverse impacts on the settlement arising from rapid growth due to inadequate services and infrastructure and car dependent development. The NPF sets out that the growth of development of settlements outside of the city and key towns shall not exceed 30% growth. In response to the OPR submission, the Council have reviewed the assumptions for Patrickswell and the extent of extant planning permissions in the village. A survey of the nature and extent of services and infrastructure to support development in Patrickswell was also undertaken. Following these assessments, it was concluded that having regard to the unique situation in the village, the limited growth over a prolonged period and location of the village in the Metropolitan Area, that 36% growth is considered appropriate in this instance. However, this will result in rezoning of significant lands in Patrickswell in the review of the Local Area Plan and will not support the zoning of these lands.</p>
Chief Executive’s Recommendations		
<p>1. (i) No change to zoning. (ii) Amend the Core Strategy Table and Map as per OPR submission.</p>		
SEA/ AA Response		
See response to OPR and SRA SEA/ AA Responses as they relate to Patrickswell.		

No. 121	Ref. & Name/ Group: LCC-C62-121 BGM Community Council	
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Bruff Digital Hub: The submission outlines Objective ECON O8 County Towns and Villages and Objective IN O2(g) Digital Connectivity. Through Innovate Limerick the Council has taken a proactive and innovative approach to the development of enterprise and employment opportunities in towns and villages such as Rathkeale, Bruree and Broadford (all West Limerick). Bruff should be a Digital Hub, given the e-town status designation. This would have multiplier effects of generating spend in the community, attracting families and diaspora, reducing carbon footprints and supporting national objectives for sustainable travel.</p> <p>2. Rural Tourism: Bruff should be included in Objective ECON O36(c) Rural Tourism. The heritage value of Bruff together with its connection to Lough Gur, John Fitzgerald Kennedy, the Grange Stone Circle, Deise Beag etc. Is more than enough</p>	<p>1. Bruff Digital Hub: Comment noted. The Minister for Rural and Community Development earlier this year launched a new five-million-euro fund to support the development of Ireland’s first national network of remote working hubs. The Connected Hubs Fund will support the key objectives of <i>Our Rural Future</i> – the Government’s ambitious new five year policy for rural Ireland. The Council recognises hubs and Broadband Connection Points (BCPs) as ideal locations for people to work remotely, as well as acting as key economic assets for towns and villages. The Draft Plan fully supports the development of ‘working hubs’ across the County, including Objective ECON O26 <i>Enterprise Incubator Units</i> Objective ECON O27 <i>Rural Hubs</i>. The Draft Plan also acknowledges that The Digital Innovation Cluster will be connected to the existing Mid-West E-hub network to drive employment and job creation in towns and villages of the Mid-West and Section 4.7.14 <i>Rural Enterprise and Employment Opportunities</i> establishes that the Council will implement the provisions of the Government’s Rural Development Policy 2021-2025 - <i>Our Rural Future</i></p> <p>2. Rural Tourism: Bruff Settlement Objectives as set out in Volume 2 - Level 4 - Large Villages, Settlement Zoning and Development Objectives includes the following specific objectives:</p>

to warrant special consideration. Under this objective, connectivity between Bruff and Lough Gur, Bruff and the Stone Circle should be prioritised.

3. Transport: In line with Policy TR P10 Sustainable Transport in Rural Areas, the road from the Bruff to the Rugby Club in Kilballyowen is suggested. The Club is 3km from the Main Street and could be linked by extending the footpath at the edge of the town a further 2.3km to the Club using the grass margin which is in Council ownership. Part of this route also serves Carebright (Dementia Centre) and two houses in Ardykeohane used by the Brothers of Charity. The existing footpath is unfit for purpose and wheelchair users are having to use the main road, a health and safety hazard. Everyone could use the path to go to training, matches, gym and the perimeter nature trail.

4. Record of Protected Structure: The observation supports the owner’s request to delist RPS Reg. No. 1010 Butlers Main

Objective BR O3 – Tourism Development – It is an objective of the Council to enhance the tourism potential of the village, including the promotion of new tourism products in an environmentally sustainable manner, such as the linkages to JFK ancestry and the JFK Museum and work with relevant stakeholders to encourage new tourism development to be located within the village.

Objective BR O5 – Walkway and Cycleway Improvements – It is an objective of the Council to facilitate the development of walkways and cycleways in co-operation with local interested parties, including the private, voluntary and public sector and support the development of linkages between the village and Lough Gur.

Having regard to the above objectives No change is required.

3. Transport: The Council supports sustainable transport and the development of connections in rural areas. The upgrade of individual footpaths is outside the remit of the Development Plan.

<p>Street Bruff. The building does nothing for the visual amenity of the streetscape and is a huge obstacle to any progress in the town regarding developing backlands, off street parking etc.</p>	<p>4. Record of Protected Structure: Noted. See response to submission No. 274.</p>
<p>Chief Executive’s Recommendations</p>	
<p>1 – 4. No change.</p>	
<p>SEA/ AA Response</p>	
<p>N/A</p>	

No. 133	Ref. & Name/ Group:	LCC-C62-133 Cian O’Loinsigh
	Submission/ Observation Summary	Chief Executive’s Response
	<p>Rural Housing – Chapter 3 Settlement and Housing Strategy (i) The submission expresses concern regarding the Council’s and Government’s further restrictions on the construction of single dwelling in rural areas. Prohibiting families not originating in areas from building homes in the area is compounds issues regarding housing supply, demand and affordability in major urban settlement.</p>	<p>Rural Housing Policy: (i) In terms of sustainable housing in rural areas, the Draft Plan is required to reflect consistency with the National Planning Framework (NPF) and fully supports the concept of the sustainable development of rural areas. It recognises the distinction between growth and decline by encouraging growth and arresting decline in areas that have experienced low population growth or decline in recent decades, while also highlighting the need to manage certain areas around cities and towns that are under strong urban influence and under pressure from unsustainable overdevelopment. The Draft Plan aligns with NPO19 of the NPF requiring applicants to demonstrate a social (intrinsic part of the community) or economic (persons working full or part time) or exceptional (aligning with RPO 42 of the RSES) need to live in rural areas under strong urban influence.</p>

	<p>(ii) This national planning policy conflicts with the Department of Rural and Community Development seeking investment in rural working hubs, community facilities to support the sustainable development of rural communities.</p>	<p>(ii) The NPF also recognises that in rural Ireland many people seek to have an opportunity to build their own homes. Under National Policy Objective 18b the Government is committed to developing a programme with local authorities, public infrastructure agencies such as Irish Water and local communities for the provision of serviced sites for housing to attract people to build their own homes and live in small towns and villages and this is also reflected in the Programme for Government (PFG). This critical mass will support the development of rural working hubs in towns and villages across the county and is consistent with the provisions of the Government’s Rural Development Policy 2021-2025 - <i>Our Rural Future</i>.</p>
Chief Executive’s Recommendations		
1. No change.		
SEA/ AA Response		
N/A		

No. 152	Ref. & Name/ Group: LCC-C62-152 Frank Ross	
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Level 5 Small Villages: There are inadequate lands zoned and in the present climate this is too restrictive. Would it be possible to increase the boundary limits in all of these areas? Particularly in Ballyhahill, especially to the north side of the village.</p>	<p>1. Level 5 Small Village: Level 5 - Small Villages are generally within a population range of 120 – 500 people with a range of infrastructural, social and community facilities. The cores strategy sets out the growth of each settlement within the county. 22% growth has been identified and applied in a uniform manner to all Level 5 Settlements and accordingly sufficient lands have been identified within the settlement boundaries to accommodate this growth. With respect to Ballyhahill the observer’s request to extend</p>

<p>2. Level 6 Rural Clusters: There are no boundary limits to the rural clusters. These need to be promoted better and provisions made for side roads leading into the villages.</p> <p>3. General: Would it be possible to leave lands open for consideration for serviced sites, where the developers would demonstrate they could provide sewerage and services.</p>	<p>the village boundaries would be contrary to the principles of compact growth, in particular, where there are ample available developable lands within the core of the village.</p> <p>2. Level 6 Rural Clusters: The development of Level 6 settlements will be in line with the principles of compact growth and contiguous to the core. The Draft Plan anticipates that each rural cluster can cater for a small population increase from their current population base over the period of the Draft Plan in the form of incremental local growth. It is not anticipated that Level 6 rural clusters will cater for significant residential densities as most lack necessary services. Section 3.4.6 Level 6 Settlements – Rural Clusters and Objective SS O15 Development in Level 6 Settlements establish development criteria for Level 6 clusters and these policies do not support ribbon development leading into these villages.</p> <p>3. Serviced Sites: The Draft Plan establishes that within settlements outside of the City and Environs, allowance will be made for the development of serviced sites, which will act as an alternative to one off rural housing. In line with the Planning Guidelines for Sustainable Residential Development in Urban Areas up to 20% of proposed housing units within these settlements will be allocated to serviced sites at a density of 10 units per hectare.</p>
Chief Executive’s Recommendations	
1 – 3. No change.	
SEA/ AA Response	
N/A	

No. 163	Ref. & Name/ Group:	LCC-C62-163 Herbertstown Development Association	
	Submission/ Observation Summary		Chief Executive’s Response
	<p>1. Sustainable Communities and Social Infrastructure: The submission seeks the development of the ‘Old Store’ on Main Street as a community facility or local shop given the absence of a shop in Herbertstown.</p> <p>The submission requests the development of the existing sports field to accommodate other hard-surface recreation and non-ball recreation.</p> <p>A community car park is requested given traffic associated with the school, sports field and the crèche.</p> <p>Investment is sought for water services as these services are insufficient for current and future demand.</p>		<p>1. Sustainable Communities and Social Infrastructure: The Development Plan sets out overriding policies and objectives for the provision of Sustainable Communities and Social Infrastructure (chapter 9) and will support and encourage such development. However, the Development Plan but does not specify specific infrastructural / development works (except in certain circumstances such as identified regeneration areas). This is outside of the remit of Draft Development plan process and can be pursued through the development management process supported by the policies and objectives established in Chapter 9.</p> <p>Investment in water services is an issue for Irish Water. The Council will continue to work with Irish Water to deliver critical infrastructure for Limerick.</p>
	Chief Executive’s Recommendations		
	1. No change.		
	SEA/ AA Response		
	N/A		

No. 173	Ref. & Name/ Group:	LCC-C62-173 Pallasgreen/Templebraden Community Council	
	Submission/ Observation Summary		Chief Executive’s Response

<p>1. Infrastructure/Tourism/Settlement Boundaries: The submission states that the Draft Plan is not reflective of the community council’s Development Plan for the future, nor of their proposed and comprehensive tourism route for the area. Both the Plan and tourism objectives accompany this submission. The submission raises key issues with regard to the area.</p> <p>2. Housing: The submission sets out that the community would welcome mixed building. However, in order to attract developers, the Council must include a commitment to a major upgrade of the sewage works in the area and must be expanded to include the whole of Nicker village, Old Pallas village and Barna village.</p> <p>3. Tourism: The community proposals include linking of the three major villages, Nicker, Old Pallas, and New Pallas, by footpath which is already a very popular walking route, but dangerous. The community would welcome the Councils commitment to the walking route to St. Anthony’s Nursing Home in the development Plan. Reference is made to contents of the Community Tourism Plan.</p> <p>4. Community Centre: The submission reiterates previous request that the Council support the community in providing a new parking surface on the grounds of our Community</p>	<p>1. Infrastructure/Tourism/Settlement Boundaries: Opening comments noted. The Draft plan sets out the development approach for Pallasgreen, including a number key objectives to guide development of the settlement.</p> <p>2. Housing: The Settlement Strategy for Limerick focuses on the creation of sustainable communities, including increased density and compact growth, in line with national and regional policy including the provision of a wide range of household types and tenures for Limerick. Regarding sewerage upgrade works, Irish Water is responsible for the upgrade of wastewater infrastructure and the Council will continue to work with Irish Water to deliver critical infrastructure.</p> <p>3. Tourism: The provision of enhanced pedestrian infrastructure is provided for in the Draft Plan under Objective <i>TR O14 Walking and Cycling Infrastructure</i>. Policy support is identified in the Draft Plan and the proposal could be developed subject to funding.</p> <p>4. Community Centre Car Park: This is outside of the remit of Draft Development plan process and can be pursued through the</p>
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Centre. This community centre will be a focal point for most social and community services, and recreation when it reopens in Mid- September after refurbishment.

5. Other Issues:

(i) It is set out that it was Pallasgrean / Templebraden Community Council, and not Development Association, which spearheaded the changes over the past 3-4 years. It is requested that this amended in the plan.

(ii) The submission would welcome the renovation of the Barracks in New Pallas (Private property), the community would have strong views about its future use.

(iii) The submission considers that the settlements at Old Pallas, Barna and Knockane/Garrydoolis should have been included in this development plan, as all these three villages will play a major role in the future of the parish as per the Community development Plan and Tourism Route.

(iv) Nicker Village - In addition to the above footpath connection, the Community proposes a focus/central outdoor meeting place for Nicker village at the T-junction. This would include a plaza, a fountain centre piece depicting the derivation of the word ‘Nicker’ and benches. These are the community priorities for Nicker Village over the term of your development Plan for Nicker and the submission requests that the Council include them under objectives for Nicker Village.

development management process supported by the policies and objectives established in Chapter 9.

5. Other Issues:

(i) Noted. Text shall be amended to read ‘Pallasgrean/Templebraden Community Council’.

(ii) Noted. Policy support is provided in the Draft Plan to support its redevelopment.

(iii) Noted. Old Pallas is identified in the Draft Plan as a Level 6 settlement. Barna and Knockane/Garrydoolis due to their limited size, amenities and available services do not contain the critical mass of services and infrastructure, in accordance with proper planning and sustainable development to be defined as a settlement within the Draft Development Plan.

(iv) Nicker is defined as a level 5 settlement in the Draft Development Plan. Having regard to the limited development potential of these settlements identified, there are no specific objectives included in the Draft Plan for Nicker. The Council will support local communities in the development of appropriate public realm works in consultation with the relevant area engineer.

Chief Executive’s Recommendations	
<p>1 – 4. No change;</p> <p>5. (i) Amend the reference to ‘Development Association’ in Volume 2 - Settlements and Zoning Maps Level-4-large-village -Pallasgreen to Pallasgrean/Templebraden Community Council;</p> <p>(ii) – (iv) No change.</p>	
SEA/ AA Response	
No impact.	

No. 175	Ref. & Name/ Group:	LCC-C62-175 Catherine Hickey
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Settlement Boundary: The observer requests that the site identified below be included within the settlement boundary of Kildimo. The site is located opposite the school and is the subject of a current planning application. Adjoining lands have been included.</p>	<p>1. Settlement Boundary: Kildimo is identified as a Level 5 settlement in the Draft Development Plan, with a projected population growth of 22%, within the lifetime of the plan, it is considered that there is sufficient zoned lands within the settlement boundary to accommodate this growth.</p> <p><i>Objective SS O14 Scale of Growth for Level 5 Settlements establishes - no one proposal for residential development shall be larger than 5 – 7 units. A limited increase beyond this may be permitted where demonstrated to be appropriate, dependent on the extent of the settlement and the services in place to serve growth.</i></p> <p>With respect to Kildimo the observer’s request to include additional lands would be contrary to the principles of compact growth, in particular, where there are ample available developable lands</p>

	sequentially located closer to core to provide for development growth over the lifetime of the plan.
Chief Executive’s Recommendations	
1. No change.	
SEA/ AA Response	
N/A	

No. 176	Ref. & Name/ Group:	LCC-C62-176 Woodfield Grove Residents Association
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Residential Density: The submission highlights a number of concerns as follows:</p> <ul style="list-style-type: none"> - Concerns expressed that the density is identical to that proposed for the suburbs of Limerick city which has a vastly better public transport system compared to the non-existent one in Newcastle West. The submission also sets out that increasing residential density will result in smaller unit sizes and smaller unit floor areas. - A related and additional focus of the draft report is to achieve a reduction in private travel. It is set out that while the drivers behind it are real, the proposals followed in this plan are derived in our capital city and only apply to it and our other three major cities. It is not suitable to be applied to a town with a small population - There is no evidence of a link between where people live and work thus there will always be an employment deficit 	<p>1. Residential Density: Comments noted. However, it is a requirement of Section 10(2A)(a) of the Act that the Core Strategy is consistent with planning policy requirements of guidelines issued under Section 28 of the Act. The Guidance Note on Core Strategies clearly reinforces that density assumptions used in the preparation of a Core Strategy should be consistent with the Planning Guidelines for Sustainable Residential Development in Urban Areas (2009).</p> <p>The Guidelines establish that the greatest efficiency in land usage will be achieved by providing net residential densities in the general range of 35-50 dwellings per hectare and such densities (involving a variety of housing types where possible) should be encouraged generally. Development at net densities less than 30 dwellings per hectare should generally be discouraged in the interests of land efficiency. A reduction in density requirements to 22 units per hectare would be contrary to Planning and Development Act 2000 as amended.</p>

in the town. So continually quoting a reduction in travel patterns as a basis for increased living densities is baseless. - Also the current initiatives by the government towards greater rights for an employee to work from home will have a greater reduction impact on travel patterns compared to the creation of high-density housing in a rural town.

- The submission refers to the current density requirement and the proposed and raises concern about apartment building in NCW and argues that the basis of apartment living is centred on an efficient public transport system, a thing that does not exist in Newcastle West.
- It is further argued that land is not in short supply in NCW and this is a city issue. It is argued that adopting a plan that outlines higher living densities for a small town like Newcastle West only serves to make land vastly more expensive and then as a direct consequence make it more scarce resulting in increased purchase cost and will force more people into schemes like HAP and affordable housing which in turn will increase the cost of housing to the public purse.

The submission makes the following comments of specific elements of the Draft Plan:

a. Concept of a 10 minute town being central to this plan - Implementing this vision for a town like Newcastle West

will only lead to other problems like traffic congestion and lack of parking etc. Central to the theme of a 10 minute town is the availability of modes of public transport which, as already covered does not exist in the town.

b. Key objective, which is to create attractive and liveable environments, where more people will choose to live. In order to deliver compact growth, whilst ensuring a high quality of life for residents in Limerick - people will not choose to live in the high-density areas proposed, rather they will be forced to do so by the implementation of policy that is outside of their control. It is also highly debatable if people living in high density areas have a high quality of life.

c. The NPF’s core principles is to ‘ensure a high standard quality of life to future residents -There is no evidence presented to link a high quality of life to high density living and we would be reasonably sure such information does not exist

d. Objective S2 02 promotes high density developments that are appropriate to their location - fail to see how increasing the density of an area by 59% can be implemented while achieving this objective.

e. Chapter 5 introduction- The purpose of the Draft Plan is to guide decision making on what we choose to hand onto the next generation. In this context we would like to highlight that our standard of living and expectations around quality of life are ever increasing. So, increasing density by 59% would only serve to create smaller houses.

	<p>One wonders if future generations would thank us for this? We believe not.</p> <p>f. Chapter 10.3 outlines that Limerick City and County Council acknowledges the social and economic benefits of more compact settlements and is committed to delivering compact growth. – There are no social benefits to compact living</p> <p>g. Chapter 10 also outlines that Successful compact growth requires “enhanced connectivity and accessibility”- A direct acknowledgment that higher density living requires good public transport. As outlined earlier there is no public transport in Newcastle West.</p> <p>Considering the negative effects outlined above of increasing the density of new developments in Newcastle West to 35 Uph from its current level of 22 Uph or less the submission requests the council to abandon pursuing this increase in order to preserve the character and quality of life in the town and ensure the investment that is presently happening in housing is wisely spent and ensure it continued use and suitability for future generations</p>	
Chief Executive’s Recommendations		
1. No change.		
SEA/ AA Response		
N/A		

No. 178	Ref. & Name/ Group:	LCC-C62-178 Maurice Hayes
Submission/ Observation Summary		Chief Executive’s Response
<p>1. Serviced Sites/Rural Housing: The observer notes that the draft plan proposes that the development of serviced/cluster sites will act as an alternative to one off rural housing and will be allocated at a density of 10 units per hectare (0.1 ha each). In this regard the observer states:</p> <ul style="list-style-type: none"> • Economically the proposal does not make sense. • The entire initiative is based on false foundations stating that in a country setting like west limerick, a person, if allowed to build in the countryside may very well be closer to their work compared to living in a town like Newcastle West. They will still need transport in the form of a car and will use it as much or more if forced to live in an urban setting. • Reference is made to a specific planning application (20/799) and a planning refusal based on the lack of services in the area. It is argued this refusal reason is just a smokescreen to force people to live in built up areas where housing is as or more expensive. • Referring to the population make-up, it is set out that approximately 59% of those living in the entire Newcastle West municipal district live outside of NCW town and for many of these people their desired future place of abode and where they want to rear a family is being taken away from them. 		<p>1. Serviced Sites: Serviced sites also offer an alternative to more scattered forms of development in the open countryside which are harder to service and result in a longer commuting patterns. It is recommended that the serviced sites text is amended to ensure greater flexibility in terms of site size.</p> <p>Rural Housing: A primary focus of the development plan is to ensure that the plan that is adopted has been informed by the national, regional and statutory guidelines, which must be complied with. It is national planning policy to manage the spread of one-off housing in to the rural countryside and to accommodate local growth into town and villages. In terms of sustainable housing in rural areas, the Draft Plan is required to reflect consistency with the National Planning Framework (NPF) and fully supports the concept of the sustainable development of rural areas. It recognises the distinction between growth and decline by encouraging growth and arresting decline in areas that have experienced low population growth or decline in recent decades, while also highlighting the need to manage certain areas around cities and towns that are under strong urban influence and under pressure from unsustainable overdevelopment. The Draft Plan aligns with NPO19 of the NPF requiring applicants to demonstrate a social (intrinsic part of the community) or economic (persons working full or part time) or exceptional (aligning with RPO 42 of the RSES) need to live in rural areas under strong urban influence.</p>

<ul style="list-style-type: none"> • The draft plan also proposes that serviced sites in line with the Planning Guidelines for Sustainable Residential Development be incorporated in urban settlements at up to 20% of newly proposed housing units. The observer queries that if a developer does not put in for 20% serviced sites are the council planners going to insist on it?? Or is it just truly a sneaky backdoor method of removing people for the countryside. • Forcing native rural people to live in urban areas gains nothing only unwanted displacement from the place these rural people were reared and want to live. <p>The observer makes a number of comments on excerpts of initiatives/aims from the Draft Plan and the negative consequences they are going to have on the rural people of west Limerick. The continued allowance of once off housing in the country will encourage the growth of services in villages and help maintain rural life, serviced sites will help also in rural villages but serviced sites in urban areas are not an alternative to living in the countryside.</p> <p><i>The amount and location of these serviced sites shall be controlled to ensure that they would not significantly impact on the fabric and character of the town or village and its sense of identity and place would be..... settlement,</i></p>	<p>In accordance with the NPF (National Policy Objective 18b) the Draft Plan establishes that within settlements outside of the City and Environs, allowance will be made for the development of serviced/cluster sites, which will act as an alternative to one off rural housing. It is the policy of the Council to accommodate local growth by facilitating cluster and village development in the rural areas subject to the availability of necessary services as set out in Chapter 3 of the Draft Plan.</p> <p>Development proposals for serviced sites will be required to adhere to the relevant objectives and development management standards as set out in the Draft Plan. The assessment of individual applications will be on a case-by-case basis at development application stage and it is intended that the provision of serviced sites will offer a real and affordable alternative to one-off rural housing, by allowing individuals to build their own dwellings on larger sites and be in close proximity to towns or villages to avail of services and reduce our carbon footprint by being able to walk to school, or places of work and also supporting the revitalisation of the towns or villages.</p>
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Thus serviced sites in reality will be heavily controlled so even if people are willing to move from their preferred rural place of residence to an urban area and if they are able and willing to pay what will be the exorbitant price for a scarce serviced site their chances of getting one according to the statement above will be very slim. So as a consequence, lack of availability will drive the purchase cost even higher.

- *Objective SS O17 Rural Areas under Strong Urban Influence -*

These are much too narrow and will prove impossible to fulfil for a large cohort of people. In order to avoid discrimination against people wishing to build in the countryside especially those with a history of being reared in a rural area where they now wish to build it is imperative that criteria 3 (a) be extended to all those with a 10-year history of living in the countryside.

Referring to the statistics for one-off rural housing in the county the observer raised queries How many of these projected units per year will fulfil the very strict criteria to build in the countryside?

There is a central theme running through this draft report of excluding choice of place of abode from people wishing to live in the countryside and discriminating against them with regard to their projected needs. This has to be corrected or

it will demonstrate a clear lack of inclusion and unequal treatment of this sector of the population by the Council.

Chief Executive’s Recommendations

1. Amend third paragraph in section 3.5 Serviced sites as follows and include additional text after this paragraph:

Serviced sites refer to a number of individual residential plots typically of the order of 0.1HA ~~of not less than 0.1ha.~~ with access to services such as utility connections, footpaths, lighting and within walking distance of the town or village core. The density shall generally be 10 housing units per hectare. ~~Larger sites may be required for a dwelling unit in excess of 250m² floor area, to allow sufficient space for private amenity, parking and landscaping.~~ Whilst individual house design on serviced sites is encouraged, the overall design of the scheme must be consistent in terms of boundary treatments and landscaping.

Sites must comply with the requirements of “Code of Practice: Wastewater Treatment Systems for Single Houses” (EPA 2009). Where necessary, cumulative effects must be considered in accordance with “Guidance on the Authorisation of Discharges to Groundwater” (EPA 2011). Minimum site size will be determined by house size, number of bedrooms, type of treatment proposed and soil conditions, but will be typically of the order of 0.1HA for a four bedroomed house.

It is important to note that not all lands will demonstrate suitable drainage characteristics to allow this type of development. It will be a requirement that the houses in question connect to the public sewerage system once the relevant wastewater treatment plant is upgraded and has sufficient capacity. Provision for this must be made at the time of construction. Once connected to the sewerage system, on site wastewater systems should be decommissioned.

-Amend first two paragraphs in section 11.4.1 Serviced Sites as follows:

Serviced sites refer to a number of individual residential plots typically of the order of 0.1HA ~~of not less than 0.1 ha~~ with access to services such as utility connections, paths, lighting and within walkable distance of town or village centres, close to the urban core. Serviced sites offer an alternative to the single one-off rural house, to self-build according to one’s own design, but located in a town or village. The density is generally 10 housing units per hectare.

~~It is desirable that serviced sites of not less than 0.10 ha. (0.25 acres) are provided on this land, except in exceptional circumstances. Larger sites may be required for housing with a floor area exceeding 250sqm to allow sufficient space for private amenity space, parking and landscaping.~~

	<p><u>There is no additional wastewater treatment capacity in a number of settlements in County Limerick. Where there are no plans to upgrade the wastewater treatment plants in the Irish Water Investment Plan, current at the time of making an application, the Council will allow developments of multiple units where each house is served by individual on-site waste water treatment systems (OSWWTs). However, a technical assessment will be required to demonstrate that such developments pose no risk of pollution or nuisance, either individually or cumulatively. The assessment of discharges to groundwater should be risk-based and receptor-focused and undertaken in accordance with <i>Guidance on the Authorisation of Discharges to Groundwater (EPA 2011)</i>. The level of the assessment should be proportionate to the risk posed by the discharge.</u></p> <p><u>Under no circumstances will discharges to surface water from such developments be permitted. At the time of construction, provision must be made for the houses to tie into the public sewerage system once capacity is available. The necessary pipe work must be clearly indicated on the planning drawings. Once connected, the individual system should be decommissioned.</u></p>
	SEA/ AA Response
	The change reflects the importance of compact growth, in that it stresses being close to the urban core. Serviced sites also offer an alternative to more scattered forms of development in the open countryside, which are harder to service and result in longer commuting patterns. This change is in accordance with the higher tier plans such as the RSES and NPF.

No. 183	Ref. & Name/ Group:	LCC-C62-183 Templeglantine Community Development CLG
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Templeglantine: In relation to Level 5 Small Village Templeglantine the observer requests the red line boundary be amended to include all lands in parish and school ownership, in particular the land to the north of the existing school.</p>	<p>1. Templeglantine: Templeglantine is identified as a Level 5 Settlement in the Draft Plan. It is considered that there are sufficient lands identified in the settlement of Templeglantine to cater for the projected population growth of 22% within the lifetime of the Draft Plan.</p> <p>The development of lands within village for tourism associated with the Greenway is supported in the Draft Plan. The Draft Plan</p>

	<p>The church, school and community hall comprise the historical core of the village and there is direct access to the Greenway 600m to the north.</p> <p>The inclusion of additional lands within the red line would support the future expansion of the school. It is an ambition of the community to develop parish lands within the village for a variety of community uses to benefit residents locally and for amenities to support tourism associated with the Greenway.</p>	<p>acknowledges the strategic location of Templeglantine relative to the Greenway and establishes that opportunities for the development of amenities to support the Greenway should be supported in the village. This is reinforced in section 4.8.3 Limerick Greenway and Objective ECON O37 Limerick Greenway of the Draft Plan.</p> <p>It is further noted the extension or not of the settlement boundary will not prohibit future expansion of the existing school.</p>
Chief Executive’s Recommendations		
1. No change.		
SEA/ AA Response		
N/A		

No. 207	Ref. & Name/ Group:	LCC-C62-207 John and Pdraig Hogan
Submission/ Observation Summary		Chief Executive’s Response
<p>1. Settlement Boundary: The observation is requesting the inclusion of lands (10.4 acres) in Glin for residential zoning based on the following:</p> <ul style="list-style-type: none"> • It is located within the 50km speed limit; • It is adjacent to an existing housing cluster; • It is close to the village centre and village facilities; • It is served by a public footpath; • It is adjacent to an existing child care facility. 		<p>1. Settlement Boundary - Glin: The Draft Plan sets out the future growth for Limerick in the core strategy, which will be concentrated in the built-up footprint of Limerick’s City, towns and villages, in order to achieve compact growth. The core strategy provides a housing allocation for Glin of 59 units over the plan period. The Draft Plan provides for suitable zoned lands sequentially located close to the village core to cater for the required housing allocation as identified.</p>

	<p>The allocation of population growth targets seeks to ensure that population growth is sustainable and consistent with the scale of the settlement in accordance with the higher tier plans of the Regional and Spatial Economic Strategy for the Southern Region and the National Planning Framework. It also ensures the settlement can accommodate the additional growth in a compact manner without damage to the character of the settlement and the carrying capacity of its environment and supporting infrastructure.</p> <p>The zoning of lands the subject of this request removed from the core area would be contrary to compact growth and proper planning and sustainable development. It is considered that the lands identified for growth in the draft plan are more suitably located to achieve compact growth and revitalise the village core.</p>
Chief Executive’s Recommendations	
1. No change.	
SEA/ AA Response	
N/A	

No. 212	Ref. & Name/ Group: LCC-C62-212 Cllr. Jerome Scanlon				
	<table border="1"> <thead> <tr> <th>Submission/ Observation Summary</th> <th>Chief Executive’s Response</th> </tr> </thead> <tbody> <tr> <td> <p>1. Density - Table 2.6 Density Assumptions per settlement hierarchy - Level 2 Key Town: The observer proposes that the 35 U.P.H for 80% of dwelling units be reduced to 22 U.P and the remaining 20%</p> </td> <td>See response to Submission No. 176 above.</td> </tr> </tbody> </table>	Submission/ Observation Summary	Chief Executive’s Response	<p>1. Density - Table 2.6 Density Assumptions per settlement hierarchy - Level 2 Key Town: The observer proposes that the 35 U.P.H for 80% of dwelling units be reduced to 22 U.P and the remaining 20%</p>	See response to Submission No. 176 above.
Submission/ Observation Summary	Chief Executive’s Response				
<p>1. Density - Table 2.6 Density Assumptions per settlement hierarchy - Level 2 Key Town: The observer proposes that the 35 U.P.H for 80% of dwelling units be reduced to 22 U.P and the remaining 20%</p>	See response to Submission No. 176 above.				

of dwelling units proposed latter be allocated for serviced sites.	
Chief Executive’s Recommendations	
1. No change.	
SEA/ AA Response	
N/A	

No. 214	Ref. & Name/ Group:	LCC-C62-214 Cllr. Kevin Sheahan and Cllr. Adam Teskey
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Log Cabins: The observation proposes an amendment to the Draft Plan as follows:</p> <p>‘That Limerick City and County Council would be favorably disposed to the construction of log cabins for the purpose of domestic dwellings and that they would be subject to the usual planning conditions’.</p>	<p>1. Log Cabins: Table DM 4: <i>Design Guidelines for Rural Houses</i> of the Draft Plan establishes design principles to be adhered to in the design of any rural dwelling. Applicants are advised to refer to <i>Limerick’s Rural Design Advice for Individual Houses in the Countryside updated in 2012</i> and any subsequent documents prepared by the Council. The main emphasis of the design advice is to reinforce the distinctive local qualities of the County. It works on the basis that new development in the countryside should share some of the characteristics that define the locality in which it is located. It should be clear that the new house has appropriate features in common with buildings and landscapes of a similar kind in the surrounding area.</p> <p>Fundamental to any design in a rural context is the appropriate integration of the structure into the landscape in terms of design, scale and finishes with due regard to the vernacular. Log Cabins are generally alpine in style and aspects of the house may not fit with our</p>

	vernacular style. However, the application of contemporary modern innovative design, including the use of natural timber materials and finishes is encouraged subject to appropriate integration into the landscape. Detailed design will be assessed through the Development Management Process.
Chief Executive’s Recommendations	
1. No change.	
SEA/ AA Response	
N/A	

No. 221	Ref. & Name/ Group: LCC-C62-221 Cronan Garry				
	<table border="1"> <thead> <tr> <th>Submission/ Observation Summary</th> <th>Chief Executive’s Response</th> </tr> </thead> <tbody> <tr> <td> <p>1. Lands north of Ballyneety Village: The submission relates to lands to the north of Ballyneety Village and the potential to develop said lands for serviced sites. The lands are located 400m from the village with a pedestrian footpath covering a distance of c.200m from the village toward the observer’s site.</p> <p>The observer states that the Draft Plan stipulates that 30% of all new homes targeted within level 5 settlement shall be within their existing built-up footprints. In this regard, the settlement plan proposed for Ballyneety fails to adequately identify sufficient quantum of lands for future residential development.</p> </td> <td> <p>1. Lands north of Ballyneety Village: Level 5 - Small Villages are generally within a population range of 120 – 500 people with a range of infrastructural, social and community facilities. The cores strategy sets out the growth of each settlement within the county. 22% growth has been identified and applied in a uniform manner to all Level 5 Settlements and accordingly sufficient lands have been identified within the settlement boundaries to accommodate this growth.</p> <p>The Core Strategy is developed around a framework of high-level population and household targets that are set out in the NPF, the NPF Implementation Roadmap, the RSES for the Southern Region and Section 28 guidance document ‘Housing Supply Target Methodology for Development Planning’, (DHLGH, December 2020). Housing and</p> </td> </tr> </tbody> </table>	Submission/ Observation Summary	Chief Executive’s Response	<p>1. Lands north of Ballyneety Village: The submission relates to lands to the north of Ballyneety Village and the potential to develop said lands for serviced sites. The lands are located 400m from the village with a pedestrian footpath covering a distance of c.200m from the village toward the observer’s site.</p> <p>The observer states that the Draft Plan stipulates that 30% of all new homes targeted within level 5 settlement shall be within their existing built-up footprints. In this regard, the settlement plan proposed for Ballyneety fails to adequately identify sufficient quantum of lands for future residential development.</p>	<p>1. Lands north of Ballyneety Village: Level 5 - Small Villages are generally within a population range of 120 – 500 people with a range of infrastructural, social and community facilities. The cores strategy sets out the growth of each settlement within the county. 22% growth has been identified and applied in a uniform manner to all Level 5 Settlements and accordingly sufficient lands have been identified within the settlement boundaries to accommodate this growth.</p> <p>The Core Strategy is developed around a framework of high-level population and household targets that are set out in the NPF, the NPF Implementation Roadmap, the RSES for the Southern Region and Section 28 guidance document ‘Housing Supply Target Methodology for Development Planning’, (DHLGH, December 2020). Housing and</p>
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	<p>The settlement of Ballyneety is essentially identified as the village crossroads, housing within the golf club and the linear pattern of residential development along the R512 to the south. No account has been taken of the established settlement pattern to the north of the village which historically consisted of the village service station and shop, in addition to the established mature pattern of linear residential development to the east and west of the regional road reflecting the natural extension of the village to the north towards Limerick City.</p> <p>The observer requests that the Council review the settlement boundary for Ballyneety to have due regard to the established and historical development pattern of the village and the wider village context in terms of landscape topography, traffic safety, accessibility and future development potential with a view to the future development of the observer’s lands for residential serviced sites.</p>	<p>population allocations are provided having regard to the potential of the settlement to absorb increased residential density and ensure no adverse impacts on the settlement arising from rapid growth due to inadequate services and infrastructure and car dependent development.</p> <p>The NPF sets out that the growth of development of settlements outside of the city and key towns shall not exceed 30% growth. The Council in their assessment of the lands in Ballyneety identified services and facilities and the main location of residential development in the village, which is serviced or serviceable within the lifetime of the Plan. There are many opportunities for infill and brownfield development within the settlement.</p> <p>The lands in question are removed from settlement core and outside the 50kmph speed limits on a strategic regional road, the lands fail to consolidate the village and seeks to include unserviced lands at a distance from the village, which is contrary to national and regional policy.</p>
Chief Executive’s Recommendations		
1. No change.		
SEA/ AA Response		
N/A		

No. 222	Ref. & Name/ Group:	LCC-C62-222 AK Planning on behalf of Tom Flavin
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Submission/ Observation Summary	Chief Executive’s Response
<p>1. Lands in Carrigkerry: The observer is the owner of lands in the northern side of the village of Carrigkerry, Co. Limerick. The observer has successfully applied for outline permission for 2 no. dwellings (Ref 18/600) and has recently submitted an application for permission consequent. As part of this proposal public lighting will be provided along the access lane.</p> <p>The submission requests that the Local Authority revises the development area and to encompass Site 1 and Site 2 and the balance of lands shaded green in the final development boundary for the village.</p> <p>Providing additional critical mass in this village is key to retaining the local businesses at this location and supporting the local national school. The observer would anticipate adding 3 further sites at this location in the near term. These sites would provide a counter balance to urban generated rural dwellings in the area.</p>	<p>1. Lands in Carrigkerry: Carrigkerry is a Level 5 - Small Village defined generally within a population range of 120 – 500 people with a range of infrastructural, social and community facilities and as such, it is projected that the village will grow by 22% based on the 2016 Census figure within the lifetime of the Plan. It is considered that there are sufficient lands identified within the settlement boundary, which are sequentially located closer to core, to accommodate the projected growth within the lifetime of the Plan.</p>
1. No change.	
SEA/ AA Response	
N/A	

No. 231	Ref. & Name/ Group:	LCC-C62-231 Cllr. Eddie Ryan
Submission/ Observation Summary		Chief Executive’s Response

	<p>1. Volume 2: Level 6 Settlements – Rural Clusters: This submission states that Martinstown is a growing village and it could accommodate appropriately scaled and designed housing on some of the approaches to the village.</p>	<p>1. Volume 2: Level 6 Settlements – Rural Clusters: Comment Noted. Martinstown has been included as a level 6 settlement in the Draft Plan.</p>
<p>Chief Executive’s Recommendations</p>		
<p>1. No change.</p>		
<p>SEA/ AA Response</p>		
<p>N/A</p>		

<p>No. 233</p>	<p>Ref. & Name/ Group:</p>	<p>LCC-C62-233 Cllr. Stephen Keary</p>	
<p>Submission/ Observation Summary</p>		<p>Chief Executive’s Response</p>	
<p>1. Settlement policies, rural housing and the need for the plan to reflect the changing housing needs post Covid-19:</p> <p>(i) The Submission requests that additional zoned land should not be included at any location that does not have sufficient utilities and services to allow for such development.</p> <p>(ii) The submission raises concerns regarding the population projections outlined in Table 3.1.</p> <ul style="list-style-type: none"> • The increase of just 7.5% in Level 7 Open Countryside is insufficient and needs to be increased. This projection is worryingly underestimated, unacceptable and does not reflect the current demands for rural living. 		<p>1. Settlement policies, rural housing and the need for the plan to reflect the changing housing needs post Covid-19:</p> <p>(i) The NPF sets out that lands shall be serviced or serviceable within the lifetime of the plan, if they are to be considered for zoning. Lands that are neither serviced or serviceable within the lifetime of the plan should not be zoned and this is the approach that the Council has taken in the preparation of the Draft Plan.</p> <p>(ii) The Council acknowledged that the 7.5% increase could be considered conservative in comparison to the overall population growth projections, which are very ambitious, but it still remains generous in the context of the overall growth of Limerick. The Council is obliged to comply with national and regional planning policy and set out a hierarchical distribution of the</p>	

<ul style="list-style-type: none"> • The forecasted 870 houses to be built in Open Countryside or 145 per year over a six-year period needs to be at least doubled to allow for current demands • If these issues are not addressed it will lead to detrimental consequences for the county both socially and economically. <p>(iii) Objective SS04 Prevention of urban Sprawl is omitted from the plan and replaced with a common sense alternative as it is considered that the objective would effectively limit development to within the speed limits of towns and villages.</p>	<p>population growth throughout all settlements, in accordance with NPF and RSES. The NPF sets out in NPO 2a that a target of 50% of future population and employment growth will be focused in the five cities and their suburbs. Furthermore, the RSES sets out that in RPO 11 that Key Towns can grow by up to 30%, subject to capacity analysis. Accordingly, the population growth for the different levels of the Settlement Hierarchy has been already established. In addition to the above, Limerick has a wide network of nucleated settlements, where in general growth should be prioritised to help strengthen these settlements, thereby also lifting the rural areas to which they are intimately connected and in an environmentally and economically sustainable manner. National and regional policy seeks to grow the cities, towns and villages, the allocation of growth to the rural area is considered appropriate in the context of the overall growth figures.</p> <p>(iii) Objective SS O4 Prevention of Urban Sprawl: Objective SS O4 seeks to safeguard the rural area from inappropriate ribbon development on the approaches to towns and villages, in accordance with the Sustainable Rural Housing Guidelines 2005. The Draft Development Plan supports coordinated growth of an appropriate scale to all of the towns and villages in Limerick, in favour of uncoordinated urban sprawl, the Objective is considered appropriate. A Key strategic objective of the NPF is compact growth. The Draft Plan sets out policy support to consolidate development within existing settlement footprints and Objective SS04 is compliant with both the NPF and section 28 Sustainable Rural Housing <i>Guidelines</i>.</p>
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<p>(iv) Objective SS013 Development within Level 5 Settlements should be omitted from the plan as it is considered the objective would have the potential to have a major negative impact on the future development of towns and villages.</p> <p>(v) Map 3.1: Rural Housing Map includes errors insofar as it designates the Electoral Divisions of Rooskagh and Particles as Areas of Strong Urban Influence, these need to be amended to an appropriate designation.</p> <p>(vi) Limerick is a more diverse county than what is reflected in the Rural Housing Map and requests that the breakdown in the existing Development Plan remains.</p>	<p>(iv) Objective SS O13 sets out guidance on development within Level 5 Settlements and the purpose of this Objective is to ensure that growth of villages on Level 5 of the Settlement Hierarchy is of appropriate scale and proportionate to the pattern and grain of the existing settlement and consistent with Government guidance. The proposed Objective will not prevent the development of appropriately located opportunity sites in towns and villages.</p> <p>(v) There is no inconsistency in that the single criterion for designation of Electoral Districts, belonging to Areas of Strong Urban Influence was identified where 15% or over of the population of the Electoral Division commuted to Limerick for work purposes, which is in line with the requirement of the NPF. Rooskagh, Particles falls into that category. However, as outlined in the response to the submission from the OPR, additional criteria in terms of population growth over the last Census period, will now also be considered to determine the Rural Settlement Strategy Map. The Rural Settlement Strategy Map will be updated.</p> <p>(vi) The Council is obliged to prepare a Development Plan that complies with national and regional planning policy. The NPF and the RSES for the Southern Region requires a different approach to determining the area of strong urban influence and is also based on the Census of Population from 2016, unlike the existing County Plan, which was prepared based on the 2011 Census of Population. The Draft sets out policy in line with the NPF and RSES for the Southern region.</p> <p>(vii) Noted. See response to (vi) above.</p>
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	<p>(vii) The dramatic increase to the Area under Strong Urban Influence should be amended to reflect the existing Rural Settlement Strategy.</p> <p>(viii) The policies enshrined in the 2010 – 2016 Limerick County Development Plan should be adhered to for the lifetime of this plan in regard to the entitlement of all rural people with a housing need.</p>	<p>(viii) Noted. See response to (vi) above.</p>
	Chief Executive’s Recommendations	
	<p>1. (i) - (viii) No change.</p>	
	SEA/ AA Response	
	<p>N/A</p>	

No. 237	Ref. & Name/ Group:	LCC-C62-237 Cllr. Eddie Ryan
	Submission/ Observation Summary	Chief Executive’s Response

<p>1. Volume 1, Chapter 3, Settlement & Housing Strategy Rural Housing:</p> <p>(i) The submission states that the rural policies set out in the Southern, Regional Assembly, Regional Spatial and Economic Strategy (RSES) and the National Planning Framework are not measured or appropriate and should not be directly reflected in the Draft Development Plan. This submission requests the need to be flexible and pragmatic in the approach to rural housing policies and the need to coordinate with upgrades to treatment systems. The submission outlines the importance of people having the right to build homes and raise families in rural areas ensuring communities remain sustainable supporting schools, sports clubs etc.</p> <p>(ii) The submission outlines support to for the include the hinterland of villages, such as Galbally, Ballylanders, Glenroe, Angelsborough, Kilbeheny, Kilfinnane, Ballyorgan, Ardpatrick etc. as “Rural Housing Category 2: Rural Areas Elsewhere/Structurally weak” (Map CDP-C3-RSS).</p> <p>(iii) The submission considers that current policies for example relating to Rural Housing Elsewhere as proposed have worked well in bringing young people back to rural areas. There should be no requirement to demonstrate a</p>	<p>1. Volume 1, Chapter 3, Settlement & Housing Strategy Rural Housing:</p> <p>(i) The Draft Plan is required to reflect consistency with the NPF, RSES for the Southern Region and Section 28 Guideline – Sustainable Rural Housing Guidelines for Planning Authorities, which supports the concept of the sustainable development of rural areas and recognises the distinction between growth and decline by encouraging growth and arresting decline in areas that have experienced low population growth or decline in recent decades, while also highlighting the need to manage certain areas around cities and towns that are under strong urban influence and under pressure from unsustainable overdevelopment. The Draft Plan aligns with NPO19 of the NPF requiring applicants to demonstrate a social (intrinsic part of the community) or economic (persons working full or part time) or exceptional (aligning with RPO 42 of the RSES) need to live in rural areas under strong urban influence.</p> <p>(ii) Noted.</p> <p>(iii) In the area identified as Elsewhere, there is no requirement to demonstrate a social, economic or exceptional need. Applications will be assessed based on normal planning and environmental criteria.</p>
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<p>social or economic need in policies relating to Rural Houses Elsewhere.</p> <p>(iv) Requests that Map CDP-C3-RSS/ Map 3.1 Rural Housing Map is amended to identify the areas marked by an orange star – Knocklong, Elton, Martinstown, Glenbrohane are changed to “green” and identified as Rural Areas Elsewhere/Structurally Weak. Stated that these areas have suffered population decline.</p> <p>(v) Support extended to Objective SS 018: Rural Areas Elsewhere as a flexible approach to one off housing is required.</p> <p>(vi) Supports Objective SS 017: Rural Areas under Strong Urban Influence as it allows for consideration of a dwelling when only one criterion of the policy is met.</p>	<p>(iv) The criteria used for designation of Electoral Districts, belonging to Areas of Strong Urban Influence was identified where 15% or over of the population of the Electoral Division commuted to Limerick for work purposes, which is in line with the requirement of the NPF. The OPR has highlighted some areas that are urban influence, which have not been identified using this criterion and has asked for additional spatial analysis criteria to be considered. The Council have considered population growth over the last Census period, and examined areas which have grown and declined over the Census period, in line with the Sustainable Rural Housing Guidelines and this has resulted in the extent of strong urban influence increasing around Newcastle West and Abbeyfeale. The Rural Settlement Strategy Map will be updated accordingly in response to the OPRs submission.</p> <p>(v) Comment noted.</p> <p>(vi) Comment noted.</p>
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Chief Executive’s Recommendation
1. (i) - (vi) No change.
SEA/ AA Response
N/A

No. 240	Ref. & Name/ Group: LCC-C62-240 Cllr. John Sheahan	
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Zoning: The submission requests a change to the land use zoning for Level 4 Settlement, Glin from ‘new residential’ to ‘mixed use’. It is considered that the lands identified as Site 1 is in close proximity to the village core and has the potential to support a wide variety of uses on site, supporting the further development of the village, in line with the Draft Development Plan.</p> <p>The objective for mixed use lands as identified in the Draft Development Plan seeks to provide for a mixture of residential and compatible commercial uses, which would facilitate the use of land for a mix of uses, making provisions, where appropriate for ‘primary’ uses i.e., residential and combined with other compatible uses e.g., offices as ‘secondary’. These secondary uses will be considered by the Local Authority, having regard to the particular character of the area. A diversity of uses for both day and evening is encouraged. These areas require high</p>	<p>1. Zoning: Site 1 is centrally located to the rear of Glin village centre consistent with the principles of compact growth and the sustainable provision of services, in addition to access to services and amenities within walking distance. The provision of residential development on this site will provide the critical mass necessary to comply with compact growth in accordance with proper planning and sustainable development.</p> <p>The Draft Plan includes an extensive village centre area with significant potential to provide for a ‘mix of uses’ in accordance with Table 12.4 <i>Land Use Zoning Matrix</i> of the Draft Plan. Furthermore, the village centre already suffers from commercial vacancy and to help stem this decline commercial development should be located on lands identified ‘village centre’ in order to promote a strong and sustainable village core. To facilitate the use of Site 1 lands for a mix of uses would be contrary to the principles of compact growth and may lead to further commercial vacancy in the existing village centre.</p>

	levels of accessibility, including pedestrian, cyclists and public transport (where feasible).	
Chief Executive’s Recommendations		
1. No change.		
SEA/ AA Response		
N/A		

No. 242	Ref. & Name/ Group:	LCC-C62-242 Shane Kelly and Margaret Murphy on behalf of Paddocks Resident Association	
	Submission/ Observation Summary		Chief Executive’s Response
	<p>1. Density: Level 2 Key Towns: The submission made on behalf of the Paddocks Residents Association located in Newcastle West. The submission refers to housing density with respect to Level 2 Key Towns whereby the observer submits that 35 housing units per hectare for 80% of new residential dwelling units is excessive. The submission proposes that density is reduced to 22 units per hectare in line with what is proposed for towns and villages in Limerick. The submission notes that the town does not have the infrastructure to support what is proposed and doesn’t represent good practice. The change is sought in the interest of sustainable living, required open space and better quality of living and refers support to this in Section 5.3.7 Blue Green Infrastructure.</p>		<p>1. Density: Level 2 Key Towns: See response to submission No. 176 above.</p>
	Chief Executive’s Recommendations		
	1. No change.		
SEA/ AA Response			

N/A

No. 251	Ref. & Name/Group	LCC-C62-251 SLR Consulting on behalf of Irish Cement	
Submission/Observation Summary		Chief Executive Response	
<p>1. Marine Related Industry - Zoning and Objectives: The submission requests land use zoning of ‘Marine Related Industry’ on Foynes Island, Co. Limerick, be reinstated in the Limerick Development Plan 2022 – 2028, as per the current Limerick County Development Plan 2010 - 2016 (as varied). The submission outlines how the 2010 Development Plan accommodates marine related industry through Objective ED06 Marine Related Industry, and Objective ED 04 Safeguard Strategic Development Locations on the Estuary, and ED08 Marine Related industry and Flooding.</p> <p>2. It is requested that the zoning designation should be enlarged to cover the entirety of the ICL landholding (46ha). Whilst the site is designated a Strategic Development Location in SIFP for the Shannon Estuary with specific objectives SIFP MRI 1.2.4 Foynes Marine Related Industry and SIFP MRF 1.2.5 connectivity with the Port of Foynes, the SIFP does not have the same statutory weighting as Development Plan. Furthermore, the omission</p>		<p>1. Marine Related Industry - Zoning and Objectives:</p> <p>The subject site is located on Foynes Island, approximately 230m from the port of Foynes, in Foynes Village, Co. Limerick. The island itself is located in the Shannon Estuary. The Council recognise the importance of the Shannon Estuary and accordingly have included an entire section on the Marine economy, Objectives Econ O43 sets out policy support for strategic development locations along the estuary. The lands identified particularly in Foynes Village and on Foynes Island are in line with the Strategic Integrated Framework Plan for the Shannon Estuary. The zoning is also in line with the current Limerick County Development Plan 2010 –2016 (as extended).</p> <p>2. It is an objective of the Council to support the expansion of the Port at Foynes and promote the economic and industrial development of the Shannon Estuary as a strategic transport, energy and logistics Hub, serving Limerick and the wider region by utilising naturally occurring deep water characteristics and by identifying and safeguarding existing and future strategic transportation links, subject to fulfilling the requirements of safeguarding the designated sites that exist in the vicinity of the Port. The area outlined in blue in Map 4.3 of the Draft</p>	

of the ‘Marine Related Industry’ zoning from Foynes Island is contrary to the strategic objectives of the SIFP, especially considering that there appears to be no supporting explanatory rationale for the omission of the land use zoning, which should be considered critical to the success of developing a Marine Economy in Foynes and along the Shannon Estuary.

3. Chapter 12 defines Industrial land use in the Draft Plan but there is no definition for Marine Related Industry. Similarly, the zoning matrix does not reflect Marine Related Industry.

Development Plan, is as set out in the Strategic Integrated Framework Plan for the Shannon Estuary (SIFP) and in the current County Development Plan.

The development location is included in a Natural Heritage Area designation as well as being part of the River Shannon & Fergus Estuary SPA, and the Lower Shannon SAC. The area is also one where numerous structures have been identified in the study of underwater heritage potential.

The SIFP outlines that the “existing commercial jetty will require upgrading to accommodate larger vessels and some civil works to link the lands into the existing Port facilities. Development works are restricted to the western part of the island to minimise the impact of any such works, on the natural environment”. Extensive environmental assessments were carried out to support the SIFP and accordingly the proposal set out here would be contrary to the SIFP. Accordingly, it not proposed to extend the zoning on Foynes Island.

3. Noted. Marine Related Industry is not defined in the Draft Plan. However, the value of the marine economy is recognised in Chapter 4 and identified as part of the land use zoning provision.

Furthermore, the Maritime Area Planning Bill (2021) is currently before the Dail. This legislation intends to put in place a comprehensive and

4. There are concerns regarding the zoning map for Foynes not including Foynes Island. Map 4.3 Map of Foynes Island in Chapter 4 is not a zoning map. The apparent omission of the zoning designation on Foynes Island is detrimental to realising the Marine Economy related objectives as set out in the Draft Development Plan and the Strategic Integrated Framework Plan for the Shannon Estuary.

The submission concludes that not providing a land use zoning definition for ‘Marine Related Industry’ and by not

coherent planning system for the entire Maritime Area. The Bill will provide for a completely new regime for the entire maritime Area underpinned by the NMPF. The introduction of these legislative changes will have implications for the Draft Plan. Accordingly, it is considered that Chapter 4 Section 4: Marine Economy is revised to include new Section 4. 9.1 Marine Spatial Planning.

With respect to the zoning matrix and related marine industries these will be assessed on a case-by-case basis, subject to supporting documentation with due regard to the policies and objectives set out in the recently adopted National Marine Planning Framework and the proposed Maritime Area Planning Bill 2021 and revised Section 4.9.1. The SIFP and marine related policies and objectives of the draft plan will also be considered in any planning application.

4. Noted. See response to point 2 above. The Council would also draw the observer's attention to Objective ECON O43 *Safeguard Strategic Development locations along the Estuary which specially includes Foynes Island.*

setting out clear development parameters within which to operate, there is a missed opportunity in offering potential investors and developers the assurance and certainty that marine related industry potential at Foynes Island will be realised through the course of the proposed Development Plan.

Chief Executive Recommendation

1. - 2. - No change;

3. Insert the following Section in Chapter 4: Marine Spatial Planning

The 2020 Programme for Government, Our Shared Future, committed to reaching Ireland’s target of 10% under the Marine Strategy Framework Directive (MSFD) as soon as is practical and aim for 30% of MPAs by 2030. This is in line with the EU Biodiversity Strategy.

Marine Spatial Planning (MSP) is a new way of looking at how we use the marine area and planning how best to use it into the future. MSP will try to balance the different demands for using the sea including the need to protect the marine environment. It is about planning when and where human activities take place at sea. It is about ensuring these activities are as efficient and sustainable as possible.

National Marine Planning Framework

Ireland’s Marine Spatial Plan is known as the National Marine Planning Framework was published in June 2021. The National Marine Planning Framework (NMPF) brings together all marine-based human activities for the first time, outlining the Government’s vision, objectives and marine planning policies for each marine activity.

Ireland’s National Marine Planning Framework will be a key decision-making tool for regulatory authorities and policy makers into the future in a number of ways, including decisions on individual consent applications which will have to have regard to the provisions of the plan in the same way that terrestrial plans form part of the decision making tool-kit in the on-land planning process.

Maritime Planning Bill 2021

The Maritime Area Planning Bill (MAP) is the State’s leading response to the much-needed reform of marine governance. This legislation intends to put in place a comprehensive and coherent planning system for the entire Maritime Area. The constituent elements of this system are:

- A forward planning regime for the maritime area;
- A new streamlined development management system for the maritime area incorporating consenting for the occupation of the maritime area (Maritime Area Consents and licencing) and a new planning consenting regime (to be implemented by coastal local authorities and An Bord Pleanála);
- The establishment of a new agency, the Maritime Area Regulatory Authority (MARA) to manage the occupation of the maritime area and to enforce the provisions of the new regime.

The Bill provides the legal underpinning to an entirely new marine planning system, which will balance harnessing our huge offshore wind potential with protecting our rich and unique marine environment. The Bill is a key enabler of Ireland’s decarbonisation goals. The Bill will provide for a completely new regime for the entire maritime Area underpinned by the NMPF. Foreshore Consents will be replaced by a more focused and streamlined Maritime Area Consent regime. The planning permission system will be extended into the entire maritime area with development subject to a single comprehensive environmental assessment. Compliance and enforcement activities are supported through robust provisions.

Insert new objective as follows:

Objective ECON O43 National and Regional Marine Planning

It is an objective of the Council to

- a) Support and facilitate the implementation of the National Marine Planning Framework (NMPF) and the Maritime Area Planning Bill 2021 upon its adoption.
- b) Continue to work with the relevant Government Departments and other relevant stakeholders in the promotion of integrated marine management and following the adoption of the NMPF to identify those areas that may have particular management requirements and, where appropriate set out any requirement that may exist for Maritime Spatial Plans (MSPs) and Designated Maritime Area Plans (DMAPs)

- c) Support the potential of the marine environment by nurturing opportunities for innovation in the Maritime economy while ensuring that its ecosystems are managed sustainably.

4. No change.

SEA/AA Response

The inclusion of more detailed policies in relation to Marine Spatial Planning ensures that the plan content is in line with Government policy and ensures that the Development Plan, as the principal planning document for Limerick is ideally placed to play a key role in supporting marine planning. This is in line with higher tier plans and should bring environmental benefits supporting sustainable development in marine and coastal areas.

No. 252	Ref. & Name/Group	LCC-C62-252 SLR Consulting on behalf of Irish Cement Ltd.	
Submission/Observation Summary		Chief Executive Response	
<p>1. Zoning: Chapter 4 A Strong Economy and Volume 2 Level 4 – Large Villages, Settlement Zoning and Development Objectives</p> <p>This submission requests that lands be re-zoned for ‘Marine Related Industry’ use, as the alternative proposed ‘Agriculture’ zoning. The rationale put forward is as follows:</p> <ul style="list-style-type: none"> - The proposed zoning is contradictory and a missed opportunity with respect to the Policy ECON P 7 		<p>1. Zoning: A review of the settlement zoning and the site context adjacent to Foynes Port and associated marine related industry has been carried out, on receipt of the zoning.</p> <p>The marine economy is identified as an emerging sector in the RSES (Objective RP O76). The Shannon Estuary, its ports and future development are a significant economic driver and transport corridor in the region. The potential of the Shannon Estuary is also given recognition in the Strategic Integrated Framework Plan for the Shannon Estuary (SIFP), which is a land and marine based framework plan to guide the future development and management of the Shannon</p>	

<p>Marine Economy in the Draft Plan and the SIFP, and RPO 076 Marine Economy set out in RSES.</p> <ul style="list-style-type: none"> - Marine Related Industry zoning would consolidate with other Marine Related Industry zoning in Foynes, and capitalise on associated synergy through concentration of marine related industry in Foynes. - Chapter 4 recognises the marine economy is vital for Limerick’s economic development through strengthening established resources and diversification. - Marine Related Industry zoning would support Foynes Port as a Tier 1 port, whereby considerable investment/expansion is envisaged by the Shannon Foynes Port Company (SFPC) in its masterplan - Vision 2041. 	<p>Estuary. It aims to transform the Shannon Estuary into an international economic hub. The SIFP identified an additional 1,200 ha. for marine related development across 9 no. strategic development locations and proposes building on existing industry connectivity and synergy, as well as the existing infrastructure, to create a more sustainable and attractive network for further investment.</p> <p>The lands are located in Flood Zone A and therefore at risk of flooding. Although marine related industry is water compatible, it only includes development which is essential to the port /marine operations, having regard to the removed location of the lands from the port, it is questionable what the proposed use would be on the lands. The lands are located on the opposite side of the road from the port and are peripheral from the village, there remains a significant land bank within the confines of the Port. Accordingly, it is considered inappropriate to rezone the lands from ‘Agriculture’ to ‘Marine Related Industry ‘.</p>
<p>1. No change.</p>	
<p>SEA/AA Response</p>	
<p>N/A</p>	

<p>No. 259</p>	<p>Ref. & Name/Group</p>	<p>LCC-C62-259 McMahon & Hardiman on behalf of Wallace, O’Shea and Hogan</p>
<p>Submission/Observation Summary</p>		

1. Volume 2 Level 4 Large Villages, Settlement Zoning and Objectives

The submission requests the zoning of 1.2ha at Kilfergus Glin as New Residential. The rationale is as follows:

- The site is serviced by mains, sewer and storm-water system.
- The precedent of residential development permitted on the site. Planning ref: 07/601 was granted for 15 houses on these lands, but were not developed due to the recession. Under Ref: 13/7045 an extension of time was granted until 2018 but this has lapsed.
- Lands adjacent to this site have been developed under Ref:04/748 consisting of 23 houses. The layout of this development provides the access to the subject lands.
- Given the upgrade of waste water treatment in Glin being progressed by Irish Water.

1. Volume 2 Level 4 Large Villages, Settlement Zoning and Objectives:

See response to Submission No. 1, Part 1, which outlines the position of the Draft Plan in relation to core strategy and population growth. Glin is identified as a level 4 Settlement in the Draft Plan and as such, 28% growth has been allocated to Glin, above its population base in 2016. The allocation of population growth targets seeks to ensure that population growth is sustainable and consistent with the scale of the settlement in accordance with the higher tier plans of the Regional and Spatial Economic Strategy for the Southern Environs and the National Planning Framework. It also ensures the settlement can accommodate the additional growth in a compact manner without damage to the character of the settlement and the carrying capacity of its environment and supporting infrastructure.

The zoned lands identified in the Draft Plan are sequentially located adjacent to the village core consistent with 3c of the NPF. The zoning of lands the subject of this request removed from the core area would be contrary to compact growth and proper planning and sustainable development.

Chief Executive Recommendation

1. No change.

SEA/AA Response

N/A

No. 272	Ref. & Name/ Group:	LCC-C62-272 HRA Planning on behalf of Dwellings Developments Adare Ltd.
Submission/ Observation Summary		Chief Executive’s Response
<p>1. Core Strategy: Adare is designated as a ‘Level 4 Large Settlement’. The Additional Households forecasted for Adare for the Plan period 2022-2028 as set out in Table 2.7 of the Core Strategy is 98 units and the Quantum of zoned land required to accommodate this additional growth is 5.5 ha.</p> <p>The additional household forecast and quantum of zoned land required, fails to take account of current planning circumstances and the pending SHD application by Dwellings for 156 units on 6.4ha. at 36 units per hectare.</p> <p>The site was acquired from Limerick City and County Council under contract for the express purpose of developing residential, dependent on providing/maintaining easements and wayleave for the provision of infrastructure through the site. Dwellings has entered into contract of sale on the express understanding that the site is developable in principle under the provisions of the Limerick County Development Plan.</p> <p>The site is currently zoned for Residential use in the current Adare Local Area Plan and will contribute to sequential</p>		<p>1. Core Strategy: Adare is identified as a Level 4 Settlement in the Draft Plan and has a Local Area Plan that governs planning policy for Adare. The existing Local Area Plan is the Adare Local Area Plan 2015 – 2021 (as extended), will be reviewed following the adoption of the Limerick Development Plan 2022 – 2028.</p> <p>The Core Strategy is developed around a framework of high-level population and household targets that are set out in the NPF, the NPF Implementation Roadmap, the RSES for the Southern Region and Section 28 guidance document ‘Housing Supply Target Methodology for Development Planning’, (DHLGH, December 2020). Housing allocations housing and population allocation are provided having regard to the potential of the settlement to absorb increased residential density and ensure no adverse impacts on the settlement arising from rapid growth due to inadequate services and infrastructure and car dependent development.</p> <p>The NPF sets out that the growth of settlements outside of the city and key towns shall not exceed 30% growth in NPO 3 c.</p> <p>Section 10(1A) of the Planning Act requires that the development plan includes a core strategy which: <i>“shows that the development objectives in the development plan are consistent, as far as practicable, with national and regional development objectives set out in the National</i></p>

	<p>development and a compact core. The SHD will exceed the Core Strategy, a material consideration by An Bord Pleanala. Contrary to the Draft Development Plan Guidelines, the draft Plan does not reflect the expected development outcomes of the SHD. The submission requests the provisions of the Core Strategy be amended.</p> <p>The submission includes a letter from Dwellings in relation to their successful tender to develop the lands, the ready application to be submitted and the Core Strategy issue</p>	<p><i>Planning Framework and the regional spatial and economic strategy and with specific planning policy requirements specified in guidelines under subsection (1) of section 28”.</i></p> <p>The growth identified for Adare in the Draft Plan was 28.89%, above the 2016 population figure. The Core Strategy has been updated in response to the OPR Submission and the Adare housing figure has been amended to take into account extant permissions.</p> <p>The Adare LAP 2015-2021 (as extended) when reviewed will be required to adhere the core strategy figures established as part of the Development Plan process and land will be zoned to reflect identified capacity and in accordance with proper planning and sustainable development.</p>
Chief Executive’s Recommendations		
1. Core Strategy updated in line with OPR Submission No. 225.		
SEA/ AA Response		
N/A		

No. 276	Ref. & Name/ Group:	LCC-C62-276 Cllr. Eddie Ryan
Submission/ Observation Summary		Chief Executive’s Response
<p>1. Galbally: The following is recommended: “Flooding has been identified as a potential threat in the village and any development proposals within such areas shall comply with the relevant flood guidelines. There will be a presumption against inappropriate development in these areas”.</p>		<p>1. Galbally: The OPW minor works allocation for 2021 is for Ballinatona, Galbally is off the R663. The OPW maps www.Floodinfo.ie identify a recurring flood event at two areas in Galbally associated with the Suir Catchment. The local area engineers have advised that they have no knowledge of any significant flooding issue in Galbally village.</p>

	<p>As proposed, this is inappropriate as it is not clear where "these" areas refer to and may hinder development proposals. Each application should be decided on its own merits and on a case-by-case basis. The wording does not allow for this. Any technical issues regarding flooding or otherwise can be resolved with technical/engineering solutions.</p> <p>2. Settlement Boundary: The observation requests that the village boundary be extended to include a property and associated recycling site to the north west of the village on the Tipperary Road. These recycling facilities and property are absolutely within the village settlement and served by a footpath and street lighting. It may also make sense to include the dwelling beyond this property for completeness as the last dwelling on this street.</p>	<p>Notwithstanding, Section 8.3 <i>Flooding, Flood Risk Management and Water Management</i> of the Draft Plan establishes criteria to be adhered to in such instances where there is a potential risk of flooding. In all cases where there is a risk of flooding compliance with the Flood Risk Management Guidelines will be required. Such proposals will be assessed on a case-by-case basis supported by relevant flood risk analysis, as applicable.</p> <p>2. Settlement Boundary: Site inspection determined that the bring centre and adjoining structure in use as an upcycling unit form part of the functions of the village and the area provides parking for the adjacent Sli na Slainte walking route. This area is within the speed limit with pedestrian connectively back to the village centre. It is recommended that the village boundary be revised to include the bring centre, adjoining structure and dwelling house, which function as an active part of the village.</p>
	Chief Executive’s Recommendations	
	<ol style="list-style-type: none"> 1. No change; 2. Amend the Galbally settlement boundary to include the bring centre, adjoining structure and dwelling house. 	
	SEA/ AA Response	
	No significant effect. The settlement boundary is being altered to include a recycling facility.	

No. 278	Ref. & Name/ Group:	LCC-C62-278 Hutch O’Malley Consulting Ltd. On behalf of William O’Brien
	Submission/ Observation Summary	Chief Executive’s Response
	1. Draft Plan: The submission reviews the Draft Plan, with specific reference to zoning in Cappamore. The population	1. Zoning: The core strategy provides a housing allocation for Cappamore of 65 units to the village over the plan period. The

<p>analysis largely ignores the population fluctuations in rural areas, increased one parent household and how this should translate to village or town population growth. Villages over 15 mins drive from the city have suffered and experienced minimal growth, exacerbated by Irish Water. The KPMG analysis is based on 2016 Census data. Conclusions on one off housing demand was stark and must be viewed in the context of growing likelihood of future national restriction on one off housing.</p> <p>The 200 unit per annum demand for one off housing must be accounted for. Most villages have experienced a sharp increase in social housing provision. Very few private housing schemes or serviced sites have been delivered, purchases and development by the Local Authority or Approved Housing Bodies have primarily been through the purchase of houses in the settlements. Population growth in a lot of the settlements has been artificially inflated by the Local Authority and Approved Housing Body input. The percentage of social housing proposed for Cappamore-Kilmallock Municipal District is 7.3%. Of this, 36 units or 13.6% of the total is due to be granted in Cappamore in the coming weeks.</p> <p>The property price register since 2016 indicates that there was a relatively consistent 50-50 split between rural and settlement purchases. It is clear that the citizens of communities in east Limerick have a very strong preference for housing outside of the settlements. It is thus imperative</p>	<p>primary focus of the development strategy is to support the proportionate growth of Cappamore and to strengthen and consolidate the village in accordance with National Policy Objective 3c of the NPF.</p> <p>The allocation of population growth targets seeks to ensure that population growth is sustainable and consistent with the scale of the settlement in accordance with the higher tier plans of the Regional and Spatial Economic Strategy for the Southern Environs and the National Planning Framework. It also ensures the settlement can accommodate the additional growth in a compact manner without damage to the character of the settlement and the carrying capacity of its environment and supporting infrastructure.</p> <p>The zoned lands identified in the Draft Plan are sequentially located adjacent to the village core consistent with 3c of the NPF. The zoning of lands the subject of this request is removed from the core area would be contrary to compact growth and proper planning and sustainable development.</p>
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<p>that the development plan encourages development in villages.</p> <p>The 5 settlements in the northern part of the Cappamore-Kilmallock Municipal District need to be providing about 800 units in the lifetime of the plan. Assuming 150 units in the Caherconlish Local Area Plan only 437 units are zoned for across these settlements.</p> <p>The submission outlines the Plan’s provisions in relation to Cappamore. The potential provision of a nursing home and independent living units should not have any influence on the serviced sites zoning provision. The “serviced sites” provision is to infill in a ghost estate rather than sustainable development of high-end residential units to attract middle class re-population.</p> <p>The submission details Objective SS O11 and SS O16. Each site earmarked for development in Cappamore has been reviewed, concluding that the vision for Cappamore for 2028 is 12 private families, 50% elderly accommodation development and nearly 40% social housing development.</p> <p>Significant areas have been de-zoned to the west of the village, potentially due to water pressure or lack of access to separated surface water infrastructure.</p> <p>The submission includes a comparison of</p>	
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<p>Murroe and Castleconnell.</p> <p>For a rural village such as Cappamore, growth must be focused on job creation along with housing. The NDP encourages a focus on ICT job provision, meaning high end manufacturing or high-quality office space.</p> <p>The submission identifies lands, which are located to the north of the village, adjacent to the soccer pitch, library, community centre, fire station and small car garage. These lands previously had a master plan layout agreed with Shannon Development for an E-town business park and residential use.</p> <p>The lands were previously zoned in the 2005 Variation. In 2011 due to concerns regarding flood risk the lands were de-zoned due to inaccurate flood risk maps and/or incomplete OPW work, which are now completed and the lands are not at risk.</p> <p>The lands have access to an overflow point for surface water, good quality drainage for SUDS, public foul sewer accessible by gravity, a potable water main across the road, existing road and pedestrian access.</p> <p>Cappamore has never been provided with a business park, innovation hub or any significant business development, the village has lost a secondary school and seen the primary</p>	
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	<p>schools amalgamate while the satellite schools of Bilbao and Tenaterriffe have grown. The level of house construction has been limited and either Council development or low-quality housing. The surrounding rural area has seen stable populations and consistently score above average on the Pobal Index. The village has suffered from decades of poor planning and low-end residential development.</p> <p>The site proposed to be zoned would provide high quality serviced sites as envisaged by the development plan, and the location would solidify the core of the village while providing a much-needed facelift to two approach roads</p>	
Chief Executive’s Recommendations		
1. No change.		
SEA/ AA Response		
N/A		

No. 285	Ref. & Name/ Group:	LCC-C62-285 Robert Gubbins
Submission/ Observation Summary		Chief Executive’s Response

	<p>1. Rural Housing: The observation queries whether there is provision in the Plan for granting applications on rural lands where the applicant has shown a requirement for a purpose-built house due to special needs requirements, such as an autistic child.</p>	<p>1. Rural Housing: Section 3.6 of the Draft Plan sets out the policy in relation to Rural Housing and sets that development proposals will be evaluated in accordance with the provisions of the Sustainable Rural Housing Guidelines for Planning Authorities, 2005 (and any amendment thereof) and Circulars SP 05/08 and PL 2/2017. Furthermore, Objective SS O17 sets out in Part 3 that persons with a demonstratable exceptional need to live in a rural area, will be considered. The specific details of an individual planning application would be required to be assessed as part of the Development Management process.</p>
Chief Executive’s Recommendations		
1. No change.		
SEA/ AA Response		
N/A		

Theme 7: Tourism, Arts and Culture

No. 2	Ref. & Name/ Group:	LCC-C62-2 Catherine Chamberlain	
Submission/ Observation Summary		Chief Executive’s Response	
<p>1. Signage: Villages, towns and cities have “Welcome” signs on entering, but there is no sign to say “Goodbye” or strike through on exiting.</p> <p>Roads have signs stating what rivers are being crossed, but no signs to say what mountain ranges are visible.</p> <p>2. Pedestrian Access: A footpath or footbridge across the river in Adare is required. Many tourists want to walk to Desmond Castle or locals to the Golf Club.</p>		<p>1. Signage: The Planning Authority notes the issue raised. However, this issue is outside the remit of the Draft Development Plan and has been referred to the relevant Section of the Local Authority for consideration.</p> <p>2. Pedestrian Access: The bridge in Adare is a Recorded Monument, LI021-032002, protected under the National Monuments Act. It is also in close proximity to Adare Castle, which is a National Monument (No.622) in State ownership. The bridge was rebuilt in the mid 19th century, but it retains much of its late 14th century fabric.</p> <p>Pedestrian access across the bridge is very curtailed due to the volume and type of traffic, although intermittent pedestrian refuges were provided in the 19th century widening. However, there are a number of issues from an archaeological, visual and safety perspective in relation to the provision of pedestrian connectivity in this area.</p>	

		Pending the alleviation of heavy traffic following construction of the by-pass, the provision of pedestrian access could be evaluated. However, this is unlikely to take place over the lifetime of the proposed Draft Plan.
	Chief Executive’s Recommendations	
	1 – 2. No change.	
	SEA/ AA Response	
	N/A	

No. 45	Ref. & Name/ Group:	LCC-C62-45 Patrice and Conor Heffernan	
	Submission/ Observation Summary		Chief Executive’s Response
	<p>1. Location of Campsites/Holiday Accommodation Parks: The Development Plan confines the future developments of holiday accommodation to existing towns, villages and settlements. Campers consider that camping/holiday accommodation parks should be in rural locations. Limerick currently has only two campsites, both are in rural areas and have appealing surroundings.</p> <p>The observer is not in favour of any proposal that would limit the future development of campsites to urban areas. Limerick needs to have more campsites/holiday accommodation parks to take advantage of the amenities the county has to offer, such as the Limerick Greenway, The Wild Atlantic Way, Ballyhoura. If confined to urban areas, it would not have the same appeal. Camping locations are predominantly rural.</p>		<p>1. Location of Campsites/Holiday Accommodation Parks: The provision of tourist accommodation to facilitate the expanding tourist industry is encouraged in appropriate locations by the Planning Authority. Objective ECON O40 Location of Tourism Accommodation supports the location of holiday home accommodation within settlements, which best supports the development of vacant and derelict properties and in doing so improves the vitality and viability of these settlements.</p> <p>In this regard, limerick has a dispersed settlement pattern with capacity to accommodate tourist accommodation within or adjoining these defined settlements, which by virtue of their dispersed nature are located within relative proximity to tourist attractions across the County.</p>

	<p>Limerick will disadvantage itself as a holiday destination if this proposal goes through.</p>	<p>In relation to Camping, the Council acknowledge that there is no specific policy support within the Draft Plan to support Campsites. Further to the significant and continued investment in tourism related infrastructure, the resultant vibrancy of the tourism product and associated increase in demand for tourism accommodation. The Council recognises that the provision of sites for caravans and camping is an important element in the accommodation of holiday makers and the Planning Authority is keen to see the provision of quality tourist and visitor accommodation for all price ranges and for a variety of lifestyles.</p> <p>The Council considers that consolidating rural settlements leads to clear socio economic and ecological benefits. However, having regard to the above, it is considered appropriate to expand Objective ECON O40 to include all types of tourism accommodation including campsites and to clarify that tourist accommodation should be located on lands within or adjoining existing settlements. Thereby reflecting the requirement to protect and enhance existing towns and villages where services and amenities exist and safeguard the natural, built and cultural landscape of Limerick and its environment.</p> <p>The provision of tourism development is further supported in the Draft plan including Section 11.9.5 Caravan/Glamping/Camping sites. Similarly, the Draft Plan supports appropriate tourism ventures, including niche tourism ventures (Section 4.8.4) and farm diversification (Objective ECON 030). Multi-partner coordination is critical to ensure the delivery of an integrated strategy that</p>
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	addresses the myriad of issues that must be addressed in growing the tourism industry in Limerick.
Chief Executive’s Recommendations	
<p>1. Amend Objective ECON O40 a) Location of Tourism Accommodation to support the development of tourism facilities in appropriate locations, as follows:</p> <p>a) Ensure that holiday home developments should be concentrated within existing towns, villages and settlements <u>holiday accommodation including campsite (i.e. static and touring caravans, campervans, glamping and tents) developments should be concentrated within or adjoining existing towns, villages and settlements</u>, where they can best support the provision of services and minimise the impact on the open landscape. Such developments should respect the existing fabric of the settlement, both in scale and design.</p>	
SEA/ AA Response	
The amendment regarding campsites ensures that they will be located in places where they might be better serviced and have a positive benefit for local shops and services. This would have both positive environmental and economic benefits.	

No. 77	Ref. & Name/ Group:	LCC-C62-77 HRA Planning on behalf of Neville’s Bar and Restaurant
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Tourism: The Draft Plan addresses both urban and rural tourism as separate but interrelated industries, it does not detail how it will support and promote rural tourism. The submission acknowledges that the Draft Plan seeks to make vital connections between attractions, supports large scale group tourism, recognises the heritage value of towns and seeks to harness the growth of heritage sites and amenities.</p>	<p>1. Tourism: The purpose of the Draft Plan is to sets out a vision and framework for the future of Limerick through a combination of policies and objectives. The implementation of relevant tourism policies and objectives is set out Chapter 4 Section 3 of the Draft Plan and is supported by The Limerick Tourism Development Strategy 2019-2023, the Limerick 2030 Economic and Spatial Plan for Limerick and the River Shannon Tourism Masterplan. These key</p>

<p>However, there are no proposals for diversification and advancement of rural tourism.</p> <p>A move to more theme based and special interest tourism must be promoted in the Draft Plan. Consideration should be given to the promotion and advancement of Food and Culinary Tourism in Limerick, similar to other counties including Mayo and Cavan. Food tourism is the act of travelling for a taste of place in order to get a sense of place. A holistic approach is promoted on the basis of the fusion of food and social interaction, through the promotion of a number of strands, including restaurants, cookery schools and on-site accommodation.</p> <p>2. Business Concept and Proposal: Neville’s Bar and Restaurant is located at Neville’s Cross outside Kilfinny near Adare in the Ballyhoura area. The general area is heavily promoted as a tourist destination. The Bar and Restaurant already provides a tourist offering which is also a significant service to the local community, providing high quality food at affordable prices with a focus on large groups including golfers, bikers, walkers and equestrians.</p> <p>The business is in a rural area classified as an Area of Strong Agricultural Base under the current County Development Plan 2010-2016 (as extended). It employs 30 no. people and up to 40 no. over Christmas.</p>	<p>strategic plans will form the basis for the development of tourism in Limerick.</p> <p>The Draft Plan does not limit or restrict the potential scope for tourism development in the Limerick and acknowledges the diverse range of potential within Limerick. The Draft Plan includes Objective ECON O30 which supports farm diversification and Objective ECON O35 which supports Limerick Food Strategy, the aim of which is to develop and enhance Limerick’s reputation for outstanding food and drink, by supporting Limerick’s food and drink producers.</p> <p>2. Business Concept and Proposal: Section 4.8.4 acknowledges the potential to develop niche forms of tourism. Section 11.9.2 <i>Sustainable Forms of Niche Tourism and Recreation</i> establishes that the Council will promote sustainable forms of niche tourism and recreation in the countryside. These include theme holidays and group-based activities that take advantage of local and natural resources. Such proposals will be assessed on a case-by-case basis, in accordance with development management criteria.</p> <p>As a priority, the Council recognise the benefit of consolidating tourism development, in particular, accommodation to serviced towns and villages, where services and amenities exist and the associated economic benefits are returned to the local area; this approach is reflected in the relevant policy and objectives as set out</p>
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<p>In 2015 significant intensification of use was granted, notwithstanding its location outside of a defined settlement, to include use of commercial kitchen and to diversify from public house to include a restaurant.</p> <p>Survival of the restaurant business in this rural location is dependent on securing overnight on-site accommodation as it seeks to expand and offer culinary weekends and cookery classes, developing culinary tourism and partnerships with other key establishments to offer a diverse culinary experience in County Limerick. There is inadequate short term, self-catering accommodation in the proximity. There are no outbuildings or other buildings in need of repair or restoration which could provide accommodation. A change in the Draft Plan is required to address unique situations such as this.</p> <p>3. A New Approach: A more proactive and flexible approach to rural tourism must be adopted in the new Development Plan. Research shows that all elements of a holiday must be available and intrinsically linked for the tourist’s experience, including accommodation, food and activities. Accommodation and food absorb 66 cents of every euro rural tourists spend.</p> <p>To support the development of Limerick as a ‘Foodie Destination’ the Draft Plan should commit to the implementation of the Failte Ireland ‘Food Tourism</p>	<p>in the Draft Plan and is consistent with national policy to promote compact growth.</p> <p><i>Overnight Accommodation</i></p> <p>The Council acknowledge the existing business at this location. However, the provision of short term, self-catering accommodation at this rural location removed from any settlement and the associated shared services and amenities is contrary to the principle of compact growth and sustainable development. This type of type of development would be more suitable to neighbouring settlements which have the appropriate services and supports in place.</p> <p>3. A New Approach: It is recognised that the Draft Plan does not include reference to The Food Vision 2030 Strategy. This is a new ten-year Strategy for the Irish agri-food sector (taken to include primary agriculture, food and drink processing and manufacturing, fisheries, aquaculture and fish processing, forestry and forestry processing and the equine sector). This will deliver significant benefits for the Irish agri-food sector itself, for Irish society and the environment. In demonstrating the Irish agri-food sector meets the highest standards of sustainability – economic, environmental, and social – this will also provide the basis for the future competitive advantage of the sector.</p>
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<p>Development Strategy 2018-2023 and the Limerick City & County Council Food Strategy 2016-2018, in conjunction with the Tourism Section of the Council and other stakeholders.</p> <p>4. Proposed Changes: The submission requests the following policies and objectives are included/amended in Section 3, Chapter 4 A Strong Economy:</p> <p>(i) Objective ECON-----: It is an objective of the Council to:</p> <p>a. Promote Limerick as a ‘Foodie Destination’ and to implement the Fáilte Ireland ‘Food Tourism Development Strategy 2018-2023’ and the Limerick City and County Council Food Strategy 2016-2018 regarding the development of food tourism in conjunction with relevant stakeholders.</p> <p>b. Support the development and expansion of tourism-related enterprise, including visitor attractions, services and accommodation and food and craft businesses, particularly</p>	<p>Furthermore, it is considered the Draft Plan should also include reference to the Failte Ireland ‘Food Tourism Development Strategy 2018-2023 which aims to increase the availability of great Irish food and drink experiences across the country, to increase the number of tourism businesses engaged with development initiatives and, overseas, to increase and enhance the awareness and perception of Ireland’s food and drink offering.</p> <p>It is considered appropriate that this objective be amended to include reference to Food Vision 2030 Strategy and the Failte Ireland ‘Food Tourism Development Strategy 2018-2023.</p> <p>4. Proposed Changes: The proposed changes are noted and while the Council recognise the importance of the tourism industry for Limerick, the development and expansion of tourism should be in the appropriate location and of an appropriate scale.</p> <p>(i) The Council recognise the importance of the development of Limerick as a food destination and consider it appropriate the Section 4.7.20 Limerick’s Food Sectors and Objective ECON O35 be updated accordingly and an additional objective included promoting limerick as food destination.</p>
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<p>those offering a visitor experience, such as tastings, tours and demonstrations.</p> <p>(ii) Objective ECON OXX: It is an objective of the Council to cluster niche services and infrastructure in visitor destination locations, including locations where the service or tourist attraction currently exists.</p> <p>(iii) Objective ECON O40 (additions underlined): It is an objective of the Council to:</p> <p>a. Ensure that holiday home developments should be concentrated within existing towns, villages and settlements, <u>where possible</u>, where they can best support the provision of services and minimise the impact on the open landscape. Such developments should respect the existing fabric of the settlement, both in scale and design.</p> <p>b. Proposals to reinstate, conserve and/ or renovate existing, vacant, derelict or disused buildings for holiday accommodation in both urban and rural areas, will be considered subject to normal planning and environmental criteria.</p> <p>c. <u>Recognise the need for limited tourist accommodation outside of an established settlement in certain instances, where an existing tourist service / attraction already exists and tourist accommodation is necessary to support the continued viability of the tourist service / attraction.</u></p>	<p>(ii) The Council do not consideration the insertion of this objective appropriate, the clustering of niche services and infrastructure in visitor destination locations may not be appropriate and should be considered on a case-by-case basis.</p> <p>(iii)The Council do not consider the insertion of this objective appropriate, see repose above to Submission No. 45, which suggest the revision of a (a) as outlined above.</p>
Chief Executive’s Recommendations	
1. No change;	

2. Amend Section 4.7.20 Limerick’s Food Sectors to include the following text:

The Agri-Food sector is one of Limerick’s most important indigenous industries, playing a vital role in the local economy. Limerick also supports the rich heritage of market towns with the potential to revive farmer markets to support local SMEs and food tourism. The Council supports the Department of Rural and Community Development’s Action Plan for Rural Development (APRD), which focuses on the continued development of the agri-food sector through implementation of Food Wise 2025.

The Food Vision 2030 Strategy is a new ten-year Strategy for the Irish agri-food sector (taken to include primary agriculture, food and drink processing and manufacturing, fisheries, aquaculture and fish processing, forestry and forestry processing and the equine sector). Its Vision is that Ireland will become a world leader in Sustainable Food Systems (SFS) over the next decade. This will deliver significant benefits for the Irish agri-food sector itself, for Irish society and the environment. In demonstrating the Irish agri-food sector meets the highest standards of sustainability – economic, environmental, and social – this will also provide the basis for the future competitive advantage of the sector. By adopting an integrated food systems approach, Ireland will seek to become a global leader of innovation for sustainable food and agriculture systems, producing safe, nutritious, and high-value food that tastes great, while protecting and enhancing our natural and cultural resources and contributing to vibrant rural and coastal communities and the national economy.

The Failte Ireland ‘Food Tourism Development Strategy 2018-2023 aims to increase the availability of great Irish food and drink experiences across the country, to increase the number of tourism businesses engaged with development initiatives and, overseas, to increase and enhance the awareness and perception of Ireland’s food and drink offering. In order to develop and improve the food and drinks experiences in pubs the product must be authentic and the service must be of high quality.

The Food Strategy for Limerick 2016–2018 is a plan to develop and enhance Limerick’s reputation for outstanding food and drink by supporting Limerick’s food and drink producers. The Food Strategy aims to encourage, support and develop Limerick’s rural and urban food scene through information, education and marketing.

3. Replace Objective ECON O35 as follows: ~~Limerick Food Strategy It is an objective of the Council to support Limerick’s food and drink producers in accordance with the aims/goals established under the Food Strategy for Limerick 2016–2018 and any update thereto~~ a) Support *The Food Vision 2030 Strategy* and the Food Strategy for Limerick 2016–2018 and any update thereto, the aim of which is to develop and enhance Limerick’s reputation for outstanding food and drink, by supporting Limerick’s food and drink producers and to ensure the development of Limerick as leader of innovation for sustainable food and agriculture systems, producing safe, nutritious, and high-value food that tastes great, while protecting and enhancing our natural and cultural resources

	<p><u>and contributing to vibrant communities and the economy. b) Support Fáilte Ireland’s ‘Food Tourism Development Strategy 2018-2023 and any update thereto.</u></p> <p>4. (i) Include a new objective as follows: <u>Promote Limerick as a food destination and to implement the Fáilte Ireland ‘Food Tourism Development Strategy 2018-2023’ and the Limerick City and County Council Food Strategy 2016-2018, regarding the development of food tourism in conjunction with relevant stakeholders.</u></p> <p>(ii) No change;</p> <p>(iii) Amend Objective ECON O40 to as follows a) Ensure that holiday home developments should be concentrated within existing towns, villages and settlements <u>holiday accommodation including campsite (i.e., static and touring caravans, campervans, glamping and tents) developments should be concentrated within or adjoining existing towns, villages and settlements,</u> where they can best support the provision of services and minimise the impact on the open landscape. Such developments should respect the existing fabric of the settlement, both in scale and design.</p>
	<p>SEA/ AA Response:</p> <p>The supporting text for the rural food industry helps to promote local quality food production, which would have both beneficial economic and environmental benefits reducing the amount of travel for food, but also helping to promote local sustainable industry. The recommendation that holiday accommodation, including camping and caravans, should be located within or adjacent to settlements is consistent with the objectives for compact growth.</p>

No. 101	Ref. & Name/ Group: LCC-C62-101 Grainne O’Keeffe	
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Tourism: The observation requests inclusion of a policy to promote the development of Motorhome/Campervan parking and service areas (‘Aires’ in France and Europe). This would support tourism growth and generate economic benefit.</p>	<p>1. Tourism: The Draft Plan is open to supporting all camping elements subject to compliance with DM standards Section 11.9.5. In this regard, it is recommended that Section 11.9.5 Caravan/Camping/Glamping be amended to include reference to Aires.</p>

	<p>The service area would include overnight parking, grey water disposal points, chemical toilet disposal, fresh water supply and electric hook up points for a fee. There were 12,793 licensed motorhome/campervans in Ireland in 2019, a 24.7% increase since 2105. There are 4,749 in Northern Ireland and 280,000 in the UK. With Covid 19 restrictions there has been a growing demand for self-contained tourist accommodation and an increase in staycations, this trend is likely to continue to grow.</p> <p>Limerick is well located to maximise the tourism potential of passing motorhomes on the Wild Atlantic Way or the N21 to Kerry. Tourists may not consider Limerick for a week’s holiday, but they would be more likely to stop overnight at a conveniently located Aire, growing the local economy.</p>	
Chief Executive’s Recommendations		
1. Amend Section 11.9.5 first line to include reference to Motorhome/Caravan parking (Aires) .		
SEA/ AA Response		
No effects as these would be located in or close to areas where they could be serviced. See SEA/ AA Response to Submission No. 77 above.		

No. 104	Ref. & Name/ Group:	LCC-C62-104 Billy Roberts
Submission/ Observation Summary		Chief Executive’s Response
1. Tourism: It is considered that that the location of certain holiday home developments should not and could not be concentrated within existing towns, villages and settlements.		1. Tourism: See response to Submission No. 45.

	<p>How is this sustainable for camping and glamping? For glamping and those types of retreats they need to be in the middle of nowhere, so it is peaceful and you can see the stars. To restrict these to towns is a waste of time. Good company or sites will not be found in towns and villages, where you can stay in a hotel or AirBnB. It does not make sense to not allow an exclusive glamping site away from towns. The observer would not go camping or glamping if it was near a town or village. You pay to get away in the countryside. Unless you live in a town or have a property in a village you cannot contribute to tourism within your area.</p>	
Chief Executive’s Recommendations		
<p>1. Amend Objective ECON O40 as follows a) Ensure that holiday home developments should be concentrated within existing towns, villages and settlements holiday accommodation including campsite (i.e., static and touring caravans, campervans, glamping and tents) developments should be concentrated within or adjoining existing towns, villages and settlements, where they can best support the provision of services and minimise the impact on the open landscape. Such developments should respect the existing fabric of the settlement, both in scale and design.</p>		
SEA/ AA Response		
See SEA/ AA Response to Submission No. 77 above.		

No. 105	Ref. & Name/ Group:	LCC-C62-105 Larry de Cleir
Submission/ Observation Summary		Chief Executive’s Response
<p>1. Tourism: In addition to investment in infrastructure, Limerick would benefit from a proactive approach to enhancing confidence and self-assuredness of citizens. Limerick can build on its sporting endeavours, traditionally</p>		<p>1. Tourism: The Council recognises the importance of tourism for Limerick from both an economic and social perspective and will continue to work with all the relevant stakeholders to develop and market tourism products and the tourism industry throughout Limerick.</p>

<p>rugby and now hurling. Limerick has the potential to become a major centre for river and sea boating activity, being uniquely placed on the River Shannon (inland) and the Estuary (sea).</p> <p>(i) 4.8.1 Urban Tourism City Centre and Environs: Urban tourism is enabled not only by festivals, historic building, heritage sites also etc. but also by perceived confidence and self-assuredness of citizens, reflected in citizens’ choices, and manifest in entrepreneurship, creativity, spirit of generosity, embracing new ideas and leadership in same, common sense, environmental awareness, people centred approach to planning, awareness and respect for history, genuine care for vulnerable citizens, high level and usage of non-car transport, low rates of anti-social behaviours and safe streets by night and day. As part of the Development Plan, the Council will build on the feel-good factor that is currently in Limerick due to such confidence/self-assuredness being evident in sport and <i>initiate a forum for interested citizens to explore how such traits can contribute to Limerick’s ongoing development as a tourist destination.</i> Such action would also grow the visibility of Limerick.</p> <p>(ii) The following are examples of reputation enhancement that would cost very little and yield significant dividends:</p>	<p>(i) 4.8.1 Urban Tourism City Centre and Environs: The Draft recognises the wide scope of urban tourism and also the importance of the development of this area to support the development of urban areas. The idea of a forum for interested citizens to explore how such traits can contribute to Limerick’s ongoing development as a tourist destination is beyond the scope of the Development Plan, the Council will continue to work with relevant stakeholders and interested parties to progress urban tourism in Limerick.</p> <p>(ii) Reputation Enhancements:</p> <ul style="list-style-type: none"> - Renaming Limerick City and County Council to Limerick Council: Noted, however this is outside the remit of the Development Plan;
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<p>- Renaming Limerick City and County Council to Limerick Council, boosting the integrity and identity of the Limerick brand;</p> <p>-Renaming of King John’s Castle to Limerick Castle, providing a focus on Limerick rather than King John and would indicate the pride in our name. Apart from small costs in rebranding, publicity etc. It would be cost free;</p> <p>-Revitalising Limerick Lace to capitalise on the current interest in arts and crafts. An Arts/Crafts Festival focusing on lacemaking, but also including different North Munster crafts should be considered.</p> <p>(iii) Critical success factors for the development of Limerick as a WAW Gateway City include:</p> <p>-Continuous development of new visitor experiences across the day and evening economy – Is there anything specific in mind here? Would a city centre cinema be viable? Safe streets are essential for a thriving evening economy.</p> <p>-The development of the city as a coherent visitor destination through a Wayfinding, Orientation and Signage Plan in 2021 – Very good idea.</p> <p>-The development of new globally significant attractions and activities that provide reasons to visit Limerick – Anything else to the Rugby Experience in mind here?</p> <p>-Capitalising on the cultural and urban edge of Limerick to build a global tourism positioning – What does this mean? Is this an error/typo?</p>	<p>- Renaming of King John’s Castle to Limerick Castle: Noted, however this is outside the remit of the Development Plan;</p> <p>- Revitalising Limerick Lace to capitalise on the current interest in arts and crafts. An Arts/Crafts Festival focusing on lacemaking: Noted, however this is outside remit of the Development Plan.</p> <p>(iii) Critical Success Factors for the development of Limerick as a WAW Gateway City include:</p> <p>- The Council will continue to support the development of new visitor experiences throughout Limerick. Objective ECON O12 sets out the preparation of a night time economy strategy for Limerick within the lifetime of the Plan.</p> <p>- Noted.</p> <p>- Within the lifetime of the Plan, there will be investment in tourism to develop tourism attractions and visitor experiences, the Draft Plan seeks to support this development.</p> <p>- Limerick City and County Council launched a new brand for Limerick – entitled Edge and Embrace, the Draft Plan seeks to build on this brand, nationally and internationally.</p>
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<p>-Maximising the tourism potential of the Medieval Quarter/Nicholas Street, Georgian Quarter and Market Quarter – The Georgian Quarter would need not only significant financial input but also a cultural change among citizens i.e. choosing to live and work in Newtown Pery.</p> <p>(v) 4.8.2 Rural Tourism: Limerick also boasts the fifth highest peak in Ireland – Galteemore and the route from the Anglesborough and Ballyanders is particularly attractive, rising over Lyracapull at 825m. A way-marked, safe Limerick Galtee Trail could be established joining the two towns to the Galtee peaks. This would not need major infrastructure work and could be marketed at families as well as hillwalkers.</p> <p>A task force within Limerick Council will meet stakeholders to see if Limerick can capitalise on the potential of the WAW and at the same time increase the international visibility of Limerick.</p> <p>(vi) Objective ECON O36 Tourism: include the following in Objective ECON O36: g) To adopt a leading role in Inland Waterways. Even though the Shannon flows through or borders many different counties, Limerick people are frequently referred to as ‘Shannonsiders’. In many Irish people’s thinking, Limerick is synonymous with Shannon. For example, there is a nationally recognised rugby club of that name, an</p>	<p>- The Council continues to work with stakeholders, home owners and developers promote and redevelop the Georgian Quarter, through the Living City Initiative and the CityXChange programmes.</p> <p>(v) 4.8.2 Rural Tourism: Section 9.12 <i>Trails and Green Routes</i> establishes that Limerick has a range of hiking and biking trails and the Council is committed to further develop and promote this activity. Section 9.12 states that the Council will co-operate with relevant agencies and groups and landowners as appropriate, with a view to increasing such routes.</p> <p>Section 4.8 of the Draft Plan recognises the asset of the WAW and establishes a number of factors critical to the success of Limerick as a WAW Gateway City. The Council will continue to work with relevant stakeholder to progress the initiative.</p> <p>(vi) Objective ECON O36 Tourism: Noted. A key driver of the Limerick Tourism Strategy is to build on our ‘Waterways’. Embracing the River Shannon is identified as a key objective in the Draft Plan. This is supported in the Draft Plan and it is considered that the proposed text doesn't add to the objective.</p>
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<p>adjacent international Airport and many commercial ventures. Waterways Ireland and Failte Ireland will be major stakeholders in development of the inland waterways activity sector in Limerick by exploring the potential for increased accessibility to Limerick’s waterways for water-based tourism activity.</p> <p>With this in mind, a task force will be initiated to examine such potential. Future tourism strategy will be proactive in: ensuring the development of connections with Killaloe and beyond, with potential connection to Belfast, Limerick will actively lobby for the improvement and continued maintenance of the Grand and Royal Canals; seeking funding to refurbish the historic and beautiful Errina Canal, with a boat lift (toll) at Parteen Weir – O’Brien’s Bridge, thereby offering boaters an attractive, exciting and adventurous alternative to the current Head/ Tail Race through Ardnacrusha. Refurbishment of the Park Canal and locks, what used to be the Guinness Dock at Lock Quay, and adjacent to Clare St. Park to accommodate boaters from the Inland Waterways, and construction of a modern, secure marina at that location which would be safe, non-tidal, 10-12 mins walk from the City Centre.</p> <p>(vii) 4.8.3 Limerick Greenway: include the following text: (i) Extend the already highly successful Shannon Fields – Plassey walk/cycleway along what is now the Red Path, and then from bottom of Mill Rd. To Bishop O’Dwyer Bridge.</p>	<p>The initiation of taskforce/groupings in beyond the remit of the Development Plan process, the preparation of a new tourism strategy will occur as part of a separate process. The Council prepared a Tourism Development Strategy in 2019, these points are beyond the scope of the Development Plan.</p> <p>(vii) 4.8.3 Limerick Greenway: Strategic Objective 8 seeks to protect, enhance and connect areas of natural heritage, green infrastructure and open space for the benefits of quality of life, biodiversity, protected species and habitats, while having the potential to facilitate</p>
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	<p>This would necessitate a capital investment i.e. bridge over the Limerick – Ennis Railway line and necessary safety railings along the railway;</p> <p>H) Restoration of the Island Field Embankment so it can be used as a walkway and cycleway from Bishop O’Dwyer Bridge to Verdant Crescent/ Thomond Bridge, thereby extending the ‘Three Bridges’ walk;</p> <p>I) Twice yearly clearance of brushwood, brambles and other vegetation, leaving mature trees untouched, will be undertaken along the Shannon Fields – Plassey walk/cycleway to allow better views of the river for users of the facility. (Currently the river is actually invisible for much of the walk).</p>	<p>climate change adaptation and flood risk measures. The Council are currently preparing a Blue – Green Infrastructure Strategy, which seek to strengthen linkages and connections throughout Limerick, subject to feasibility, funding and viability.</p> <p>Where such options arise to enhance Greenway provision, there is policy support within the Draft Plan to implement.</p> <p>The maintenance of the green space is outside of the remit of the Draft Plan.</p>
	Chief Executive’s Recommendations	
	1. No change.	
	SEA/ AA Response	
	N/A	

No. 127	Ref. & Name/ Group: LCC-C62-127 Cllr. Michael Collins	
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Tourism: Limerick should become a Campervan and Camping friendly County in its promotion of tourism. Coupled with this policy, Limerick should consider putting</p>	<p>1. Tourism: See response to Submission No. 101.</p>

	<p>‘Aires’ in strategic places to facilitate campervan and motorhome users.</p> <p>Aires are mostly in public parking areas and private land, where motorhomes and campervan users may stop overnight for free or for a small fee. They symbolise the freedom of motor homing and welcome you into local communities, where you can stay at unique locations only available to motorhome travellers.</p>	
Chief Executive’s Recommendations		
1. Amend Section 11.9.5 first line to include reference to Motorhome/Caravan parking (Aires) .		
SEA/ AA Response		
No effects. These would be located in areas where they could be serviced.		

No. 131	Ref. & Name/ Group:	LCC-C62-131 Alan Ruttle
Submission/ Observation Summary		Chief Executive’s Response
<p>1. Chapter 4 A Strong Economy - Inadequacy of Objective ECON O40 Tourism Accommodation: The submission states this objective is unsuitable and fails to serve a new market and demand for alternative tourist accommodation, including glamping which is considered to be no longer a niche tourist product. The submission requests a new policy on camping/glamping including in rural locations where specific criteria is met including proximity to existing tourist attractions.</p>		<p>1. Chapter 4 A Strong Economy - Inadequacy of Objective ECON O40 Tourism Accommodation: See response to Submission No. 45 above and proposed amendments to ECON O40.</p>

	<p>The rationale put forward to support the request includes; opportunities for urban dwellers to experience rural amenity and nature; an alternative accommodation to hotels for young families and those seeking active pursuits; tourists expenditure in local economy, recent advancement in tourism promotion; the need to offer choice of accommodation to overcome the issue of the dominance of day trip tourists over longer stay; and the need to capitalise on the Shannon Estuary Way, the Wild Atlantic Way, Limerick as the Gateway City and the Munster Vales.</p> <p>2.Reduction of land area with settlement boundaries: The submission comments that the reduction of the area within the settlement boundary and associated zoning will increase land values within the settlement and market prices will not be feasible for investment in glamping in the settlement.</p>	<p>2.Reduction of land area with settlement boundaries: The Council is legally required to be consistent with the planning policy and objectives of the higher-level plans such as the NPF and the RSES. Both of these Plans have policies, objectives, to deliver compact growth, in order to achieve more sustainable development. Consequently, all settlement boundaries and zoning in the Draft Plan, have been reviewed to align with these higher-level plans and seek to achieve compact growth.</p>
Chief Executive’s Recommendations		
<p>1. Amend ECON O40, as follows: a) Ensure that holiday home developments should be concentrated within existing towns, villages and settlements holiday accommodation including campsite (i.e., static and touring caravans, campervans, glamping and tents) developments should be concentrated within or adjoining existing towns, villages and settlements, where they can best support the provision of services and minimise the impact on the open landscape. Such developments should respect the existing fabric of the settlement, both in scale and design.</p> <p>2. No change.</p>		
SEA/ AA Response		
See SEA/ AA Response to Submission No. 77 above.		

No. 138	Ref. & Name/ Group:	LCC-C62-138 Siobhan Mulvihill
	Submission/ Observation Summary	Chief Executive’s Response
	1. Chapter 4 A Strong Economy - Inadequacy of Objective ECON 040 Tourism Accommodation: The submission requests revised policy objective to facilitate camping/pod type tourist accommodation and such accommodation should not be restricted to settlements to encourage tourists to holiday in rural Ireland. The submission outlines that the offer for glamping/pod park cannot be delivered in a town/city and can only be achieved in the rural context.	1. Chapter 4 A Strong Economy - Inadequacy of Objective ECON 040 Tourism Accommodation: See response to Submission 45 above – and proposed amendments to Objective ECON 040.
	Chief Executive’s Recommendations	
	1. Amend Objective ECON 040, as follows: a) Ensure that holiday home developments should be concentrated within existing towns, villages and settlements holiday accommodation including campsite (i.e., static and touring caravans, campervans, glamping and tents) developments should be concentrated within or adjoining existing towns, villages and settlements, where they can best support the provision of services and minimise the impact on the open landscape. Such developments should respect the existing fabric of the settlement, both in scale and design.	
	SEA/ AA Response	
See SEA/ AA Response to Submission No. 77 above.		

No. 220	Ref. & Name/ Group:	LCC-C62-220 Cllr. Eddie Ryan
	Submission/ Observation Summary	Chief Executive’s Response
	1. Limerick Green/Blue Way: The submission outlines that Limerick Greenway is a fantastic resource for Limerick as a	1. Limerick Green/Blue Way: The Draft Plan recognises the benefits of developing our Blue Green Infrastructure (BGI). The BGI approach for

	<p>local amenity as well as a tourist attraction. This type of infrastructure should be supported, but also expanded or extended in all parts of Limerick. In particular the following is recommended in the submission:</p> <p>Include a specific policy in either Chapter 5 or Chapter 6, as appropriate regarding scoping and feasibility of a green and or blue way (or sections of the same) which is located in part in south east Limerick.</p> <p>Objective EH O12 ‘Blue Green Infrastructure’ could be expanded to include a section regarding the promotion, scoping and feasibility of a green and or blue way in the south east Limerick (and the surrounding areas). It is important to ensure all parts of County Limerick are afforded tourism and leisure amenities. In time there could be a fully connected and joined up blue/green way route which takes in parts of the entire county as well as the city.</p>	<p>Limerick also guides and assists in developing a wide blue/green infrastructure network and includes the following provisions to advance BGI across the City and County.</p> <p>Section 9.12 <i>Trails and Green Routes</i> establishes that Limerick has a range of hiking and biking trails and the Council is committed to further develop and promote this activity and states that the Council will co-operate with relevant agencies and groups and landowners as appropriate, with a view to increasing such routes.</p> <p>Section 5.3.7 Blue Green Infrastructure and Objective EH O12 <i>Blue Green Infrastructure</i> establishes that it is an objective of the Council to promote a network of green and blue infrastructure throughout Limerick.</p> <p>The Council consider that the text referenced above as expanded on in the Draft Plan provides ample scope to advance the BGI network across the entire County, including southeast Limerick, subject to resources and an adequate level of environmental assessments.</p>
	Chief Executive’s Recommendations	
	1. No change.	
	SEA/ AA Response	
	N/A	

No. 229	Ref. & Name/ Group:	LCC-C62-229 Geraldine Mulvihill
	Submission/ Observation Summary	Chief Executive’s Response

	<p>1. Tourist Accommodation: The observer outlines that they were shocked to see a policy that states all new tourism accommodation will be in a town or village only. As an older person, living in the countryside all their life, and now with health issues. The observer outlines that they still want to stay in rural places in the countryside, when they go away, as do so many others. Limerick has very little to offer right now and this policy will just set us back more years, while our Clare and Kerry neighbours who all have embraced camping and indeed glamping in the countryside. The observer states that the Council’s policy is wrong and needs to be fully changed.</p>	<p>1. Tourist Accommodation: See response to Submission No. 45 in this regard.</p>
Chief Executive’s Recommendations		
<p>1. Amend Objective ECON O40, as follows: a) Ensure that holiday home developments should be concentrated within existing towns, villages and settlements holiday accommodation including campsite (i.e., static and touring caravans, campervans, glamping and tents) developments should be concentrated within or adjoining existing towns, villages and settlements, where they can best support the provision of services and minimise the impact on the open landscape. Such developments should respect the existing fabric of the settlement, both in scale and design.</p>		
SEA/ AA Response		
See SEA/ AA Response to Submission No. 77 above.		

No. 230	Ref. & Name/ Group:	LCC-C62-230 Patrick Mulvihill	
Submission/ Observation Summary		Chief Executive’s Response	
<p>1. Glamping and Camping Sites: The observer considers that glamping and camping sites are only suitable for the</p>		<p>1. Glamping and Camping Sites – See response to Submission No. 45 in this regard.</p>	

	country sides. People like to get out from the cities and big towns to get away for privacy and explore the lovely countryside	
Chief Executive’s Recommendations		
1. Amend Objective ECON O40, as follows a) Ensure that holiday home developments should be concentrated within existing towns, villages and settlements holiday accommodation including campsite (i.e., static and touring caravans, campervans, glamping and tents) developments should be concentrated within or adjoining existing towns, villages and settlements, where they can best support the provision of services and minimise the impact on the open landscape. Such developments should respect the existing fabric of the settlement, both in scale and design.		
SEA/ AA Response		
See SEA/ AA Response to Submission No. 77 above.		

No. 239	Ref. & Name/ Group:	LCC-C62-239 Cllr. Francis Foley
Submission/ Observation Summary		Chief Executive’s Response
1. Objective ECON 040: Location of Tourism Accommodation: The location of certain tourism developments should not be only confined to towns, villages and settlements. There is a need for opportunities for certain types of appropriate development where they can be accommodated into the local area i.e. glamping/camping. This type of tourism benefits the rural economy.		1. Objective ECON 040: Location of Tourism Accommodation: See response to Submission No. 45 in this regard.
Chief Executive’s Recommendations		
1. Amend Objective ECON O40, as follows a) Ensure that holiday home developments should be concentrated within existing towns, villages and settlements holiday accommodation including campsite (i.e., static and touring caravans, campervans, glamping and tents) developments should be concentrated within or adjoining existing towns, villages and settlements, where they can best		

	support the provision of services and minimise the impact on the open landscape. Such developments should respect the existing fabric of the settlement, both in scale and design.
	SEA/ AA Response
	See SEA/ AA Response to Submission No. 77 above.

No. 245	Name/ Group:	LCC-C62-245 Arts Council/ An Comhairle Elaiaion
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Introduction: The Arts Council is guided by its own strategy ‘Making Great Art Work, 2016 - 2025’, which sets a vision for Ireland in which the Arts are valued as central to civic life, as a hallmark of local and national identity and as a signature of our creativity.</p> <p>The Arts Council is currently preparing a ‘Spatial Policy’, highlighting the importance of place and spaces where people live, work and come together for cultural participation, as an essential component of life and strongly integrating the sector into spatial development frameworks, and land uses planning policy, including through appropriate and effective provision and use of public open spaces.</p> <p>The submission details how the provision of Arts and Culture can contribute toward community and societal development in a number of ways including for example</p>	<p>1. Introduction: The Council recognises the value of Arts and Culture to the development of Limerick and continue to support and work with all the relevant stakeholders to progress the industry in Limerick. The value of Arts and Culture for Limerick is also recognised from both an economic and social perspective and is acknowledged in the Draft Plan and the policy support help further progress the sector. A number of strategies have been prepared by the Council in recent time and the plan seeks to support the implementation of these strategies.</p>

<p>place making and psychological wellbeing, creation of stronger communities and physical and economic value.</p> <p>Planning for culture and the arts is required under Section 10(2) of the Planning and Development Act 2000 (as amended) regarding objectives for the integration of the planning and sustainable development of the area with the social, community and cultural requirements of the area and its population.</p> <p>2. Observations on the Draft Development Plan: The Arts Council welcomes the Draft Plan’s recognition of the Arts and Culture and Objective SCSi O30. Greater recognition would be welcomed of the vital role and function of arts and culture generally in placemaking, spatial and community planning, and to the strategy approach and recommendations which are set out in the <i>Limerick Culture and Creativity Strategy 2018–2022</i>, and the <i>Limerick Cultural Strategy A Framework 2016-2030</i>. Greater reference, clarity and support in the Development Plan to the value placed on the function of arts and culture as referenced in these strategies and consideration to the implementation of spatial/physical ambitions of those strategies insofar as possible would be welcomed.</p> <p>3. Responsiveness to and Collaboration with County Arts Strategies: The collective consideration of the</p>	<p>2. Observations on the Draft Development Plan: The Draft Plan includes a number of interlinked strategic objectives, including supporting and facilitating revitalisation and consolidation of the city, towns and villages, through public realm and placemaking. Section 9.14 <i>Arts and Culture</i> recognises the value of the arts to the social, cultural and economic development and their impact, direct and indirect on communities. The implementation of quality place making is a development management function guided by the policies and objectives set in the Development Plan. The Draft Plan also recognises the Council’s pivotal role in the promotion and encouragement of the arts and culture, while prioritising direction for future development and investment. The Draft Plan includes specific Objective SCSi O30 <i>Art and Culture</i> to Support the objectives of Limerick Cultural Strategy 2016-2030, Limerick Local Economic and Community Plan 2016-2021 and Limerick City and County Heritage Plan 2030.</p> <p>3. Responsiveness to and Collaboration with County Arts Strategies: Limerick Culture and Creativity Strategy 2018–2022 and Limerick Cultural</p>
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Limerick Culture and Creativity Strategy 2018–2022 and Limerick Cultural Strategy A Framework 2016-2030 reflects the national and emerging approach to the value and function of arts and culture as an essential part of social capital and infrastructure. These strategies include ambitions which fall within the consideration of spatial and development planning and policy formulation in the Development Plan. Whilst the draft plan contains a number of welcomed policies in respect to community and amenity facilities, the Arts Council would welcome greater reference, clarity and support in the Development Plan to the value placed on the function of arts and culture as referenced in these strategies and consideration to the implementation of spatial/physical ambitions of those strategies insofar as possible.

4. Greater emphasis on Arts and Culture contribution towards placemaking: The Arts Council would welcome greater recognition of and reference in the Development Plan to the contribution that arts and culture infrastructure can have on placemaking, and the regeneration and revitalisation of settlements as an essential part of social infrastructure, contributing to the creation of healthy and attractive locations to live and visit including specific policy direction where necessary. Whilst acknowledging the provisions of Objective SCSO 030 (‘Art and Culture’) and Objective SCSO 031 (‘Public Art Strategy’) it is unclear how these objectives can and

Strategy A Framework 2016-2030 reflects the national and emerging approach to the value and function of arts and culture as an essential part of social capital and infrastructure, The Council do not see the necessity to reintroduce text, which already exists in these documents and provides policy support to implement these strategies.

4. Greater emphasis on Arts and Culture contribution towards placemaking: The principle of quality placemaking is embedded in the Draft Plan as identified in Section 1.3 Interlinked Strategic Objective 4. The Council recognise that creative placemaking integrates arts, culture and design activities into efforts to create quality developments. To this end the Draft Plan includes a number of objectives as referenced relating *Art and Culture*. Similarly quality placemaking is a cross cutting theme across the Draft Plan, in particular, Objective CGR O1 *Place-making, Universal Design and Public Realm*. The Council consider that the combined implementation of these policies and objectives will ensure the integration of Art and Culture in placemaking. To this end the role of

will be implemented and the assigned responsibility for same.

5. Co-ordination between Development Plan Policy Objectives:

The policy strategy and development management obligations to provide for appropriate space or infrastructure, (formal or informal), that could accommodate arts and culture infrastructure in the community, even as a secondary or ancillary activity, is currently unclear. The draft Plan does not outline any findings from the community facilities audit nor, does it set out a timeline for when the community facilities strategy may be prepared. The Council would welcome appropriate consideration of Arts and Culture provision in the context of such policy objectives and perhaps identification of specific areas in need of community and/or cultural infrastructure based on the findings of the community facilities audit undertaken and the development of the subsequent strategy.

6. Future Planning for Arts and Culture: The Arts Council would encourage the Local Authority to prepare a county register of arts and cultural assets, including clarification of infrastructure such as arts centres, museums, heritage buildings, artists’ workspaces, or public spaces and locations which either individually or collectively, contribute to the provision of arts and culture. This would provide a baseline database of assets and spatial distribution/concentration based on the type of activity,

the Draft Plan is establish policy provision, the implementation of which is a development management issue.

5. Co-ordination between Development Plan Policy Objectives: The Council have prepared a Community Facilities Audit, which will inform the future development Strategy on Community Facilities in Limerick (Objective SCS1 O6 Strategy on Community Facilities). This will be published in early 2022. The preparation of the Community Facilities Strategy will implement the findings of the Community Facilities Audit and provide enhanced policy support to address the identified deficits in community and/or cultural infrastructure in specific area. This will be complete within the lifetime of the Plan.

6. Future Planning for Arts and Culture: The Community Facilities Audit did consider the majority of Arts and Culture facilities. In addition, the Community, Tourism and Culture Directorate have committed that Limerick will undertake a dynamic database for a Cultural Audit and Map similar to the Dublin City Council Model. A new objective shall be included to support this work.

	level of provision, and key attributes to inform locational decisions and future needs and other service providers interested in co-location.	
	Chief Executive’s Recommendations	
	1. – 5. No change.	
	6. Include a new objective in Section 9.14 as follows: Objective SCS1 XX Undertake a cultural audit and create a dynamic database and associated map of existing and future locations and landmarks that incorporates or has the potential to incorporate cultural/creative arts.	
	SEA/ AA Response	
	The inclusion of an objective to undertake a cultural audit will addressing cultural issues. This is consistent with Environmental Protection Objective P1: Facilitate a good standard of quality of life for the population of Limerick, through ensuring high quality residential, recreational, educational and working environments.	

No. 261	Ref. & Name/ Group:	LCC-C62-261 Brian and Bridget O’Connell	
	Submission/ Observation Summary	Chief Executive’s Response	
	1. Attyflin Estate – Agri-Food Industry: This submission gives a detailed history of the Attyflin Estate set on over 250 acres near Patrickswell. The observer and present owners state that it is a working estate steeped in the traditions of food production and a thriving agri-business supplying to local and national customers. It is requested that it must be formally recognised as a key food production, tourism, education, job creation and business asset. It is the goal of this submission to highlight the history of Attyflin and demonstrate how the work carried out accords with new EU and National policy on	1. Attyflin Estate – Agri-Food Industry: The Council recognises the importance of the Agri – Food Industry throughout Limerick and continue to work with and support producers. The amendment proposed to Submission No 77 above addresses the issues raised.	

<p>sustainable, environmentally aware, food production and wider rural development initiatives. Harnessing the potential and sustainability of the Estate needs the support of Limerick City and County Council.</p> <p>This submission sets out the history of the estate as it passed from family to family over centuries. The observer states that the main sectors they are targeting to ensure Attyflin’s future viability are; Sustainable food production, respect and learn from history, education and training, live and learn, employment, eating local, rural development opportunities and innovate the future.</p> <p>2. Chapter 4: The observer states that many objectives are relevant to Attyflin, however, it is considered that amendments be made as follows:</p> <p>(i) Include explicit reference to “<i>Food 2030</i>” (EU) and “<i>Food Vision 2030</i>” in the Development Plan at ECON 35.</p> <p>(ii) Include explicit reference to “<i>Our Rural Future – Rural Development 2021-2025</i>” in the Development Plan within Chapter 4.</p> <p>(iii) Expand ECON P9 to sectors that would benefit from this objective to include horticulture and agri-tourism.</p> <p>(iv) The Development Plan should also recognise “<i>Agri-food-tourism</i>” as a specific asset in rural Limerick. Harnessing the day-to-day activities within agricultural and</p>	<p>2. Chapter 4: Comments noted and addressed below.</p> <p>(i) See response to Submission No. 77;</p> <p>(ii) “<i>Our Rural Future – Rural Development 2021-2025</i> is referred to through that Draft Plan;</p> <p>(iii) Objective ECON O9 relates to Rural Retail and provides support for retail ancillary to farm diversification and accordingly is addressed, any application will be assessed on a case-by-case basis;</p> <p>(iv) See response to Submission No. 77 above. The Draft Plan includes Objective ECON 030 which supports farm diversification and Objective ECON 035 which supports Limerick Food Strategy, the aim of which is to</p>
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<p>horticultural assets as attractions in and of themselves, is an obvious and important asset for sustainable tourism and a key building block for the future of Attyflin Estate as discussed above in the vision for the estate.</p> <p>(v) ECON 36 seeks only to support the tourism potential of Limerick Towns and villages with no reference to rural assets such as Attyflin Estate. Expand ECON O36 to include specific reference to heritage assets such as Attyflin Estate. A new subsection “h” can be added to read: <i>“Support and harness the tourism potential of the County’s heritage assets such as Attyflin Estate”</i>.</p> <p>(vi) A further subsection could include reference to the supporting and harnessing agri-food-tourism. A new subsection “l” can be added to read: <i>“Agri-food-tourism is a growing, important and sustainable resource that must be supported and harnessed”</i>.</p> <p>3. Objective P40: On the one hand the objective seeks to direct holiday home development to towns and villages. On the other hand, it merely allows for the ‘<i>consideration</i>’ of holiday accommodation in vacant, derelict or disused buildings in both urban and rural areas. There must be more robust support for holiday accommodation attached to existing assets such as Attyflin Estate.</p> <p>4. Chapter 5</p>	<p>develop and enhance Limerick’s reputation for outstanding food and drink, by supporting Limerick’s food and drink producers.</p> <p>(v) Objective ECON O36 includes d) Support and harness the tourism potential of existing rural and heritage site amenities/attractions. The Draft Plan has not referenced every individual asset in Limerick, it is considered that the Objective addresses the issue.</p> <p>(vi) Include new Objective to support Agri Tourism</p> <p>3. Objective P40: See response to Submission No. 45 in relation to proposed amendment to objective ECON O40. This objective clearly states that proposals to reinstate, conserve and or renovate existing vacant, derelict or disused buildings for holiday accommodation in both urban and rural areas will be considered subject to normal planning and environmental criteria.</p> <p>4. Chapter 5</p>
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<p>(i) Reword EH O48 to include “h” to read: <i>“Support new and adapted uses that are compatible with the character and special interest of the Protected Structure”</i>. Adjust the wording of subsection “l” as follows: <i>“Protect the curtilage of protected structures and to refuse planning permission for inappropriate development within and <u>outwith</u> the curtilage and attendant grounds, that would adversely impact on the special character of the Protected Structure”</i>.</p> <p>(ii) The new Limerick Development Plan represents the <i>key</i> local, spatial planning tool for supporting and harnessing its potential. To this end, there should be a specific objective included in the Development Plan tailored to the needs of the Estate. <i>“Attyflin Estate is an important rural, food production, education and tourism resource the potential of which must be supported and harnessed. The appropriate development of the Estate, including growth in agri-food-tourism, horticulture, tourism accommodation, and ancillary development is supported by the Council”</i>. OR <i>“ It is an objective of the Council, in respect of historic estates such as Attyflin in Patrickswell, to positively consider a range of sustainable and integrated uses such as food production, education, craft, agri-tourism, eco-tourism and horticulture that are compatible with the estates' character, history and heritage value.”</i></p>	<p>(i) Planning applications for development proposals relating to Protected Structures will be assessed on a case-by-case basis, in accordance with Objective EH O48. This includes the adaptive re-use and change of use of Protected Structures, subject to such development works ensuring the character and the special interest of the structure and its attendant grounds, as applicable, is maintained and protected. The Council acknowledge that the continued active use of a Protected Structure is the best way to ensure its continued protection and longevity. In addition to this, the protection of curtilage is provided for under Objective EH O48 -<i>Work to Protected Structures</i>. The text proposed is not appropriate.</p> <p>(ii) The Draft Limerick Development Plan provides overriding policies and objectives to be implemented to support the proper planning and sustainable development of Limerick, from an economic, social, physical and environmental perspective. While, the Draft Plan supports enterprise initiatives, the Draft Plan cannot identify a specific enterprise, such as Attyflin Estate the over and above any others in Limerick. Policies and objectives set out in the Draft Plan and the Material Alterations shall facilitate the sustainable development of Limerick.</p>
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Chief Executive’s Recommendations

1. (a) Amend Section 4.7.20 Limerick’s Food Sectors to include the following text:

The Agri-Food sector is one of Limerick’s most important indigenous industries, playing a vital role in the local economy. Limerick also supports the rich heritage of market towns with the potential to revive farmer markets to support local SMEs and food tourism. The Council supports the Department of Rural and Community Development’s Action Plan for Rural Development (APRD), which focuses on the continued development of the agri-food sector through implementation of Food Wise 2025.

The Food Vision 2030 Strategy is a new ten-year Strategy for the Irish agri-food sector (taken to include primary agriculture, food and drink processing and manufacturing, fisheries, aquaculture and fish processing, forestry and forestry processing and the equine sector). Its Vision is that Ireland will become a world leader in Sustainable Food Systems (SFS) over the next decade. This will deliver significant benefits for the Irish agri-food sector itself, for Irish society and the environment. In demonstrating the Irish agri-food sector meets the highest standards of sustainability – economic, environmental, and social – this will also provide the basis for the future competitive advantage of the sector. By adopting an integrated food systems approach, Ireland will seek to become a global leader of innovation for sustainable food and agriculture systems, producing safe, nutritious, and high-value food that tastes great, while protecting and enhancing our natural and cultural resources and contributing to vibrant rural and coastal communities and the national economy.

The Failte Ireland ‘Food Tourism Development Strategy 2018-2023 aims to increase the availability of great Irish food and drink experiences across the country, to increase the number of tourism businesses engaged with development initiatives and, overseas, to increase and enhance the awareness and perception of Ireland’s food and drink offering. In order to develop and improve the food and drinks experiences in pubs the product must be authentic and the service must be of high quality.

The Food Strategy for Limerick 2016–2018 is a plan to develop and enhance Limerick’s reputation for outstanding food and drink by supporting Limerick’s food and drink producers. The Food Strategy aims to encourage, support and develop Limerick’s rural and urban food scene through information, education and marketing.

(b) Replace Objective ECON O35 as follows: ~~Limerick Food Strategy It is an objective of the Council to support Limerick’s food and drink producers in accordance with the aims/goals established under the Food Strategy for Limerick 2016–2018 and any update thereto~~ a) Support *The Food Vision 2030 Strategy* and the Food Strategy for Limerick 2016–2018 and any update thereto, the aim of which is to develop and enhance Limerick’s reputation for outstanding food and drink, by supporting Limerick’s food and drink producers and to ensure the development of Limerick as leader of innovation for sustainable food and agriculture systems, producing

	<p><u>safe, nutritious, and high-value food that tastes great, while protecting and enhancing our natural and cultural resources and contributing to vibrant communities and the economy. b) Support Failte Ireland’s ‘Food Tourism Development Strategy 2018-2023 and any update thereto.</u></p> <p><u>(c) Include a new objective as follows: Promote Limerick as a food destination and to implement the Fáilte Ireland ‘Food Tourism Development Strategy 2018-2023’ and the Limerick City and County Council Food Strategy 2016-2018, regarding the development of food tourism in conjunction with relevant stakeholders.</u></p> <p>2. (i) Addressed above in response to Point 1 in this submission; (ii) - (v) No change;</p> <p>3. Amend ECON O40 as follows a) Ensure that holiday home developments should be concentrated within existing towns, villages and settlements <u>holiday accommodation including campsite (i.e., static and touring caravans, campervans, glamping and tents) developments should be concentrated within or adjoining existing towns, villages and settlements</u>, where they can best support the provision of services and minimise the impact on the open landscape. Such developments should respect the existing fabric of the settlement, both in scale and design.</p> <p>4. No change.</p>
	SEA/ AA Response
	The inclusion the policy in the Draft Plan to support the development of the local food industry is considered positive from both an environmental and ecological perspective.

No. 262	Ref. & Name/ Group:	LCC-C62-262 Breita and Patrick O’Neill
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Objective ECON 040: Location of Tourism Accommodation: The observer expresses concern that the above objective will prevent tourist accommodation i.e. camping to develop in County Limerick. This submission states the importance of campsites/pod parks in rural</p>	<p>1. Objective ECON 040: Location of Tourism Accommodation: See response to Submission No. 45 in this regard.</p>

Limerick as many people want the opportunity to stay away from villages/towns.	
Chief Executive’s Recommendations	
<p>1. Amend Objective ECON O40, follows a) Ensure that holiday home developments should be concentrated within existing towns, villages and settlements <u>holiday accommodation including campsite (i.e., static and touring caravans, campervans, glamping and tents) developments should be concentrated within or adjoining existing towns, villages and settlements</u>, where they can best support the provision of services and minimise the impact on the open landscape. Such developments should respect the existing fabric of the settlement, both in scale and design.</p>	
SEA/ AA Response	
See SEA/ AA Response to Submission No. 77 above.	

No. 269	Ref. & Name/ Group: LCC-C62-269 Fáilte Ireland	
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Introduction: The submission seeks to enhance the policy coverage in the Draft Development Plan to ensure a meaningful framework is established for the enhancement of tourism in the City and County, and the wider region, during the Plan period.</p> <p>Tourism needs to be included in the vision, tourism strategic objectives stated for the County and how to achieve this through product development and the regional brand Wild Atlantic Way, and as set out in the submission in response to the Issues Paper in 2020.</p> <p>The submission outlines proposals under the following headings:</p>	<p>1. Introduction: The Council recognise the importance of tourism to Limerick and in particular the economic benefits that tourism brings. The vision for Limerick as set out in the Draft Plan is underpinned by a number of interlinked strategic objectives that will be realised through the chapters of the Plan. Supporting growth in the tourism sector in Limerick and capturing key opportunities to grow the sector is at the heart of the overall strategy for Limerick. The Council prepared a robust Tourism Strategy for Limerick in 2019, focused on capitalising on key assets and the draft Plan supports this approach.</p>

2. Dedicated Tourism Chapter/Section: It is considered that tourism could be more strongly referenced throughout the Draft Development Plan and in particular the inclusion of a dedicated Tourism Chapter, or a more detailed and robust Tourism Section, would ensure that all aspects of tourism policy are captured in a clear and robust manner within the Development Plan. Greater identification of the County’s key assets and proposal for enhancement should be included with policy support for key projects and proposals.

The reference to a soon to be expired [Limerick Tourism Development Strategy 2019-2023](#) and a small number of objectives along with references to tourism throughout the Plan, does not set up the Plan robustly enough to ensure the integration of tourism policy and land use plans.

3. Additional Tourism Considerations: The Submission goes on to reference a number of issues, which should be addressed.

(i) Regional Tourism Plan (RTPs): The submission requests the inclusion of an objective supporting the preparation and implementation of Regional Tourism Plans in the Development Plan, to support the continued collaboration with Fáilte Ireland and tourism stakeholders to ensure successful implementation and delivery of these tourism plans. Regional Tourism Plans are currently being prepared by Fáilte Ireland for each of the four Regional Experience

2. Dedicated Tourism Chapter/Section: Chapter 4 Section 3 sets out the policies and objectives of the Draft Plan with respect to Tourism. This is supported across the wider Draft Plan with respect to natural heritage, Blue Green Infrastructure, cultural, historical and built heritage, rural diversification and the development management standards. The Draft Plan is further supported by tourism related plans and strategies which have been referenced, where applicable, in the Draft Plan. The Council recognise the importance of tourism from an economic perspective and hence the location of the Tourism Section in this Chapter and are satisfied that combination of policies and objectives set out in Chapter 4 supported by the wider interlinked document and associated tourism related plans and strategies produced by the Council ensures that the Draft Plan is robust enough to ensure the integration of tourism policy and land use plans.

3. Additional Tourism Considerations: Each of the issues will be addressed below.

(i) Regional Tourism Plan (RTPs): The Council recognise the importance of tourism at a regional level and that collaboration with neighbouring Local Authorities and stakeholders is critical to the delivery of a sustainable tourism industry. The Council is committed to progressing tourism in Limerick and support the development of regional plans and an objective shall be included to support the delivery and implementation of these plans.

Brands, which include: Dublin, Wild Atlantic Way, Ireland’s Ancient East and Ireland’s Hidden Heartlands.

(ii) Limerick Wild Atlantic Way Gateway City Strategy: The Submission specifically requests the inclusion of an objective supporting the delivery and implementation of The Limerick Wild Atlantic Way Gateway City Strategy. The Limerick Wild Atlantic Way Gateway Strategy provides a 5-year focus to deliver a collective ambition to transform Limerick into a compelling visitor destination and a base for exploring the Wild Atlantic Way.

(iii) Destination Towns: As part of the €15.5million ‘Destination Towns’ initiative launched in 2019 by Fáilte Ireland, funding was allocated for Limerick City. Limerick City has received significant funding through this scheme which should be further capitalised upon to maximise the impact of this investment.

(iv) Platforms for Growth Investment Programme: A capital investment programme worth €150 million and will run from 2019 to 2022. Major new visitor attractions of scale will be developed and existing attractions greatly enhanced under the programme, which falls under the Government’s Project Ireland 2040 strategy.

(v) Accessible Tourism: In order to improve the experience of those who visit Limerick, the Council should include a

(ii) Limerick Wild Atlantic Way Gateway City Strategy: In June 2021 Fáilte Ireland launched a new strategy to develop Limerick as a compelling visitor destination and base for exploring the Wild Atlantic Way. Limerick has been designated as a Wild Atlantic Way Gateway City based on its geographical and cultural position in the West of Ireland and its close proximity to the Wild Atlantic Way. It is considered appropriate that this document be referenced in Policy ECON P6 b) in recognition that the Council will support the implementation of this strategy document.

(iii) Destination Town: The Council welcome the funding allocation and will continue to seek funding opportunities as they arise.

(iv) Platforms for Growth Investment Programme: The Council will continue to identify projects and will work with funding bodies to deliver tourism products for Limerick.

(v) Accessible Tourism: The policies and objectives throughout the Draft Plan support accessible and inclusive development in all sectors of

new policy, into the draft Plan, as follows; It is an objective of the Council to support the provision of accessible tourism. Access tourism is important from both social and economic purposes.

(vi) Digitalisation/Tourism Industry: The impact of COVID 19 on tourism has been significant and has heightened the need for attractions and activity providers to move bookings online. The Plan should include a policy to support the necessary investment in digital infrastructure, as follows: Encourage and support investment in digital technology in the tourism sector, with a particular focus on sectors such as visitor attractions and activities with low digital presence and/or integration.

(vii) The Shannon Tourism Masterplan: The Shannon Masterplan is being led by Waterways Ireland and prepared in conjunction with Local Authorities and Fáilte Ireland. The key objective of the masterplan is to revitalise the combined Shannon navigation and Shannon Erne Waterway as a key destination within Ireland’s Hidden Heartlands. It is suggested that the following two objectives be included: The Shannon Tourism Masterplan has been prepared by Waterways Ireland. The key objective of the Masterplan is to revitalise the combined Shannon Navigation and Shannon Erne Waterway as a key destination within Ireland’s Hidden Heartlands and the Wild Atlantic Way, identifying world class visitor

society, for example sections 10.3.1.1 and 10.3.1.2 covers universal design and public realm. It is considered that this issue is addressed in the Draft Plan.

(vi) Digitalization/Tourism Industry: The Council recognise the impact Covid 19 has had on all sectors of society and the profound impact on the tourism industry. The Council also recognise the importance of the rapidly evolving digital age that we find ourselves in, it is considered appropriate that an objective is included to support the digitalisation of the tourism industry.

(vii) The Shannon Tourism Masterplan: The Shannon Tourism Masterplan is supported in the Draft Plan as set out in Policy ECON P6. However, having regard to the significance of the River Shannon to the development of Limerick and the potential tourism opportunities that may arise, the Council consider the inclusion of the objectives appropriate in Chapter 4, Section 3.

experiences based on the region’s natural and cultural assets. This Masterplan was launched in March 2021.

Promote, encourage and facilitate the implementation of the Shannon Tourism Masterplan and its objectives in co-operation with Waterways Ireland, Fáilte Ireland and adjoining local authorities. This includes proposals for the increased access to and visibility of the Shannon’s scenic attributes and its use for land-based activities such as cycling and walking.

Promote, encourage and facilitate the implementation of the Lower Shannon Priority Projects as identified in the Shannon Tourism Masterplan where they relate to Limerick.

(viii) Sustainable Tourism: There is limited reference to Sustainable Tourism in the Development Plan and it should be considered in a dedicated sub-section to ensure it is enshrined throughout tourism policy for the county.

(ix) Festivals: The Council needs to work with Fáilte Ireland and review existing large festivals like Riverfest and Pigtown and ensure that they appeal to national and international audiences. The observer wishes to see support for new and existing festivals in the Development Plan.

(viii) Sustainable Tourism: The concept of sustainable development is embedded in the draft Plan, throughout every aspect of development, that is carried out in Limerick, it is considered that the Draft Plan addresses this issue.

(ix) Festivals: Policy ECON P6 Tourism, sets out that it is a policy of the Council to promote and facilitate the growth of the tourism industry in Limerick and tourism employment opportunities, through the sustainable development of urban and rural visitor attractions, amenities, facilities, festivals and events. Furthermore, Objective ECON O12 seeks the development of an Night Time Strategy, which will be prepared within the life time of the Plan and which also address festivals that may occur at night time. The Council recognise that Festivals & Events in Limerick create memorable opportunities for

(x) Business Tourism: When business tourism resumes Limerick City needs to position itself to be best placed to provide an attractive offering. In this regard Limerick City, is missing a large-scale venue to cater for large events, conferences, galas and after conference dinners/entertainment associated with business tourism. The provision of such a space, and ideal spaces, would have positive knock-on effect for other businesses in the retail and hospitality sectors acting as a catalyst for local tourism.

4. Additional Suggested Text Insertions:

(i) Proposed amended text, Section 4.8: include reference to Limerick Wild Atlantic Way Gateway City Strategy as being a key strategic plan, which will form the basis for the development of tourism in Limerick.

(ii) Proposed amended/additional text, Section 4.8.1: The Limerick Wild Atlantic Way Gateway City Strategy is a five-year destination development strategy designed to guide

audiences to engage in a wealth of unique and often new experiences in a celebratory atmosphere. While some programmes focus purely on local communities, others have proven their power to draw international visitors to the city. A number of festivals within the city offer international and multi-cultural programming, attracting both performers and audiences from around the world. Accordingly, it is considered appropriate to include an objective to support and develop new and existing festivals in the Draft Plan.

(x) Business Tourism: Policy provision to address the provision of a large-scale venue in Limerick is addressed under Objective ECON O36 *Tourism* which states: it is an objective of the Council to actively develop Limerick as an Events location with the appropriate infrastructure to attract international conferences, sporting, cultural and commercial events, including the development of an International Conference Centre and improved public realm, which supports outdoor performance and events of scale. The Limerick 2030 update also references the need for a new city conference / entertainment venue.

4. Additional Suggested Text Insertions:

(i) Proposed amended text, Section 4.8: Noted. Strategic Policy ECON P6 Tourism of the Draft Plan shall be updated to include Limerick Wild Atlantic Way Gateway City Strategy. Refer to 3 (ii) above.

(ii) Proposed amended/additional text, Section 4.8.1: Noted. See above. It is considered that the inclusion of the strategy in revised strategic policy ECON P6 text in addition to the Section 4.8 will ensure sufficient regard is afforded to the document. The Council recognise the

tourism through a roadmap of key projects adopted by all stakeholders in the pursuit of sustained tourism growth for Limerick city. The future development of the Milk Market is a catalyst project in the Limerick Wild Atlantic Way Gateway City Strategy to create a 7-day visitor experience and a key contributor to the Limerick tourism offering. The project will also look at the surrounding areas assessing public realm, visitor amenities and area aesthetic presentation. Limerick City and County Council will lead out on this important tourism project. Limerick has been designated as a Wild Atlantic Way Gateway City based on its geographical and cultural position in the West of Ireland and its close proximity to the Wild Atlantic Way. The new designation aims to highlight the value to the visitor of combining a city stay in Limerick and using it as a base to easily access and explore the wider iconic coastal touring route – the Wild Atlantic Way.

(iii) King John’s Castle: The observer notes reference in Section 4.8.1 and Section 10.4.2.4 to King John’s Castle, however it is considered given the recent announcement that ownership of King John’s Castle will be transferred to Limerick City and County Council, there is a huge opportunity to maximise the tourism potential of this key heritage asset and as such this should be highlighted and referenced in the plan.

value and importance of Limerick’s Milk Market and the opportunities that it can bring to Limerick City Centre and beyond and will work with all relevant stakeholders to develop and enhance the offering.

(iii) King John’s Castle: Section 4.8.1 establishes that the Council will support existing tourist attractions, including: King John’s Castle, Hunt Museum, St. Mary’s Cathedral, Limerick City Gallery of Art, Limerick Museum and the People’s Museum of Limerick.

It should be an objective of the plan to make provision for car parking facilities for visitors to the city’s key attractions including King John’s Castle, which receives in excess of 110,000 annual visitors (2019 figures). Furthermore, the castle is often used as a concert or events venue and parking is vitally important for these larger-scale events. The lack of suitable nearby parking could impede the future development of the castle as a multi-use venue and events centre.

(iv) Collaboration with Fáilte Ireland and other Tourism Stakeholders: Include an objective to continue to engage and collaborate with tourism stakeholders including Fáilte Ireland to deliver on the Tourism objectives for the City and County.

(v) Wayfinding, Place-Making and Public Realm: Outdoor trails and walking routes need to be improved in the city with the new focus on bringing people outdoors in all seasons and also dispersing people around the city to the various themed quarters that will exist in the future. These plans are included in the Limerick Wild Atlantic Way Gateway City Strategy and should be referenced where appropriate in the draft Plan.

There is ample car parking availability to service city centre attractions including King John’s Castle. There are also a number of bus bays immediate to the castle.

(iv) Collaboration with Fáilte Ireland and other Tourism Stakeholders: The draft Plan recognises the value of collaboration and has a long history of working collaboratively with all stakeholders to progress Limerick as a tourism destination and the plan sets out that Limerick City and County Council in partnership with local and national stakeholders, seeks to increase tourist numbers and support sustainable job creation, through targeted tourism initiatives including the development of new tourism products and leveraging natural and built heritage assets to support tourism across Limerick.

(v) Wayfinding, Placemaking and Public Realm: The need to improve Wayfinding, Placemaking and Public Realm is acknowledged in Section 4.8.1 Urban Tourism: City Centre and Environs During the lifetime of the Draft Plan, Limerick will increase the range of day and evening experience options for visitors by working collaboratively to deliver an improved visitor environment. Ongoing public realm improvement works in the City Centre and a new Wayfinding Orientation and Signage Plan will enhance the visitor experience, by introducing and orientating

(vi) Section 4.8.2 - Rural Tourism: Proposed amended/additional text to Section 4.8.2 “Limerick City and County Council works collaboratively with Fáilte Ireland, West Limerick Tourism, Muster Vales and Ballyhoura Fáilte to support the sustainable geographic spread of tourism development across rural Limerick and actively seeks collaboration opportunities for cross promotion and development with neighbouring Local Authorities and national agencies.” The Implementation of the Limerick Wild Atlantic Way Gateway City Strategy and development of improved transport links in the area, will optimise the region’s potential to increase visitor numbers drawing on the success of the Wild Atlantic Way.

(vii) References to Wild Atlantic Way and Limerick Wild Atlantic Way Gateway City Strategy in the Draft Plan: It is requested that all references to both documents should be correct and consistent through the Development Plan as follows:

- Limerick, a Wild Atlantic Way Gateway City;
- The Strategy is called– The Limerick Wild Atlantic Way Gateway City Strategy;
- No abbreviation of Wild Atlantic Way to WAW.

visitors through the city, delivering new and coherent visitor experiences.

(vi) Section 4.8.2 - Rural Tourism: The Council recognise the importance of rural tourism for Limerick and the benefits for rural Limerick, however it must be carried out in an appropriate and sustainable manner. It is considered appropriate the following objective be included: Limerick City and County Council works collaboratively with Fáilte Ireland, West Limerick Tourism, Muster Vales and Ballyhoura Fáilte to support the sustainable geographic spread of tourism development across rural Limerick and actively seeks collaboration opportunities for cross promotion and development with neighbouring Local Authorities and national agencies.

(vii) References to Wild Atlantic Way and Limerick Wild Atlantic Way Gateway City Strategy in the Draft Plan: Noted. The plan will be updated accordingly.

(viii) Section 4.8.4 - Tourism Facilities and

Accommodation: It is considered that this Section of the Plan as drafted could be considered to be proposing a policy that no tourism accommodation would be permitted outside of towns and villages. This could have a negative impact and undermine work done to date in developing businesses and communities in areas such as the Shannon Estuary Way.

It is considered that the Development Plan should particularly support the development of tourist accommodation in areas of the County which currently have limited accommodation offerings and this should be reflected with a new policy objective in section 4.8.4.

ECON O40 Location of Tourism Accommodation: Proposed amended Policy ECON O40: a) Ensure that holiday home developments should be concentrated within existing towns, villages and settlements, where possible, where they can best support the provision of services and minimise the impact on the open landscape. Such developments should respect the existing fabric of the settlement, both in scale and design. c) Support the development of a variety of accommodation types (hotels, B&Bs, Guest Houses, self-catering, caravan and camping, glamping etc.), which can improve the economic potential of increased visitor revenue, increase dwell time and meet visitor needs.

(viii) Section 4.8.4 - Tourism Facilities and Accommodation:

The provision of tourist accommodation to facilitate the expanding tourist industry is encouraged in appropriate locations by the Planning Authority. Objective ECON O40 Location of Tourism Accommodation supports the location of holiday home accommodation within settlements, which best supports the development of vacant and derelict properties and in doing so improves the vitality and viability of these settlements.

In this regard, the Council notes that Limerick has a dispersed settlement pattern with capacity to accommodate tourist accommodation within or adjoining these defined settlements, which by virtue of their dispersed nature are located within relative proximity to tourist attractions across the County.

In relation to Camping, the Council acknowledges that there is no specific policy support within the Draft Plan to support Campsites. Further to the significant and continued investment in tourism related infrastructure, the resultant vibrancy of the tourism product and associated increase in demand for tourism accommodation. The Council recognises that the provision of sites for caravans and camping is an important element in the accommodation of holiday makers and the Planning Authority is keen to see the provision of quality tourist and visitor accommodation for all price ranges and for a variety of lifestyles.

The Council considers that consolidating rural settlements leads to clear socioeconomic and ecological benefits. However, having regard to the above, it is considered appropriate to expand Objective ECON O40 to

(ix) Section 1.3 – Strategic Objectives: Proposed amended objective, Strategic Aim 10: *Acknowledging the vital importance of the tourism sector to economic development*, continue to support growth in the tourism sector in Limerick and capture key opportunities to grow the sector based around four key drivers - Waterways, Activities, Heritage, Arts and Culture, in an urban and a rural environment.

(x) Section 9.12 Trails and Green Routes: Proposed amended objective, Trails and Green Routes SCS1 O28: It is an objective of the Council to *support* and promote the development of regional and local networks of mountain biking, hiking and walking routes/trails. These should be waymarked/ signposted and listed, where feasible and appropriate.

(xi) Water Based Sports: Add additional text to SCS1 O29 as identified below, it is an objective of the Council to support and encourage water-based sports and leisure activities at appropriate locations throughout Limerick, *and to support*

include all types of tourism accommodation including campsites and to clarify that tourist accommodation should be located on lands within or adjoining existing settlements. Thereby reflecting the requirement to protect and enhance existing towns and villages where services and amenities exist and safeguard the natural, built and cultural landscape of Limerick and its environment.

(ix) Section 1.3 – Strategic Objectives: Noted. Strategic Objective 1 refers to the growth of Limerick's Economy as a key objective this is reinforced in relation Tourism under Strategic Objective 10. It is considered that the issue addressed.

(x) Section 9.12 Trails and Green Routes: The inclusion of “support” in the Objective SCS1 O28 is considered appropriate in this instance.

(xi) Water Based Sports: SCS1 O29 includes for all water-based sports and leisure activities and does not distinguish between existing or proposed. It is considered that the existing objective addresses the proposal.

both the enhancement of existing and development of new access to water locations in the County for recreational purposes. The provision of shared facility centres for water-based activities in the County shall be supported by the Council, subject to Council Bye-Laws and the Habitats and Birds Directives.

(xii) Chapter 12 Land Use Zoning: In the future, there will be a need to expand and develop the tourism product offering in Limerick County in the towns along the Limerick Greenway and the Shannon Estuary Way. Therefore, it is crucial that provision is made for tourism facilities in these areas. Limerick Greenway towns and villages include: Rathkeale, Ardagh, Newcastle West, Barnagh Tunnel, Templeglantine and Abbeyfeale. The future extension of the Limerick Greenway will include: Croom, Patrickswell and Adare and a section between Abbeyfeale and Listowel. The Shannon Estuary Way towns include: Mungret, Clarina, Pallaskenry, Askeaton, Foynes and Glin.

The observer notes that the zoning matrix on page 349 does not include this Land Use Zone (Regeneration Area). However, it is imperative that tourism facilities and other mixed uses including café use/retail etc. are permissible in this zone.

5. Renewable Energy Strategy: Fáilte Ireland recommends that all Councils prepare a dedicated Renewable Energy

(xii) Chapter 12 Land Use Zoning: See response to Submission No. 45 above. The Draft Plan does not seek to prevent or reduce the tourism product offering. Section 4.8.4 *Tourism Facilities and Accommodation* acknowledges and there is a delicate balance to be struck between cultural and natural attractions and associated facilities and amenities designed to cater for various tourist requirements. Tourism facilities should be planned in a sensitive and proactive manner. The provision of tourism facilities and other mixed uses including café use/retail are permissible in accordance with the land use zoning matrix.

Noted.

5. Renewable Energy Strategy: The Council do not intend to carry out a Renewable Energy Strategy, Chapter 8 of the Draft Plan sets out a

Strategy specific to each county, and this should if not form part of the Plan, there should be an objective included in the Plan for the County which should be progressed in the short term. Included within this should be a map, with identified sensitive areas and assets, which identifies areas suitable and unsuitable for the siting of wind turbines. It is considered that much of Section 11.7.2 could form part of this Strategy.

6. Landscape Character Assessment: The observer welcomes reference to the National Landscape Strategy 2015-2025 in the draft Plan however to achieve a more specific protection for tourism assets, the observer requests an objective protecting the integrity of key tourist amenities from negative visual and landscape impacts in Section 5.4.

robust approach to renewable energy development in Limerick in a statutory document, which comprehensively addresses Limerick’s commitments to renewables, furthermore, the OPR has requested that targets be included for Limerick to outline Limerick’s commitment to meeting national targets, in this regard, it is considered that the overall approach will be addressed in the final plan.

6. Landscape Character Assessment

The protection of Views and Prospects is established in the Draft Plan under Section 5.4.2, Objective EH O30. The appropriate implementation of development management standards will ensure all relevant tourist sites are protected in accordance with proper planning and sustainable development.

Chief Executive’s Recommendations

1. – 2. No change;

3(i) No change;

(ii) Update ECON P6 b) to include reference to [Limerick Wild Atlantic Way Gateway City Strategy](#);

(iii) - (v) No change;

(vi) Include an objective in Chapter 4, Section 3 as follows: [It is an Objective of the Council to support digital innovations to support the tourism industry throughout Limerick](#);

(vii) Include Objectives in Chapter 4 Section 3 as follows: [Promote, encourage and facilitate the implementation of the Shannon Tourism Masterplan and its objectives in co-operation with Waterways Ireland, Fáilte Ireland and adjoining local authorities. This includes proposals for the increased access to and visibility of the Shannon’s scenic attributes and its use for land-based activities, such as cycling and walking.](#)

and promote, encourage and facilitate the implementation of the Lower Shannon Priority Projects, as identified in the Shannon Tourism Masterplan, where they relate to Limerick.

(viii) - (viii) No change;

(ix) Include a new objective in Chapter 4 as follows: Support and develop existing festivals and encourage the establishment of new festivals and events on a yearly basis in conjunction with relevant stakeholders.

(x) No change;

4(i) Remove all abbreviations of ~~WAW~~ throughout the Plan and replace with Wild Atlantic Way;

(ii) - (vi) No change;

(vii) Remove all abbreviations of ~~WAW~~ throughout the Plan and replace with Wild Atlantic Way;

(viii) Amend ECON O40 as follows a) Ensure that ~~holiday home developments should be concentrated within existing towns, villages and settlements~~ holiday accommodation including campsite (i.e., static and touring caravans, campervans, glamping and tents) developments should be concentrated within or adjoining existing towns, villages and settlements, where they can best support the provision of services and minimise the impact on the open landscape. Such developments should respect the existing fabric of the settlement, both in scale and design.

(ix) No change;

(x) Amend Objective SCS1 O28 to include the word support;

(xi) - (xii) No change;

5. – 6. No change.

SEA/ AA Response

The promotion of tourism, subject to suitable assessment and management, has the potential to promote local economies and employment benefits and is consistent with Environmental Protection Objectives P1 and P2.

Theme 8: Community and Education

No. 3	Ref. & Name/ Group:	LCC-C62-3 Louise Kelly	
Submission/ Observation Summary		Chief Executive’s Response	
<p>1. Sports Facilities: Newcastle West has no public sports facilities. Nearest public sports complex is in Askeaton, 16km away and only accessible by private car. Private owned leisure facilities are too expensive and unaffordable to low-income earners and unemployed. The Dean O’Brien Swimming Pool closed in the mid-1990s. Ballinasloe with the same population and Askeaton with only 2,000 people have indoor pools and gyms. A new public sports complex in Newcastle West should match that of Tralee’s and Askeaton’s.</p> <p>Newcastle West has a catchment of 18,994 people. A new sports complex has a target market of sports clubs (GAA, Rugby, Running, Cycling, Tennis), 29 Primary Schools, 5 Post Primary Schools, casual swimmers, gym and fitness users. Swimming has huge benefits for physical and mental health.</p> <p>The new sports complex will be an excellent asset to rural towns and villages. The Desmond Complex is a perfect location with two schools adjoining. The new sports complex should have a 25m swimming pool, a learners’ pool, gym with 40 stations, hall, changing rooms, a rock-climbing wall.</p>		<p>1. Sports Facilities: The Draft Plan supports building healthy, strong and socially inclusive communities as a key element in achieving sustainable communities which contribute to the ‘Quality of Life’ principles.</p> <p>The Council acknowledges the references to participation in physical activity for all members of society and the resultant benefits of same. In this regard, the goals and actions of Healthy Ireland have been incorporated into the Draft Plan.</p> <p>In acknowledgement of the benefits of community and social infrastructure and its importance in achieving sustainable, healthy and socially inclusive communities, the Council is fully committed to the reservation of appropriate lands and encouragement of the provision of facilities, suitable for multiple activities and accessible to all.</p> <p>Chapter 9 Sustainable Communities and Social Infrastructure, Section 9.10 of the Draft Plan includes objectives to facilitate the provision of sports facilities which include swimming pools and gyms. An objective for the preparation and implementation of a Sports and Recreation Facilities Strategy has also been included.</p>	

	<p>The new sports complex would be the heartbeat of the rural town, is a vital facility and will cater and be affordable for all. It will bring business and employment, improve quality of life, social inclusion, physical and mental health.</p> <p>Ireland has high levels of obesity. Fitness is vital for weight loss and mental health issues. Without facilities, levels of obesity will keep increasing, leading to more serious health problems like diabetes, heart attack, stroke and death. Regular physical activity is recommended by WHO.</p>	<p>The specific request for the provision of a swimming pool and gym in Newcastle West is an issue which is more appropriately addressed during the preparation of the aforementioned strategy.</p>
	Chief Executive’s Recommendations	
	1. No change.	
	SEA/ AA Response	
	N/A	

No. 8	Ref. & Name/ Group:	LCC-C62-8 Louise Kelly
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Sports Facilities: Newcastle West is getting a new running track but has no gym. Castleisland Co. Kerry has a running track, gym, sauna and steam room at the running track. Newcastle West should get a gym for the new running track to improve fitness.</p>	<p>1. Sports Facilities: See response to submission No. 3 above.</p>
	Chief Executive’s Recommendations	
	1. No change.	
	SEA/ AA Response	
N/A		

No. 123	Ref. & Name/ Group:	LCC-C62-123 Sheehan Planning on behalf of Castletroy Golf Club
Submission/ Observation Summary		Chief Executive’s Response
<p>1. Open Space and Recreation Objectives: Castletroy Golf Club is one of several recreational facilities (Monaleen GAA, Aisling Annacotty Soccer Club, UL Bohemians Rugby Club etc.) operating in the Castletroy area providing sporting amenities. These amenities need to be protected from encroachment of inappropriate development on their site boundaries.</p> <p>- Objective SCS1 O18: The observation suggests the following modifications: Protection of lands zoned for public open space <u>Open Space & Recreation</u>. It is an objective of the Council to:</p> <p>a) Protect existing open space by not permitting development <u>on lands zoned Open Space & Recreation or on lands immediately adjoining Open Space & Recreation zoned lands</u> which would encroach <u>or impinge</u> on <u>the</u> open space and would result in reducing the recreational value to the public.</p> <p>It is not necessary to encroach on open space to diminish its recreational utility. ‘Impinging’ would clarify the scope of the Objective. Development on lands immediately adjoining Open Space & Recreation zoned lands may</p>		<p>1. Open Space and Recreation Objectives: The Draft Plan supports building healthy, strong and socially inclusive communities as a key element in achieving sustainable communities which contribute to the ‘Quality of Life’ principles. The Council is fully committed to the reservation of appropriate lands and encouragement of the provision of facilities, suitable for multiple activities and accessible to all.</p> <p>The title of Objective SCS1 O18 can be amended to reflect lands zoned Open Space and Recreation. However, the use of the term impinge is too general and ambiguous in addressing what is a purely local and a specific case. The implication of the change would pass on the liability to mitigate any of the over spill effects of an amenity on the safety of those living in adjacent properties or to the developers of those lands. It is reasonable to require where relevant that mitigation can be a consideration in landscaping and layouts, it is considered that this issue would be better addressed at Development Management level.</p>

<p>reduce the recreational value of the land to the public. The Objective should apply to development on adjoining lands that might reduce the recreational value of the open space.</p> <p>-Objective SCS1 O19: The observation suggests the following modifications: Protection of Sports Grounds/Facilities: It is an objective of the Council to:</p> <p>b) Protect, retain and enhance existing sports facilities and grounds <u>by restricting development that would encroach or impinge on their recreational value.</u></p> <p>This modification would protect existing sports facilities from inappropriate development, either on or adjacent to the facilities.</p> <p>The observation also requests a specific local planning objective on the Metropolitan Zoning Map on the lands immediately north of the site, requiring that any new development does not impinge or encroach on the operation of the Golf Club. Any development on the lands should also include a landscaped buffer along the boundary with the Castletroy Golf Club so as to preserve its recreational and sporting amenity.</p> <p>Residential development on vacant lands to the north could have a serious impact on the club’s viability. Some of the undeveloped lands come within the zone of safety of</p>	
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	<p>Hole No. 1, due to the high elevation there is a risk that golf balls would fall outside of the course and give rise to safety risks, despite the mature trees. The erection of netting on the northern boundary would cost in excess of €100k, jeopardising viability and insurance premiums and development would require a redesign of the first and second holes, diminishing the recreational utility and at a high-cost undermining viability.</p>	
Chief Executive’s Recommendations		
1. Amend the title of Objective SCSI O18 from Public Open Space to <u>Open Space and Recreation</u> .		
SEA/AA Response		
None. This is for clarification purposes only with no environmental implications.		

No. 124	Ref. & Name/ Group:	LCC-C62-124 Newtown Rovers Football Club
Submission/ Observation Summary		Chief Executive’s Response
<p>1. Social Infrastructure: Newtown Rovers Football Club was established in 2020 with the aim of providing playing opportunities at a recreational level for players of all ages. The club has over 100 members and 3 teams that compete in the Limerick & District League and the Limerick Women’s & Schoolgirls’ Soccer League. Approximately 20 youth players wanted to enter, however the addition of a 4th team was declined due to a lack of playing facilities in the Castletroy area, namely a playing pitch.</p>		<p>1. Social Infrastructure: Chapter 9, Section 9.10 of the Draft Plan includes objectives to facilitate the provision of sports facilities and objectives that encourages multi use of facilities. For example, Objective SCSI 05 sets out that it is an objective of the Council to develop in partnership with other agencies, opportunities for multi and co-use active and passive recreational amenities including sports and recreational facilities. An objective for the preparation and implementation of a Sports and Recreation Facilities Strategy has also been included.</p>

	In line with the policies and objectives in Chapter 9, coupled with the targets for population growth, the Club believes that it is essential and imperative to open education facilities outside of school hours to community and volunteer groups to provide for the social needs of the locality, considering the decrease in land availability due to residential construction and an increase in land prices. The use of the pitches at Castletroy College and the Castletroy Park was specifically mentioned in the submission.	
Chief Executive’s Recommendations		
1. No change.		
SEA/ AA Response		
N/A		

No. 151	Ref. & Name/ Group:	LCC-C62-151 Michael Hennessy, Denis Tierney
Submission/ Observation Summary		Chief Executive’s Response
<p>1. Strong and Sustainable Communities: The Draft Plan should make playgrounds mandatory in all new housing estates. Innovative design can mitigate anti-social behaviour and by people acting responsibly. The novelty wears off quickly and their attractiveness for anti-social behaviour to congregate reduces over time. These playgrounds do not negate the need for large scale play areas such as Mungret or Castletroy, but would help achieve targets and policy set out by the Council.</p>		<p>1. Strong and Sustainable Communities: There are already provisions in the Draft Development Plan to ensure that there is adequate provision of play lots and or playgrounds in the open space hierarchy. This is contained in Table DM 1 in Chapter 11, which will be updated in response to other submissions made to the draft plan.</p> <p>Objective SCSI O26 ‘Playgrounds’ in the Social Infrastructure Chapter, shall be amended so that there is a clear link with the open space hierarchy in the Development Management chapter, and ensuring that</p>

	<p>The submission references a number of Objectives in the Draft Plan including policies SCS1 P1, SCS1 P2 and Objective SCS1 O1 and requests amendments to Policy SCS1 P5 Play and Objective SCS1 O26 Playgrounds as follows: By making the provision of playgrounds a pre-requisite requirement of planning new housing proposals that this will ensure it is <u>they would be incorporated into the planning/ delivery costs of the overall development</u>, thereby reducing <u>costs</u> which would be minimal <u>in any case</u>. The play area should be required at Phase 1 and not as an afterthought.</p>	<p>at least developers should provide low maintenance small areas for children's play as part of new developments.</p>
Chief Executive’s Recommendations		
<p>1. Add a new part to Objective SCS1 O26 (d) ‘Require developers of new residential schemes commensurate with the scale and purpose of the development to provide in situ, natural play areas for children, or as the case may be, small play grounds, where it is considered necessary and opportune to address local deficits in provision as set out in Table DM1 ‘Open Space Hierarchy’.</p>		
SEA/ AA Response		
<p>This policy change stresses the need for adequate local play facilities for children. This is consistent with the requirement to take human health into account in the SEA guidance and the Environmental Report. It is consistent with Environmental Protection Objective P1 in the Environmental Report, which is to “facilitate a good standard of quality of life for the population of Limerick through ensuring high quality residential, recreational, educational and working environments”.</p>		

No. 165	Ref. & Name/ Group:	LCC-C62-165 Swim Ireland	
Submission/ Observation Summary		Chief Executive’s Response	
<p>1. Chapter 9 Sustainable Communities and Social Infrastructure: (i) The submission notes there is no specific reference to swimming or the increased provision of swimming pools in the Draft Plan. It suggests that</p>		<p>1. Chapter 9 Sustainable Communities and Social Infrastructure: The Council recognises the importance of swimming, and the importance of developing an infrastructure that would facilitate and promote swimming, in suitable bathing waters and in publicly accessible</p>	

<p>consideration is made to its inclusion for a number of reasons, such as alignment with national and local policy and research (Get Ireland Swimming 2016, Limerick Sports Partnership Strategic Plan 2016 – 2020, Irish Sport Monitor 2014 and Sport and Physical Activity among u16s in Co. Limerick) swimming is a life-saving skill and swimming is accessible by all ages, abilities and fitness levels. The submission seeks swimming pools be listed as one of the top leisure and recreational priority facilities.</p> <p>(ii) Swim Ireland requests infrastructure in support of open course swimming and water quality should be undertaken throughout the year. Swim Ireland advocates for a review of the identified bathing waters within the County and to identify popular spots that are currently not being tested for water quality. The submission requests revision of Objective SCSi 05 Multi-use Facilities as it is important to consult with sporting bodies at the design phase. It suggests an amendment to provide for such consultation with sporting bodies such as Swim Ireland who provide advice on design elements which could impact on the longer-term use of swimming pools. The submission suggests National Governing Bodies (NGBs) of Sport be recognised in the Plan as key collaborators as the delivery agents of National Sports Policy, NGBs are a significant stakeholder and can add considerably to the discourse.</p>	<p>swimming pools. There are five objectives set out in the Draft Plan concerning recreational amenities, which are of particular relevance to swimming facilities. In particular, Objective SCSi O29 ‘Water Based Sports’ the Council sets out the Council’s commitment ‘to support and encourage water-based sports and leisure activities at appropriate locations throughout the County, subject to Council bye-laws and the Birds and Habitats Directives’. Water based sports includes swimming.</p> <p>(ii) Three Objectives (SCSi O22, O23, and O24) relate to strategies for sports and or recreation facilities and sports activity generally. SCSi O22 states its commitment ‘to facilitate the preparation and implementation of a Limerick Sports and Recreation Facilities Strategy’. SCSi O23 states its commitment ‘to support the implementation of Limerick Sports Partnership Strategic Plan 2018-2021 and subsequent updates’. SCSi O24 ‘Local Sports Plan’ (under S9.10.1: Local Sports Plan) states the Council’s commitment to ‘support and assist the National Sports Plan 2018-2027...with the development of a local sports plan’. The two existing strategies and plans are comprehensive in their scope, so too will the Sports and Recreation Facilities Strategy and the Local Sports Plan be comprehensive in their scope and swimming will feature highly.</p> <p>The submission states National Governing Bodies (NGBs) be recognised in the Plan as key collaborators as they are delivery agents of National Sports Policy. The Plan already recognises them as such as reflected in the Objective to ‘support and assist the National Sports Plan’</p>
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	<p>(Objective SCSI O24), ‘with the development of a Local Sports Plan’ where it is mentioned that such support requires ‘<i>working in partnership with Sport Ireland, Limerick Sports Partnership and National Governing Bodies of Sport</i>’.</p> <p>SCSI O24 Local Sports Plan shall be renumbered as SCSI O25 to avoid duplication with SCSI O24 ‘Limerick City Centre Leisure Strategy’, above this section. All subsequent Objectives in this chapter are to be renumbered accordingly.</p>
Chief Executive’s Recommendations	
<p>1. No change;</p> <p>2. SCSI O24 Local Sports Plan shall be renumbered as SCSI O25 to avoid duplication with SCSI O24 ‘Limerick City Centre Leisure Strategy’, above this section, and all subsequent Objectives in this chapter are to be renumbered accordingly.</p>	
SEA/ AA Response	
N/A	

No. 234	Ref. & Name/ Group: LCC-C62-234 Department of Education				
	<table border="1"> <thead> <tr> <th>Submission/ Observation Summary</th> <th>Chief Executive’s Response</th> </tr> </thead> <tbody> <tr> <td> <p>1. Chapter 9: Sustainable Communities and Social Infrastructure - The Department generally welcomes the Objectives in this chapter, however, requires a number of changes as follows:</p> <p>(i) Objective SCSI O9 (a) - Given the NPF Objectives around compact growth, the facility to expand existing schools and/or to otherwise maximise the use of existing school</p> </td> <td> <p>1. Chapter 9: Sustainable Communities and Social Infrastructure:</p> <p>Noted</p> <p>(i) Objective SCSI O9 (a) The contents of the submission are noted and Objective SCSI O9 (a) shall be amended as suggested.</p> </td> </tr> </tbody> </table>	Submission/ Observation Summary	Chief Executive’s Response	<p>1. Chapter 9: Sustainable Communities and Social Infrastructure - The Department generally welcomes the Objectives in this chapter, however, requires a number of changes as follows:</p> <p>(i) Objective SCSI O9 (a) - Given the NPF Objectives around compact growth, the facility to expand existing schools and/or to otherwise maximise the use of existing school</p>	<p>1. Chapter 9: Sustainable Communities and Social Infrastructure:</p> <p>Noted</p> <p>(i) Objective SCSI O9 (a) The contents of the submission are noted and Objective SCSI O9 (a) shall be amended as suggested.</p>
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<p>sites is critical for the future, in order to meet emerging requirements in Co. Limerick (and nationally). Include the following: <i>To ensure that existing and new school sites are protected for educational use and that lands adjacent to existing schools are protected for future educational use in order to allow for expansion of these schools, if required, subject to site suitability.</i></p> <p>(ii) Objective SCS1 O9 (c) - The Department considers that there is already a network of City Centre schools in Limerick and that the key priority is to protect this existing network so that it can meet future need and supplant it then with new facilities if required. Cost effective to protect what already exists and maximize it for future generations. Therefore, the Department requests that Objective SCS1 O9 (c) be re -worded to read as follows: "In order to ensure availability of educational provision to meet projected increased requirements arising from the consolidation and densification of development within the City Centre, all existing City Centre <i>schools (and land buffers around them if available) should be protected so that they can be purposed to meet future educational requirements</i>".</p> <p>(iii) Objective SCS1 O12 – Further and Higher Education Facilities - The Department would welcome the inclusion of a specific objective supporting educational campus development, where feasible. This is within the remit of</p>	<p>(ii) Objective SCS1 O9 (c) The contents of the submission are noted and Objective SCS1 O9 (c) shall be amended as suggested.</p> <p>(ii) Objective SCS1 O12 – It is considered that Objective SCS1 O12 already addresses all further and Higher Education Facilities.</p>
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<p>the Department of Further and Higher Education, Research, Innovation and Science.</p> <p>2. Additional Educational Requirements: The Department anticipates that some requirements for additional educational accommodation may emerge over the lifetime of the Plan should the projected population increases materialise. Limerick City Metropolitan Area (Level 1 Settlement): The Department divided the area into four segments with the estimated projected breakdown of the population increase: 1) City Centre and the concentric zone around the centre, 2) City East (Principally Castletroy and Annacotty), 3) Southern Environs (Principally Mungret), 4) North City (Caherdavin, King’s Island & Corbally).</p> <p>(i) City Centre – Primary Level - Additional places that may be required could be provided by expansion of some of the existing facilities. This underscores the importance of protecting all the existing facilities and any land buffer that may exist around them. Post-Primary Level – There is already a network of schools, additional places that may be required could be provided at existing facilities.</p> <p>(ii) City East - Given the level of population expansion envisaged for this area, the protection of land buffers around existing schools is requested in order to enable the school to expand, if required. Primary Level - in order to cater for future development scenarios, the Department</p>	<p>2. Additional Educational Requirements: The Council recognises the need for expansion of education facilities to cater for the growth in the population proposed for Limerick. Significant areas of Education and Community have been zoned to cater for this expansion, including immediately adjoining existing schools where possible to facilitate the expansion of existing schools on site. The Council will continue to liaise with the Department of Education to ensure sufficient zoned lands are available to cater for the proposed growth.</p> <p>(i) City Centre – The Council recognise the importance of safeguarding City Centre Schools and having regard to the growth identified in national and regional policy for Limerick City, the Council are seeking to retain, enhance and expand schools in the City Centre, as outlined in SCSi 09. The Council will continue to liaise with the Department of Education to ensure sufficient zoned lands are available to cater for the proposed growth.</p> <p>(ii) City East – There are 14.6ha of undeveloped Education and Community lands zoned in this broad area, which could accommodate expansion of existing schools and development of new schools to accommodate the proposed growth. The Council will continue to liaise</p>
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<p>requests that three primary school sites be zoned for this area. Post-Primary Level – Short to medium term the new school being built in Castletroy will meet demand. Medium to long term it would be prudent to zone another future post-primary school site in this area to cater for the scenario that the existing schools could not expand further to meet demand.</p> <p>(iii) Southern Environs - Given the level of population expansion envisaged for this area, it is requested that land buffers (if any) around existing schools be zoned for educational use in order to enable the school expand.</p> <p>Primary Level - the Department welcomes the zoning of additional land surrounding St. Nessans primary school in Mungret in order to facilitate the development of the school. In order to cater for future development scenarios, the Department requests that three primary school sites be zoned for the area. Post-Primary Level - Short to medium term the new school being built in Mungret will meet demand. Medium to long term it would be prudent to zone another future post-primary school site in this area to cater for the scenario that the existing schools could not expand further to meet demand. The Department requests the zoning of sufficient land in the Mungret area in order to facilitate the development of a special school.</p> <p>(iv) North City – Primary Level - the Department welcomes any zoning of additional land beside existing schools in</p>	<p>with the Department of Education to ensure sufficient zoned lands are available to cater for the proposed growth.</p> <p>(iii) Southern Environs – There are 16.89ha of undeveloped Education and Community lands zoned in this broad area, which could accommodate expansion of existing schools and development of new schools to accommodate the proposed growth. The Council will continue to liaise with the Department of Education to ensure sufficient zoned lands are available to cater for the proposed growth.</p> <p>(iv) North City – There are 24.9ha of undeveloped Education and Community lands zoned in this broad area, which could accommodate</p>
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<p>order to help them expand to meet requirements. The Department requests that at least one additional primary school site be zoned to meet the future needs of this area.</p> <p>Post-Primary - A potential significant increased requirement has been identified based on the projected population. It is of a level that could necessitate the provision of a new school, depending on the capacity of the existing schools to expand. For this reason, it would be deemed prudent to zone a site for a possible future post-primary school.</p> <p>(v) Towns (Level 3 Settlements) - Abbeyfeale, Castleconnell, Caherconlish, Large Villages (Level 4 Settlements) - Murroe, Patrickswell, Kilfinane and Small Villages (Level 5 Settlements) and Rural Clusters (Level 6 Settlements) and Open Countryside (Level 7): It is considered that all of the above at primary and post-primary level have the ability to meet the requirement at existing facilities or expansion thereof. However, with the following exception:</p> <p>(vi) Newcastle West Primary Level - there is a potential requirement to establish an additional school, this would necessitate zoning of a site.</p>	<p>expansion of existing schools and development of new schools to accommodate the proposed growth.</p> <p>(v) Noted.</p> <p>(vi) The Newcastle West Local Area Plan 2014 –2020 (as extended) governs the local policy in relation to Newcastle West. The review of this Local Area Plan will commence in mid 2022, and will deal with specific matters, such as zoning of lands/demands for school expansion. The Council will continue to liaise with the Department of Education to ensure sufficient zoned lands are available to cater for the proposed growth.</p>
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<p>(vii) Patrickswell – Primary Level – There will be a requirement for a significant expansion of the existing school, if this is not possible an additional primary school site would need to be zoned.</p>	<p>(vii) The Patrickswell Local Area Plan 2015 –2021 (as extended) governs the local policy in relation to Patrickswell, the review of this Local Area Plan will commence in mid 2022, and will deal with specific matters, such as zoning of lands. The Council will continue to liaise with the Department of Education to ensure sufficient zoned lands are available to cater for the proposed growth.</p>
<p>Chief Executive’s Recommendations</p>	
<p>1(i) Amend SCS1 O9 to replace existing point a) <u>To ensure that existing and new school sites are protected for educational use and that lands adjacent to existing schools are protected for future educational use in order to allow for expansion of these schools, if required, subject to site suitability.</u> Reserve lands to facilitate the delivery of new educational facilities, including extensions of existing schools in cooperation with the Department of Education.</p> <p>(ii) Amend SCS1 O9 to replace existing point c) <u>In order to ensure availability of educational provision to meet projected increased requirements arising from the consolidation and densification of development within the City Centre, all existing City Centre schools (and land buffers around them if available) should be protected so that they can be purposed to meet future educational requirements.</u></p> <p>Support the provision of new City Centre schools, with a general presumption against the relocation of City schools away from the City Centre.</p> <p>(iii) No change;</p> <p>2. No change.</p>	
<p>SEA/ AA Response</p>	
<p>The changes are to ensure that educational establishments are protected and have sufficient space to facilitate expansion, in order to cater for future school place demand in tandem with projected population growth. This “future proofs” lands for schools and allows them to cater for school place demand in close proximity to the areas where this exists. It also reduces the need to develop sites that may be located at a distance from their natural catchment. This is consistent with the requirement of compact growth and sustainable communities.</p>	

No. 264	Ref. & Name/ Group:	LCC-C62-264 Caherconlish AFC
	Submission/ Observation Summary	
	<p>1. Development of a carpark in Caherconlish: This submission relates to the development of the lands located adjacent to the club grounds in the village of Caherconlish. Currently the village has a severe shortage for parking for recreational use and community events that take place at the community centre. The AFC grounds are used for these events, but can only facilitate 30 cars which leads to parking on the main road outside the grounds. The land is currently part of Oakley Lawns Residential Estate, after a consultation process a development plan was created for the construction of a car park for both sports and public use which can be maintained and serviced by Caherconlish AFC. The observer outlines that a new carpark will enable multiple sports events to occur at the same time, approx. 80 car capacity preventing congestion on the main road, parking within a short distance of the community center, Primary School and village center and phase 2 development involves the construction of a walkway approx. 800m long, which will tie in with the newly developed ‘creamery walkway’</p>	
	Chief Executive’s Response	
	<p>1. Development of a carpark in Caherconlish: The Caherconlish Local Area Plan 2012 –2018 (as extended) governs the local policy in relation to Caherconlish. The review of this Local Area Plan will commence in early 2022, which will deal with specific matters, such as carparking.</p>	
	Chief Executive’s Recommendations	
	1. No change	
SEA/ AA Response		
N/A		

Theme 9: General Mixed Issues

No. 92	Ref. & Name/ Group:	LCC-C62-92 Construction Industry Federation	
Submission/ Observation Summary		Chief Executive’s Response	
<p>1. Population Growth: The NPF envisages the need for 550,000 additional homes in the Country by 2040. The NPF has a target population for Limerick City and County of 229,000 – 235,000 by 2026 and 246,000 – 256,500 by 2040. The Draft Plan goes into considerable detail on how to accommodate this significant rise in population. It is critical to ensure that policy objectives in the County support the viability of future developments. Viability of developments will be dependent on an adequate supply of affordable, developable land and the market demand for residential units. The Limerick City and County Draft Plan chooses to raise the population allocation to the Limerick MASP area to 36,394, equivalent to a further 14% over the 31,918 NPF pro-rata allocation at the expense of settlements outside of the Metropolitan Area.</p>		<p>1. Population Growth: The Council acknowledge that the population projections are very ambitious, especially for the Limerick City and Environs, where there remains generous provision of zoned lands for residential development. The focus of the NPF, is to plan for significant growth to 2040 on the Island of Ireland and to redress the imbalance of development on the Island, with the growth of regional cities and selected towns throughout the country. It identifies Limerick as the largest urban centre in Ireland’s Mid – West region and sets out ambitious targets for housing and commercial growth in the city, with an addition 56,000 persons in Limerick City and Environs by 2040. A large proportion of this growth will be directed into Limerick City and Environs, in order for this area to accommodate this growth, it is necessary for both building height and density to increase in order to achieve compact growth, in line with the requirements of national and regional policy.</p>	
<p>2. Brownfield sites: Developing residential units in city centres are typically more expensive because of the increased costs on building on brownfield sites. 142 out of the 161 sites zoned residential in the MASP area of the draft plan are identified as Brownfield. The NPF fosters an unrealistic approach to land allocation, which effectively</p>		<p>2. Brownfield sites: National Policy Objective 3 sets out that a target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs. The Council must comply with the requirement of national and regional policy in this regard and while the Council acknowledge that development of brownfield sites can be challenging, this development is crucial to the growth of</p>	

<p>shrinks the available land bank for housing in achievable areas in an attempt to redirect development to urban infill/brownfield sites, which are inherently more difficult to deliver.</p> <p>In the absence of active land management measures and national incentive schemes, or initiatives, few infill/brownfield sites will be commercially viable. It is hoped that the plan will incorporate active land management measures or initiatives to contribute to the commercial viability of the development of infill/brownfield sites. A viability assessment of all key brownfield and Infill sites should be considered.</p> <p>3. Housing Density: The Limerick Draft Development Plan has adopted a high-density approach to all sites in the Limerick MASP area. There is an established market resistance to higher density developments and particularly apartment developments in locations outside the core of our city centres. The CIF consider that the density objectives set out for settlements will not be achievable and will have a significant negative impact on the deliverability of housing units in these settlements. There</p>	<p>Limerick City and Environs and throughout towns and villages in Limerick.</p> <p>The Draft Development Plan sets out a number of policies and objectives to support active land management and the Council have been proactive in acquiring brownfield and derelict sites to facilitate active land management throughout Limerick. Limerick Twenty Thirty DAC are currently progressing two of the largest brownfield sites in Limerick City Centre, namely Opera Square and the Cleeves site, which provides opportunities for achieving compact growth and achieving population and employment growth in the city. The Land Development Agency are also in the process of preparing a framework plan for the Colbert Quarter site, which represents a significant brownfield site in Limerick city.</p> <p>Viability assessments are important tools to examine the viability of development, however it is beyond the scope of the proposed Development Plan.</p> <p>3. Housing Density: The Council acknowledge that the Draft Development Plan increased density in the City and Environs, this shift is required by national and regional planning policy to deliver on the ambitious population targets set out in the NPF. The design standards have been established and are in compliance with Section 28 Government guidance most notably ‘Sustainable Residential Development in Urban Areas’ (2009) in setting a minimum of 35 units to the hectare in outer suburban areas, which states that ‘the greatest efficiency of land usage...will be achieved by providing residential</p>
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<p>is a need for far greater flexibility in other settlements and on lands outside the City Core.</p> <p>It is recognised that there is a national requirement for more economic use of land, particularly within the established urban footprint of settlements. However, the arbitrary application of minimum density requirements per development proposal together with required ratios for unit types and minimum design standards is leading to design uniformity, which is unresponsive to market demand.</p> <p>The density sought in Density Zone 1 of 100+ units for hectare far exceeds the recommended guidelines, which generally range between 35 to 50 dwellings per hectare in urban areas. Such densities will require the construction of apartments as set out in Objective HO 05.</p> <p>The level of change required by the NPF cannot be implemented immediately. It will take several Development plans cycles to change long-term patterns. There is a need to tailor housing solutions to the local city profile.</p> <p>The Submission requests that particular attention is given to the guidance in Chapter 6 of the 2009 guidelines for sustainable residential development in urban areas. In particular the CIF request that the development plan</p>	<p>densities in the general range of 35-50 dwellings per hectare...developments at densities of less than 30 hectares should generally be discouraged, particularly in sites in excess of 0.5 hectares’. The Guidance also state the minimum net densities of 50 dwellings per hectare should be applied in public transport corridors. Higher densities again should be applied in city and town centres. The density applied to Limerick City and Environs and the remainder of County Limerick reflect the varying scale of settlements throughout Limerick and a tailored approach has been taken, which sets out the highest density requirements at the heart of the City Centre, with the density requirements significantly reduced for small settlements down to serviced sites in towns and villages.</p>
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prescribes the zoning of a significant proportion of serviced land for lower density residential development in accordance with 6.3 (d) of the guidance.

4. Adequate Supply of land for Development: The CIF welcome the NPF and RSES policy to support Limerick City as the economic engine of the Mid-West. However, in order to facilitate this, care must be taken to ensure that adequate land is zoned and supported with the necessary infrastructure. Given the emphasis on compact development concentrating development within existing urban areas and of maximising the use of brownfield sites, we are concerned of the risk that the quantum of developable lands is overestimated because insufficient research is carried out on measuring existing constraints. Developments will not be progressed if the construction industry cannot demonstrate financial viability to the investment sector. Viability of developments will be heavily dependent on an adequate supply of serviced, affordable, developable land in addition to the market demand for residential units. Demand specific to unit type is an important consideration in this regard as is clearly justified density specific zoning policies. It is critical that a review mechanism is incorporated into the Development Plan. After 2 years a thorough review of the development should take place to assess the impact Covid-19 had had on living arrangements, and to examine

4. Adequate Supply of land for Development: The Core Strategy sets out the population and household growth identified for Limerick within the lifetime of the proposed Development Plan, there is also a requirement to demonstrate the required land in hectares to support the delivery of this growth. There is significant over zoning of lands in many of the towns, which have Local Area Plans, these Local Area Plans will be reviewed following the adoption of the proposed Development Plan, to comply with the Core Strategy requirements.

In considering land for zoning the Planning Authority undertook extensive research into the serviceability of the land and in accordance with the requirements of the NPF identified if lands were within tier 1 or tier 2 category in terms of serviced land or serviceable within the life time of the plan.

After adoption of the proposed Development Plan, a two-year review of the Development Plan, will be complete in line with the requirements of the Planning and Development Act 2000 (as amended).

if the target number of residential units needed are being built annually in the County and if not the reasons why.

5. The Role of the Land Development Agency (LDA): The Land Development Agency (LDA) may play a role in residential delivery. However, in most locations in Limerick existing private housing developers will continue to play the main role.

In Limerick, the LDA anticipates that the new urban neighbourhood to be built on the Colbert Station site could accommodate a population of up to 6,300 people. The CIF is concerned that the LDA site is extremely larger and may adversely affect the zoning policy for the rest of the city. It is imperative that the draft development plan contain a realistic estimate of the achievable development potential of the Colbert Station within the plan period to 2028. The CIF have concerns about the ability of the Colbert Station to deliver the quantity of units it's claimed can be built there.

6. The Limerick-Shannon MASP: The Limerick-Shannon MASP area is the slowest growing Strategic Planning Area (SPA) in the Country. It is welcome to see the Strategic Integrated Framework Plan for the Shannon Estuary with all relevant stakeholders.

The Regional Flood Risk Appraisal (RFRA) states that of the 17 locations identified for future economic growth within the Limerick-Shannon MASP, 7 locations lie in Flood Risk

5. The Role of the Land Development Agency (LDA): The Land Development Agency have prepared a draft Framework Plan for the Colbert Quarter in consultation with the relevant landowners within the identified area. The draft Framework is currently on public display and it identifies Colbert Quarter as a key brownfield site in Limerick City Centre, which is in need of development and revitalisation and has the potential to develop as a new urban quarter for Limerick. This draft Framework is a design led exercise that sets out the vision, principles and key opportunity sites with guidance to shape how this area could be unlocked and developed over time. The draft Framework sets out an overall plan, which will be delivered over a long period. The Draft Development Plan only allocates a limited proportion of the potential residential yield as the development of the framework will be realised over a number of plans.

6. The Limerick-Shannon MASP: The Council is committed to working with all relevant stakeholders and bodies to develop a robust flood relief scheme for Limerick. The OPW have prepared flood modelling based on river catchment area, which is considered a more appropriate response to addressing flooding than by regional approach. The OPW in conjunction with Limerick City and County Council have engaged Flood Consultants to develop a Flood Relief Scheme for

<p>Zones A or B, and only 2 of those locations have flood defences in place providing only partial protection. Where it is found to be necessary the planning authorities should prepare joint studies to address flood risk issues</p> <p>7. Phased Zoning: Ireland is currently experiencing a housing crisis. Despite recent estimates from the Central Bank of Ireland and the ESRI stating that, an average of c.35.000 new dwellings will be required per annum until 2030 to keep pace with the projected population growth. De — zoning, long term zoning, down zoning and land prioritisation measures including phased release of zoned lands or the application of the sequential test are often motivated by the need to guide development to more appropriate sites closer to the centre. Extreme care should be taken in adopting this approach in the context of catering for short to mid-term housing needs. Preferentially promoting unviable brownfield sites while rendering the development of other site as contingent on unviable brownfield sites has the potential to result in a significant shortfall in housing provision.</p> <p>8. Infrastructure: The CIF recognise that infrastructure investments require co-ordination of priorities across several different Government Departments and agencies, particularly Transport Infrastructure Ireland; National Transport Authority; and Irish Water. The Council should be empowered to deliver infrastructure requirements</p>	<p>Limerick City and Environs, which will identify the optimum solution for the study area in terms of flood relief.</p> <p>7. Phased Zoning: The Draft Development Plan doesn't contain any phasing, long term strategic reserves or land prioritisation, dezoning has occurred particularly in areas that are at risk of flooding and also to meet the requirements of the Core Strategy within the lifetime of the Draft Development Plan. The promotion of the development of brownfield sites in favour of greenfield sites is in line with national and regional planning policy.</p> <p>Residential zoning in the draft plan is in line with the ESRI figures, ‘Regional Demographics and Structural Housing Demand at a County Level’, forecasts that were issued by the Department. This includes both brownfield and greenfield residential zoned sites.</p> <p>8. Infrastructure: The Council is committed to working with all the relevant stakeholders to secure the delivery of infrastructure in line with the availability of resources.</p>
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	<p>(Water, Roads etc) themselves thus opening up more suitable lands for development in both Limerick City and County.</p> <p>9. Sustainability: Both Government and local authorities are responsible for the promotion of policies for sustainable development and related planning policies. Such policies need to be realistic and should ensure that the total cumulative cost of meeting the requirements set down by those policies does not undermine the deliverability of new housing.</p>	<p>9. Sustainability: The Council is committed to delivering sustainable development through the development plan process and is committed to working with the relevant stakeholders to secure development in line in national and regional planning policy.</p>
Chief Executive’s Recommendations		
1. – 9. No change.		
SEA/ AA Response		
N/A		

No. 244	Name/ Group:	LCC-C62-244 Limerick Branch Green Party
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Vision and Strategic Overview: (i)The submission outlines that Key ambition 4 is not consistent with mitigating climate change and protecting nature and recommends it is rephrased to: The Limerick region will be an inclusive, self-sustaining economy which adapts to the challenge of climate change and biodiversity loss by operating within the limits of the ecological boundaries of the planet, in particular, by protecting our</p>	<p>1. Vision and Strategic Overview: (i) The Strategic Vision sets out that Limerick seeks to be a green city region, which will develop as an environmentally sustainable and carbon neutral economy. Sustainability and climate action are considered a key central focus of development.</p>

<p>land, trees, air, water and wildlife, and by providing a foundation of human well-being for all members of society.</p> <p>(ii) The submission proposes that Strategic Objective 1 should be to “Actively transition Limerick’s economy” to respect ecological boundaries.</p> <p>(iii) The submission outlines that Strategic Objective 6 should be reworded as follows: “Reduce car dependency and enable and prioritise sustainable modes of transport and mobility. Prioritise walking, cycling and public transport over road infrastructure to avoid facilitating private car usage and urban sprawl.”</p> <p>(iv) The submission refers to Strategic Objective 10 and recommends it is amended as follows: “Support growth in the tourism sector in Limerick, specifically focusing on sustainable tourism, and capture key opportunities to develop the sector based around five key drivers – Greenways, Waterways, Activities, Heritage, Arts and Culture in an urban and rural environment.”</p>	<p>(ii) The ambition of the NPF and RSES is to grow Limerick, as a counter balance to Dublin and for Limerick to compete on an international and national market. The Council recognises the need to transition to a low carbon economy and to meet its obligations in terms of climate action, however the vision seeks to grow Limerick in an environmentally sustainable manner. This is set out in key ambition number 1 and strategic objective number 2.</p> <p>(iii) The Draft Development Plan seeks to reduce car dependency and enable and prioritise sustainable modes of transport, however, the draft Plan also recognises the importance of an appropriate level of road infrastructure to support existing and proposed development.</p> <p>(iv) The Council recognises the value of the tourism market for Limerick and consider that the Draft Plan would benefit from the inclusion of Greenways, as suggested.</p>
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2. Core Strategy:

(i) The submission refers to Section 2.3.3 Settlement Hierarchy: Combining Limerick City, its Environs, Annacotty and Mungret into Level 1 is not appropriate. The city should be Level 1, its Environs Level 2, Annacotty and Mungret Level 3 and the remaining re-numbered accordingly. The city is distinct from its Environs and both are distinctively different from Annacotty and Mungret.

(ii) The City Centre has many dilapidated heritage buildings, derelict sites, brownfield sites, low population, low income, a declining retail sector, traffic congestion, and a lack of quality public realm and amenities for all. The City Centre needs a plan for a high-quality built environment to become a sustainable and multi-functional place.

(iii) Annacotty and Mungret with growing populations requires services such as schools and new infrastructure. Recent development is expanding urban sprawl and increasing car dependency, contrary to compact growth and carbon reduction objectives. Developing Mungret as a key future growth enabler is challenging, parts are in flood risk areas and adjacent to heavy polluting industry,

2. Core Strategy

(i) See response to Submission No. 1 to the OPR in this regard, the Core Strategy Table and Settlement Hierarchy will be amended to comply with the Recommendation of the OPR.

(ii) The Council recognise the many challenges that exist in the City Centre, which have been exacerbated by the Covid 19 pandemic. A number of progressive steps have been taken to address dereliction and vacancy in the City Centre, with the establishment of a dedicated team to deal with property owners, also the appointment of a City Centre Revitalisation Manager in 2020 with a role of liaison between retailers/traders and the Local Authority. There are currently a number of Strategies been prepared which will have far reaching change for the City Centre including the LSMATS, City Centre Traffic Management Plan and a Public Realm Strategy for the City Centre. The coordination and implementation of all these strategies will enhance the City Centre, as a better place to live, work and enjoy.

(iii) Mungret and Annacotty have formed important parts of Limerick City and Environs for many years, the NPF specifically identifies Mungret as a key location for growth. Both Mungret and Annacotty are well served by local schools, developing sustainable travel infrastructure and public transport. The growth of these suburbs is intrinsic to the development of Limerick as a whole and significant

<p>constraining residential and amenity development. The objective of a compact, livable, green and sustainable metropolitan area is best attained by maximising development in the city core and its Environs.</p> <p>3. Settlement and Housing Strategy:</p> <p>(i) The submission refers to Section 3.1 Settlement and Housing Strategy and suggests the following changes under the introduction: “In order to deliver the ambition set out in the NPF and the RSES, which is to continue to secure appropriately sustainable economic growth and increased productivity in Limerick, it is essential that there is a clear and coherent strategy in place, outlining how and where this growth will take place.”</p> <p>(ii) The submission refers to the same suggestion as per 3(i) in Section 3.3.2 Settlement Hierarchy.</p> <p>(iii) The submission refers to Section 3.4 Settlement and Housing Strategy and recommends the following: To achieve compact growth and reduce urban sprawl car dependency and their costs, the percentages of 50% of all new homes within the existing built-up footprint of Limerick City and Environs and 30% in the towns and villages must be increased.</p> <p>(iv) Referring to the Housing Strategy and Housing Need Demand Assessment, the submission notes that the Draft</p>	<p>investment has already been delivered to these neighbourhood’s in Limerick. The lands identified for development are outside flood risk areas.</p> <p>3. Settlement and Housing Strategy:</p> <p>(i) See responses to point raised above, the NPF and RSES identify Limerick for growth, the premises of the entire Draft Development Plan is that it will be managed in a sustainable manner at an appropriate scale for the location it is been inserted. As the plan includes an evidence based robust settlement strategy, it is not considered necessary to include the additional text.</p> <p>(ii) Noted.</p> <p>(iii) This a requirement of national and regional planning policy, as set out in the draft Plan. Compact growth is a key requirement in achieving compliance with the relevant legislation. The updated ‘Residential Settlement Capacity Audit’ clearly demonstrates how compact growth will be achieved.</p> <p>(iv) The publication of Housing for all in September 2021, sets out the government’s plan to increase of housing supply to 2030. The ambitious</p>
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Plan does not address affordability. Houses built on publicly owned land should be built on a ‘not for profit’ basis, providing homes at affordable rental prices using the ‘Cost Rental’ model and affordable buying prices using the ‘Cost Purchase with Restricted Resale’ model.

4. A Strong Economy:

(i) The Draft Plan does not discern between economic activities that are harmful to the environment and those that are less harmful. This is incompatible with mitigating climate change, loss of biodiversity and obligations under the Paris Agreement and the Climate Act. The Plan must clearly identify the types of economic activity to be supported and inhibited to ensure Limerick addresses the climate emergency and plans for a resilient economy. Activities such as prospecting for lead and zinc should not be supported by the Plan.

(ii) Re Objective ECON O24, the Plan should speak to the overall objective of reducing emissions, in line with the Climate Act, and the national objective of achieving the targets of electricity from renewables, as set out in the national Climate Action Plan. Data centres should not act counter to achieving these targets.

plan is a multi - annual, multi - billion euro with will require the public and private sector to work together to reach overall targets of 300,000 homes by 2030. The plan is framed with the overall objectives that everyone in Ireland should have access to sustainable, good quality housing to purchase, rent at an affordable price in the right location. The Housing Strategy and Housing Need Demands Assessment will be updated to reflect the government’s plan for the delivery of housing.

4. A Strong Economy:

(i) The Draft Development Plan sets out the economic strategy for the development of Limerick, this is a high-level strategy document and details of harmful and unharmed effects of individual activities are not considered, the specific details of these activities would be considered as part of a planning application. The economic strategy seeks to guide development to appropriate locations in compliance with national and regional planning guidance, support job creation and enable the creation of sustainable communities, which are supported by the economic activity.

(ii) Climate Action is a cross cutting theme throughout the Draft Plan and has been considered throughout the preparation of the Plan, the Council are aware of the challenges that data centres present in terms of energy consumption. ECON O24 sets out that data centres will be considered on appropriately zoned lands and it promotes co - location of renewable energy sources to reduce the energy demands.

<p>(iii) ECON O44 should be amended to include “c” “in order to drive and ensure that Limerick city and hinterland becomes the primary hub for the development of Ireland’s “west coast” renewable energy potential (approx 50 - 70 Gigawatts wind and green hydrogen) - in research, innovation, logistics, development, maintenance and administration”.</p> <p>(iv) The Development Plan must include references to and objectives for green hydrogen and other energy storage technologies.</p> <p>(v) The required move to a circular economy is not given enough prominence in Chapter 4. Although in Chapter 7, this should be given more depth consideration and detail of how it can assist the region to move from a ‘take/make/waste’ economy to a circular one.</p>	<p>(iii) ECON O44 should include a (c) to promote Limerick to become the primary hub for the development of Ireland’s west coast renewable energy potential in research, innovation, logistics, development, maintenance and administration.</p> <p>(iv) Chapter 8 of the Draft Development Plan addresses emerging technologies, including hydrogen and energy storage developments.</p> <p>(v) The Council recognise the importance of the Circular Economy and the value to the economy of Limerick. It is proposed to include new text and an associated objective on the Circular Economy and Economic Development in Chapter 4. In addition, it is proposed to include additional text in the Strategic Objectives in Section 1.3 of Chapter 1, as suggested in submission 248 by the Southern Region Waste Management Plan as follows: ‘Limerick City and County Council plays a fundamental role in the transition from a linear to a circular economy as they are responsible for key policies in public services that affect citizens’ wellbeing, economic growth and environmental quality. This plan will foster the linkages to transition from linear model to a circular model which keeps resources in use for as long as possible’. Amendments are also proposed in response to submission 248, to section 7.7.1.3 Economic Opportunities around the Circular Economy. The submission proposes a more relevant activity offered as an example could be the organisations involved in designing out waste and</p>
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<p>(vi) Retailing and Motor Fuel Stations: It should be stated in the text and Objective ECON 05 that petrol station shops should not undermine the vitality and viability of retail in the core of towns and villages. Such petrol stations and shops should be excluded on by-pass roads.</p> <p>(vii) The submission refers to Section 4.6.11 Casual Trading and notes the number of towns in which casual trading is permitted should be expanded.</p> <p>(viii) The submission refers to Section 4.7.13 Incubator/Starter Units and Rural Hubs and notes these units should include “fab lab” capability such as 3D printing, laser cutting etc. and professional kitchens.</p> <p>(ix) The submission refers to Section 4.4 A Strong Economy and Section 4.7.15 Agriculture and states that the Plan lacks a policy to facilitate and support locally grown agricultural and food products, produced on farms and allotments using sustainable farming methods and sold at farmers’ markets. This will also underpin food security.</p> <p>(x) Given the destruction of habitats for wildlife and increased levels of pollution in watercourses and emissions, the Plan should inhibit the increasing</p>	<p>those in equipment lease, reuse and repair sectors and materials recycling.</p> <p>(vi) The limitation on floor area set out in Objective ECON 05 is in line with the Retail Planning Guidelines and is proposed to safeguard the vitality and viability of the city/towns and villages.</p> <p>(vii) The designation of Casual Trading zones is beyond the remit of the Draft Development Plan.</p> <p>(viii) Objective ECON O26 supports the development of these incubator/starter hubs, the development of hubs will take many forms, which will be subject to demand and growth in individual sectors.</p> <p>(ix) The Council recognise the importance of the development of Limerick as a food destination and in response to submissions 77 and 261 (under the tourism theme) consider it appropriate to amend Section 4.7.20 Limerick’s Food Sectors and Objective ECON O35 and also include an additional objective promoting limerick as food destination.</p> <p>(x) Farming practices are governed by legislation and guidance from the Department of Agriculture, Food and the Marine. It is not the role of the proposed Development Plan to manage farming practices.</p>
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<p>intensification of agriculture and support and encourage more sustainable practices. Content of Section 4.7.15 should be amended as follows: “The Planning Authority will support and facilitate agricultural developments and improvements, subject to consideration of the proposal’s likely impact on wildlife and biodiversity, on pollution and on the character and amenity of the surrounding area. More sustainable farming practices will be favoured in planning applications.”</p> <p>(xi) The submission proposes that the following condition should be added to ECON 029 and ECON 030: “They do not lead to destruction of habitats or other adverse effects for wildlife and biodiversity or lead to increased levels of pollution of the land, air or water”.</p> <p>(xii) The submission refers to Section 4 The Marine Economy and Shannon Estuary and notes the Shannon Estuary is a protected, environmentally sensitive area. Certain industrial activities are incompatible with a clean, pollution free environment and have been allowed to establish on the estuary. All industries need to be diligently monitored by the EPA and any planning applications carefully scrutinised.</p> <p>(xiii) The expansion of Foynes Port as a base for servicing an offshore renewable wind energy sector must be done</p>	<p>(xi) Both Objectives require that the proposals demonstrate that they have taken account of environmental and amenity considerations, as set out in the Draft Development Plan. There are also a number of policies and objectives in chapter 5 that requires the protection of habitats and the environment against pollution.</p> <p>(xii) Noted.</p> <p>(xiii) Any proposals for the expansion of Foynes Port will be subject to the appropriate level of assessment necessary to determine the impact on any designated sites in the vicinity of any proposed development</p>
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<p>under the strictest environmental conditions and oversight, respecting the SAC and SPA status.</p> <p>5. Environment, Heritage, Landscape and Green Infrastructure</p> <p>(i) The submission refers to Section 5.3 Natural Heritage and the Environment and outlines that additional sites being accorded protection should be evidence based. An annotated list of more than 150 Limerick sites of botanical and ecological interest, including designated and non-designated sites, is under preparation, and should be availed as an expert resource.</p> <p>(ii) The submission notes section 5.3.3 Conservation Outside Protected Sites and states that given the condition of habitats and species, the following text should be added to the end of the paragraph: “Conservation outside Protected Sites requires all new developments to identify, protect and enhance ecological features by making provision for local biodiversity (e.g. through provision of swift nest boxes or towers, bat boxes, green roofs etc.) and providing links to the wider green infrastructure network as an essential part of the design process.”</p> <p>(iii) The submission refers to Section 5.3 Trees and Hedgerows and notes the measures proposed for the</p>	<p>and conditions as deemed necessary applied by the consenting authority shall be applied.</p> <p>5. Environment, Heritage, Landscape and Green Infrastructure</p> <p>(i) Noted.</p> <p>(ii) The Council have recognised the importance of conservation outside of protected sites in the Draft Plan. The text outlined for inclusion is unnecessary and each application for development will be considered on a case-by-case basis, with appropriate conditions attached as determined appropriate, in the development process. The development management process will have regard to the Draft Plan, which sets out in objective EH08 Roosting Habitats that it is Council policy to support the provision of alternative roosting or settlements facilities for species including bad boxes, swift boxes, etc. Policy EH03 Ecological Impact Assessment also calls for adequate ecological assessment of sites, prior to development which would detect nesting sites and recommend appropriate mitigation measures.</p> <p>(iii) See response to Submission No. 25.</p>
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<p>protection of existing mature trees and hedgerows are much too weak. The Council needs to consider a more effective means for the protection of these vital biodiversity habitats. It should also be acknowledged that hedgerows play a significant role in sequestering carbon as our forestry cover is one of the lowest in Europe (7%).</p> <p>(iv) The submission outlines that in Section 5.3.10 Wetlands, particularly peatlands, play a significant role in sequestering carbon and need protection. The Plan needs a clear objective and plan to outline how best to protect biodiversity habitats with structure and processes in place and clear timelines, actionable measures, clear deliverables and oversight.</p> <p>(v) The submission proposes that Section 5.3 Objective EH O26 be amended as follows: “It is an objective of the Council to improve air quality and help prevent people being exposed to unacceptable levels of pollution in Limerick, through the support and prioritisation of clean industrial activity, sustainable modes of transport, renewable energy, promotion of energy efficient buildings and homes and urban greening.”</p> <p>(vi) The submission refers to section 5.3.12/13 Light emissions and Night sky and outlines how the plan fails to address significant scientific evidence surrounding the negative effects of light pollution on health and</p>	<p>(iv) Section 5.3.1 sets out the Council’s position with regard to the safeguarding biodiversity and the natural environment. Section 5.3.10 specifically deals with protection of wetlands.</p> <p>(v) There are a number of Objectives included in Section 5.3.14 in relation to Air Pollution and improvement of Air Quality and monitoring, the proposed objective is not considered appropriate and is not implementable.</p> <p>(vi) Objective EH O23 sets out the Council’s position with regard to light pollution and seeks to reduce the negative impacts of light pollution on human health and wildlife.</p>
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<p>biodiversity. It is imperative that the plan addresses the issue of light pollution, starting with adoption of the EU guidelines regarding light pollution as outlined in the submission.</p> <p>(vii) Referring to Section 5.3.14.2 Air Quality Monitoring the submission notes the objectives should outline an implementation plan with improved targets for the improvement of air quality and a clear timeline, expansion of air quality monitors, improvement of the siting, results clearly accessible and communicated.</p> <p>6. Sustainable Mobility and Transport:</p> <p>(i) Referring to Section 6 Sustainable Mobility and Transport, the submission requests that it should be clearly stated as a priority objective that the Avoid-Shift-Improve approach is being adopted.</p> <p>(ii) Noting the plans reference to rail, the submission notes It is crucial that a rail network infrastructure is a high priority objective, using the principles of transit-oriented development, building new stations at locations such as Annacotty, Ballysimon, Raheen, Adare, Parkway and Moyross. The city needs more large employers located together with housing, services and amenities near these new rail stations. A rail link to Shannon Airport should be strongly supported. Rail must be enhanced and upgraded for intercity travel, regional and national connectivity.</p>	<p>(vii) The Environmental Protection Agency manages the national ambient air quality network. The Council will continue to support the work carried out the Agency and monitor air quality, subject to resources.</p> <p>6. Sustainable Mobility and Transport:</p> <p>(i) See response to the submission from the National Transport Authority, a table will be included in the Plan to demonstrate how all the transport policies and objectives comply with the principals of Avoid – Shift – Improve.</p> <p>(ii) The National Development Plan 2021 – 2030 has highlighted the potential for rail infrastructure in Limerick. The first Draft LSMATS Plan didn’t include such an approach, however, the updated LSMATS will be published in the coming months and may include the governments ambition. The Draft Plan offers policy support for the implementation of the LSMATS on completion and support for the development of rail as appropriate.</p>
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Double tracking of Limerick to Limerick Junction is critical. Re-opening the freight line to Foynes port, will enable a significant centre for off-shore renewable energy. Land zonings and densities should fit with the objective of creating high-density, transit oriented development.

(iii) Carbon Intensive Roads Projects: The submission notes that the Draft Plan is very heavily biased towards new road construction. The justification for such road building is not supported by evidence and will lead to an increase of car usage and carbon emissions. To reduce emissions by 51% by 2030 and net zero by 2050, some projects will have to be prioritised. If all major roads schemes are delivered, it will prevent Limerick meeting the necessary climate targets. Referring to Objectives TRO1, O2, O3, O4, O5, O6, O8, O12, O13, O31, O34, O37, O39, and O40 as well as TR P7, TR P8 and TR P9, it is submitted to append the following “where this is consistent with national and sectoral greenhouse gas emission budgets reducing to net zero by 2050”.

(iv) In addition, it is submitted to add an objective “Climate emissions reduction - It is an objective of the Council to put in place a process for carbon proofing major decisions, programmes and projects on a systematic basis, including investments in transport and energy infrastructure moving over time to a near zero carbon investment strategy. Such carbon proofing will take into account national and sectoral

(iii) The Council recognise the importance of the provision of major infrastructure to enhance regional connectivity, to promote economic development and to enable the development of new homes. All the projects supported in the Draft Development Plan have policy support in at least one of the following documents: the National Planning Framework, the Regional Spatial and Economic Strategy or the National Development Plan. The Draft Plan is aligning transport policies with national and regional policy.

(iv) All applications for major infrastructure such as road/energy projects and programmes require climate proofing. This is required by the consenting authority and will be a determinant in the decision-making process. The Council recognises the importance of addressing climate and Chapter 8 sets out the policy support to meet targets established at a national level.

<p>greenhouse gas emission budgets to reach a 50% reduction in emissions by 2030 and net zero by 2050.”</p> <p>(vi) The submission outlines how compact development objectives will be undermined by opening up tracts of land beyond the county boundary for development and contrary to a low carbon economy. In particular, this claim on Page 5 of the volume 2 settlements and zoning maps that “In addition, there are a number of indicative road proposals which will alleviate local congestion. Two major new road projects, including the Limerick Northern Distributor Road and the LIHAF road at Mungret, will unlock the potential of substantial tracts of land for development, while alleviating congestion and contributing to the ease of movements of goods and vehicles through the city”.</p> <p>(vii) Referring to Strategic Environmental Assessment: the submission outlines how the Section 8 Measures envisaged for monitoring needs to be revised/completed. “Review of plan” is not a suitable entry for frequency of monitoring. “Non-attainment of targets set out in LCEA energy audit” as a remedial action - needs to be changed. There is no monitoring of GHG emissions and this needs to be rectified.</p> <p>(viii) The submission notes Table 8. Sustainable Mobility and Transport Policies and Objectives and states it requires</p>	<p>(vi) The Council has outlined its commitment to compact growth throughout the Draft in compliance with national and regional policy, the text hereto referred to relates to Level 4 Settlements, and local link roads to open up lands within the core of the settlements to facilitate development. The development of both the LNDR and LIHAF road in Mungret is to enhance connections with the local environment, supported with appropriate levels of active travel and public transport services and improve the quality of life for residents of Limerick.</p> <p>(vii) The Strategic Environmental Assessment will be reviewed and amended as appropriate.</p> <p>(viii) The Strategic Environmental Assessment will be reviewed and amended as appropriate.</p>
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<p>significant revision and should describe the methodology used to ascribe an indicator. Inconsistencies are evident. Digital connectivity objective IN 02 is rated as positive, on the basis that it ‘could help reduce [road] travel...’ while the 8 Objectives TRO1-O8 for large road schemes are falsely rated as neutral. Road building contributes to carbon emissions. Objectives for improving public realm and enabling sustainable transport are rated neutral even though these are key to meeting climate and biodiversity goals. The specific mitigation measures for TR O37 to TRO41 must be included in the revised SEA document.</p> <p>(ix) The methodology behind Appendix 2: Alignment of Policies and Objectives with UN Sustainable Development Goals should be included. Carbon intensive infrastructure developments work against reducing carbon emissions and must be corrected.</p> <p>(x) Active Travel and Public Transport: The targets set out for a modal shift in transport by 2040 are underwhelming and inadequate to enable Limerick to play its part in helping the country achieve a 51% reduction in greenhouse gas emissions.</p> <p>(xi) Initiatives as outlined in the 5 Cities Demand Management Study should be implemented, including Low Emission Zones, reducing the number of car lanes, removal</p>	<p>(ix) Appendix 2: Alignment of Policies and Objectives with UN Sustainable Development of the Strategic Environmental Assessment will be reviewed in light of policy/objective changes and amended as appropriate.</p> <p>(x) The targets for modal shift have been amended in line with the submission from the OPR and NTA and have been prepared in consultation with the NTA, as suggested by the OPR. The targets established for the Limerick Metropolitan Area comply with the draft LSMATS.</p> <p>(xi) The 5 Cities Demand Management Study identifies transport demand drivers, and assesses the suitability of measures to reduce demand in Ireland’s five largest urban centres—Dublin, Cork,</p>
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<p>of on-street parking and perhaps even a congestion charge in the city centre.</p> <p>(xii) A clear objective of the Plan needs to be a quality active travel and public transport network throughout Limerick city, the towns and urban settlements, as well as inter-urban network components. The active travel network needs to be inclusive for all ages and abilities and needs to be (i) cohesive, (ii) direct, (iii) safe, (iv) comfortable and attractive. Nodes such as public transport stops, residential areas, schools, public services, amenities need to be prioritised.</p> <p>(xiii) Limerick City and every town and urban settlement in Limerick County should have a clear mobility plan designed to achieve significant, strategic modal shift targets in line with national targets.</p> <p>(xiv) Section 6.7 Roads Infrastructure, Policy TRP7 Road Safety and Carrying Capacity of Road Network: This paragraph is contrary to government policy and should be rewritten as follows: “It is a policy of the Council to seek improvements to road safety of the road network throughout Limerick, through designing for the reduction of private car usage, minimising existing traffic hazards</p>	<p>Waterford, Limerick, and Galway. Policy support will be provided to comply with the key emerging recommendations. See response to Submission No. 247, in this regard.</p> <p>(xii) Noted. The LSTMATS will establish the public transport network and the priority active travels measures, the Draft outlines that it is an objective to implement the final LSMATS on completion.</p> <p>(xiii) LSMATS will establish a clear mobility plan designed to achieve significant, strategic modal shift targets in line with national targets. A Local Transport Plan will be complete for Newcastle West in line with the requirements of the RSES and high level targets will be established for all other settlements on aggregate as recommended by the OPR.</p> <p>(xiv) The Council acknowledge the sentiments of the proposed amendment; however, the Council are obliged to improve and enhance the carrying capacity of the road network and seek improvements to road safety and accordingly disagree with the proposed change and the comments that it is contrary to government policy.</p>
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<p>such as speeding, preventing the creation of additional or new traffic hazards in the road network.”</p> <p>(xv) Rural Transport: Walking and cycling should be enabled in rural areas between towns and villages, by giving active travel priority on rural roads with low traffic levels.</p> <p>(xvi) Limerick City Centre Traffic Management Plan: The core objective of the City Traffic Management Plan should be to achieve significant, strategic modal shift targets in line with national targets. The Draft Plan is lacking in detail as to how it will reduce traffic in the city centre, while growing population and employment. Space currently used for on street parking should be used for greater economic, societal, health and environmental benefits. The Plan should introduce dynamic parking pricing and consider a congestion charge.</p> <p>7. Infrastructure:</p> <p>(i) The submission refers to the Water Services Act 2013 and proposes the addition to Objective IN O6 Public Water as follows: Supply that the Council will provide drinking water fountains in the city, towns and villages.</p> <p>(ii) The submission requests the addition to Objective IN O7 under Section 7.5.2 Group Water Schemes and Private Water Supplies/Wells as follows: Objective IN O7 Private</p>	<p>(xv) Policy TR P10 seeks to enhance sustainable transport in rural areas, with support for investment in public transport and high-quality walking and cycling infrastructure.</p> <p>(xvi) The City Centre Traffic Management Plan will address the issues raised; this level of detail is not appropriate for inclusion in the Development Plan.</p> <p>7. Infrastructure:</p> <p>(i) The provision of drinking water fountains is not a matter for the proposed Development Plan, it is an operational matter and a number have been provided in conjunction with various stakeholders and would be subject to resources.</p> <p>(ii) The Council nor the EPA currently have a role in monitoring private wells, this is not a matter for the Development Plan.</p>
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<p>Water Supply that the Council and the EPA will monitor private water supplies and financial assistance will be provided to householders to upgrade.</p> <p>(iii) The submission requests the following addition to Objective IN O8 Public Waste Water, that Waste Water Treatment Plants should have their own on-site anaerobic digestion plants for the treatment of sewage sludge.</p> <p>(iv) The submission requests the addition of the following to Objective IN O9 Private Waste Water Treatment, page 176, bullet point e) “Monitor and ensure that private wastewater treatment facilities, where permitted, are operated in compliance with their wastewater discharge license, in order to protect water quality. Financial assistance will be provided to householders to upgrade them if required.”</p> <p>(v) The submission requests the addition to Objective IN O10 Surface Water and SuDS as follows: The Council will encourage and promote rainwater harvesting. In conjunction with Irish Water, UV or other suitable technologies will be deployed to remove pathogens from water abstracted from rivers.</p>	<p>(iii) The treatment of on –site wastewater treatment plants are assessed in accordance with the EPA Code of Practice – Domestic Waste Water Treatment Systems for individual houses and these guidelines do not require on-site anaerobic digestion plants for the treatment of sewage sludge.</p> <p>(iv) The Council generally do not permit treatment of individual wastewater treatment plants to discharge effluent to watercourses and accordingly no discharge licence is required. Financial assistance is available from the EPA, in limited circumstances and subject to meeting a series of criteria determined by the EPA annually.</p> <p>(v) Rainwater harvesting is one feature of a wide array of SuDS measures, Section 11.3.11 sets out in a considerable amount of detail, what the Council require when dealing with planning applications, in terms of managing storm water.</p> <p>The removal of pathogens from water abstracted is a matter for Irish Water and not a matter for the Development Plan.</p>
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<p>(vi) The submission requests the following addition under Section 7.5.5 Storm Water and Surface Water: Add a final sentence to the second paragraph as follows “Limerick City and County Council will require proposals in excess of 300sqm to incorporate green roofs into their surface water management systems. In all cases the green area shall cover a minimum of 60% of the roof area.” Also add to Objective IN O10 Surface Water and SuDS.</p> <p>(vii) Referring to Section 7.6 Energy Networks – Resource efficiency, Electricity and Gas Networks, Policy CAF P8 Community Based Renewable Energy and Section 8.5.3 Solar energy, the submission requests the addition to Objective IN O11 Energy and Gas Network: the restriction on the number of solar panels on the roofs of private houses will be relaxed to allow householders to maximise their roof space for generation of solar electricity.</p> <p>(viii) The submission requests the following addition to Objective IN O14 Gas Development: that it is opposed to the development and construction of a Liquefied Natural Gas (LNG) Terminal on the Shannon Estuary.</p> <p>(ix) Referring to Section 7.7.1.2 Circular Economy for Building Design and Construction Projects, the submission requests changing “shall be encouraged” to “shall be required” in the following sentence: “To adopt the principle of the Circular Economy more fundamentally,</p>	<p>(vi) The Council agree with the principle of using green roofs, as there are a number of benefits to the use of green roofs, including storm water management, improving air quality, reducing ambient temperature, reducing energy costs, amenity etc. See Submission No. 155 in this regard.</p> <p>(vii) The Development Plan doesn’t restrict the extent of roof space, which can be covered in Solar Panels.</p> <p>(viii) The Council is not opposed to the development and construction of the LNG Terminal on the Shannon Estuary; the proposal will be determined by the Competent Authority and is outside the jurisdiction of Limerick City and County Council</p> <p>(ix) ‘shall be encouraged’ shall be replaced by ‘shall be required’.</p>
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<p>applicants shall be required to submit a Resource Management Plan.</p> <p>(x) The observer requests that Section 7.7.8 SEVESO Sites be added to add Irish Cement and Rusal to Table 7.1 Seveso Sites.</p> <p>(xi) Referring to Section 7.7.10 Litter Management: The Council should consider how it can strengthen its capability to prevent ‘fly-tipping’ and dog fouling.</p> <p>8. Climate Action, Flood Risk and Transition to a Low Carbon Economy:</p> <p>(i) The submission notes that Chapter 4 A Strong Economy does not give sufficient weight to the Circular Economy. Targets for modal shift are underwhelming and places too much emphasis on road building. The submission states that chapter 6 is likely to promote an increase in greenhouse gas emissions from car use.</p> <p>(ii) Referring to Section 8.2 Climate Change, the submission notes the underpinning legislation should include the Climate Action Bill (2021).</p>	<p>(x) These sites are not identified as SEVESO sites and the Council is not responsible for the designation of SEVESO sites.</p> <p>(xi) This issue is an operational manner for the Council and will not be considered in the Development Plan.</p> <p>8. Climate Action, Flood Risk and Transition to a Low Carbon Economy:</p> <p>(i) In line with the recommendations of the OPR and the NTA, the Plan will be updated to incorporate enhanced targets for modal shift, the revised Chapter 6 will reprioritise sustainable modes of transport in Limerick, which seeks to address a reduction in Green House Gases, coupled with the policies and objectives in Chapter 8, it is considered a significant shift from the current position.</p> <p>(ii) The Council will address its obligations under Climate Action and Low Carbon Act 2021 and the Climate Change Action Plan and all other relevant climate legislation and guidance as they emerge during the lifetime of the plan. The Draft Plan will be amended to include reference to the updated Climate Action Bill.</p>
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<p>(iii) The submission notes that there is no mention of flood risks at Irish Cement in Mungret or Rusal at Aughinish.</p> <p>9. Sustainable Communities and Infrastructure</p> <p>(i) The Council should be active in recognising and providing continuing support for local communities, both urban and rural, which have organised themselves to take actions to reduce GHG emissions and enhance biodiversity in their areas.</p> <p>(ii) Referring to section 9.10 Sports and Recreation the submission notes that with the development of the Opera Centre, UL Campus and Cleeves Site in Limerick City Centre, space will have to be developed for sports playing fields to cater for the increased population in the city centre.</p> <p>10. Compact Growth and Revitalisation:</p> <p>(i) The submission proposes the rewording of Section 10.4.2.7 Ellen Street to: “Limerick City and County Council acknowledges the need to repurpose all surface car parks throughout the City Centre. In particular, the Council notes the need and opportunity for development of a large brownfield site located on Ellen Street, which is currently utilised as a surface car park and will consider useful use of city centre land such as for housing, social and community amenities or retail potential.”</p>	<p>(iii) The activities on both sites are operational, neither are vulnerable uses and no additional zoning is proposed at either site.</p> <p>9. Sustainable Communities and Infrastructure</p> <p>(i) The Council are active in supporting local communities in organising themselves to take actions to reduce GHG emissions and enhance biodiversity in their areas, through supporting community energy projects, tidy towns initiatives and other environmental initiatives, such as ‘Dont Mow, Let it Grow’</p> <p>(ii) The Council are currently preparing a Sports and Recreation Strategy, which will consider the availability of sports facilities in Limerick. Policy support is provided in Chapter 9 to implement the Strategy on completion.</p> <p>10. Compact Growth and Revitalisation:</p> <p>(i) This Section of Chapter 10, deals specifically with the redevelopment of the Ellen Street Site, it is not considered appropriate to apply this as a blanket approach, each site would have to be examined on a case by case basis.</p>
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<p>(ii) Referring to Objective PV O1 Parkway Valley and 10.4.2.12 Groody Valley, the submission notes that consideration should be given to leaving this area alone for wildlife and biodiversity. Walking and cycling infrastructure must be provided and road space for private car traffic must be reallocated for active travel infrastructure and public transport efficiencies.</p> <p>11. Development Management Standards: The submission refers to Section 11.3.9 Trees nothing there is nothing preventing a developer from removing trees and hedgerows from land and then applying for planning permission. The submission proposes adding the following text: “Accordingly, the council will require payment of the monetary value of any trees removed prior to the planning application and the granting of planning permission, calculated in accordance with a recognised tree valuation system (e.g. Helliwell, CAVIAT).”</p> <p>12. Land Use Zoning Strategy: With respect to the industry category, the economic development of Limerick should not rely on heavy, dirty industries, but rather on industries and social enterprises that are environmentally sustainable, respect the principles of the circular economy, do not endanger public health and promote human well-being.</p>	<p>(ii) The Groody Green Wedge provides an important green lung between the city and its suburbs, with much of the lands at flood risk. There is an opportunity to open the lands up for recreational use for the residents of Limerick to help promote a wide range of benefits, including mental and physical health, improved biodiversity and sustainable travel.</p> <p>11. Development Management Standards: The area of protecting trees and hedgerow outside of the planning process is difficult and it is considered that the text proposed would be impossible to enforce.</p> <p>12. Land Use Zoning Strategy: The economy of Limerick is reliant on a wide array of industry to sustain economic activities; the control and management of individual industries is not a matter for the development plan nor is restricting a particular type of industry. The Draft Development Plan sets out the principles to assess the impact of development and where the development should be appropriately located. All types of economic activities will be considered in line with relevant legislation and policies and zoning objectives that relate to each site.</p>
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Chief Executive’s Recommendations

1(i) - (iii) No change;

(iv) Amend Strategic Objective 10 in section 1.3 as follows: Support growth in the tourism sector in Limerick, specifically focusing on sustainable tourism, and capture key opportunities to ~~grow~~ develop the sector based around ~~four~~ five key drivers – Greenways, Waterways, Activities, Heritage, Arts and Culture in an urban and rural environment.

2(i) Amend Core Strategy Table and Map, (see response to OPR submission)

(ii) - (iii) No change;

3(i) - (iii) No change;

(iv) Update Housing Strategy and Housing Need Demand Assessment and prepare new Chapter 4 in this regard, to reflect policy change at national level (Housing for All);

4(i) - (ii) No change;

(iii) Insert the following into **Objective ECON O44:**

(c) to promote Limerick to become the primary hub for the development of Ireland’s west coast renewable energy potential in research, innovation, logistics, development, maintenance and administration

(iv) No change

(v) Insert the following text and associated objective in to Chapter 4

The transition to a more circular economy, where the generation of waste is minimised by the principals of designing out waste and pollution and keeping products and materials in use for as long as possible, is essential in developing a competitive, sustainable, low carbon, resource efficient economy. The Council recognises the multiple economic and environmental benefits and opportunities that arise from a more circular economy particular in the creation of job opportunities in recycling and high-quality repairs and new innovative enterprises. More information on the Economic Opportunities around the Circular Economy can be found in Chapter 7 Infrastructure.

Insert new objective as follows: **Objective ECON OX: Circular Economy-** It is an objective of the Council to: Support the economic benefits and opportunities that exist in the transition to a more circular economy.

Change the text in Section 7.7.1.3 as follows:

~~A current example is the potential for transferring jobs from peat extraction and processing to new green jobs, such as reinstatement and protection of wetlands~~ and replace with Current examples include organisations involved in designing out waste and those in equipment lease, reuse and repair sectors and materials recycling.

Change Section 1.3 Point 7 to include the following:

This plan will also foster the linkages to transition from linear model to a circular model which keeps resources in use for as long as possible;

(vi) - (xiii) No change;

5. No change;

6(i) No change;

(ii) Insert within amended Chapter 6, a new table, which outlines policies and objectives contained in the proposed Plan that align with the implementation of the elements of the ASI framework assessing;

(iii) - (vi) No change;

(vii) - (ix) The Environmental Report and the Natura Impact Assessment will be fully updated following receipt of amendments by the Elected Members and prior to putting the Material Amendments to the Draft Plan on Public Display;

(x) Relocate Section 6.5.13 and associated Objective TRO30 to new Section named ‘Active Travel’ see recommendation to NTA’s submission no. 247.

(xi) Include the following new section under Transport Policy and associated objectives. The Five Cities Demand Management Study - The Five Cities Demand Management Study identifies transport demand drivers, and assesses the suitability of measures to reduce demand in Ireland’s five largest urban centres—Dublin, Cork, Waterford, Limerick, and Galway. As part of the Study, measures were examined using insight from international best practice and national stakeholder engagement in order to assess their impact in reducing emissions, tackling congestion, improving air quality, and improving the overall urban environment of the five cities. The Strategy provides a focused and evidence-based approach to addressing the carbon, congestion and air quality challenges facing Irish Cities.

Insert new Objective as follows: It is an objective of the Council to support the recommendations of the Department of Transport’s Five Cities Demand Management Study in addressing the carbon, congestion and air quality challenges facing Limerick;

(xii) - (xvi) No change;

7(i) - (v) No change;

(vi) Update IN O10 and Section 11.3.11 to include: Require green roofs for all roof areas for the following development types and encourage for all other types of development unless otherwise agreed with Limerick City and County Council's planning department:

Apartment Developments;

Employment Developments;

Retail Developments;

Leisure Facilities;

Education Facilities;

All roofs of 300m² or greater to provide a minimum of 60% green roof coverage, unless exempted/ partially exempted.

(vii) - (viii) No change;

(ix) Amend Section 7.7.1.2 to replace ~~‘shall be encouraged’~~ to ‘shall be required’

(x) No change;

8(i) Changes proposed in relation to modal share – see recommendations in submission 247;

(ii) Include reference to the Climate Action Bill (2021) in Chapter 8;

(iii) No change;

9. – 12. No change.

SEA/ AA Response

The emphasis on sustainable tourism is expected to have positive environmental benefits as, without adequate planning and monitoring this activity could have damaging effects.

The update of the housing policies is in line with EPO P1 which states ‘Facilitate a good standard of quality of life for the population of Limerick through ensuring high quality residential, recreational, educational and working environments’.

The emphasis on modal shift and the new definition of active travel in terms of unpowered transport offer a clear and environmentally friendly perspective on sustainable transport.

The point on establishing Limerick as a centre for renewables support is in line with Council policy to emphasise Foynes as a service centre for off shore renewables, but is broader in scope. Its inclusion would add to the policy on Foynes Port and emphasise Limerick’s determination to champion green energy in the west of the country. Subject to suitable assessment of such projects, this is beneficial from a climate mitigation perspective.

While green roofs may appear as a sustainable solution for both SuDS and ecology, this may not always be the case. In this regard, they should not be considered in any of their forms as a substitute for conventional open or green space. However, it should be noted that their inclusion in suitable circumstances offers another tool for SuDs and could result in positive improvements in local ecology. All of the above suggested changes would be expected to have environmentally beneficial impacts. The changes suggested to the Environmental report will be made. The SEA will benefit from the proposed updates.

No. 146	Name/ Group:	LCC-C62-146 Labour Party Limerick
Submission/ Observation Summary		Chief Executive’s Response
<p>1. Strategic Vision:</p> <p>(i) The submission welcomes the strategic vision for Limerick especially the 4 key ambitions. However, the submission states that as the Plan is underpinned by the Climate Change Adaptation Strategy (2019-2024), the Green Region ambition should be re-drafted to include a reduction in transport emissions as a key part of this ambition.</p> <p>(ii) Referring to the Strategic Objectives, the submission requests that Objective 6 should be amended to the following: Reduce car dependency and facilitate sustainable modes of transport through the delivery of walking, cycling and public transport infrastructure. Provide an appropriate level of road reallocation away from the private car to support existing and future development of active modes and to enhance connectivity.</p>		<p>1. Strategic Vision:</p> <p>(i) Noted, the Council is committed to the reduction of transport emissions and the implementation of the draft LSMATS. key ambition No. 1 seeks to develop Limerick as an environmentally sustainable and carbon neutral economy and a pioneer of sustainable growth. It is considered that reduction in transport emissions is addressed in the strategic vision and its key ambitions.</p> <p>(ii) Strategic Objective No.6 addresses the point in relation to addressing promotion of sustainable travel and reduction in car dependency. The reallocation of road space is not considered a matter for a strategic objective and will be considered on a street-by-street basis, as part of a number of studies, which will be developed as part of the final LSMATS process, including the City Centre Traffic Management Plan.</p>

<p>(iii) Referencing the UN Sustainable Development Goals, the Labour Party request that in advance of the next draft that Limerick Council formulates a set of KPIs to measure the projected progress within these goals and more tightly the goals within the larger document.</p> <p>2. Placemaking:</p> <p>(i) The submission notes the emphasis on place-making, compact growth, active land management and the impact of climate change are all welcome.</p> <p>(ii) The submission recommends that the Council must outline how current trends in city development, which do not reflect the placemaking objective currently, will be reversed.</p> <p>3. Settlement and Housing Strategy:</p>	<p>(iii) KPIs have a very specific meaning, the SDGs are very broad goals, and the relationship between land use planning and SDGs is highly variable and influence or causation is often not easy to trace or measure. The Council are required to prepare a progress report on the implementation of the final plan, two years after the plan is adopted, as a requirement of the Planning and Development Act 2000 (as amended), this is currently the means of measuring the implementation of the Development Plan. However, the Draft Development Plan Guidelines published in August 2021, establishes the requirement for an Annual Development Plan Monitoring Report with its own established indicators, which is in addition to the two-year monitoring report. In response to other submissions made to the plan it is proposed to update chapter 13, Implementation and Monitoring.</p> <p>2. Placemaking:</p> <p>(i) Noted;</p> <p>(ii) The Council are committed to enhance placemaking throughout Limerick as outlined in the draft development Plan. The draft also supports the delivery of a public realm strategy for the city and environs and a number of other locations within the lifetime of the Plan, which will address existing issues.</p> <p>3. Settlement and Housing Strategy:</p>
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<p>(i) The submission states that it is unfortunate that there are no measurable targets set out in the Plan, which undermines the credibility of its claims and stated objectives.</p> <p>The submission requests that the Council set clear targets that identify how placemaking and making environments more attractive and liveable is going to be achieved. There is no mention of the urgency of affordable housing delivery as a stand-alone objective or the objective of redesigning the regeneration areas, readily identified as inaccessible and cut-off from the city. We need to consider the abandoned unused space through the city and county and provide potential solutions for reimagining these spaces.</p> <p>(ii) The Development Plan must be underpinned by a commitment by the local authority that public land will be made available for social and affordable housing, including schemes of affordable home ownership. Public land will not be sold outside public ownership/the LDA or the OPW for social or affordable homes.</p> <p>(iii) The majority of the development in the Metropolitan area (11,200 households) is planned for Mungret and Annacotty (surely contributing to urban sprawl) and there is no focus on regenerating the City Centre as a place for people to live.</p> <p>There is no consideration given to tackling dereliction and vacancy in the city centre to meet housing need and</p>	<p>(i) Placemaking is a key theme of the Draft Development Plan and the Council have established a Directorate dedicated to Environment, Planning and Placemaking. The draft Development Plan sets out in section 10.3.1 the Council’s ambition for placemaking.</p> <p>The introduction of new Government policy in ‘Housing for All’ issued in September 2020, will be incorporated into the proposed Plan and the Housing Strategy and Housing Needs Demand Assessment updated accordingly. This requires a mandatory 20% in either social, affordable or cost rental housing on all private schemes. Objectives in the Draft Plan will also be revised to integrate Housing for All accordingly.</p> <p>(ii) The sale of lands by the Council or other agencies is beyond the scope of the Development Plan. There are sufficient residential lands zoned to cater for the projected population growth within the lifetime of the proposed Development Plan.</p> <p>(iii) National and regional policy require that 50% of all new development within the city and 30% outside of the city shall be located within the built-up area. In line with the recommendation of the OPR, a dedicated Chapter will be prepared, which will incorporate a City Spatial Strategy and the Core Strategy will be updated to demonstrate the amount of brownfield/infill and greenfield lands, which will be required to accommodate the projected growth. Also,</p>
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<p>depopulation. However, this approach is mentioned in relation to county towns.</p> <p>(iv) Objective SS 01 Compact Growth needs far more detail. Thus far, the track record of LCCC in developing infill/ underutilized building and derelict sites has been very poor. This objective needs to be more explicitly linked to transport and the digital strategy. The submission outlines how in terms of supporting the development of additional housing and reducing the impact this will have on carbon emissions – using derelict and vacant buildings as well as repurposing buildings that were once used for retail but no longer in use for that purpose, is an obvious solution, omitted in the plan.</p> <p>(v) The Draft Plan sets out that at least 30% of all new homes shall be located within the existing built-up footprint of the (key town) settlements and Level 3 towns, it is considered too low, it should be 50% the same as the city, so it is consistent.</p> <p>(vi) Large neighbourhoods within the city like Corbally, King’s Island, Garryowen should get their own LAP that considers such issues as housing and transport, schools and regeneration.</p>	<p>the updated ‘Residential Settlement Capacity Audit’ clearly demonstrates how compact growth will be achieved.</p> <p>(iv) Delivering compact growth is one of the key cornerstones of the Draft Development Plan, in line with national and regional policy, the Council is committed to the delivery of compact growth in line with SS O1 and all the policies set out in Chapter 10. In line with the recommendation of the OPR, a dedicated Chapter will be prepared and inserted that will bring together a spatial strategy for Limerick with a stronger focus on compact growth.</p> <p>The Council already is committed to addressing vacancy that stands in the way of housing and or regeneration, through the operation of the Vacant Site Levy and also, to addressing dereliction through implementation of the Derelict Sites legislation. Amendments to the Planning and Development Regulations 2001 (amended) permit change of use of retail use to residential use with planning consent.</p> <p>(v) The requirement for 30% of all new homes within the built-up area outside of the city is set out in the NPF and RSES.</p> <p>(vi) The neighbourhoods identified are addressed in the City and Environs zoning and the City Spatial Strategy (the dedicated Chapter requested by the OPR) will provide clearer focus on the City Spatial</p>
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(vii) The Council must clearly indicate a commitment to reducing urban sprawl and the incidence of one-off housing that is not directly related to rural based need. The submission recommends that LCCC must clearly identify those permissions will be favourably regarded for those wishing to build in a village/town context (or even a rural cluster context – type 6 settlement). The criteria currently listed in the draft are too broad for exemptions and in reality, allow for most scenarios where a person is applying for one-off housing.

4. Regeneration: Referencing the history of the city and the continued concentration of acute urban disadvantage in areas such as St. Mary’s Park, Southill, Moyross, and Ballinacurra – Weston. The submission states that the Regeneration plan is ‘almost completely invisible in this document’. Labour strongly recommends that the regeneration areas and their unique challenges are highlighted and addressed in the housing section as well as in transport, climate and zoning.

Strategy, policies in relation to housing, education, transport and regeneration are addressed throughout the draft Plan.

(vii) The criteria in Objective SS O17 and SS O18 have been prepared in compliance with the NPF and the RSES, the premise is that individuals that have a social or economic need to live in the rural area. However, the Council is also committed to the development of towns and villages throughout Limerick, with strong policies and objectives that supports this development. Revitalisation of towns and villages is critical to sustaining rural areas.

4. Regeneration: Regeneration Areas are covered comprehensively in Chapter 10 ‘Compact Growth and Revitalisation’, with eight objectives and a range of measures for each of the three regeneration areas, these are taken from the current Regeneration Framework Implementation Plan. These objectives are already quite detailed. In respect of transport, Objective TRO O16 is precisely aimed at Regeneration Areas ‘sustainable travel infrastructure’ and pledges support to the ‘LSMATS [Limerick Shannon Metropolitan Area Transport Strategy] in the identification and delivery of improvements...based on the measures identified in the Limerick Regeneration Framework Plan’. The LRFIP Programme runs to 2023, the draft Plan seeks to integrate these disadvantaged communities with Limerick City and Environs.

<p>5. The Living Limerick City Centre Initiative: The submission references Living City Objective [Section 3.7.14, Objective HO O12] and queries what is meant by community housing and how it differs from other forms of housing and how it is particularly suited to the City Centre and towns/villages renewal. The submission questions whether there are supports/encouragements for stabilisation/renovation and restoration/conservation of the historic Georgian core.</p> <p>6. Student Accommodation and Co-Living: The Labour party supports the clarity that student housing will not be permitted for use as any other type of tenure. However, the Council should consider repurposing existing buildings to support students that cannot afford to rent new purpose-built accommodation.</p> <p>7. Homelessness: The submission notes the continued funding of programmes such as Housing First, own-door accommodation is vital to address those with complex needs and long-term homeless. The submission recommends a clear commitment to Housing First should be made within the development plan. Equally, a commitment to the removal of emergency</p>	<p>5. The Living Limerick City Centre Initiative: The Council acknowledge that there is a need to provide a clearer definition of ‘community housing’. This Initiative is currently profiled in Section 10.4.2.1, in Chapter 10, where there is specific reference to an innovative approach to the provision of housing in the ‘Living Georgian City Programme’ involving ‘a revolving fund managed by a structured governance model overseeing Investment Modelling and Feasibility for differing forms of housing and groups.</p> <p>Change wording of Objective HO 12 ‘to support the Living Limerick City Initiative for the delivery of community housing across the city and rural towns and villages’ should read ‘and the extension of a similar initiatives to rural towns and villages’.</p> <p>6. Student Accommodation and Co-Living: Additional text will be included to address the provision of student accommodation, in response to Submission 210, Milford Grange Residents. The Council will support repurposing of existing vacant or derelict buildings for student accommodation, subject to appropriate zoning and planning criteria.</p> <p>7. Homelessness: Section 3.7.16 and Objective HO O14 sets out policy support for Homeless Accommodation and support services throughout Limerick. The recommendations set with regard to homeless accommodation provision are operational matters and beyond the scope of the Development Plan.</p>
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night-by-night homeless provision should be made over the lifespan of the plan.

The submission recommends that the Council should make clear commitments that a local connection is not required for persons seeking emergency homeless accommodation.

The submission recommends that clear commitments to reducing youth homelessness through prevention services, eliminating the need for people with disabilities and complex needs entering homeless services, support for the development of additional drug treatment facilities in Limerick City and County in partnership with the HSE should be clearly stated and ongoing service development for vulnerable groups

8. Traveller Accommodation:

(i) The submission recommends that the following is included in the Draft Plan: All Traveller specific accommodation be built to the highest standards of development including health, safety, building standards, disability planning and the provision of green and recreational which should include play areas for children. Full consultation should take place with Travellers regarding the suitability of their accommodation during the design phase of the development in question.

(ii) The submission recommends that the following is included in the Draft Plan: A detailed census should take place to establish the true need for Traveller

8. Traveller Accommodation

(i) Section 3.7.17 and Objective HO O15 address Traveller Accommodation. Changes recommended to comply with OPR recommendations will include additional policy and mapping to support Traveller accommodation. The Traveller Accommodation Programme 2019 – 2024 sets out the priorities for the Council in relation to the specific accommodation needs and standards to be met with the lifetime of the Programme.

(ii) This issue is beyond the scope of the Development Plan, the CSO Census of Population, identifies Travellers as a specific ethnicity on the

<p>accommodation and that this be fully incorporated into the settlement Strategy. Running alongside this census must be a Health Impact Assessment to determine the suitability of the current accommodation the Traveller community are residing in.</p> <p>(iii) The Local Authority will prioritise the provision of Traveller and Roma accommodation and the annual departmental budget secured for Traveller housing provision is planned for and spent appropriately, ensuring accommodation needs are met. Development of Roma specific accommodation units and support services where a need is identified.</p> <p>9. Accommodation for Refugees and Asylum Seekers: The submission recommends that the Draft Plan include a clear commitment be given in the Development Plan to the establishment of own-door accommodation for those currently residing in Direct Provision as per government commitments.</p> <p>The submission recommends that the Local Authority must act alongside the Housing Agency and other approved housing bodies to support the development of housing units specifically for immigrants seeking protection. Limerick City and County Council should look beyond government policy and have a clear mission to support the end of Direct Provision within the county, emphasising the local authority’s solidarity with those temporarily housed in</p>	<p>Census form and also queries health, so there is some information available in this regard.</p> <p>(iii) This issue is beyond the scope of the Development Plan.</p> <p>9. Accommodation for Refugees and Asylum Seekers: Objective HO O16 seeks to implement government policy in relation to the provision of accommodation of refugees and asylum seekers, which is subject to funding. The Council will work with relevant agencies to implement government policy.</p>
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Direct Provision, for some over many years and having raised their families in these centres.

10. A Strong Economy:

(i) More emphasis should be placed on how the plan will allow the economy to grow by 50% without negative environmental impact. The CityXChange initiative needs to be highlighted here. The plan MUST commit to supporting initiatives and businesses that reduce emissions, reduce energy use and enhance the natural environment.

(ii) It is stated that the plan almost totally ignores the cultural and creative industries and must engage with the city centre arts community and consultation with them to enhance the public realm. The site currently being developed at Cleeves should incorporate extended use of city spaces, indoor and outdoor, the amenity offered by the riverfront, the Milk Market; The Potato Market is noted and should be advanced. Allowing mobile food units to trade outside of ‘designated areas’ can add to the vibrancy of an area/city /town.

(iii) The submission states that the plan does not seem to reflect the changes in society brought about by the recent pandemic, including the importance of green space, increased home working, quality of life etc. The new way of working with a major trend towards working from home

10. A Strong Economy:

(i) The draft Development Plan sets out the economic strategy for Limerick, in line with national and regional policy. The Council is committed to work with businesses to reduce emissions/energy use and enhance the natural environment. The work been carried out by the +CityXChange working with business is proof of the Council’s commitment to progress Limerick in a sustainable and responsible manner.

(ii) The Council recognises the value of Arts and Culture to the development of Limerick and continue to support and work with all the relevant stakeholders to progress the industry in Limerick. The value of Arts and Culture for Limerick is also recognised from both an economic and social perspective and is acknowledged in the Draft Plan and the policy support help further progress the sector. A number of strategies have been prepared by the Council in recent time and the plan seeks to support the implementation of these strategies. The Council will undertake a dynamic database for a Cultural Audit and Map and an objective will be inserted in the plan to this effect.

(iii) The Draft Plan was prepared amidst the COVID 19 pandemic, dealing with many of the issues that the submission highlights such as home/remote working. Chapter 4 outlines objectives to support the development of hubs in town and villages and policies to support remote working as well as objectives to support SME and startups.

and hybrid model of working (part in office, part time from home) is not adequately addressed in the plan.

(iv) The submission notes that it is regrettable that there is no mention of the Circular Economy in the economic plan for the county over the next 7 years, especially when the European Green Deal is based on a move to a more efficient use of resources via a circular economy restoring biodiversity, reducing carbon emissions and cutting pollution.

11. Retail: The observer queries how the Council will enhance the public realm and creation of a sense of place. In relation to Objective ECON O1 City Centre the submission suggests engagement with the arts community to enhance the public realm. In relation to Objective ECON O4 Local/Neighbourhood Centres Objectives (and also in relation to county towns and villages) the submission suggests there should be reference to hubs for home workers and the use of vacant buildings for this purpose. In relation to casual trading the submission states that allowing mobile food units to trade outside of ‘designated areas’.. In relation, Objective ECON O12 Night-time Economy, it is set out that this strategy needs to be

(iv) The Council recognise the importance of the Circular Economy and the value to the economy of Limerick. It is proposed to include new text and an associated objective on the Circular Economy and Economic Development in Chapter 4. In addition, the circular economy is dealt with in Chapter 7 Infrastructure and the Council recognises the economic opportunities that the circular economy can bring to the economy. Objective IN O15 seeks to promote sustainable patterns of consumption and production in the area of product design, production, processes and waste management. The Council acknowledge the importance of the European Green Deal and reduction in carbon emissions and linking this to the economic strategy for Limerick.

11. Retail: The Council recognise the many challenges that exist in the City Centre, which have been exacerbated by the Covid 19 pandemic. A number of progressive steps have been taken to address dereliction and vacancy in the City Centre, with the establishment of a dedicated team to deal with property owners, also the appointment of a City Centre Revitalisation Manager in 2020 with a role of liaison between retailers/traders and the Local Authority. There are currently a number of strategies being prepared which will have far reaching change for the City Centre including the LSMATS, City Centre Traffic Management Plan and a Public Realm Strategy for the City Centre. The coordination and implementation of all these strategies will enhance the City Centre, as a better place to live, work and enjoy. The draft Plan also includes an

developed in partnership with Arts and Cultural organisations in the city and county.

12. Enterprise and Employment:

(i) Referring to Section 4.7.2 Strategic Employment Locations Limerick City and Environs, Objective ECON O13, the submission queries if there will be a focus on types of business targeted for the North side business campus and will this objective directly link in with the employment needs of Moyross, King’s Island residents.

(ii) Referring to the Knowledge Economy and Objective ECON O16 Knowledge Economy – the submission queries the new way of remote working and the move towards 4-day working week. Knowledge workers can be sourced worldwide and will expect to be able to work in a flexible way. The submission queries whether the Development Plan should reflect this societal change that has accelerated through the pandemic.

(iii) Referring to Section 4.7.5 Education and Skills, the submission states that Objective ECON O17 lacks ambition and is about ‘sustaining existing levels’. How will LCCC build access to training options for all of society to ensure equality in Education and training. LIT is now the Technological University of the Shannon Midlands and Mid-West (TUS): all references to LIT should be replaced with its new title.

objective to prepare a night time strategy, which will be prepared in consultation with all the relevant stakeholders.

12. Enterprise and Employment:

(i) The draft Plan sets out Strategic Employment Locations in line with RSES, the Council will seek to work with stakeholders to progress the development of zoned lands, to support economic development in all locations.

(ii) The Council recognises the changing society that we find ourselves in, having regard to the current economic climate, policies and objectives in the Draft Plan support remote/home working, development of hubs in towns and villages.

(iii) The Council is committed to maintaining and sustaining existing levels of education and will work with education providers to expand, with sufficient zoned lands to accommodate this growth. All reference to Limerick Institute of Technology will be updated and replaced with Technological University of the Shannon Midlands and Mid-West (TUS).

<p>(iv) The submission notes the Draft Plans Objective ECON O19 Clustering and Innovation and queries whether this or an additional objective should specify the creative industries and identify how they will be supported and nurtured.</p> <p>(v) The submission refers to Objective ECON O20 Tackling Unemployment stating the objective is vague and lacks defined actions. The submission recommends that Limerick City and County Council be innovative in mentoring the setting up of a model format for apprenticeship as a cooperation between industry and the ETB. Waiting for Government to act in this sphere will not assist the tackling of unemployment.</p> <p>(vi) Referring to Objective ECON O21 Smart City – the submission recommends that access to high-speed broadband must be available across city and county to ensure equal opportunity.</p> <p>(vii) The submission requests that more detail is needed on office development and inclusion of specific co-working hubs in the objective is required.</p> <p>(viii) The submission references Objective ECON O24 Data Centres noting the controversy surrounding data centres,</p>	<p>(iv) ECON O25 included in the Draft Plan to support and enhance the development of creative industries.</p> <p>(v) Policy support is provided in Objective ECON O20 to support tackling unemployment, the Council are committed to working with relevant stakeholders to address issues relating to unemployment, however defining precise measures is beyond the scope of the Development Plan.</p> <p>(vi) The roll out of the National Broadband Plan is currently addressing accessibility to high-speed broadband. The policy support looks beyond broadband provision and seeks to develop Limerick as a Smart City.</p> <p>(vii) This specific objective set out in ECON O25 Office Development, seeks to promote office development in appropriate locations, co-working hubs are dealt with separately. See response to Submission No. 247.</p> <p>(viii) The Council recognise the challenges that data centres present and seeking a balance between dealing with the need for data centres</p>
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<p>mainly that they are a drain on the energy resources and provide few employment opportunities. The submission notes that Part B of the ECON 024 Objective is very light touch with ‘Promote co-location of data-centres with renewable energy sources’ and needs to be a directive that all data centres generate their own energy from renewable resources, or at a minimum of 50-75%, of their own energy from renewables.</p> <p>(ix) The submission refers to Objective ECON O25 Cultural and Creative Industries. The submission states that in light of the total decimation of the cultural industries during the pandemic, this Section needs much more focus and Limerick City and County Council must support the cultural industries, not merely ‘promote’.</p> <p>(x) In relation to Objective ECON O27 Rural Hubs, the submission notes that this could also include neighbourhood hubs in the city that support home workers and home-based SMEs.</p> <p>(xi) The submission questions how the plan will facilitate home working referring to Objective ECON O34 Home Working/E-Working.</p> <p>(xii) Referring to Objective ECON O35 Limerick Food Strategy –The submission notes that there is a huge</p>	<p>and addressing environmental challenges. The objective seeks to set out this challenge, by co locating renewable energies close to data centres. Details of each specific data centres will be addressed on in a case-by-case basis.</p> <p>(ix) The Council acknowledge the challenge the pandemic has brought to creative and cultural industries and continue to work with the industry and to seek funding and work with the relevant stakeholders to develop the sector.</p> <p>(x) This Objective shall be updated to include urban hubs, as well as rural hubs, as the Council recognise the importance of the service these hubs also provide.</p> <p>(xi) The purpose of the Development Plan is to provide policy support and facilitate the development of home working and to support the relevant infrastructure to enable home working.</p> <p>(xii) ECON O35 provides policy support for the Food Strategy and the Council through the Local Enterprise Office support and develop the sector.</p>
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opportunity for the Council to develop Limerick’s Food Sectors.

13. Tourism: The submission notes the critical success factors for the development of Limerick as a Wild Atlantic Way Gateway City as outlined in the Plan. However, Labour would make the following suggestions; In this entire tourism Section, little of no reference is made to the creative and cultural industries. These industries are central to attracting tourism into a region as well as enhancing the lives of those living and working in the city and county. Collaboration with the cultural and creative organisations is vital to build a dynamic tourism product. The submission recognises the value of the value of the Limerick Greenway; however, it does suggest that it should be about the town and villages along the route, that benefit and develop from the product.

14. Marine Economy: The submission queries why the Draft does not include the tourism potential of Limerick’s estuary coastline. The submission queries whether there is scope for a coastal greenway that links to the Tarbert Ferry and the lucrative and world-renowned Wild Atlantic Way which could link part of West Limerick and enhance its tourism potential building on the Foynes Flying Museum etc.

13. Tourism: The Council is committed and continue to work with creative and cultural industries, the economic development section of the Draft Plan sets out in ECON O25 seeks to promote the development of these industries for all opportunities for development, including tourism potential.

14. Marine Economy: The Tourism section in Chapter 4, sets out policy support for tourism throughout Limerick, supporting all elements of tourism, furthermore there are specific policies located in Volume 2 in relation to tourism development within specific settlements such as Glin and Foynes on the Wild Atlantic Way.

<p>15. Environment Heritage Landscape and Green Infrastructure:</p> <p>(i) The submission recommends that the Council should state specifically how its policies will comply with adherence to and alignment with EU Directives, National and Regional Policy as set down by the EU, the Oireachtas and the Regional Assembly. The submission recommends that:</p> <p>(ii) The Council should state that it will adopt an ecological/scientific basis for decision making in relation to the effect of development on biodiversity and the protection of the natural world.</p> <p>(iii) Labour considers that the objectives stated in the plan on Trees are very minimal and don’t specify any methodology for protection. The submission recommends that the Council should develop a comprehensive Trees Policy and appoint a full time Trees Officer. A comprehensive database should be developed for existing and proposed tree planting.</p> <p>(iv) The submission recommends that the Draft Plan should explain more clearly the concept of Blue/Green Infrastructure and differentiate it from other aspects of environmental protection.</p>	<p>15. Environment Heritage Landscape and Green Infrastructure:</p> <p>(i) The Council has an obligation to adherence and alignment with EU Directives, national and regional polices as outlined in the policies and objectives identified in Chapter 5, the Council is committed to meeting its obligations in this regard.</p> <p>(ii) A balance approach to decision making is key to proper planning and sustainable decision making, the Council seek to safeguard biodiversity and the natural environment in a balanced manner.</p> <p>(iii) See response to Submission No. 25 in this regard.</p> <p>(iv) The topic of green infrastructure is now a well-established concept in urban environmental planning, policy, research, and design, while awareness and understanding of its potential benefits for ecology and society have increased. The term green infrastructure often refers to projects that include vegetated design elements such as parks, green roofs, greenbelts, alleys, vertical and horizontal gardens and planters.</p>
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<p>(v) The submission requests that a comprehensive strategy to engage with Irish Water around the alignment of its strategic plans with those of the State and the Regions and the requirements of Limerick’s growth and development.</p> <p>(vi) The submission notes that Section 5.5.4 Landscape and Visual Amenity is mislabeled as 5.5.4 instead of 5.4.4.</p> <p>(vii) The submission recommends that an aspect of this Section should not be separated from the issue of Built Heritage. Historic Gardens and Designed Landscapes should be considered and amalgamated within the Built Heritage.</p> <p>(viii) The Register of Protected Structures should be assessed and selected using expert, independent and</p>	<p>Blue infrastructure technically refers to infrastructure related to the hydrological functions, including rainwater and urban storm water systems as well as surface water and groundwater aquifers. The development of Blue – Green Infrastructure brings many benefits, such as water benefits, climate change, adaptation and biodiversity, aesthetics and health and wellbeing benefits. The Council are currently preparing a Blue – Green Infrastructure Strategy for Limerick City and Environs, which will deal with detailed approach in this area.</p> <p>(v) The Council have a strong working relationship with Irish Water and continue to engage with the service provider in line with the Service Level Agreement. The Forward Planning Team have liaised extensively with Irish Water throughout the Development Plan making process to date and the Council will continue this ongoing dialogue with Irish Water to deliver the services for Limerick.</p> <p>(vi) Noted, however, it is not mislabeled.</p> <p>(vii) Historic Gardens and Designed Landscapes are considered to be appropriately located within the Draft Plan.</p> <p>(viii) The Record of Protected Structures has been considered using in house expertise.</p>
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<p>professional consultation and when published should include a specific justification for selections.</p> <p>(ix) The submission notes Fingal County Council’s objective in relation to green roofs including the requirements for all roof areas greater than 300m² for the following types of development (unless otherwise exempted by the Planning and Strategic Infrastructure Department); apartments, employment, retail and ancillary, leisure and education. The submission outlines how a similar approach had been taken in the draft plan but subsequently omitted before the public consultation process began. Labour asks that the Council reconsiders inputting green roofing as demonstrated above.</p> <p>16. Sustainable Mobility and Transport:</p> <p>(i) The submission welcomes the approach to reducing dependency on car usage and the shift to more sustainable means of travel, however the Draft Plan outlines the inclusion of 6 road projects, which is contradictory to a plan that wants to transition the county to a low carbon society and states that it is simply not plausible that increasing motorway capacity to the extent of the objectives listed in the Plan will not lead to a significant increase of CO₂ output and increased car dependency in the region.</p> <p>The submission includes a list of objectives to be included in the plan and given priority above those already listed:</p>	<p>(ix) See response to Submission No. 155 in this regard.</p> <p>16. Sustainable Mobility and Transport:</p> <p>(i) These issues are addressed in the responses to the following submissions:</p> <p>Submission No. 145 Limerick Pedestrian Network point raised no. 4 in relation to Policy TR P4 Delivery of Transport Infrastructure in line with National Policy Integration of Land Use and Transport Policies.</p> <p>Submission No. 247 National Transport Authority regarding recommended amendment to TR O18 and TR O19 with proposed new additional objectives in association with BusConnects and park and ride programme.</p>
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<p>Objective: Delivery of a comprehensive cycling and walking network for Limerick City Metropolitan Area.</p> <p>Objective: Delivery of the full BusConnects programme (inclusive of ticketing systems, bus corridors, additional capacity, new bus stops and bus shelters) for the Limerick City Metropolitan Area.</p> <p>Objective: Development of a Park and Ride programme for Limerick, linked with the BusConnects Programme</p> <p>It is an objective of the Council to only deliver large infrastructure projects that are compatible with a reduction of carbon emissions on a glidepath to reach a 50% reduction by 2030 and net zero by 2050 in line with most relevant national targets and with the council’s commitments under the climate action charter as signed in 2019.</p> <p>It is an objective of the Council to only deliver large infrastructure projects that are compatible with compact development goals as set out in the national planning framework.</p> <p>(ii) The submission refers to School Transport Planning and notes that in addition to a quickly delivered cycle network, the submission suggests that the following be included within this section directly targeted at both primary and secondary schools:</p> <ul style="list-style-type: none"> -A 15kph limit on all streets, which contain a school entrance or exit, with any traffic calming initiatives or 	<p>(ii) Objective TR O30 Behavioural Change Measures of the Draft Plan supports the implementation of behavioural change initiatives and the facilitation of school streets and school zones in the promotion of active travel options for Limerick’s children.</p> <p>There are a number of Limerick schools involved in the ‘Safe Routes to School’ (SRTS) programme which is funded by the Department of Transport through the National Transport Authority and coordinated by An Taisce’s Green Schools (ATGS). 37 Limerick schools applied to be</p>
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<p>infrastructure, delivered within the first year of the development plan programme.</p> <ul style="list-style-type: none"> -The development of car-free school streets at all urban and suburban schools. -The banning and removal of any existing “drive-thru” lanes within school grounds. -The installation of covered bike parking that will facilitate a minimum of 20% of the school population to safely park their bikes. This bike parking must also be given priority space near the main entrance door of each school with the removal of on-site car parking facilities if necessary. -Limerick Council commits to the development of a Bike Life report for Limerick in collaboration with the NTA. <p>(iii) Referring to Limerick Cycle Network, the submission proposes to amend Objective TR O15 to include:</p> <ul style="list-style-type: none"> -The completion of the main cycling arterial routes connecting each city ward suburb by the end of 2023. -Prioritise the completion of the full Limerick Cycle Network as identified in both documents by 2028. -It is an objective of the council to amend the identified barriers to cycling as identified in the Limerick Metropolitan Cycle Network Study (2016) such as roundabouts, river crossings and permeability blockages in the short term. 	<p>involved in the programme with eight picked for the first round. Once one of the schools have completed the project, another school will be taken from the waiting list. ATGS are currently doing consultation with all the chosen schools and will then, go on to prepare an outline delivery plan. This plan will then be submitted to the Council for detailed design and implementation. Any school that is part of the SRTS programme is eligible to apply for bike parking under that programme and it will be delivered by Green Schools.</p> <p>In addition to the Safe Route, the Council are available to work with all schools in Limerick regarding mobility management planning. The interested school are welcome to contact the Council to develop proposal specific to their school.</p> <p>(iii) The objectives included in LSMATS are built upon the existing Limerick Metropolitan Cycle Network Study, which identifies barriers to cycling, both real and perceived, natural and built on the existing network.</p> <p>Objective CC1 Develop a Comprehensive Strategic Cycling Network in LSMATS outlines the following:</p> <ul style="list-style-type: none"> -It is the intention of the NTA and the local authorities to: Build upon the existing Limerick Metropolitan Cycle Network Study and Shannon and Environs Local Area Plan to deliver a comprehensive cycle network for the LSMA, in a manner consistent with the National Cycle Manual and emerging best international practice; -To deliver an integrated, fully connected high-quality cycle network linking all major origins and destinations within the LSMA;
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	<p>(iv) Enhanced Public Transport – The submission proposes to amend Objective TR O17 to include the following: It is also an objective of the Council to support the enhancement of Limerick’s public transport fleet to ensure adequate bike parking within all city services to encourage multi-modal trips through the use of bikes and other micro-mobility devices for “first mile/last mile” trips.</p> <p>(v) Referring to the Draft Plan’s objective on Transport Interchange the submission proposes amending TR O20 to</p>	<ul style="list-style-type: none"> -Develop an Inter-Urban network connecting Limerick City and Metropolitan town centres; -Identify local opportunities for permeability and feeder routes to improve links to the primary, secondary and greenway network and enhance the attractiveness of cycling for short trips; and -Maintain and enhance existing infrastructure to a high standard <p>Objective CC2 Shannon River Crossing of LSMATS outlines the intention of the NTA and the Council to provide significantly enhanced cycle infrastructure across the River Shannon, via the upgrading of existing bridges and, if required, the provision of a new crossing dedicated to pedestrians and cyclists.</p> <p>The implementation of infrastructure proposed under LSMATS will be set out in a phased basis depending on the investment programme prepared by the National Transport Authority. This will be undertaken once LSMATS, which is at Draft stage, is finalised.</p> <p>(iv) The provision of Limerick’s public transport fleet is outside the control of the Local Authority. However, Objective TR O17 supports and encourages public transport providers to enhance the provision of public transport. The Plan also outlines the Council's commitment to the provision of multiple public transport modes and seeks to ensure that appropriate levels of cycle parking, cycle facilities and electric charging infrastructure are provided at public transport interchanges.</p> <p>(v) It is considered appropriate that the plan should seek to install safe and secure bike parking at all park and ride hubs.</p>
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<p>include the installation of safe and secure bike parking at all park and ride hubs.</p> <p>(vi) Behavioural Change Measures –the submission proposes to amend TR O30 to include the following: to encourage behavioural change the Council will deliver the Limerick Metropolitan Cycle Network in full by end of year 2025.</p> <p>(vii) The submission proposes that Policy TR P7 Road Safety and Carrying Capacity of the Road Network be removed and replaced with: It is a policy of the Council, guided by our climate commitments, to seek improvements to road safety while reallocating the existing carrying capacity of the road network throughout Limerick from motor traffic to active modes and public transport</p> <p>(viii) The submission proposes that Objective TR O43 HGV Restrictions is amended to:</p>	<p>(vi) The implementation of infrastructure proposed under LSMATS will be set out in a phased basis depending on the investment programme prepared by the National Transport Authority. This will be undertaken once LSMATS, which is at Draft stage, is finalised. The Draft Plan outlines in TR O15, that it will implement in full the cycle network, with priority given in the short term to delivering the primary cycle network and cycle routes serving schools.</p> <p>(vii) It is a policy of the Council (TR P4) to support the delivery of transport infrastructure identified within the National Planning Framework, National Development Plan, 2018 – 2027 (and any update) and the Regional Spatial and Economic Strategy for the Southern Region and to support enhanced connectivity within Limerick and inter-urban connectivity within the regions. Equal priority and focus is given to reduce dependency on the private car and secure a shift towards sustainable modes of transport, including walking, cycling and public transport through the implementation of LSMATS and ongoing behavioural change and infrastructure initiatives carried out by the Council. Policy TR P5 Sustainable Travel and Transport; Objective TR O9 Climate Proofed Transport Infrastructure; Objective TR O12 Limerick – Shannon Metropolitan Area Transport Strategy are all relevant in this regard.</p> <p>(viii) TR O43 outlines the Councils objective on HGV Restrictions: ‘It is an objective of the Council to identify specific lorry routes and/or time</p>
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<p>It is an objective of the Council to identify specific lorry routes to eliminate HGV movements through Limerick City and neighbourhoods, also</p> <p>It is an objective of the Council to limit deliveries to businesses in the city core to before 11am each day to further improve the safety of pedestrians and active mode users and to facilitate better use of street space for business and of liveability for citizens.</p> <p>(ix) The submission proposes that Objective TR O45 Car and Cycle Parking is amended to:</p> <p>It is an objective of the Council to support the provision of safe, secure and monitored bike parking in the city core. With the abundance of off-street car parking facilities, it is an objective of the Council to reduce the existing on-street car parking spaces in order to reallocate space to improved pedestrian and cycle infrastructure within the city core, and to provide space for improved public realm use.</p> <p>17. Climate Action Flood Risk and Transition to Low Carbon Economy: The Labour Party welcomes the recognition that the business-as-usual model, cannot continue and there is a need to reconsider our carbon footprint. It is suggested that the climate mitigation objectives are more specific and consistent with a quantifiable carbon budget approach. Labour propose that the Council adopt an additional objective in the new Development Plan, which builds on</p>	<p>restrictions, to reduce peak-time HGV movements through Limerick City and neighbourhoods. In addition, the Council, in conjunction with the National Transport Authority has committed to the preparation of a City Centre Traffic Management Plan, which will also consider the issues further.</p> <p>(ix) The Draft LSMATS outlines the plans for secure, long-stay cycle parking. This includes the provision of such in Colbert Station and other key transport nodes across the LSMA. The Draft Plan supports the implementation of LSMATS as is outlined in TR O12. Furthermore, the proposed City Centre Traffic Management Plan and the City Centre Public Realm Strategy will consider the issue of improved public realm use.</p> <p>17. Climate Action Flood Risk and Transition to Low Carbon Economy: The Draft Plan seeks to deliver a robust response to dealing with climate change, with much stronger policies and actions to deal with the challenges of climate adaptation and mitigation. The policies and objectives set out in the Draft Plan are much more far reaching in terms of compliance with EU, national and regional policy than those of previous plans. Climate Change/Action is a theme from the Strategic Vision and carried right throughout the plan, with a dedicated Chapter in Chapter 8 to tie it all together. It is considered that</p>
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<p>commitments made in the previous City Development Plan; Climate emissions reduction - It is an objective of the Council to put in place a process for carbon proofing major decisions, programmes and projects on a systematic basis, including investments in transport and energy infrastructure moving over time to a near zero carbon investment strategy. Such carbon proofing will take account of the need to reduce emissions on a glidepath to reach a 50% reduction by 2030 and net zero by 2050</p> <p>18. Sustainable Communities and Social Infrastructure: The submission welcomes the ambition of the Plan around healthy place making and improved community infrastructure. The submission states that it should be the ambition of the Council that all schools across the county will be serviced with segregated cycling infrastructure by 2028 and however, we would like to see the amenity value of the public rights of way enhanced as walkways and or cycleways.</p> <p>19. Land Use Zoning Strategy: Moyross is a key area of over 155 acres within the city. Residents and their PPN representative groups are calling on the Council to ensure that the zoning of Pineview Gardens as a green zone is reversed, as it is unnecessary. These lands shall be rezoned back to residential zoning.</p>	<p>Policies/Objectives set out in Section 8.2 address the matters highlighted.</p> <p>18. Sustainable Communities and Social Infrastructure: The Council recognise the role that healthy place making and availability of community facilities can do, to enhance the quality of lives for the residents and visitors to Limerick. The Council is committed to the provision of sustainable transport for children in terms of access to schools, this can be challenging in rural areas. The Council is committed and has dedicated resources in place to assist schools in this area and work will continue throughout the lifetime of the Plan.</p> <p>19. Land Use Zoning Strategy: This issue is addressed in the response to Submission No. 11 Point 1.</p>
<p>Chief Executive’s Recommendations</p>	

1. – 2. No change;
3. Update Housing Strategy, Housing Need Demand Assessment and prepare a dedicated Chapter 4 on Housing, which will be included in Part C of the Chief Executive’s Report;
4. No change;
5. Change wording of Objective HO O12 to include ‘to support the Living Limerick City Initiative for the delivery of community housing across the city and rural towns and villages and the extension of a similar initiatives to rural towns and villages.
6. Amend Objective HO O8 Student Accommodation as follows: It is an objective of the Council to:
 - A) Support the provision of high quality, professionally managed purpose-built student accommodation either on campus, or in appropriate and accessible locations on public transport or cycle networks. All forms of student accommodation shall respect and protect the existing residential amenities of the area in which it is proposed. Student accommodation shall be and of appropriate design, in accordance with the Department of Education and Science ‘Guidelines on Residential Development for Third Level Students’ (1999), and (2005) ~~National Student Accommodation Strategy (2017)~~ and any subsequent updates. Applications for change of use from student housing to any other form of ~~housing use~~ shall be strongly resisted, without adequate demonstration that there is no longer a need for such use in the area and an over-provision of student housing exists’.
 - B) Ensure that all applications for new off campus purpose built student accommodation, the change of use to student accommodation in existing residential areas, or extensions to existing dwellings to facilitate student accommodation, include a Student Demand and Concentration Statement with details outlining the presence and distribution of any permanent residential occupiers, the extent of students renting in the private housing market and the presence of any other housing catering primarily for students and short term lets in the area/estate. The application should address any potential impacts of the proposal on residential amenity and any permanent residents in the area.
 - C) Require all applications for off campus purpose built student accommodation to be accompanied by a Student Management Plan outlining how the scheme will be professionally managed. The Plan shall demonstrate how the development will be managed so as to avoid potential negative impacts from occupants on surrounding properties and neighbourhoods and ensure the maintenance of safe, secure and clean environments for the community, occupants and nearby residents.
 - D) Ensure permissions for student accommodation will be subject to a condition requiring planning permission for a change of use to any other type of use, including short term holiday letting. Future applications for this type of change of use will be resisted. Where it is demonstrated that such form of housing is no longer required a planning application will require details of a proper management plan for the non-student use of the units to prevent adverse impacts on traditional residential estates.

7. No change;

8. Update zoning maps to identify Traveller accommodation locations;

9. No change;

10(i) No change;

(ii) Include a new objective in Section 9.14 as follows:

Objective SCSI XX Undertake a cultural audit and create a dynamic database and associated map of existing and future locations and landmarks that incorporates or has the potential to incorporate cultural/creative arts.

(iii) No change;

(iv) Insert the following text and associated objective into Chapter 4:

The transition to a more circular economy, where the generation of waste is minimised by the principals of designing out waste and pollution and keeping products and materials in use for as long as possible, is essential in developing a competitive, sustainable, low carbon, resource efficient economy. The Council recognises the multiple economic and environmental benefits and opportunities that arise from a more circular economy particular in the creation of job opportunities in recycling and high-quality repairs and new innovative enterprises. More information on the Economic Opportunities around the Circular Economy can be found in Chapter 7 Infrastructure.

New objective: Objective ECON OX: Circular Economy- It is an objective of the Council to: Support the economic benefits and opportunities that exist in the transition to a more circular economy.

11. No change;

12(i)-(ii) No change;

(iii) All reference to Limerick Institute of Technology will be updated and replaced with Technological University of the Shannon Midlands and Mid-West (TUS) throughout Draft Plan.

(iv)- (ix) No change;

(x) Amend Objective ECON O27 as follows:

ECON O27 Rural Remote Working Hubs It is an objective of the Council to facilitate the development of remote working/rural working hubs at appropriate locations across the County. Limerick.

(xi)-(xii) No change;

13. - 14. No change;

15(i) - (ii) No change;

(iii) Update Section 8.2.3 to include the following: including the retention and integration of existing natural landscape features such as trees and hedgerow into the design of all new development.

Amend Objective EH O10 Trees and Hedgerows to include the following:

It is an objective of the Council to:

a) Retain and protect amenity and biodiversity value of the County and City by preserving as far as possible trees, woodlands and hedgerows, having regard to the significant role that trees and hedgerows play in local ecology, climate change and air quality and their contribution to quality place making and the associated health and wellbeing benefits

b) Require, in the event that mature trees or extensive mature hedgerow is proposed to be removed, that a comprehensive tree and hedgerow survey be carried out by a suitably qualified ~~individual, demonstrating that the subject trees/hedgerow are of no ecological or amenity value~~ tree specialist to assess the condition, ecological and amenity value of the tree stock/hedgerow proposed for removal and to include mitigation planting and management scheme. The Council will seek in all cases to ensure when undertaking development or when permitting development that the loss of or damage to existing trees is minimised.

c) Require the planting of native trees, hedgerows and vegetation and the creation of new habitats in all new developments and public realm projects. The Council will avail of tree planting schemes administered by the Forest Service, in ecologically suitable locations, where this is considered desirable

d) To identify and prepare TPO’s where trees of exceptional amenity, cultural or environmental value are identified which warrant a high level of protection

e) To implement the Limerick City and County Tree Policy when completed and review as appropriate

(iv)-(viii) No change;

(ix) Update IN O10 and Section 11.3.11 to include: Require green roofs for all roof areas for the following development types and encourage for all other types of development unless otherwise agreed with Limerick City and County Council's planning department:

Apartment Developments;

Employment Developments;

Retail Developments;

Leisure Facilities;

Education Facilities;

All roofs of 300m² or greater to provide a minimum of 60% green roof coverage, unless exempted/ partially exempted.

16(i)-(vi) Reorganise and update Chapter 6, which will be set out in Part C of the Chief Executives Report;

16(v) Include additional text in Section 6.5.5 to include reference to appropriate levels of safe and secure cycle parking.

	<p>(vii) - (ix) No change; 17. - 18. No change; 19. Change an element of zoning from Open Space to Existing Residential at Pineview Gardens, Moyross.</p>
	SEA/ AA Response
	<p>The update of the Housing Strategy and Housing Chapter of the Draft Plan will offer clear guidance for accommodation in both urban and rural areas. The section on student accommodation reflects concerns raised elsewhere in the CE’s report. The update of policy is welcomed in helping to address the specific accommodation issues of this cohort of the population.</p> <p>The objective for a cultural audit is welcomed. However, it should be noted that this is a land use plan and its functions and implementation are guided by planning legislation. This means that the elements of cultural heritage that fall within this remit would be recorded. A new Environmental Protection Objective C3 is proposed in the Environmental Report as follows: C3 Conserve and record all those elements of cultural heritage that may be affected by planning related activities.</p> <p>The inclusion of additional text on hedgerows and trees is welcomed and useful from an ecological perspective.</p> <p>For green roofs see SEA/ AA Response to Submission No. 244 above.</p>

No.	Name/ Group:	LCC-C62-148 Limerick Chamber
148	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. City Centre: The submission from Limerick Chamber notes the decline in both footfall and private investment in the city centre over the past decade has had a detrimental effect on businesses in Limerick City and the impact of the COVID-19 pandemic has only exacerbated these effects. While the ambitions of this Draft Plan are welcomed, included in this submission are key recommendations which Limerick Chamber feel are essential to include in the final Plan.</p>	<p>1. City Centre: The Council acknowledge and concur with sentiments of Limerick Chamber, with regard to declining footfall and the impact of Covid – 19, however the outlook as we progress towards the emergence from the pandemic appears to be brighter. Investments and job creation in Limerick have continued despite the pandemic, however it is acknowledged that footfall figures have been slower to increase. The Council will continue to work with the Chamber to support retailing in Limerick with campaigns such as Shop Limerick etc.</p>

<p>2. Introduction, Vision and Strategic Overview:</p> <p>(i) Limerick Chamber welcomes the increased focus on sustainability and placemaking.</p> <p>(ii) While it is important to acknowledge the strengths that Limerick possesses, it is even more important to acknowledge the challenges it faces. A 2019 report by Copenhagen Economics showed the challenges facing Shannon Airport in terms of its international connectivity, while a 2021 report by Indecon showed the educational and health gaps that exist between Limerick and other Irish cities. Limerick certainly has the potential to build on its existing strategic assets, but it is misleading and premature to claim that we have a competitive advantage across these areas.</p> <p>(iii) Limerick Chamber welcomes the commitment to the Sustainable Development Goals but asks that clarity be given in relation to the proposed implementation model. The main document refers to a 10-minute model; however, the Limerick 2030 review background document refers to a polycentric approach. The Chamber also asks the LDP to consider an alternate approach to our city’s model of sustainability. The proposed ‘Future Limerick Model’ is one that targets</p>	<p>2. Introduction, Vision and Strategic Overview:</p> <p>(i) Noted.</p> <p>(ii) As part of the First Issues public consultation for the plan in August – October 2020 the Planning Authority prepared a number of background issues documents. These identified the strengths, challenges and opportunities facing Limerick and were used to inform the writing of the Draft Plan. The Limerick 2030 Review and Update also contains a section on the strengths, constraints, opportunities and threats. Limerick recognises the importance of Shannon Airport to Limerick and the wider region in attracting business and visitors to the area and the Council will continue to work with the Shannon Airport to enhance its offering where possible. Market leaders and new business often quote the reason for locating in Limerick is the access to highly skilled and well-educated pipeline of graduates from the Universities/Colleges, the Council is committed to working with education providers to ensure this pipeline is maintained.</p> <p>(iii) The Draft Development Plan seeks to achieve compact growth and the delivery of the 10-minute city/town/neighbourhood as a key premise of the policy approach. The NPF and RSES seek to grow Limerick City and Suburbs significantly by 2040, this development must occur in a planned manner and must be done in a manner that supports and develops the array of neighbourhoods that exist surrounding the City Centre. It is proposed that Limerick will develop in a sustainable coordinated manner, which is supported by sustainable transport and the development of community’s services to support population growth.</p>
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<p>key areas of growth and development for Limerick moving forward. This model also puts an emphasis on greater connectivity and compact growth, but links into other important areas relevant to Limerick achieving sustainable growth.</p> <p>3. Core Strategy; Chapter 3: Settlement & Housing Strategy:</p> <p>(i) Concern is expressed regarding the depiction of population projections within the main documents. Separate quantifiable targets for housing in the city centre should therefore be included to observe progress on housing developments in Limerick City Centre.</p> <p>(ii) Limerick Chamber asks that clarity be given as to whether historical undersupply since 2016, which has resulted in many 25-29 years old’s having to live with parents, has been factored into housing need projections.</p> <p>4. A Strong Economy:</p> <p>(i) The three largest economic sectors in Limerick identified in Section 4.3.1 of this report are</p>	<p>The polycentric urban structure proposed in the LK2030 Update is based on the proposed zoning plan, which was informed by in-depth analysis of available infrastructure and services. The polycentric urban structure for Limerick consists of a consolidated city centre containing the core area flanked by outlying urban neighbourhoods.</p> <p>3. Core Strategy; Chapter 3: Settlement & Housing Strategy:</p> <p>(i) The Core Strategy Table and associated maps will be updated in line with the response to the OPR’s recommendations. The ‘Residential Capacity Analysis’ will also be updated and will identify sites within the City Centre for redevelopment.</p> <p>(ii) The Housing Strategy and Housing Need Demand Assessment has considered the growth requirements across each of the 5 identified Market Areas. The Household projections used in the Draft Development Plan (Section 2.3.2, and Table 2.3) were undertaken in accordance with Section 28 Government guidance and taking into account the latest accurate figures available of unmet demand from the 2016 Census. Both the Housing Strategy and HNDA will be updated to reflect changes in Government policy through Housing for all.</p> <p>4. A Strong Economy:</p> <p>(i) The information contained in the Draft Development Plan is taken from the Census of Population 2016.</p>
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<p>Construction, Wholesale and Retail Trade and Professional, Scientific and Technical Activities. However, the recent Mid-West Economic Insights report for April 2021 highlights that Industry, Human Health and Wholesale & Retail sectors as the three largest sectors.</p> <p>(ii) The Chamber would also like to highlight the contrast in tone between Draft Plan Chapter 4 and the background retail strategy document. A much more positive stance on the city centre is presented with claims that Limerick City is “performing satisfactorily and fulfilling its role as the primary retail centre of the County”, with much less recognition towards the decline of the retail sector in recent years. The much more realistic view present in the Draft Plan main document is welcomed, with the recognition that there is work to be done to address the key issues associated with the decline in both footfall levels and the retail sector in Limerick City Centre.</p> <p>(iii) It is important that the Development Plan recognises the opportunity that exists to develop the tourism sector in Limerick City Centre. The Chamber believes that significant opportunities exist to develop Limerick city as a visitor destination in line with Fáilte Irelands planned investment and promotion of Limerick as a Gateway City on the Wild Atlantic Way, along King</p>	<p>(ii) The Draft Retail Strategy has been prepared and provides an overview of existing retailing and looks at the overall performance of Limerick City and Environs as opposed to Limerick City. The aim of the Draft Strategy is to create the appropriate conditions necessary to foster a healthy and vibrant environment in Limerick over the Development Plan period in Limerick and in the Limerick Shannon Metropolitan Area.</p> <p>(iii) Section 4.8.1 of the Draft Plan assessed Urban Tourism and the importance of the development of the sector, ECON O36 sets out policy support for the tourism sector.</p>
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<p>Johns Castle, the International Rugby Experience and the Milk Market.</p> <p>(iv) Project Ireland 2040 projects that the population of Ireland will grow by a further 1 million by the year 2040. Limerick Chamber feels it is essential that the Development Plan acknowledges the need for a ‘Future Urban National Strategy’, given the release of a rural development strategy earlier this year.</p> <p>(v) Limerick Chamber welcomes the commitment to enhancing the vitality of the City Centre and policies to encourage compact growth without putting a strain on current resources.</p> <p>(vi) Plans to introduce a joint-use space for the higher education institutes (HEI) in the city centre are welcomed.</p> <p>(vii) Limerick Chamber calls for a stronger commitment within the Development Plan to address youth unemployment. Limerick Chamber believes that the implementation of national plans to address youth unemployment, such as the establishment of a one-stop-shop Youth Desk needs to be acknowledged in the Development Plan.</p>	<p>(iv) The Council recognise the value in the preparation of a report on the future development of urban areas, however, this is a matter for the Government and beyond the scope of the proposed Development Plan.</p> <p>(v) Noted.</p> <p>(vi) Noted.</p> <p>(vii) Tackling youth unemployment is challenging and largely beyond the scope of the Deveolpment Plan process, however the Draft Plan put in place support to assist develop programmes and initiatives to address the issue. ECON O20 of the Draft Plan outlines that it is an objective of the Council to support the work undertaken by the Education and Training Boards, in relation to courses provided under SOLAS and the establishment of Community Training Boards Training Initiatives and Specialist Training Provision in Limerick.</p>
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<p>5. Sustainable Mobility and Transport:</p> <p>(i) Limerick Chamber welcomes the commitment in the Development Plan to the delivery of key infrastructure assets such as the M20, the N69 Foynes to Limerick and the Limerick Northern Distributor Road. These projects will play a key role in enhancing Limerick’s connectivity both locally and nationally.</p> <p>(ii) Limerick Chamber seeks clarity on how climate goals will be monitored at local level for both the aforementioned projects as well as other/future pipeline projects.</p> <p>(iii) References to ‘behavioural change measures’ and ‘micro-mobility’ are also welcomed as these were not covered in the original LSMATS draft.</p> <p>(iv) Objective TR 018 refers to protecting existing bus services. Limerick Chamber contends that the objective should be reworded to state “to expand and enhance existing services.”</p> <p>6. Sustainable Communities and Social Infrastructure:</p> <p>(i) Chapter 9 does not acknowledge the health challenges that Limerick continues to face particularly with regards to childhood asthma and obesity nor does</p>	<p>5. Sustainable Mobility and Transport:</p> <p>(i) Noted.</p> <p>(ii) All applications for major infrastructure such as road projects require climate proofing, this is required by the consenting authority and as standards/targets progress, this will evolve over the lifetime of the plan, as priorities change, this is an issue for determination on a case-by-case basis for each project.</p> <p>(iii) Noted.</p> <p>(iv) Objective TR O18 specifically deals with existing bus services, see response to Submission No. 247 in this regard.</p> <p>6. Sustainable Communities and Social Infrastructure:</p> <p>(i) The Council do not have a role to play in provision of healthcare, however the Council recognises the challenges of the health system and</p>
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<p>it acknowledge the connection between adverse health conditions and areas of deprivation as was previously highlighted by Indecon.</p> <p>(ii) Chamber calls on the Development Plan to recognise the need to develop the appropriate facilities to address these concerns. Under Objective SCS1 O12 in Chapter 9, a fourth facet should be added which commits to delivering teaching, research and development and innovation facilities. The facilitation of appropriate levels of student accommodation must also be committed to within the Development Plan to cope with this growth.</p> <p>7. Compact Growth and Revitalisation: Limerick Chamber has concerns regarding a separate Chapter on compact growth being included at such a late point in the document. The development of compact growth will create a sustainable level of footfall which is crucial to reviving the retail sector in the city centre. It is set out that an in-depth discussion on compact growth should therefore either precede or be included as part of the Settlement and Housing chapter.</p> <p>8. Implementation and Monitoring: This chapter gives no guidance regarding the standard of monitoring or data collection that should be required as part of all projects that are active during the lifespan of the LDP.</p>	<p>the provision of services. Policy support is provided in the Draft Plan and there are sufficient lands zoned to cater for expanded health services.</p> <p>(ii) The Council has no responsibility to deliver teaching, research and development and innovation facilities, sufficient zoned lands are suitably zoned to accommodate this growth. The Council recognise the issues with regard to the provision of student accommodation and additional support shall be included to support the development of student accommodation in line with the response to Submission No. 210.</p> <p>7. Compact Growth and Revitalisation: In line with the recommendation from the OPR, a dedicated Chapter will be prepared, which will include a City Spatial Strategy, which will deal with compact growth, this will be located as the third Chapter in the plan and will deal with compact growth and the development of opportunity sites.</p> <p>8. Implementation and Monitoring: In line with the recommendation from the OPR and the Draft Development Plan Guidelines, a key set of standards/targets, which will be monitored throughout the proposed plan will be included in Chapter 13.</p>
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<p>Limerick Chamber requests that the LDP acknowledge the need for a public dashboard that provides citizens with data and information on key projects for Limerick’s development.</p>	
<p>Chief Executive’s Recommendations</p>	
<p>1. No change; 2(i) - (iii) No change; 3(i) <u>Update Core Strategy Table and associated Maps, which will be contained in Part C of the Chief Executive’s Report;</u> (ii) <u>Update the Housing Strategy and Housing Need Demand Assessment to reflect national policy changes set out in Housing for All;</u> 4(i) - (vi) No change; 5(i) – (iv) No change; (v) Remove Objectives TR O18 and TR O19: Objective TR O18 Protect Existing Bus Services It is an objective of the Council to support the operation of bus services, by facilitating the provision of improved facilities and services for bus users in Limerick, including the provision of set down areas for coaches and bus shelters at bus stops, where feasible. Objective TR O19 Bus Lanes/Quality Bus Corridors It is an objective of the Council to: a) Support and facilitate implementation of an integrated, multi-modal and accessible public transport network, catering for all members of society across the Metropolitan Area, including a future BusConnects Limerick programme and investment in the rail network that will be identified in the LSMATS; b) Safeguard the proposed quality bus corridors from inappropriate development and ensure adequate set back is maintained to facilitate the implementation of the programme, in consultation with the Local Authority. Include new Objective as follows: <u>Objective TR OX Limerick BusConnects Programme: It is an objective of the council to support the implementation of the Limerick BusConnects programme including the following:</u> <u>(i) An improved Metropolitan Bus Service Network which will deliver a step change in the quality of the bus service across the city and suburbs;</u></p>	

- (ii) A programme of Core Bus Corridors, which will seek to provide end-to-end full bus priority on key bus routes via measures such as new bus lanes; bus gates and bus priority signals, in order to ensure that bus services are no longer subject to traffic congestion impacts in Limerick, with the following corridors a priority:
from the M7/Dublin Road junction to the City Centre;
from Mungret, Raheen and Dooradoyle to the City Centre;
on the Ennis Road to the City Centre;
on the Ballysimon Road from the proposed Park and Ride site to the City Centre; and
on Childers Road between Parkway Roundabout and Ballinacurra Road;
- (iii) To provide for further bus priority measures on radial routes into the city centre, as identified by the NTA and Limerick City and County Council as part of BusConnects Limerick;
- (iv) To provide for bus priority measures through the development site to the rear of Colbert Station, as part of an emerging masterplan to be agreed between the NTA, Limerick City and County Council, the landowner, and other stakeholders;
- (v) To provide for bus priority through Limerick City Centre linking the Dublin Road Bus Corridor to the Raheen/Dooradoyle corridor, with a preference for O’Connell Street as the most direct route into the centre, delivering passengers as close as possible to their destinations;
- (vi) To increase the capacity of Sarsfield Bridge by reallocating the carriageway to the movement of buses, cyclists, pedestrians and taxis;
- (vii) To carry out any minor works required to facilitate additional and altered service patterns arising out of a review of the service network under BusConnects Limerick

6(i) No change;

(ii) Amend Objective HO O8 Student Accommodation as follows: It is an objective of the Council to:

A) Support the provision of high quality, professionally managed purpose-built student accommodation either on campus, or in appropriate and accessible locations on public transport or cycle networks. All forms of student accommodation shall respect and protect the existing residential amenities of the area in which it is proposed. Student accommodation shall be and of appropriate design, in accordance with the Department of Education and Science ‘Guidelines on Residential Development for Third Level Students’ (1999), and (2005) ~~National Student Accommodation Strategy (2017)~~ and any subsequent updates. Applications for change of use from student housing to any other form of ~~housing~~ use shall be strongly resisted, without adequate demonstration that there is no longer a need for such use in the area and an over-provision of student housing exists’.

B) Ensure that all applications for new off campus purpose built student accommodation, the change of use to student accommodation in existing residential areas, or extensions to existing dwellings to facilitate student accommodation, include a Student Demand and Concentration Statement with details outlining the presence and distribution of any permanent residential occupiers, the extent of students renting in the private housing market and the presence of any other housing catering primarily for students and short term lets in the area/estate. The application should address any potential impacts of the proposal on residential amenity and any permanent residents in the area.

C) Require all applications for off campus purpose built student accommodation to be accompanied by a Student Management Plan outlining how the scheme will be professionally managed. The Plan shall demonstrate how the development will be managed so as to avoid potential negative impacts from occupants on surrounding properties and neighbourhoods and ensure the maintenance of safe, secure and clean environments for the community, occupants and nearby residents.

D) Ensure permissions for student accommodation will be subject to a condition requiring planning permission for a change of use to any other type of use, including short term holiday letting. Future applications for this type of change of use will be resisted. Where it is demonstrated that such form of housing is no longer required a planning application will require details of a proper management plan for the non-student use of the units to prevent adverse impacts on traditional residential estates.

7. Insert new dedicated chapter (which will be Chapter 3) which will deal specifically with the Spatial Strategy for the Metropolitan Area and will also deal with compact growth and revitalisation, which will be contained in Part C of the Chief Executive’s Report;

8. Insert new Chapter 13 to include further details on Monitoring and Implementation in line with the recommendation of the OPR, which will address targets and metrics, which will be monitored over the lifetime of the Plan.

SEA/ AA Response

The update of the Core Strategy will ensure compliance with higher tier plans (see response to OPR submission). The inclusion of new objectives on bus travel and bus corridors reflects increased priority placed on public transport and is in line with National transport Authority recommendations. The changes suggested are expected to have beneficial environmental effects.

Concerns have been raised in relation to student accommodation in other submissions - See SEA/ AA Response to Submission No. 146 above for example.

No. 153	Name/ Group:	LCC-C62-153 Limerick Cycling Campaign
Submission/ Observation Summary		Chief Executive’s Response
<p>1. Vision and Strategic Overview:</p> <p>(i) The observer notes that as the Draft Plan is underpinned by the Climate Change Adaptation Strategy (2019-2024), the Green Region ambition should be re-drafted to include a reduction in transport emissions as a key part of this ambition.</p> <p>(ii) The submission requests that Resilient, Connected and Inclusive Communities is amended to include a specific reference to the development of a cycle network and the importance of public transport and active modes. The submission requests that Strategic Objective 6 be amended to: Reduce car dependency and facilitate sustainable modes of transport through the delivery of walking, cycling and public transport infrastructure. Provide an appropriate level of road reallocation away from the private car to support existing and future development of active modes and to enhance connectivity.</p>		<p>1. Vision and Strategic Overview:</p> <p>(i) (ii) The Draft Plan’s vision is underpinned by a number of interlinked strategic objectives which focuses on sustainable growth of the built environment, employment generation and the provision of community and social services, together in a low carbon, compact, consolidated and connected pattern of development. The Strategic Objectives include the following:</p> <p>2. Transition to an environmentally sustainable carbon neutral economy.</p> <p>5. Create a competitive environment in which to do business. Promote, support and enable sustainable and economic development, enterprise and employment generation. Focus in particular on areas which are accessible by public and sustainable modes of transport. Enable settlements and rural areas to become self-sustaining through innovation and diversification of the rural economy.</p> <p>6. Reduce car dependency and promote and facilitate sustainable modes of transport. Prioritise walking, cycling and public transport. Provide an appropriate level of road infrastructure, road capacity and traffic management, to support existing and future development and enhance connectivity.</p> <p>Chapter 6 of the Draft Plan supports the rebalancing of the transport system towards more sustainable modes of transport, in order to mitigate against the potential impacts of climate change and to remove congestion from our city, towns and villages.</p>

<p>(iii) The submission request that in advance of the final Plan, that Limerick City and County Council formulate a set of KPIs to measure the projected progress within these goals and more tightly ties the goals within the larger document. The submission notes that transport should be included as a key metric.</p> <p>(iv) The submission notes the important focus on the Regeneration areas and feels there needs to be clear and measurable interventions informed by the UNSG’s in line with the NPF to ensure under-served communities are appropriately supported.</p> <p>2. Settlement Strategy:</p> <p>(i) The submission notes the implementation and monitoring section is weak in Chapter 3 and the absence of clear targets undermines the plans credibility.</p> <p>(ii) The submission refers to the section on homelessness, Traveller accommodation and accommodation for refugees and asylum seekers, which is felt, warrants considerably</p>	<p>(iii) This issue is addressed in Submission No. 146 Labour Party;</p> <p>(iv) This issue is addressed in Submission No. 146 Labour Party and Submission LCC-C62-32 Gerry O’Reilly;</p> <p>2. Settlement Strategy:</p> <p>(i) The Council are required to prepare a progress report on the implementation of the final plan, two years after the plan is adopted, as a requirement of the Planning and Development Act 2000 (as amended), this is currently the means of measuring the implementation of the Development Plan, however the Draft Development Plan Guidelines published in August 2021, establishes the requirement for an Annual Development Plan Monitoring Report with its own established indicators, which is in addition to the two year monitoring report.</p> <p>(ii) The issue of homelessness and refugee/asylum seeker accommodation is also addressed in Submission 146 Labour Party. It is considered that this item is addressed in the Draft Plan.</p>
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<p>more ambition and lacks any real cohesive models, implementation targets or commitments.</p> <p>(iii) The submission outlines that where objectives are stated, they are not linked back to UNSGs.</p> <p>(iv) The submission notes there is no mention of the urgency of affordable housing delivery as a stand-alone objective or the inclusion of an objective to redesign the regeneration areas that are inaccessible and cut-off from the city.</p> <p>3. Vacancy and Dereliction: Limerick Cycling Campaign recommends that more substantial consideration is given to tackling dereliction and vacancy in the city center to meet housing needs and urge the council to develop a plan for housing delivery in</p>	<p>The Housing Development Directorate is responsible for the strategic delivery of the Traveller Accommodation Programme. Section 3 of this programme outlines the performance, monitoring and measurements associated with the provision of Traveller Accommodation. It also includes proposed targets for the programme lifetime, the inclusion of Monitoring Returns submitted to the Department of the Housing, Planning & Local Government and the establishment of a new Local Traveller Accommodation Consultative Committee for Limerick City and County Council. Changes recommended to comply with OPR recommendations will include additional policy and mapping to support Traveller accommodation.</p> <p>(iii) Appendix 2 of the SEA Environment Report in Volume 4 aligns each and every Policy and Objective with UN Sustainable Development Goals.</p> <p>(iv) Update Housing Strategy and Housing Need Demand Assessment and insert new Chapter 4 to ensure compliance with ‘Housing for All’.</p> <p>3. Vacancy and Dereliction: This issue is addressed in Submission No. 146 Labour Party;</p>
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<p>the city centre whilst reducing the impact this will have on carbon emissions.</p> <p>The submission notes that consideration is needed towards the abandoned unused space in Limerick and provision of potential solutions for reimagining these spaces.</p> <p>4. Regeneration Areas: The submission queries how the Draft Plan is linked back to the current Regeneration plan or the Design and Public Realm Code for Regeneration Areas.</p> <p>The submission notes the little coverage in the Draft Plan given to the Regeneration areas such as St. Mary’s Park and strongly recommends that the Regeneration areas and their unique challenges are highlighted and addressed in the housing section as well as in transport, climate and zoning.</p> <p>5. Placemaking and Compact Growth: The observer feels that the Council must set clear targets that identify how place-making and making environments more attractive and livable is going to be achieved and how current trends in city development that do not reflect these demands, can be reversed.</p> <p>The submission welcomes the emphasis on place-making, compact growth, active land management and the impact of climate change however, the observer notes there is no attempt to sketch what these commitments actually mean in practice.</p>	<p>4. Regeneration Areas: This issue is addressed in Submission No. 146 Labour Party;</p> <p>5. Placemaking and Compact Growth: This issue is addressed in Submission No. 146 Labour Party;</p>
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6. City Centre:

(i) The focus on sustainability in the plan is welcomed noting the planned 30% increase in population up to 2028, concentrated on the city, towns and villages. However, the submission notes, the majority of the development in the metro area is planned for Mungret and Annacotty with no focus on regenerating the City Centre as a place for people to live. The submission notes the plan refers to increasing residents in the city but doesn’t indicate how this will happen.

(ii) The submission refers to the recent People’s Park controversy where the city is viewed as a place for commerce and tourism and not a site for place-making and community building. The submission refers to numerous examples of cities and towns internationally, where the success of place-making and a vibrant and embedded local residential community has created an attractive tourism and retail sector.

7. Education and Skills: The observer states that this section of the plan on Education and Skill lacks ambition referring to Objective ECON O17 Education and Skill. The submission outlines how the plan must be more ambitious and aim to grow education and training opportunities by 50% to 2040 and should ensure equality of access,

6. City Centre:

(i) This issue is addressed in Submission No. LCC-C62-32 Gerry O’Reilly under the City Theme.

(ii) The content is noted. The Local Authority acknowledges the social and economic benefits of more compact settlements. The Plan considers place-making as essential for the successful revitalisation of settlements and achieving compact growth in an attractive manner for all. Policy CGR P1 provides the policy support for compact growth and revitalisation of Limerick City, towns and villages. Objective ECON O1 of the Draft Plan provides the policy objective to enhance the vitality of the City Centre through a mixture of uses, reuse of vacant units, increased residential population and revitalisation.

7. Education and Skills: The Council is committed to growing existing levels of education and will work with education providers to expand, with sufficient zoned lands to accommodate this growth. A number of objectives are included in the draft plan to support the growth in education and training opportunities.

developing a range of skills development options from the third level to apprenticeships/traineeships.

8. Urban Sprawl and Rural Housing: The submission states that the stated desire to reduce urban sprawl contained in the draft plan lacks credibility given the performance of the council to date and the lack of detail provided. The submission notes that the council must clearly indicate a commitment to reducing urban sprawl and one-off housing.

The submission outlines how one-off housing is hollowing out our towns and villages, stripping them of their commercial and social functions. The observer notes the desire to see a revised list of criteria in meeting rural housing need as it is felt, the current criteria is too broad.

9. Green Economy: The submission notes the lack of inclusion of the circular economy in the economic plan for the county referencing the European Green Deal. The submission outlines the need to look at economic models differently in promoting resilience and recovery from COVID-19 and the importance of supporting industries that support a circular economic model.

The Green economy mentioned within the plan, needs clear commitments, outlining how it will support the economy to grow by 50% without negative environmental impact.

8. Urban Sprawl and Rural Housing: The criteria in Objective SS O17 and SS O18 have been prepared in compliance with the NPF and the RSES, the premise is that individuals that have a social or economic need to live in the rural area. The Draft Plan acknowledges that Limerick’s towns and villages have faced challenges in relation to building vacancy, declining vibrancy and a loss of services. Objective SS O4 of the Draft Plan provides an objective in the prevention of urban sprawl and linear roadside frontage development on roads leading out of the towns and villages

Objective ECON O8 of the Draft Plan outlines the strong support in strengthening the vitality and viability of Limericks towns and villages to enhance economic growth, enterprise and employment opportunities

9. Green Economy: The importance of the circular economy is acknowledged in Chapter 7 with associated supportive objectives. However, the Council recognise the importance of the Circular Economy and the value to the economy of Limerick. It is proposed to include new text and an associated objective on the Circular Economy and Economic Development in Chapter 4.

<p>10. Smart City: The CityXChange programme and Smart city initiatives and what they involve, should be included in the economic plan.</p> <p>11. Cultural and Creative Industries: The submission refers to the cultural and creative industries as key partners in the revitalisation of Limerick and notes it does not consider the decimation of these industries and the need for additional supports.</p> <p>12. Economy and Health/Climate Change: The observer notes that the economic plan seems to ignore recent public health and climate action priorities in society and consequent implications for social, physical and economic infrastructure, e.g., neglected green urban space, increased home working, societal recovery from Covid, etc. The new way of working with a major focus towards working from home and hybrid models of working is not adequately addressed in the plan. There is a need for neighbourhood hubs for home workers as well as SME start-ups.</p> <p>13. Environmental Heritage, Landscape and Green Infrastructure:</p>	<p>10. Smart City: Chapter 4 A Strong Economy Objective ECON O21 of the Draft Plan outlines the Council support to the Smart Limerick Initiative. Limerick’s Digital Strategy - Building Ireland’s First Digital City, the CityXChange Programme and other Smart City Initiatives are outlined in Chapter 7 Infrastructure of the Draft Plan.</p> <p>11. Cultural and Creative Industries: This issue is addressed in Submission No. 146 Labour Party;</p> <p>12. Economy and Health/Climate Change: In Chapter 4 Section 4.7.19 Home Working/E-Working, the Council acknowledges the increasing role and importance of home working/e-working in our economy. Objective ECON O34 provides the support in facilitating home-based economic activities. The Draft Plan outlines how the Covid-19 pandemic has highlighted the importance of towns and villages for providing employment which will undoubtedly increase, as people seek opportunities to relocate to rural areas, either through remote working in enterprise hubs or working from home. Objective ECON O27 outlines the Councils support in facilitating the development of remote working/rural working hubs at appropriate locations across the County.</p> <p>13. Environmental Heritage, Landscape and Green Infrastructure (i) This issue is addressed in Submission No. 25;</p>
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<p>(i) The submission notes the EU Biodiversity Strategy for 2030 and outlines the need for policies that will conserve what is best in Limerick’s landscape while successfully integrating suitable development. The submission urges the council to include a clear commitment that an ecological/scientific basis for decision making must be adopted in relation to the protection of the natural world.</p> <p>(ii) The submission notes the importance of a full time and resourced Tree Officer ensuring that the objectives concerning tree planting and support will be delivered alongside a clear methodology for protection.</p> <p>(iii) The submission states that blue/green infrastructure (including nature-based solutions) could be explained in clearer detail with hierarchies and objectives for delivery set out.</p> <p>14. Sustainable Mobility and Climate Change: The submission notes the Draft Plan needs to go further in aligning its objectives with national climate reduction targets and outlines how many of the objectives listed will lead to further private car dependency, further damage to towns and streets, sprawl development and increased carbon emissions.</p>	<p>(ii) This issue is addressed in Submission No. 25;</p> <p>(iii) This issue is addressed in Submission No. 146;</p> <p>14. Sustainable Mobility and Climate Change: This issue is addressed in response to submission No. 145 Limerick Pedestrian Network;</p>
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<p>15. Cycling</p> <p>(i) The submission refers to Policy TR P1 Integration of Land Use and Transport Policies and welcomes the commitment to sustained investment in active and sustainable modes. However, it is believed that this section should be amended to include a commitment to deliver the key cycling arteries from each suburban city ward to the city centre in the first year of the Plan and that the network in its entirety should be delivered by 2025.</p> <p>(ii) Limerick Council commit to the development of a Bike Life report for Limerick in collaboration with the NTA.</p> <p>(iii) The submission notes the targets for cycling from LSMATS draft strategy lack ambition and don’t reflect Limericks' potential as a cycling city. The observer requests that these targets are removed and replaced with revised targets</p> <p>(iv) The submission refers to Objective TR O15 and requests the Draft Plan to be amended to include:</p> <ul style="list-style-type: none"> - The completion of the main cycling arterial routes connecting each city ward suburb by the end of 2023. 	<p>15. Cycling</p> <p>(i) The implementation of infrastructure proposed under LSMATS will be set out in a phased basis depending on the investment programme prepared by the National Transport Authority. This will be undertaken once LSMATS, which is at Draft stage, is finalised. The Draft Plan outlines in TR O15, that it will implement in full the cycle network, with priority given in the short term to delivering the primary cycle network and cycle routes serving schools.</p> <p>(ii) A new Limerick active travel unit, which is funded by the Department of Transport, is in initial stages of being established within Limerick City and County Council. It is not considered appropriate to include individual project objectives such as that proposed within the Development Plan however, the proposed recommendations will be raised with this section for consideration.</p> <p>(iii) A revision of Mode Share Targets including baseline figures for modal share for the overall county and modal share targets for the plan period is recommended for inclusion. This issue is addressed with recommendations in Submission No. 247 National Transport Authority</p> <p>(iv) The implementation of infrastructure proposed under LSMATS will be set out in a phased basis depending on the investment programme prepared by the National Transport Authority. There is sufficient support in the Draft Plan to support the LSMATs programme.</p>
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<ul style="list-style-type: none"> - Prioritise the completion of the full Limerick Cycle Network as identified in both documents by 2028. - Prioritise our climate obligations to fully encourage modal shift by placing a moratorium on any road projects serving motor vehicles as their primary mode until and the completion of the long overdue cycle network. - It is an objective of the council to suitably amend the identified barriers to cycling as identified in the Limerick Metropolitan Cycle Network Study (2016) such as roundabouts, river crossings and permeability blockages in the short term. <p>(v) The submission proposes the inclusion of an objective on the restoration/rehabilitation of the King’s Island embankment and the O’Dwyer’s Bridge to Mill Road embankments to facilitate cycling/walking to the same standard as the Shannon Banks/Plassey Bank greenways.</p> <p>(vi) The submission refers to Policy TR P10 Sustainable Transport in Rural Areas and proposes the Development Plan should also reference Cyclist.ie’s policy document ‘A Vision for Cycling in Rural Ireland’ within this policy point.</p> <p>(vii) The submission proposes to omit Objective TR O45 Car and Cycle Parking and replace with the following:</p>	<p>(v) Objective EH O12 of the Draft Plan Blue Green Infrastructure provides the policy support in the promotion of a network of green and blue infrastructure throughout Limerick. The Limerick City and Environs Green and Blue Infrastructure (GBI) Strategy which is currently being prepared will inform the provision of green and blue infrastructure within the City and Environs.</p> <p>(vi) Policy TR P10 references relevant national policy.</p> <p>(vii) This issue is also addressed in Submission No. 247 National Transport Authority. The Draft LSMATS outlines the plans for secure, long-stay cycle parking. This includes the provision of such in Colbert</p>
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<p>- It is an objective of the Council to support the provision of safe, secure and monitored bike parking in the city core.</p> <p>- With the abundance of off-street car parking facilities, it is an objective of the Council to reduce the existing on-street car parking spaces in order to reallocate space to improved pedestrian and cycle infrastructure within the city core, and also to provide space for improved public realm use.</p> <p>(viii) The submission notes an error in the transport map CDP-V2-03 is inaccurate (missing cycle tracks in Plassey Industrial Park Childers Road).</p> <p>16. New Smarter Travel Policy: The submission notes Policy TR P2 Promotion of Sustainable Patterns of Transport Use reference to the Smarter Travel Programme outlining that the new Sustainable Mobility Policy, due for publication by the Department of Transport, is more relevant to reference.</p> <p>17. Prioritising Sustainable/Active Travel Projects: Policy TR P4 Delivery of Transport Infrastructure in line with National Policy: the observer notes the projects listed in this section and the priority given to sustainable and active travel projects. However, the submission notes that this is not reflected in the objectives listed which it considers, is only about the facilitation of private motor vehicles and road building.</p>	<p>Station and other key transport nodes across the LSMA. The Draft Plan supports the implementation of LSMATS as is outlined in TR O12.</p> <p>(viii) Transport Map will be updated.</p> <p>16. New Smarter Travel Policy: The Department of Transport is carrying out a review of sustainable mobility (walking and cycling) policy. The new policy will replace the existing sectoral policy documents published in 2009- Smarter Travel, A Sustainable Transport Future 2009-2020 and the National Cycle Policy Framework. This issue is further addressed in Submission No. 44 Department of Transport.</p> <p>17. Prioritising Sustainable/Active Travel Projects: This issue is addressed in Submission No. 247 National Transport Authority under the Transport Theme.</p>
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The submission requests that the following objectives are included and given priority over the existing list of projects:

- Delivery of a comprehensive cycling and walking network for Limerick City Metropolitan Area
- Delivery of the full BusConnects programme (inclusive of ticketing systems, bus corridors, additional capacity, new bus stops and bus shelters) for Limerick City Metropolitan Area.
- Development of a Park and Ride programme for Limerick, linked with the BusConnects Programme.

18. Road Projects: Limerick Cycling Campaign has grave reservations about how Objectives TR01 through to TR06 can be compatible with statements made in earlier chapters and at the beginning of Chapter 5. (Objective TR O1 N/M20 Cork to Limerick Project; Objective TR O2 Foynes to Limerick (including AdareBypass) Road Objective; TR O3 N21 Newcastle West and N21 Abbeyfeale Road Schemes Objective; TR O4 N24 Cahir to Limerick Junction; Objective TR O5 Motorway Network Arterial Roads; Objective TR O6 Limerick Northern Distributor Road.

The submission notes it is not plausible that increasing motorway capacity to the extent of the objectives listed will not lead to a significant increase of CO2 output, increased car dependency in the region and will reduce the region's capacity to deliver sustainable alternatives. The

18. Road Projects: It is a policy of the Council (TR P4) to support the delivery of transport infrastructure identified within the National Planning Framework, National Development Plan, 2018 – 2027 (and any update) and the Regional Spatial and Economic Strategy for the Southern Region and to support enhanced connectivity within Limerick and inter-urban connectivity within the regions. Equal priority and focus is given to reduce dependency on the private car and secure a shift towards sustainable modes of transport, including walking, cycling and public transport through the implementation of LSMATS and ongoing behavioural change and infrastructure initiatives carried out by the Council. Policy TR P5 Sustainable Travel and Transport; Objective TR O9 Climate Proofed Transport Infrastructure; Objective TR O12 Limerick – Shannon Metropolitan Area Transport Strategy are all relevant in this regard.

submission requests the following objectives to be included:

- It is an objective of the Council to only deliver infrastructure projects that are compatible with a reduction of carbon emissions on a glide path to reach a 50% reduction by 2030 and net zero by 2050 in line with most relevant national targets and with the council’s commitments under the climate action charter as signed in 2019.
- It is an objective of the Council to only deliver large infrastructure projects that are compatible with compact development goals as set out in the national planning framework.

The submission refers to Policy TR P7 Road Safety and Carrying Capacity of the Road Network and notes that policy provision in support of enhancing the road carrying capacity of the road network is in direct conflict with the Council’s obligations to reduce transport emissions and reduce the modal share given to private cars. The observer requests that this objective is removed and replaced with the following: ‘It is the policy of the Council, guided by our climate commitments, to seek improvements to road safety while reallocating the existing carrying capacity of the road network throughout Limerick from motor traffic to active modes and public transport’.

19. School Travel:

(i) The submission suggests the following to be targeted at both primary and secondary schools in the promotion of modal split:

- A 15kph limit on all streets which contain a school entrance or exit, with any traffic calming initiatives or infrastructure delivered within the first year of the development plan programme.
- The development of car-free school streets at all urban and suburban schools.
- The banning and removal of any existing “drive-through” lanes within school grounds
- The installation of covered bike parking that will facilitate a minimum of 20% of the school population to safely park their bikes. Bike parking must also be given priority space near the main entrance door of each school with the removal of on-site car parking facilities if necessary.

(ii) The submission welcomes Objective SCS1 O9 and SCS1 O10 in Chapter 9 however, would like to see consideration given to new schools that have been recently developed in the city and environs that lack cycling infrastructure and a commitment given to roll-out protected cycle paths by the end of the plan period. The submission states that it should be an ambition of the Council that all schools across the county will be serviced with segregated cycling infrastructure by 2028.

19. School Travel:

(i) - (ii) Objective TR O30 Behavioural Change Measures of the Draft Plan supports the implementation of behavioural change initiatives and the facilitation of school streets and school zones in the promotion of active travel options for Limerick’s children.

There are a number of Limerick schools involved in the ‘Safe Routes to School’ (SRTS) programme which is funded by the Department of Transport through the National Transport Authority and coordinated by An Taisce’s Green Schools (ATGS). 37 Limerick schools applied to be involved in the programme with eight picked for the first round. Once one of the schools have completed the project, another school will be taken from the waiting list. ATGS are currently doing consultation with all the chosen schools and will then, go on to prepare an outline delivery plan. This plan will then be submitted to the Council for detailed design and implementation. Any school that is part of the SRTS programme is eligible to apply for bike parking under that programme and it will be delivered by Green Schools.

In addition to the Safe Route, the Council are available to work with all schools in Limerick regarding mobility management planning. The interested school are welcome to contact the Council to develop proposal specific to their school.

<p>20. Regeneration Areas and Sustainable Travel: The submission refers to Section 6.5.2.2 Limerick Regeneration Areas Objective TR O16: Limerick Regeneration Areas Sustainable Travel Infrastructure and commends the support to combat the transport exclusion and lack of connectivity in regeneration areas currently faced.</p> <p>21. Public Transport: (i) The submission notes Objective TR O17 Enhanced Public Transport and suggest this objective be amended to also include the following: It is also an objective of the council to support the enhancement of Limerick’s public transport fleet to ensure adequate bike parking within all city services to encourage multi-modal trips through the use of bikes and other micro-mobility devices for “first mile/last mile” trips. (ii) The submission notes Objective TR O20 Transport Interchange and suggest this objective is amended to include the installation of safe and secure bike parking at all park and ride hubs.</p> <p>22. Behavioural Change: The submission refers to Objective TRO30 Behavioural Change Measures requesting that the objective be amended to include the following: To encourage behavioural change, the Council will deliver the</p>	<p>20. Regeneration Areas and Sustainable Travel: Noted</p> <p>21. Public Transport: (i) The provision of Limerick’s public transport fleet is outside the control of the Local Authority. However, Objective TR O17 supports and encourages public transport providers to enhance the provision of public transport. The Plan also outlines the Council's commitment to the provision of multiple public transport modes and seeks to ensure that appropriate levels of cycle parking, cycle facilities and electric charging infrastructure are provided at public transport interchanges. (ii) It is considered appropriate that the plan should seek to install safe and secure bike parking at all park and ride hubs.</p> <p>22. Behavioural Change: This issue has been responded to under content submitted under Policy TR P1 above (item 15).</p>
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<p>Limerick Metropolitan Cycle Network in full by end of year 2025.</p> <p>23. Traffic Circulation Plan: The submission proposes the need for a traffic circulation plan that will remove through traffic from the core City Centre, while still allowing local access and requests the following objective to be included in the plan: It is an objective of the council to develop a traffic circulation plan that aims to reduce through traffic in the city core. (notes also applicable to towns)</p> <p>24. Low Traffic Neighbourhoods: The submission welcomes the commitment to deliver 10-minute towns and city neighbourhoods however it is felt that the transport objectives do not align with this delivery. The submission refers to Low Traffic Neighbourhoods involving filtered permeability and requests the following to be included: It is an objective of the council to utilise a filtered permeability mechanism to create a number of strategic low traffic neighbourhoods within Limerick City.</p>	<p>23. Traffic Circulation Plan: The Council, in conjunction with the National Transport Authority has committed to the preparation of a City Centre Traffic Management Plan, which will consider the issues further.</p> <p>24. Low Traffic Neighbourhoods: Objective TR O12 supports the implementation of LSMATS and the strategies objectives. Objective WK5 of LSMATS outlines policy Supporting Measures for Walking and includes the intention of the NTA and the local authorities to: Ensure pedestrian infrastructure is inclusive and accessible for all individuals of all abilities and ages using Universal Design principles and collaboration between a diverse range of stakeholders; Deliver permeability projects throughout urban areas which reduce the distance required to travel on foot to key destinations and to public transport services. In select locations, a package of permeability projects will be developed as part of local area plans or masterplans; Undertake walkability audits at locations where demand for pedestrian activity is high and where deficiencies in the network have been identified. In addition, LU3 Principles for the Integration of Land Use and Transport Planning of LSMATS outlines the policy provision for the promotion of</p>
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<p>25. HGV Movements: The submission refers to Objective TR O43 on HGV Restrictions noting that any and all measures possible must be taken to divert traffic to the underused Limerick Tunnel. The submission suggests that this objective is amended to the following: It is an objective of the Council to identify specific lorry routes to eliminate HGV movements through Limerick City and neighbourhoods.</p> <p>The submission also proposes an additional objective to be added after TR O43: It is an objective of the Council to limit deliveries to businesses in the city core to before 11am each day to further improve the safety of pedestrians and active mode users and to facilitate better use of street space for business and of liveability for citizens.</p> <p>26. Climate Action, Flood Risk and Transition to Low Carbon Economy:</p>	<p>public transport, walking and cycling across the LSMA study area including the intention of the Local Authority to:</p> <p>Ensure that all new development areas will be fully permeable for pedestrians and cyclists through the application of the principle of filtered permeability whereby through traffic by private car is discouraged;</p> <p>Deliver schemes to improve permeability for walking and cycling in existing developed areas; and</p> <p>Ensure that the layout of new developments will prioritise walking and cycling and enable the efficient provision of public transport services.</p> <p>25. HGV Movements: TR O43 outlines the Councils objective on HGV Restrictions: ‘It is an objective of the Council to identify specific lorry routes and/or time restrictions, to reduce peak-time HGV movements through Limerick City and neighbourhoods. In addition, the Council, in conjunction with the National Transport Authority has committed to the preparation of a City Centre Traffic Management Plan, which will also consider the issues further.</p> <p>26. Climate Action, Flood Risk and Transition to Low Carbon Economy:</p>
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(i) Limerick Cycling Campaign is concerned that the plan’s objective on reducing environment impacts and our carbon footprint is not backed up by specific actionable policy.

The plan refers to Objective CAF O3 - Sustainable Development and notes that merely supporting projects on addressing climate change is not enough in preventing high carbon projects from progressing. The submission outlines that is not clear what carbon intensive development would be refused permission.

Referring to the Plan’s Environmental Report June 2021 and notes it is not clear where or how the transformative decarbonisation targets will come into effect and what projects will no longer proceed as a result of the new decarbonising change in policy. The submission refers to Chapter 13 Implementation and Monitoring and suggests that the climate mitigation objectives are more specific and consistent with a quantifiable carbon budget approach. The submission proposes an inclusion of the following objective building on the commitments made in the previous Limerick City Development Plan: Climate Emissions Reduction: It is an objective of the Council to put in place a process for carbon proofing major decisions, programmes and projects on a systematic basis, including investments in transport and energy infrastructure moving over time to a near zero carbon investment strategy. Such carbon proofing will take account of the need to reduce emissions on a glide path to reach a 50% reduction by 2030 and net zero by 2050.

(i) This issue is addressed under response to Submission No. 146 Labour Party.

<p>The submission welcomes Objective 18 – Energy and Emissions Balance but has concerns that the urgency needed to develop and implement a climate action plan is lacking.</p> <p>(ii) The submission states that if an area is designated a flood plain, then flood risk assessments for housing developments should be phased out and be no longer used.</p> <p>27. Sustainable Communities and Social Infrastructure</p> <p>(i) The submission proposes that health impact assessments should be included in all infrastructure plans.</p> <p>(ii) The submission requests the following sentence contained in Policy SCS1 P2 be removed ‘in so far as opportunities allow, that barriers to pedestrian access to such social infrastructure’ as universal pedestrian access should be a requirement of any new development/facility/infrastructure.</p> <p>(iii) The submission welcomes Objective SCS1 O38 however, the observer would like to see the amenity value of the public rights of way enhanced as walkways/cycleways.</p>	<p>(ii) This issue is addressed under response to Submission No. 30 Eamonn Baker under the Climate and Flooding Theme</p> <p>27. Sustainable Communities and Social Infrastructure</p> <p>(i) See response to LCC-C62-249 Southern Regional Assembly Recommendation No. 13(b).</p> <p>(ii) Policy SCS1 P2 Location of Community Facilities outlines the following: It is a policy of the Council to ensure that adequate provision is made in land use zoning, in the layout of developments and residential densities to ensure optimum accessibility to local community facilities and amenities, particularly by sustainable modes of transport and insofar as opportunities allow, that barriers to pedestrian access to such social infrastructure should be removed.</p> <p>(iii) Objective SCS1 O38 seeks the preservation of existing public rights of way contained within the Plan area. The public rights of way provided in Map 9.1 and 9.2 have multiple land owners/guardians and are more often located in highly sensitive environmental locations which result in difficulties to develop. The Council are currently</p>
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<p>28. Compact Growth and Revitalisation: The Limerick Cycling Campaign welcomes the commitment to compact growth and request the following additional text to the objectives listed:</p> <p>(i) Objective CGR O1 Place-making, Universal Design and Public Realm: It is an objective of the Council to ensure that all developments are served by segregated cycling infrastructure that connects to key arterial routes as set out in LSMATS</p> <p>(ii) Objective ES O1 Ellen Street Car Park: It is an objective of the Council to provide for an integrated sustainable mobility network that prioritises walking, cycling and public transport as the main components of mobility for the development.</p> <p>(iii) Objectives MM O1 Mungret Masterplan / PV O1 Parkway Valley / GV O1 Groody Valley / TN O1 Towlerton: It is an objective of the Council to create a low traffic neighbourhood by limiting the permeability of private cars throughout the development in favour of walking, cycling</p>	<p>developing a Green/Blue Strategy for Limerick City and Environs. A number of public rights of way proposed as part of the Draft Plan will be considered within this Strategy in the development of additional walking and cycling connections, subject to funding.</p> <p>28. Compact Growth and Revitalisation:</p> <p>(i) See response to recommendations under Submission No. 247 with regards to the provision of cycling infrastructure proposed for completion within the plan period.</p> <p>(ii) Objective ES O1 Ellen Street Car Park outlines the proposed objective for the future development of Ellen Street Car Park. Connectivity, permeability and green infrastructure are key components of Objective ES O1 which includes the following: c) Ensure integration of connectivity to surrounding streets. d) Ensure the provision of green infrastructure is a key component of the design and layout.</p> <p>(iii) Objective MM O1 outlines the Councils objective in relation to the Mungret Masterplan. Point g) outlines the following: Create a walkable and cycle friendly neighbourhood that provides easy access to schools and amenities through a safe and attractive network of streets and paths.</p>
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<p>and public transport permeability. The Council will ensure the development is served by segregated cycling infrastructure that connects to key arterial city routes as set out in LSMATS.</p> <p>(iv) Objective SF O1 Social Framework Strategy: It is an objective of the Council to prioritize the connection of regeneration communities to their surrounding communities and the city through the delivery of quality sustainable walking and cycling routes.</p> <p>29. Pineview Gardens: The submission is not in support of the rezoning at Pineview Gardens and considers it imperative that these homes are protected.</p>	<p>The issue of low traffic neighbourhoods is addressed in point no. 24 above.</p> <p>(iv) Extensive consultation has occurred between the Council and the NTA with regard to the Regenerations Areas. This is a matter for the NTA in the preparation of the updated LSMATS.</p> <p>29. Pineview Gardens: This issue is addressed in response to Submission No. LCC-C62-11 Moyross Residents Forum CLG under the City Theme.</p>
<p>Chief Executive’s Recommendations</p>	
<p>1. No change;</p> <p>2(i) The Environmental Report and the Natura Impact Assessment will be fully updated following receipt of amendments by the Elected Members and prior to putting the Material Amendments to the Draft Plan on Public Display;</p> <p>(ii) - (iii) No change;</p> <p>(iv) <u>Update Housing Strategy Housing Need Demand Assessment and prepare a new Chapter 4, which will be incorporated into Part C of the report;</u></p> <p>3. - 8. No change;</p> <p>9. Insert the following text as a new section after Section 4.7.8 in Chapter 4 and associated objective: <u>The transition to a more circular economy, where the generation of waste is minimised by the principals of designing out waste and pollution and keeping products and materials in use for as long as possible, is essential in developing a competitive, sustainable, low carbon, resource efficient economy. The Council recognises the multiple economic and environmental benefits and opportunities that arise from a more circular economy particular in the creation of job opportunities in recycling and high-quality repairs and new</u></p>	

innovative enterprises. More information on the Economic Opportunities around the Circular Economy can be found in Chapter 7 Infrastructure.

New objective: **Objective ECON OX: Circular Economy-** It is an objective of the Council to: Support the economic benefits and opportunities that exist in the transition to a more circular economy.

10. – 12. No change;

13(i) No change;

(ii) Update Section 8.2.3 to include the following: including the retention and integration of existing natural landscape features such as trees and hedgerow into the design of all new development.

- Amend Objective EH O10 Trees and Hedgerows to include the following:

It is an objective of the Council to:

a) Retain and protect amenity and biodiversity value of the County and City by preserving as far as possible trees, woodlands and hedgerows, having regard to the significant role that trees and hedgerows play in local ecology, climate change and air quality and their contribution to quality place making and the associated health and wellbeing benefits

b) Require, in the event that mature trees or extensive mature hedgerow is proposed to be removed, that a comprehensive tree and hedgerow survey be carried out by a suitably qualified tree specialist to assess the condition, ecological and amenity value of the tree stock/hedgerow proposed for removal and to include mitigation planting and management scheme. The Council will seek in all cases to ensure when undertaking development or when permitting development that the loss of or damage to existing trees is minimised.

c) Require the planting of native trees, hedgerows and vegetation and the creation of new habitats in all new developments and public realm projects. The Council will avail of tree planting schemes administered by the Forest Service, in ecologically suitable locations, where this is considered desirable

d) To identify and prepare TPO’s where trees of exceptional amenity, cultural or environmental value are identified which warrant a high level of protection

e) To implement the Limerick City and County Tree Policy when completed and review as appropriate

14. No change;

15(i) and **(ii)** No change;

(iii) New text on active travel and modal split - see recommendation to NTA’s submission no. 247.

(iv) – (vii) No change;

(viii) Amend Transport Map CDP-V2-03 to include Plassey Industrial Park/Childers Road cycle tracks.

16. Insert the following text under Section 6.5 Sustainable Mobility: The Department of Transport is carrying out a review of sustainable mobility policy which will deliver on the ambitions of the new Programme for Government replacing the existing 2009 policy document Smarter Travel, A Sustainable Transport Future 2009-2020 and the National Cycle Policy Framework. The new policy will be closely aligned with the national strategic outcomes of Project Ireland 2040, will support the actions in the Climate Action Plan and will also consider the impacts of COVID-19.

In addition, where reference is made to the Department of Transport’s Smarter Travel, A Sustainable Transport Future 2009-2020 in the Plan, the following text will be added ‘and subsequent updates’. This includes Policy TR P2 Promotion of Sustainable Patterns of Transport Use and Section 6.2.2 National Guidance;

17. Include new text in relation to the implementation of the Limerick BusConnects programme - see recommendation to NTA’s submission no. 247.

18. – 26. No change;

27(i) Include the following objective into Section 9.4 **Health Place Audits**: It is an objective of the Council to support the creation of attractive, enterprise development friendly, liveable, well designed, high quality places that are home to a diverse enterprise base mix and integrated communities by using tools such as Health Place Audits to audit locations in meeting necessary conditions.

(ii) Remove the following text from SCSi P2:

Policy SCSi P2 Location of Community Facilities It is a policy of the Council to ensure that adequate provision is made in land use zoning, in the layout of developments and residential densities to ensure optimum accessibility to local community facilities and amenities, particularly by sustainable modes of transport ~~and insofar as opportunities allow~~, that barriers to pedestrian access to such social infrastructure should be removed.

(ii)-(iii) No change;

28(i)-(iv) No change;

29. Amend Zoning Map to amend the zoning on Pineview Gardens.

SEA/ AA Response

The emphasis on sustainable travel links is in line with the Environmental Protection Objectives AQC 3, which is to include climate action in the plan policies. The emphasis on the circular economy is noted and reflects the emphasis placed on this in the draft plan. The issue of student accommodation has been raised elsewhere and the updated policies will ensure a coherent response to this issue. The updated Chapter 13 Implementation and Monitoring will provide a new framework for monitoring and review of the plan.

No. 160	Ref. & Name/ Group:	LCC-C62-160 IBEC
Submission/ Observation Summary		Chief Executive’s Response
<p>IBEC Mid-West Branch Regional Executive Committee is made up of nominees of from IBEC companies operating within Limerick, Clare and Tipperary, including multinational and indigenous companies,</p> <p>1. Rethinking Urban Centres:</p> <p>(i) Redevelop City/Town Centres with high quality public realm, green landscaping, and addressing vacancy and dereliction.</p> <p>(ii) Develop the capacity of Newcastle West to fulfil the role as a Key Town.</p>		<p>Noted.</p> <p>1. Rethinking Urban Centres:</p> <p>(i) The Draft Plan supports proposals for improvement of the public realm, including the forthcoming Public Realm Strategy, as supported under Objective CGR O1 of Chapter 10 Compact Growth and Revitalisation. The Public Realm Strategy will consider the enhancement of the City and will complement measures that will be contained in the final Limerick Shannon Metropolitan Area Transport Strategy (LSMATS) and the City Centre Traffic Management Plan. In addition, Objective CGR O1 of Chapter 10 Compact Growth and Revitalisation ‘It is an objective of the Council to: b) Prepare and facilitate implementation of Public Realm Plans for settlements including Limerick City, Adare and Rathkeale’. The issue of vacancy and dereliction is responded to under Submission 146 Labour Party.</p> <p>(ii) Identified by the RSES as a key town, the Draft Plan supports the critical role of Newcastle West in ensuring a consolidated spread of growth beyond Limerick City and Suburbs to the sub-regional level. Objective SS O7 Level 2 – Key Towns Newcastle West provides the policy objective in promoting Newcastle West as a key service centre and to promote the sustainable growth of the town to become self-</p>

	<p>(iii) Support ‘Self-sustaining Towns’ and ‘Small Growth Towns and Villages’ as local service, retail and employment centres.</p> <p>2. Economy:</p> <p>(i) Prioritise investment to support the night-time economy including infrastructure, culture, heritage, open space and use of under-used space.</p> <p>(ii) Facilitate the Estuary and Port growth potential for both Limerick Docklands and Foynes</p>	<p>sufficient settlements and act as service centres for their inhabitants and rural hinterland.</p> <p>(iii) The Draft Plan acknowledges the important role that Limerick’s towns and villages play in the provision of services, retail and employment centers. Objective SS O9 Level 3 – Towns, Objective SS O13 Development within Level 5 Settlements and Objectives contained within Volume 2 Level 4 Settlement Zoning and Development Objectives provides the supportive policy objectives.</p> <p>2. Economy:</p> <p>(i) The Draft Plan recognises the importance of the night time economy throughout Limerick as set out under Objective ECON O12 Night Time Economy, whereby ‘It is an objective of the Council to support the development of the night time economy throughout Limerick and to prepare a night time strategy and ensure the implementation of this strategy on completion’.</p> <p>(ii) The Draft Plan recognises the vital role of marine economy for Limerick’s future economic development, with considerable potential for expansion through strengthening established resources and diversification into new areas. Objectives ECON O41, ECON O42, ECON O43 and ECON O44 all provide the supportive objectives in relation to safeguarding the Strategic Development Locations at Foynes Port, Foynes and the promotion and support of the economic and industrial development of the Marine Industry in Limerick.</p>
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<p>(iii) Support the timely delivery of port infrastructure for marine renewables and hydrogen energy.</p> <p>(iv) Consider all options of funding regional projects. The potential of Exchequer and non-Exchequer funding of regional and local projects must be fully exploited. This includes encouraging new partnership models such as ‘City Deals’ and leveraging the potential of competitive financing.</p> <p>(v) Provide a focus on the re-intensification of existing business locations, to create the conditions for enterprise to thrive. Key aspects are orderly growth, place-making, smart specialisation and clustering. ‘Towns must be developed in terms of their economic self-sufficiency to minimise the need for commuting and support the development of surrounding areas...town centres will have to be rejuvenated but they will also have to be reimagined’.</p> <p>(vi) Facilitate urban resilience and recovery through investment in mitigating against the legacy issues caused by Covid-19, remote working, changes to retail and other factors</p> <p>(vii) Create the conditions for the Experience Economy to achieve world class potential.</p>	<p>(iii) Timelines for the delivery of the infrastructure is outside the control of the Local Authority</p> <p>(iv) Funding of regional projects is outside the remit of the Development Plan.</p> <p>(v) The draft Plan sets out Strategic Employment Locations in line with RSES, the Council will seek to work with stakeholders to progress the development of zoned lands, to support economic development in all locations.</p> <p>(vi) This issue is raised and responded to under Submission No. 153 Limerick Cycling Campaign.</p> <p>(vii) The Council are continuously working with all relevant stakeholders to develop Limerick from an economic perspective, to ensure Limerick is a dynamic and diverse place to do business.</p>
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<p>(viii) Progress the development of a Circular Economy Plan at a local level with the ambition of Limerick as a leader in resource efficiency and sustainable value creation.</p> <p>(ix) Ensure infrastructure is in place to support the continued expansion of higher-level education opportunities.</p> <p>3. Atlantic Economic Corridor (AEC): Invest in the development of strong urban centres on the Atlantic coast and leverage the opportunities of the AEC. Prioritise investment in underpinning and supporting the necessary infrastructure to build on the opportunities of the AEC.</p> <p>4. Connectivity:</p> <p>(i) Support investment in sustainable transport infrastructure and public realm projects that will make walking, cycling and public transport more accessible, appealing and attractive for all.</p> <p>(ii) Successfully connect transport to land use policies to encourage a more sustainable lifestyle and mobility choices.</p>	<p>(viii) The importance of the circular economy is acknowledged in Chapter 7 with associated supportive objectives</p> <p>(ix) This issue is raised and responded to under Submission No. 146 Labour Party</p> <p>3. Atlantic Economic Corridor (AEC): The employment strategy of the Draft Plan aims to develop Limerick’s enormous competitive advantages, including its central location on the Atlantic Economic Corridor. See response to Recommendation 6 and 8 in Submission 249 Southern Regional Assembly.</p> <p>4. Connectivity:</p> <p>(i) The integration of land use and transportation is a fundamental principle of the Draft Plan, which supports the rebalancing of the transport system towards more sustainable modes of transport, in order to mitigate against the potential impacts of climate change and to remove congestion from our city, towns and villages. The Council consider the delivery of sustainable and active travel infrastructure as key enablers to the growth of Limerick.</p> <p>(ii) An overarching objective of the Draft Plan is to ensure integration of transport and landuse planning.</p>
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<p>(iii) Prioritise transport connections to the Port including the Foynes to Limerick N69 and the reinstatement of the Foynes to Limerick rail line.</p> <p>(iv) Support the strategic importance of Shannon International Airport including connectivity with the City.</p> <p>(v) Ensure enhanced connectivity within and between the regions, including the M20 Cork to Limerick, N24 to Waterford, N21 Newcastle West and Abbeyfeale road scheme, the LNDR, and the N69 Foynes to Limerick road, including the Adare by-pass.</p> <p>(vi) Provide sufficient funding to improve the existing transport infrastructure stock and to implement substantial works where necessary on the existing road network.</p>	<p>(iii) The Draft Plan includes Objective TR O22 in support of the Limerick to Foynes Line and Objective TR O2 in support of the delivery of the Foynes to Limerick (including Adare Bypass) Road. Timelines for the delivery of such infrastructure projects are outside the control of the Local Authority.</p> <p>(iv) The Draft Plan recognises the importance of Shannon Airport for Limerick and for the wider region and also recognises and supports the synergies that exist between Limerick City and the development of the airport. The Draft Development Plan will support high frequency connectivity with Shannon Airport in line with the draft LSMATS. Enhanced accessibility from Limerick to Shannon Airport is outlined in Objective TR 017 and TR 031.</p> <p>(v) The NPF, NDP and RSES for the Southern Region identifies a number of key enablers to support the growth of Limerick, which will enhance connectivity within Limerick and benefit the wider region. The support of such infrastructure projects are provided for in Chapter 6 Policy TR P4 Delivery of Transport Infrastructure in line with National Policy and Objectives TR O1 through to TR O8.</p> <p>(vi) Section 6.7 of Chapter 6 outlines the Council’s policy on Road Infrastructure. Objective TR O38 Roads and Streets outlines the Council’s objective in relation to the improvements to the road network in Limerick, including improved pedestrian and cycle facilities, in conjunction and co-operation with relevant stakeholders, subject to resources becoming available. Objective TR O39 Upgrade works/New</p>
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	<p>(vii) Support investment in sustainable mobility as per LSMATS including the delivery of strategic sustainable transport projects (BusConnects), enhancing Park and Ride facilities to facilitate focussed access to multiple public transport modes and</p> <p>(viii) Progress new and upgrading of existing rail networks and infrastructure which would improve journey times and enable an increase in the frequency of services and connections.</p> <p>5. Digital Infrastructure:</p> <p>(i) Ensure the rapid roll-out of National Broadband Plan</p> <p>(ii) Ensure all communities can transition to a digitalisation for a better quality of life and eliminate digital inequalities.</p>	<p>Road Schemes outlines the Council’s objective to provide for and carry out sustainable improvements to sections of the national, regional and local road network, to address deficiencies in respect of safety, alignment, structural condition or capacity where resources permit. Objective TR O39 provides a list of new road schemes/upgrade works within the plan timeframe. The Council will continue to work with all relevant stakeholders to secure funding.</p> <p>(vii) The issues addressed to in Submission 247 National Transport Authority</p> <p>(viii) The issues addressed in Submission 247 National Transport Authority</p> <p>5. Digital Infrastructure:</p> <p>(i) The implementation of high-speed broadband connectivity falls within the remit of the Department of Communications, Energy and Natural Resources. Objective IN O3 Broadband provides the policy objectives in support of the delivery and implementation of the National Broadband Plan and any subsequent plans.</p> <p>(ii) The Council is aware of the need for high quality digital and mobile information communication systems as is outlined in the Draft Plan.</p>
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<p>Support investment in incubation and ICT infrastructure to capitalise on remote working and learning opportunities, enterprise start-ups, e-commerce and upscaling for all businesses across the city and county.</p> <p>6. Climate Action:</p> <p>(i) Update Climate Action Plan to address obligation under Climate Action and Low Carbon Act 2021 and the Climate Change Action Plan.</p> <p>(ii) Planning decision to consider long-term emission reduction obligations.</p> <p>(iii) Support the transition of the gas network to carbon neutrality.</p> <p>(iv) Climate-proof future and retrofitted infrastructure.</p>	<p>Objective IN O2 provides the following support with regards to Digital Connectivity across Limerick.</p> <p>6. Climate Action:</p> <p>(i) The Council will address it’s obligations under Climate Action and Low Carbon Act 2021 and the Climate Change Action Plan and all other relevant climate legislation and guidance as they emerge during the lifetime of the plan.</p> <p>(ii) Objective CAF O9 provides the policy objective in Achieving Climate Resilience and outlines the Councils commitment to promote climate resilience in development and economic activities that are regulated by planning. The objective further outlines the importance of ensuring that any developments are climate resilient.</p> <p>(iii) The Draft Plan recognises one of the key challenges for the climate-neutral transition is to reallocate resources from carbon-intensive to climate-neutral developments and infrastructure. Successful economic modernisation requires stimulating local economic diversification towards clean industries through decarbonisation, innovation and digitalisation. Chapter 8 Section 8.2.6 addresses Limerick’s Transition to a Low Carbon Economy with associated policy support in CAF P2, CAF P3 and CAF P4.</p>
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	<p>(v) Liaise with IW to invest in Water Services for accommodate growth, and compliance with EU Directives.</p> <p>(vi) Support the sustainable reinforcement and provision of new energy infrastructure by infrastructure providers subject to appropriate environmental and planning assessment.</p> <p>7. Housing:</p> <p>(i) Change housing design guidance to allow for increased densities.</p>	<p>(iv) The land use planning framework set out in the Draft Plan provides opportunities that can assist climate resilience and achieving the long-term goal of low carbon communities. Objective TR O9 outlines the Draft Plans Objective on Climate Proofed Transport Infrastructure: ‘It is an objective of the Council to ensure that all future and retrofitted transport infrastructure is climate proofed, through design and construction, to function in a climate altered future and would, where possible, be multifunctional e.g. provide accessible routes for other services such as fibre optics or water, energy connections or other services and technologies that might come about during the lifetime of the infrastructure’.</p> <p>(v) Objective IN O5 Water Services outlines the Draft Plans commitment to collaborate and liaise with Irish Water in the provision of water and wastewater infrastructure and services.</p> <p>(vi) Objective IN O11 Energy and Gas Network of the Draft Plan provides the policy objective in support of sustainable reinforcement and provision of new energy infrastructure by infrastructure providers subject to appropriate environmental and planning assessment.</p> <p>7. Housing:</p> <p>(i) Density policies in the Draft Plan have been prepared in accordance with current Section 28 Guidelines. Such guidelines include “Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities”, 2009, “Sustainable Urban Housing, Design Standards for new Apartments – Guidelines for Planning Authorities”, 2020 and “Urban Development and Building Height Guidelines”, 2018.</p>
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	<p>(ii) Continue investment in social housing.</p> <p>(iii) Increase the amount of zoned and serviceable lands for housing.</p> <p>(iv) Promote sustainable places and healthy communities.</p>	<p>These guidelines are prepared by the Department of Housing, Local Government and Heritage.</p> <p>(ii) Objective HO O13 of the Draft Plan provides the Council’s support in the provision of social housing in accordance with the Council’s Draft Housing Strategy, Housing Need Demand Assessment and Government policy as outlined in the DoHPLG Social Housing Strategy 2020.</p> <p>(iii) The core strategy sets out the projected population and household growth for Limerick in accordance with the National Planning Framework (NPF) Implementation Roadmap and the Regional Spatial and Economic Strategy for the Southern Region (RSES) and also the Economic and Social Research Institute’s ‘Regional Demographics and Structural Housing Demand at a County Level’. The Draft Plan has zoned sufficient land to facilitate the proposed population and household growth. Therefore sufficient lands have been zoned in Limerick to adequately cater for the allocated growth over the lifetime of the Draft Plan 2022 – 2028.</p> <p>(iv) Policy SS P1 Settlement Strategy outlines the Councils support to seek to promote the creation of sustainable places and healthy communities, while ensuring that development occurs at an appropriate pace and that infrastructure is delivered in tandem to support this growth.</p> <p>The promotion of sustainable places and healthy communities is dealt with in Chapter 9 of the Draft Plan. Policy SCS1 P1 seeks to improve the provision of community infrastructure and recreational opportunities for the wider community in co-operation with relevant bodies, in a</p>
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<p>(v) Deliver quality, affordable homes and social housing with a mix of type and tenure.</p> <p>(vi) Support compact settlement growth with appropriate scale and densities.</p> <p>(vii) Avoid delays to supporting infrastructure, so that housing and other key projects across Limerick can progress without delay.</p> <p>(viii) Ensure a consistent approach to land use zoning and community gain that balances the legitimate interests of transport providers and users, energy providers and users, and local communities.</p> <p>8. Enterprise Development: (i) Continue the supports of the Local Enterprise Office (LEO).</p>	<p>sustainable manner in accordance with the settlement strategy. Section 9.4 addresses Healthy Place-making and Communities with associated support Objective SCS1 O8.</p> <p>(v) Objective HO O1 Social Inclusion It is an objective of the Council to ensure that new developments are socially inclusive and provide for a wide variety of housing types, sizes and tenure, throughout Limerick, to cater for the demands established in the Draft Housing Strategy and the Housing Need Demand Assessment.</p> <p>(vi) The Settlement Strategy for Limerick focuses on the creation of sustainable communities, including increased density and compact growth, in line with national policy, where appropriate and the provision of a wide range of household types and tenures for Limerick. The Draft Plan provides this support through the inclusion of Objective SS O1 Compact Growth; Objective SS O2 High Quality Design; Objective SS O3 Capacity of Town/Village to Absorb Development.</p> <p>(vii) Timelines for the delivery of housing projects and infrastructure are outside the remit of the Development Plan.</p> <p>(viii) The key role that land use planning plays in progressing climate change mitigation and sustainable compact communities which are served by sustainable modes of transport is to the forefront of the Draft Plan.</p> <p>8. Enterprise Development:</p>
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<p>(ii) Ensure quality of life factors are incorporated into the Council’s enterprise policies.</p> <p>9. Planning Capabilities: Create a programme to upskill existing local authority staff to provide a more active role in performing planning including forward planning, regulatory policy, development management and enforcement. Ensure a greater pooling and sharing of specialist skills between local authorities and other public bodies, involved in planning and construction.</p> <p>10. Tourism: The submission requests the following with regards to Tourism: Prioritise on investment on tourism infrastructure. Roll out Smart tourism and smart destination initiatives. Prioritise investment in tourism infrastructure, new tourism products, visitor experience, and tourism promotion. Support development of the tourism sector, including investment in the Wild Atlantic Way to grow the sector based around water activities, Greenways, Heritage, Arts and Culture.</p>	<p>(i) The Local Enterprise Office forms part of the Council and it plays an important role in the support of enterprise across Limerick. (ii) Noted, the Council is committed to enhancing the quality of life for all citizens through a range of policies and enhancing placemaking for enterprise is addressed in the Draft Plan.</p> <p>9. Planning Capabilities: Limerick City and Council are committed to the continued training and upskilling of all staff with regards to the implementation of the Executive Functions of the Local Authority. This issue is outside the remit of the Development Plan.</p> <p>10. Tourism: Limerick City and County Council in partnership with local and national stakeholders, seeks to increase tourist numbers and support sustainable job creation, through targeted tourism initiatives including the development of new tourism products and leveraging natural and built heritage assets to support tourism across Limerick. The Limerick Tourism Development Strategy aims to revitalise the tourism sector in Limerick and to capture key opportunities to grow the sector, highlighting priority actions. Policy ECON P6 provides the policy support in the promotion and facilitating the growth of the tourism industry in Limerick. It also includes support for the Limerick Tourism Development Strategy 2019-2023, the Limerick 2030 Economic and Spatial Plan for Limerick and the River Shannon Tourism Masterplan, which inform the development of</p>
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		<p>tourism in Limerick.</p> <p>In response to the Submission No. 249 Southern Regional Assembly, an additional objective will be included in the plan in support of the development of digital services to enhance digital innovations and digital transformation throughout Limerick.</p>
Chief Executive’s Recommendations		
<p>1. No change;</p> <p>2(i) - (ix) No change;</p> <p>3. Include new objective as follows in Chapter 4 A Strong Economy: <u>Networks: It is an objective of the Council to actively engage in the development of networks, including economic networks and the Atlantic Economic Corridor Initiative, to share assets, collaborate and drive economic growth and competitiveness.</u></p> <p>4(i) - (ii) No change; (iii) - (vi) No change; (vii) Amend Objective TR O21 to include the following: Objective (Revised <u>TR O16</u>) (Old Objective TR O21) - Rail Network - It is an objective of the Council to: <u>(a) Explore a pathway to rail-based development in the review of the RSES and MASP in conjunction with the National Transport Authority and the Southern and Western Regional Assembly</u> (b) Support and encourage, <u>and facilitate</u> new and upgrading of existing rail networks, railway stations <u>and services across Limerick as identified in LSMATS</u> and protect, as required, lands necessary for the upgrading of existing railway lines or stations, which would improve journey times and enable an increase in the frequency of services and connections</p> <p>(viii) No change;</p> <p>5. No change;</p> <p>6(i) Update the Draft Plan to include reference to the Climate Bill 2021;</p> <p>(ii) - (vi) No change;</p> <p>7. No change;</p> <p>8. No change;</p> <p>9. No change;</p>		

	<p>10. Insert the following text as additional bullet point (h) into Objective IN O2 Digital Connectivity: Objective IN O2 Digital Connectivity: (h) Support emerging innovations in the digital transformation of transportation, E-Mobility and sustainable mobility in line with RPO 160 Smart Mobility, including those identified in LSMATS.</p>
	<p>SEA/ AA Response</p> <p>The points about creating networks and connectivity including digital connectivity and the use of the Atlantic Economic Corridors ties in with earlier Council Initiatives, but does perhaps need clearer content in the plan. The text in relation to rail connectivity is useful as it could build on large scale regeneration initiatives such as the Colbert Quarter to be developed by the LDA.</p> <p>The field of climate guidance is fast changing but the Council will work with all relevant guidance and legislation as it emerges. All of the suggested changes above are expected to be beneficial in terms of environmental policy, there are no adverse environmental effects arising.</p>

No. 171	Ref. & Name/ Group:	LCC-C62-171 Connellan & Associates on behalf of the University of Limerick	
	Submission/ Observation Summary	Chief Executive’s Response	
	<p>1. Policy Context: The NPF the RSES establish that the success of the regional strategy relies on how the regions and their respective sub-regions can identify and capitalise on the potential and opportunities offered at this level. The RSES document sets out what it designates as ‘national enablers’ for the Limerick Shannon Metropolitan Area Strategic Plan (MASP) at Section 4.0. All of the factors listed are very important and are supported by the University.</p>	<p>1. Policy Context: The Council recognises the importance of the University of Limerick to Limerick and the wider region and value the relations that have been in place for a number of years with the University. The collaboration that exist in the Mid – West Region is a fundamental element in the development of the region. The University is fundamental to the redevelopment of Limerick City Centre and the development of the Old Dunnes Stores site is a crucial element of the World Class Waterfront application, which was successful in receiving funding from the Urban Regeneration and Development Fund in 2021. Policy support set out in the NPF and the RSES recognise the importance of the University and its further expansion in the City.</p>	

<p>Among the ‘enablers’ with specific importance to future University developments are -</p> <ul style="list-style-type: none"> • Provision of a citywide public transport network with enhanced accessibility from the City Centre to the National Technological Park, UL and Shannon International Airport. • The fast-track delivery of the Limerick Northern Distributor Road (LNDR), which is a strategic investment priority for the MASP. • Supporting an application for the designation and subsequent development of the lands zoned as University in the Clare County Development Plan 2017-2023 as an economic Strategic Development Zone (SDZ). <p>The submission states that these are vital to the University continuing as one of the critical drivers of the city/region’s economic development and the enhancement of its role in fostering an innovative knowledge-based economy.</p> <p>2. Future proposals at UL: The Council are aware of the publication of UL @50, the University’s strategic plan, 4 key themes have shaped this publication, transforming learning, digital transformation, city and culture, and health and wellbeing. Of relevance to the Draft Development Plan, key projects progressing for the University:</p>	<p>The Draft LSMATS sets out a comprehensive citywide public transport network with enhanced accessibility from the City Centre to the National Technology Park, UL and Shannon International Airport. The Draft Development Plan sets out its support for the progression of the Implementation of the LSMATS, when it is complete and the development of the LNDR.</p> <p>The Council acknowledge the policy support set out in the RSES for the South Clare Strategic Development Zone and recognise the importance of the development of the University in Co. Clare. However, this land is outside the Limerick Development Plan boundary and the priority for Limerick is the development of the city centre brownfield site by the University.</p> <p>2. Future proposals at UL: The Council welcomes the publication of the UL@50 publication and will continue to work with the University of Limerick to progress proposals for expansion in Limerick.</p>
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<p>a) University of Limerick City Campus; b) South Clare UL Economic Strategic Development Zone.</p> <p>3. Requests from the Local Authority:</p> <p>(i) The core strategy allocates population across the County/City in accordance with the general framework of the RSES. The publication of the Clare County Development Plan has been deferred. There is a general requirement, however, that the two planning authorities would co-ordinate with each other, especially with respect to the MASP. In this context, it is considered that there should be some flexibility built into the Limerick Core Strategy to allow a certain degree of population sharing across the MASP area.</p> <p>(ii) It is considered that Chapter 4 of the Plan should include reference to the SDZ as a key national enabler and a vital economic driver in the Limerick MASP area. It is recognised that the SDZ area itself is in Co. Clare, but it is in the MASP area. It will have positive impacts for the whole of the region and it is a policy objective of the RSES to support its development.</p>	<p>3. Requests from the Local Authority:</p> <p>(i) The Core Strategy set out the population growth for Limerick in line with the NPF, ESRI Population Figures published in December 2020, NPF Roadmap for Implementation and the RSES. The Council recognise the importance of the growth of the wider MASP area to support the development of Limerick City, however, until Limerick City and Suburbs in Limerick reaches a sufficient critical mass, it is not considered appropriate that Limerick City and County Council share population allocation. Clare County Council have received its population growth similar to Limerick and it is the responsibility of Clare County Council to allocate an appropriate percentage of growth to the MASP area in Clare to support the development of the MASP in Clare.</p> <p>(ii) The Council acknowledge the policy support set out in the RSES for the South Clare Strategic Development Zone and recognise the importance of the development of the University in Co. Clare. However, this land is outside the Limerick Development Plan boundary and the priority for Limerick is the development of the city centre brownfield site by the University.</p>
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<p>(iii) In tourism/transport terms, we would like to draw attention to the University’s proposal to re-open the Errina Canal as part of the SDZ. Such transport could easily be linked to the public transport elements of the urban transport network. The University requests the Council to include a policy objective in the Plan to support such water-based transport as a key element of the transport modal shift pattern for the metropolitan transport area and to examine the provision of a transport node for river transport at the eastern City edge.</p> <p>(iv) It is obvious from reading the Limerick/Shannon Transport Strategy that it relies very heavily on public bus transport to counter what it sees as challenges to providing an efficient transport system across the Metropolitan area. The University requests that the strategy should make specific provision for a public transport on demand provision. This is relevant not alone to the University, but also to the other commercial and industrial land uses in similar situations in the city suburbs. In the case of the locations such as the University, a 10-minute journey time should be expected if public transport is to work. It is considered important that a general policy statement be included in the plan to support this high-speed single</p>	<p>(iii) Objective ECON 037 indicates that it is an objective of the Council to support the development of the Limerick to Scariff / Tuamgraney Greenway in partnership with Waterways Ireland and Clare County Council.</p> <p>(iv) The Draft LSMATS Limerick Programme will provide a reliable, high – frequency public transport system to improve connectivity of Limerick City and its suburbs. The enhanced service will represent a significant upgrade on the existing system and will comprise of a comprehensive network, bus priority and bus fleet. It will serve key destinations and provide interchange with the rail network and Park and Ride Services. The Bus Connects programme, will include two key areas of focus. Bus Priority in the form of bus lanes, bus gates, bus-only links and other measures; and changes to the bus service network to deliver greater frequency and more efficient operations.</p>
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	purpose transport link between the main UL campus and the City Campus	
	Chief Executive’s Recommendations	
	1. - 3. No change.	
	SEA/ AA Response	
	N/A	

No. 208	Ref. & Name/ Group:	LCC-C62-208 Brian Leddin T.D
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Climate Action: An additional objective should be inserted into the Development Plan, based on the Council’s 2019 Climate Charter commitment, as follows: “Climate emissions reduction - It is an objective of the Council to put in place a process for carbon proofing major decisions, programmes and projects on a systematic basis, including investments in transport and energy infrastructure moving over time to a near zero carbon investment strategy. Such carbon proofing will take into account national and sectoral greenhouse gas emission budgets to reach a 51% reduction in emissions by 2030 (from the 2018 baseline) and net zero by 2050.”</p> <p>2. Strategic Environmental Assessment:</p>	<p>1. Climate Action: Objective CAF 04 relates to the requirement for planning applications to ensure climate proofing measures are incorporated into new developments. All applications for major infrastructure such as road/energy projects and programmes require climate proofing, this is required by the consenting authority. The Council consider this a key issue in the consideration of major applications and will be determined on a case-by-case basis for each project/programme.</p> <p>2. Strategic Environmental Assessment:</p>

<p>(i) Section 8 Measures envisaged for monitoring need to be revised/completed. For example, “review of plan” is not a suitable entry for frequency of monitoring. The Air and Climate section suggests, “non-attainment of targets set out in LCEA energy audit” as a remedial action - this needs to be changed. There is no monitoring of GHG emissions as part of the transition to a low carbon economy. This needs to be remedied.</p> <p>(ii) Table 8. Sustainable Mobility and Transport Policies and Objectives requires revision and should describe the methodology used to ascribe an indicator +,=,-,--. Inconsistencies are evident. The exact and specific mitigation measures must be included in the revised SEA document in line with EPA guidance. The submission states that the methodology behind Appendix 2: Alignment of Policies and Objectives with UN Sustainable Development Goals should be included.</p> <p>3. Travel and Transport:</p> <p>(i) Transit-Oriented Development and Rail: Network: Transit-oriented development and a rail network infrastructure must be included as a key Transport and Housing objective of the Development Plan. Mixed-use development is critical to ensure the sustainability of these neighbourhoods. Regional rail connectivity needs to be an objective of the Development Plan with Ennis, Nenagh, Tipperary Town, Limerick Junction.</p>	<p>(i) The Strategic Environmental Assessment will be reviewed and amended as appropriate, to reflect the changes identified, the issues raised will be reviewed and updated.</p> <p>(ii) The Strategic Environmental Assessment, including Appendix 2: Alignment of Policies and Objectives with UN Sustainable Development Goals will be reviewed and amended as appropriate.</p> <p>3. Travel and Transport:</p> <p>(i) The National Development Plan 2021 – 2030 has highlighted the potential for expanded rail infrastructure in Limerick and it is envisaged that the updated Draft LSMATS will incorporate the government’s ambition for Limerick. The Draft Plan offers policy support for the implementation of the LSMATS on completion and support for the development of rail as appropriate. The Council recognise the importance of the provision of major infrastructure to enhance regional connectivity, to promote economic development and to enable the</p>
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<p>(ii) Active Travel- A key objective of the Development Plan must be that active travel networks must be designed and implemented across Limerick City and county for both intra-urban and inter-urban sustainable transport connectivity. Targets for modal shift should be, at a minimum, in line with national targets as set out by government policy.</p> <p>(iii) Pedestrianised Zones – Plan must ensure that pedestrianised zones are accessible to people of all ages and abilities.</p> <p>(iv) Multi-modal Planning – The plan must ensure that Active travel networks are not viewed in isolation to public transport and public transport nodes need to be prioritised in the design of active travel networks.</p> <p>(v) Accessibility Disabled bike parking should be included with the provision of bike parking at all busy locations. Public seating should be age-friendly, accommodate children, people using wheelchairs and be located at frequent intervals</p>	<p>development of new homes. All the projects supported in the Draft Development Plan have policy support in at least one of the following documents: the National Planning Framework, the Regional Spatial and Economic Strategy or the National Development Plan. The Draft Plan is aligning transport policy with national and regional policy.</p> <p>(ii) See response to NTA (Submission No. 247) in this regard.</p> <p>(iii) See response to the NTA (Submission No. 247), in this regard.</p> <p>(iv) The provision support for multimodal transport interchange is outlined in Objective TR O20. See response to Submission No. 247 National Transport Authority in this regard.</p> <p>(v) The Draft Plan’s Objective TR O11 Universal Design and CGR O1 Place-making, Universal Design and Public Realm outlines the policy objectives in support of Universal Design with regards to transport schemes and public realm improvements. In addition, Objective TR O12 supports the implementation of LSMATS on completion and the</p>
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<p>(vi) Cargo bike parking - the Council should ensure that provision is made in the Development Plan for infrastructure in urban areas for significant numbers of cargo bikes and trikes.</p> <p>(vii) Traffic light timings / ‘green man’ timings / bike priority –The submission states that a modal shift from private car use towards walking can be accelerated by appropriate programming of traffic lights and pedestrian crossing timings, prioritising pedestrians.</p> <p>(viii) Cycling Connectivity - It is critical that the suburbs of Limerick City should be connected with the city centre with safe, fully segregated, suitably wide cycle lanes and tracks.</p>	<p>strategies objectives. In investing in public transport infrastructure and vehicles and in improving the urban environment, the NTA is committed to implementing a Universal Design approach. The draft LSMATS is underpinned by the on-going work of the NTA in improving the interface between the transport system and persons with physical and intellectual disabilities. This includes designing transport infrastructure and facilities according to best practice in terms of universal access.</p> <p>(vi) Chapter 11 Section 11.8.3 outlines the Development Management Standards with regards to Carparking and Bicycle Parking. Table DM 8(a) and Table DM 8(b) includes the following - Short-term cycle parking for Cargo Bikes or Tricycles, shall be provided for developments where there may be a demand, such as retail.</p> <p>(vii) The draft LSMATS identifies barriers to walking including the lack of pedestrian priority across local junctions. Draft LSMATS Objective WK1 Improvements to the Pedestrian Environment includes the following: It is the intention of the NTA and the local authorities to: Improve junctions and pedestrian crossings through measures such as pedestrian countdowns, longer crossing times and crossings that align with desire lines. Objective TR O12 of the Draft Plan supports the implementation of LSMATS on completion and the strategies objectives.</p> <p>(viii) This issue is addressed in response to Submission No. 247 National Transport Authority.</p>
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Limerick City needs to adopt a ‘15-minute city’ approach with walkable and cyclable neighbourhoods. The road space required for cycling networks needs to be made available by reallocating road space away from private motor car capacity, to ensure the routes are the most direct, the most convenient possible.

(ix) Permeability - The Development Plan needs to outline an approach to retrofitting permeability into current housing estates and publicly owned campuses, which inconvenience active travel modes. Significant community engagement and outreach will be required in order to achieve public buy-in and support.

4. Biodiversity and Blue Green Infrastructure:

(i) Biodiversity Corridors -The design and implementation of active travel networks presents the opportunity to design and plant adjacent biodiversity corridors. The Plan should include this consideration given the biodiversity crisis and the simultaneous benefits from an attractive public realm and appealing active travel network.

(ii) Greenway Strategy - The Council should have strong objectives around the further development of greenways within Limerick. Three crucial ‘missing links’ that should be developed are:

(ix) The Draft Plan recognises walking and cycling as the most sustainable forms of transport and the creation of safe, inclusive and attractive spaces to walk around is fundamental to achieve good place-making. However, there is a need to dish footpaths to allow for safe access and egress to property, to facilitate universal access and to ensure road safety, continuous footpaths are not appropriate in all instances.

4. Biodiversity and Blue Green Infrastructure:

(i) The Council recognises the value and importance of biodiversity and Chapter 5 sets out the Council’s approach to safeguard biodiversity and the natural environment. The development of greenways offers an opportunity for the development of biodiversity corridors of both blue and green infrastructure, depending on the nature of the scheme. The Council are currently considering this issue in the Blue – Green Infrastructure Strategy, which is progressing alongside the proposed development Plan.

(ii) ECON O37 deals with Limerick Greenway and potential development from this greenway to provide connections to enhance the development of other routes, including the development of the

<p>1. Limerick City to Cahir (to connect with South Tipperary Blueway);</p> <p>2. Limerick City to Shannon Airport;</p> <p>3. Limerick City to Rathkeale (to connect with the newly opened ‘Limerick Greenway’).</p> <p>As a unique attribute of the city, the Development Plan should strongly support a full, connected river-side greenway/blueway network within the Metropolitan limits of Limerick, along the Shannon (and indeed the Abbey River and Ballincurra Creek), in conjunction with CFRAMS and the efforts to develop a “World Class Waterfront”.</p> <p>(iii) Shannon River Interpretive Centre - it is appropriate to develop an interpretative centre in Limerick City that would tell the rich story of the entire Shannon River from a heritage, ecological, social and industrial point of view and boost local tourism.</p> <p>5. Traffic Management, Demand Management and Road Safety:</p> <p>(i) The core objective of the City Traffic Management Plan should be to achieve significant, strategic modal shift</p>	<p>connection between Limerick City and Rathkeale. TII will led the development of a Strategic national Cycle Network, which will include proposals for a core network covering and linking as appropriate, cycleways and greenways coherently across rural and urban areas. The outcomes of this Strategy will and drive investment towards high quality, coherent and efficient national cycle network. The Council will continue to work with all relevant stakeholders to progress the development of cycle networks and greenways, subject to resources.</p> <p>The Council are currently considering this issue in the Blue – Green Infrastructure Strategy, which is progressing alongside the proposed Development Plan.</p> <p>(iii) The Council is committed to expanding the tourism offering in Limerick, the development of any tourism product would be subject to feasibility, funding and resources.</p> <p>5. Traffic Management, Demand Management and Road Safety:</p> <p>(i) See response to Submission No. LCC-C62-247 National Transport Authority and Submission No. 225 Office of Planning Regulator.</p>
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<p>targets. Targets for modal shift should be at a minimum, in line with national targets as set out by government policy.</p> <p>(ii) Traffic and Mobility Plans Traffic and Mobility Plans should be produced for each urban settlement in County Limerick, and should address modal shift and include an urban freight delivery plan using Urban Consolidation Centres and last-mile deliveries.</p> <p>(iii) Prioritisation of Urban Space - The Council should seek to use space currently used for on-street parking and private car traffic as part of the public realm.</p> <p>(iv) Accessibility –Universal accessibility disabilities must be a strong feature of the Plan.</p> <p>(v) Speed limits - The Plan needs to include a default speed limit of 30kph in all built up areas.</p> <p>An example of noise pollution due to motorway speed limits is at Castletroy, where the M7 runs near to residential buildings. The Council should work with TII and</p>	<p>(ii) LSMATS will establish a clear mobility plan designed to achieve significant, strategic modal shift targets in line with national targets. A Local Transport Plan will be completed for Newcastle West in line with the requirements of the RSES and high levels targets will be established for all other settlements on aggregate as recommended by the OPR.</p> <p>(iii) The proposed City Centre Traffic Management Plan and the City Centre Public realm strategies will consider the issue of prioritisation of urban space.</p> <p>(iv) This issue is addressed in above in response to this submission.</p> <p>(v) The Draft Plan includes Objective TR O42 which seeks to develop Limerick City Centre Traffic Management Plan, which will seek rebalancing of the City’s Street network towards sustainable modes of transport and management of all transportation modes, in compliance with the principles of LSMATS. Objective WK1 of the draft LSMATS seeks improvements to the pedestrian environment including lower traffic speeds to improve pedestrian safety in residential areas.</p> <p>This is an operational matter and the Council continue to work with TII to address motorway issues.</p>
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<p>seek to reduce the speed limit here from 120kph to at most 100kph.</p> <p>(vi) Parking – Utilise parking policy to reduce private motorcar usage.</p> <p>(vii) Surface Car Parks – Existing surface car parks should be redeveloped for uses such as housing, public amenities, or as green space, to improve the liveability and attractiveness of city and town centres.</p> <p>(viii) Park and Ride - Where Park & Ride facilities are developed, a similar number of car parking spaces, or greater, should be removed from the city centre.</p> <p>(ix) Parking Pricing: The City Traffic Management Plan should introduce dynamic parking pricing whereby any parking adjacent to the core city centre is more expensive than that farther out.</p> <p>(x) Parking Enforcement: Zero tolerance of illegal parking, particularly in relation to creating barriers in the active travel network e.g. parking on pavements or cycle lanes, double yellow lines or at crossings, needs to be strictly enforced. In that regard, the Council should allocate sufficient resources to effect cultural change.</p>	<p>(vi) See response to Submission No. 247 National Transport Authority.</p> <p>(vii) Many of the city and town centre car parks are in private ownership and there is currently a demand for parking, over time and with an increase in alternative modes of transport the demand for surface car parks will dwindle. The lands are mainly zoned City/Town Centre and they will develop for residential/commercial purposes.</p> <p>(viii) Objective TR 023 sets out the Councils objective to facilitate the provision of Park and Ride facilities in line with the final LSMATs</p> <p>(ix) This is not an issue for consideration in the proposed Development Plan and maybe considered in the City Centre Traffic Management Plan.</p> <p>(x) This is not an issue for consideration in the proposed Development Plan, it is an operational matter for the Council.</p>
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(xi) On street parking – The Council should repurpose space currently used for on-street parking for uses that have greater economic, societal, health and environmental benefits.

6. Public Realm /Urban Renewal Works: The submission highlights a number of key issues pertaining to public realm and preparation of relevant strategies, dealing with street clutter, planting, green space, SuDS (Sustainable Drainage Systems) and landscaping in city and town centres should be prioritised. High quality materials should also be used for public realm works (no further use or poured concrete or reconstituted stone should be permitted). Bollards should be used in extremely limited circumstances. A Parklet and Build-out Plan for Limerick City and Limerick towns must be included. Guidelines should not permit the advertising of drinks companies on any accompanying structures. Some key areas of the city centre that require

(xi) This is not an issue for consideration in the proposed Development Plan and maybe considered in the City Centre Traffic Management Plan. However, the draft LSMATS sets out in Objective PK3 Parking Management the intention of the NTA and the local authorities to better manage parking including; Implement maximum car parking standards for all new developments, Seek car-free and low car development in central and accessible areas, Repurpose car parking areas to support bus priority, cycle lanes, footpath widening, street trees and placemaking features, Support the gradual reduction of long-stay on-street parking in urban centres, Support the redevelopment of off-street parking for higher value uses including residential and employment; and Examine the case for a Workplace Parking Levy and charges on internet shopping deliveries and out-of-town shopping centres.

6. Public Realm /Urban Renewal Works: The Council have in recent months established a dedicated Directorate within Limerick City and Council dealing specifically with Environment, Planning and Placemaking, the importance and significance of place making is key to improving quality of life, increasing residential development in the city and town centres and creating employment opportunities. A public realm strategy for the city centre and a number of towns has been prioritised and are currently progressing.

<p>attention include: Rutland Street / Matthew Bridge, Medieval spine - St. John’s Square to King John’s Castle and the Riverfront.</p> <p>7. Planning and Housing: The approach to housing must be aligned with the government’s ‘Housing for All’ strategy, published September 2021, and this should be clearly stated in the Development Plan.</p> <p>(i) Affordable and Public Housing - A strong objective of the Development Plan must be to provide housing for vulnerable people and those who are less well off. Houses built on publicly owned land should be built on a ‘not for profit’ basis.</p> <p>(ii) Multi-use Development -The Development Plan needs to ensure that a clear and key objective is that infill and brownfield sites developments are multi-use, including housing for different demographics and adequate green spaces.</p>	<p>7. Planning and Housing: The Council note the publication of Housing for all and the Housing Strategy, Housing Need Demand Assessment and policy approach will be updated accordingly.</p> <p>(i) The publication of Housing for all in September 2021, sets out the government’s plan to increase of housing supply to 2030. The ambitious plan is a multi - annual, multi - billion euro with will require the public and private sector to work together to reach overall targets of 300,000 homes by 2030. The plan is framed with the overall objectives that everyone in Ireland should have access to sustainable, good quality housing to purchase, rent at an affordable price in the right location. The Housing Strategy and Housing Need Demands Assessment will be updated to reflect the government’s plan for the delivery of housing and policy in Chapter 4, will also be amended accordingly.</p> <p>(ii) The Draft Development Plan will be updated to clearly set our brownfield and infill sites in line with the recommendations of the OPR (Submission No. 225). The Draft Plan contains policy support for housing to social inclusion for demographic of society.</p> <p>(iii) The Draft Plan sets out maximum car parking standards, as oppose to minimum standards.</p>
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<p>(iii) Remove parking minimums - The imposition of minimum standards for car parking has supported car-oriented development.</p> <p>(iv) Sustainable Residential Development - All public and private residential development should be planned, designed and located such that walking, cycling, bus and/or rail will be the primary mode of transport for those who reside within them.</p> <p>(v) Bike Parking and Storage – Objective to ensure secure, sheltered and spacious bike storage and parking will be provided for all new and existing residential units.</p> <p>(vi) Dereliction & Vacancy -An objective of the Plan should be to effectively address dereliction with clear timelines of measurable actions.</p> <p>8. Roads Projects: The phenomenon of Induced Demand is not taken into consideration with regard to the road's projects in the Development Plan. To be consistent with government policy the Development Plan should clearly state as an objective that road space that is currently used for private vehicles will be reallocated to active and sustainable modes, as necessary, in order to achieve significant modal shift to these modes.</p>	<p>(iv) The Tiered Approach to Zoning sets out a requirement to demonstrate that lands are serviced or serviceable within the lifetime of the plan, including active and public transport modes.</p> <p>(v) Development Management Standards set out in Chapter 11 – Table DM 8 (b) sets out bike parking for all developments.</p> <p>(vi) Objective CGR O6 of the draft Plan sets out policy support for dealing with derelict sites, under the relevant legislation. Timelines are set out Derelict Sites Act 1990 for progressing action on property owners.</p> <p>8. Roads Projects: The reallocation of road space from vehicular use to active travel and sustainable travel modes will be addressed in the City Centre Traffic Management Plan, no one size will fit all streets in this regard.</p> <p>9. Energy:</p>
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<p>9. Energy:</p> <p>(i) The submission welcomes ECON O24. However, the Plan should speak to the overall objective of reducing emissions, in line with the Climate Act, and the national objective of achieving the targets of electricity from renewables.</p> <p>(ii) An additional objective needs to be added to ECON O44 in order to drive and ensure that Limerick city and hinterland becomes the primary hub for the development of Ireland’s “west coast” renewable energy potential (approx. 50 – 70 Gigawatts wind power couple with green hydrogen infrastructure) - in research, innovation, logistics, development, maintenance and administration.</p> <p>(iii) The Development Plan must include strong references to, and objectives in, the area of green hydrogen and other energy storage technologies.</p> <p>10. Waste and Pollution:</p> <p>(i) Waste Recycling Centres - As the proportion of private car owners in Limerick City will decrease in the coming years, as climate policy is implemented, the Mungret bring facility will not meet the waste disposal needs of an increasing number of citizens. Similarly, bring facilities should be developed in all rural towns and villages. This should be reflected in the objectives of the Development Plan.</p>	<p>(i) See response to Submission No. 225 OPR and the Limerick Green Party No. 244.</p> <p>(ii) See response to Submission No. 244 the Limerick Green Party.</p> <p>(iii) See response to Submission No. 244 the Limerick Green Party. See response above.</p> <p>10. Waste and Pollution:</p> <p>(i) There are sufficient zoned lands located in Limerick City, rural towns and villages to accommodate the development of bring centres and they will be provided based on demand and subject to resources.</p>
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<p>(ii) Polluted Air - The Development Plan objectives should include the improvement of air quality throughout the city and county. This plan must include the expansion of air quality monitors in collaboration with EPA.</p> <p>(iii) Noise Pollution - Include an objective to address noise pollution in Limerick city and county. Noise maps and a Noise Action Plan should be produced by the Council including the production of noise maps for all road sound sources within the city and county.</p>	<p>(ii) There are a number of Objectives included in Section 5.3.14 in relation to Air Pollution and improvement of Air Quality and monitoring, included in the draft Plan, the Council will continue to work with the EPA to monitor air quality.</p> <p>(iii) Section 5.3.11 deal with noise emission and there are a number of objectives related to managing different types on noise. The Council have published a Noise Action Plan for Limerick 2018 –2023, which is accompanied with appropriate noise maps.</p>
<p>Chief Executive’s Recommendations</p>	
<p>1. No change;</p> <p>2(i) - (ii) The Environmental Report and the Natura Impact Assessment will be fully updated following receipt of amendments by the Elected Members and prior to putting the Material Amendments to the Draft Plan on Public Display;</p> <p>3(i) No change;</p> <p>(ii) Provide new text on active travel and modal split - see recommendation to NTA’s submission no. 247;</p> <p>(iii) No change;</p> <p>(iv) Omit the following text from Objective TR O20 Objective TR O20 Transport Interchange It is an objective of the Council to facilitate the provision of quality transport interchanges with the rail network and proposed Park and Ride services, in order to facilitate focused access to multiple public transport modes and to maximise the movement of people via sustainable modes</p> <p>(v) - (ix) No change;</p> <p>4. No change;</p> <p>5(i) See recommendation outlined above in this section with regard to Active Travel and Modal Shift;</p> <p>(ii) - (ix) No change</p> <p>6. No change</p> <p>7(i) Update Housing Strategy, Housing Need Demand Assessment and a new Chapter 4 shall be prepared to reflect changes to Housing for all and this revised Chapter will be included in Part C of the Chief Executive’s Report;</p>	

(ii) Update Tiered Approach to Zoning to include brownfield and Greenfield sites and also to reflect updates complete since preparation of Tiered Approach to Zoning;

(iii) - (vi) No change

8. No change

9(i) Insert Renewable Energy Targets potential for Limerick within the lifetime of the Plan in Chapter 8:

Table X Renewable Energy allocations for differing technologies

<u>Output Current and Projected</u>	<u>Wind</u>	<u>Anaerobic Digestion</u>	<u>Solar</u>	<u>Hydro</u>	<u>Geothermal</u>
<u>Current capacity MW</u>	<u>234.35</u>	<u>2.0</u>	<u>113.49</u>	<u>0.1 MW</u>	<u>0</u>
<u>Target Capacity MW (2030)</u>	<u>386.45 (+65%)</u>	<u>20 (+1000%)</u>	<u>227.0 (+100%)</u>	<u>0.3MW (+300%)</u>	<u>0.5MW</u>

Note: Baseline figures drawn from LCCC sources June 2020

(ii) Insert the following into Objective ECON O44:

(c) to promote Limerick to become the primary hub for the development of Ireland’s west coast renewable energy potential in research, innovation, logistics, development, maintenance and administration

(iii) No change;

10. No change.

SEA/ AA Response

The monitoring section of the SEA will be updated. There has been new development in these areas since it was published, namely the new Draft Development Plan Section 28 guidance which calls for an annual monitoring report.

See SEA/ AA Response to Submission No’s 244 and 153 in relation to active travel.

New energy targets will be inserted in the plan, based on all technologies and not just wind. Text in relation to additional green ways is noted, but this needs to be done with care. Unless planned and designed carefully such forms of development could result in ecological damage. These should only take place following detailed design and adequate ecological assessment.

All the changes proposed, with the caveat of adequate assessment and design for greenways, should have beneficial environmental effects.

No. 265	Ref. & Name/ Group:	LCC-C62-265 J. Carroll	
	Submission/ Observation Summary		Chief Executive’s Response
	<p>1. Accessibility:</p> <p>(i) The observer considers that the Draft Development Plan has excluded people with disabilities. The observer is concerned that the issues of universal access and the commitment to the Barcelona Declaration are not covered by general use of the term's “accessibility” and “inclusion”.</p> <p>(ii) The observer has requested that additional references need to be included in relation to the specific needs of people with disabilities in Chapter 6 Sustainable Mobility. Throughout the plan ‘walking’ and public transport are referred to as optimal modes of transport, but this is not optimal for a range of people with disabilities who rely on vehicular travel and disability parking.</p>		<p>1. Accessibility:</p> <p>(i) The comments are noted, the Council is committed to universal access for all citizens. Section 9.4 Healthy Placemaking and Communities, sets out that universal design is a pre requisite for healthy placemaking. Accessibility for all citizens is a cross cutting theme throughout the plan, social and physical barriers may be the cause of exclusion. The Draft Plan seeks to break down the barriers for all members of communities to deliver healthy and safe places to live, work and enjoy. In response to the submission from the Department of Transport text in relation to universal design will be amended to reference the Whole of Government’ National Disability Inclusion Strategy (NDIS) 2017-2022.</p> <p>(ii) Sustainable transport modes are the preferred option from the perspective of the plan making process, to create safety, healthy and environmentally friendly perspective and the Council accepts that these modes may not suit all citizens as outlined in the submission. Objective TR O11 Universal Design is set out in Chapter 6 and it outlines that it is the objective of the Council to ensure that all transport schemes incorporate high-quality urban realm design that is attractive, safe, comfortable and accessible for all individuals.</p>

<p>(iii) Planning for single level homes, as set out in Chapter 3, that can be accessed from street level, enabling parking for disabled residents, caregivers or older people in high density building plans. The observer states that the new houses planned at the junction of Hyde Road and Lower Carey’s Road do not have accessible parking.</p> <p>(iv) The observer requests an amendment to accessibility of facilities and services set out in Chapter 9. There are a range of services across the city that form a pillar of primary care strategies e.g., voluntary carer support groups but they are not considered or housed through the planning strategy.</p> <p>(v) There are accessibility issues at present due to Covid-19 measures, parking spaces have been removed and businesses are placing street furniture and signage blocking safe access making it difficult to navigate on the city streets.</p> <p>(vi) The observer requests that Limerick City and County Council actively engage with its commitments and begin formally ‘disability proofing’ all plans.</p>	<p>(iii) The Council is committed to social integration for all and a society that allows its citizens a choice in terms of where they live. Chapter 3 of the draft Plan sets out in Objective HO O1 Social Inclusion that it is an objective of the Council to ensure that new developments are socially inclusive and provide for a wide variety of housing types, sizes and tenure, throughout Limerick, to cater for the demands established in the Draft Housing Strategy and the Housing Need Demand Assessment.</p> <p>(iv) The comments are noted, the Council is committed to universal access for all citizens and the Draft Plan outline policy support in SCS1 O2 Accessibility for all, which seeks the provision of appropriate inclusive and accessible safe amenity, recreational open space and community facilities that are available for all sections of the community, both urban and rural at a convenient distance from their homes and places of work.</p> <p>(v) Covid 19 measures, which have been implemented throughout Limerick seek to enhance accessibility for pedestrian and cyclists, with widening of footpaths and giving space back to the street users. There has been minimal loss of car parking spaces, in a bid to enhance the City Centre and for business to navigate the Covid 19 pandemic.</p> <p>(vi) Noted. The Council consider that the policies and objectives set out in the Draft Plan seek to promote universal access for all citizens.</p>
Chief Executive’s Recommendations	
1. No change.	
SEA/ AA Response	

N/A

No. 273	Ref. & Name/ Group:	LCC-C62-273 Patrick O’Donovan TD, Minister for the Office of Public Works	
Submission/ Observation Summary		Chief Executive’s Response	
<p>1. Population Growth and Allocation: (i) Table 3.1 Settlement Hierarchy and Table 2.7 shows a major disparity in allowing growth in rural population. Level 7 which refers to Open Countryside, accounting for the bulk of landmass will get an increase of just 7.5% increase in its total population. The Council are proposing a 37% increase in the Metropolitan area of the city, a 30% increase for Newcastle West and an average of 28% for the rest of the county, save for Patrickswell.</p> <p>Forecasting over 870 houses or 145 per annum across the rural area, is under-estimated, particularly due to Covid. This needs to be re-examined: The Settlement Strategy should reflect trends emerging as a result of COVID as people seek to leave urban areas. The 7.5% increase needs to be increased to reflect actual rural demand. The draft needs to be amended to reflect the 25% national average of self-build in the Open Countryside.</p>		<p>1. Population Growth and Allocation: (i) The Council acknowledged that the 7.5% increase could be considered conservative in comparison to the overall population growth projections, which are very ambitious, but it still remains generous in the context of the overall growth of Limerick. The Council is obliged to comply with national and regional planning policy and set out a hierarchical distribution of the population growth throughout all settlements, in accordance with NPF and RSES. The NPF sets out in NPO 2a that a target of 50% of future population and employment growth will be focused in the five cities and their suburbs. Furthermore, the RSES sets out that in RPO 11 that Key Towns can grow by up to 30%, subject to capacity analysis. Accordingly, the population growth for the different levels of the Settlement Hierarchy has been already established. In addition to the above, Limerick has a wide network of nucleated settlements, where in general growth should be prioritised to help strengthen these settlements, thereby also lifting the rural areas to which they are intimately connected and in an environmentally and economically sustainable manner. National and regional policy seeks to grow the cities, towns and villages, the allocation of growth to the rural area is considered appropriate in the context of the overall growth figures.</p>	

<p>(ii) Objective SS O4 Prevention of Urban Sprawl: This presents linear housing as something negative that has taken from the character of towns and villages, adding to the undertone that one off house is to be avoided. The objective needs to be amended. Many towns and villages survive if water and sewage are available so continuation of housing should be considered. Preventing linear roadside frontage is not the language wanted.</p> <p>(iii) Level 2: Key Town: The observer encourages the Council to continue to seek funding to tackle dereliction to free up opportunity sites in towns and villages and consider what other small urban areas across the Country are doing to maximise funding.</p> <p>(iv) Objective SS O13: This could be used negatively against applicants who are seeking to carry out developments in villages where there are no sites and where sites are being hoarded and not being released to the market. This cannot be interpreted as a means to refuse permission and it needs to be re-worded. The town centre should be developed in a sequential manner; however, it is important that the plan does not prevent opportunity sites in other parts of towns and villages.</p> <p>(v) 3.5 Serviced Sites: The following is proposed: That the Council propose for adoption, within an agreed timeframe after the adoption of this Plan, a clean Multi-Annual</p>	<p>(ii) Objective SS O4 Prevention of Urban Sprawl: Objective SS O4 seeks to safeguard the rural area from inappropriate ribbon development on the approaches to towns and villages, in accordance with the Sustainable Rural Housing Guidelines 2005. The Draft Development Plan supports coordinated growth of an appropriate scale to all of the towns and villages in Limerick, in favour of uncoordinated urban sprawl, the Objective is considered appropriate.</p> <p>(iii) Level 2 Key Town: The Council has been successful in securing funding under the Rural Regeneration and Development Fund to address dereliction and vacancy throughout Limerick and will continue to seek opportunities for funding, as they arise.</p> <p>(iv) Objective SS O13 sets out guidance on development within Level 5 Settlements. The purpose of this Objective is to ensure that growth within these villages is of appropriate scale and proportionate to the pattern and grain of the existing settlement and consistent with Government guidance. Planning tools which can be used to ensure that lands are not been hoarded, such as the Vacant Site Levy. The proposed Objective will not prevent the development of appropriately located opportunity sites in towns and villages.</p> <p>(v) Policy support is provided in the plan to support the development of Serviced Sites and the Council will examine potential funding options as they arise to support Serviced Sites in towns and villages.</p>
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<p>Strategy and Policy for the Delivery of Serviced Sites in Co. Limerick. This should have clear targets matched with resources from the Council, reported annually to the Council. This would help provide clear guidelines for those communities and others who may be interested in developing properties in towns and villages across the County during the lifetime of the Plan.</p> <p>(vi) 3.6 Rural Housing: This is welcomed and in particular the inclusion of clauses for returning emigrants and individuals going through martial separations.</p> <p>(vii) Rural Settlement Strategy Map: There are inconsistencies including Rooskagh and Particles designated as Areas of Strong Urban Influence, but adjoining DED's are Rural/Structurally Weak. DED's of Castletown and Ballyagran are areas under Strong Urban Influence but both DED's to the east and west in Feenagh and Colmanswell are designated as Rural/Structurally Weak.</p> <p>The following Electoral Divisions should be changed to Structurally Weak, on the basis of the Department of Rural and Community Development Clár designation: Glenbrohane, Emlygrennan, Bulgaden, Kilteely, Oola,</p>	<p>(vi) Noted.</p> <p>(vii) There is no inconsistency in that the single criterion for designation of Electoral Districts, belonging to Areas of Strong Urban Influence was identified where 15% or over of the population of the Electoral Division commuted to Limerick for work purposes, which is in line with the requirement of the NPF. Rooskagh, Particles, Castletown, Ballyagran, all fall into that category. However, as outlined in the response to the submission from the OPR, additional criteria in terms of population growth over the last Census period, will now also be considered to determine the Rural Settlement Strategy Map. The Rural Settlement Strategy Map will be updated.</p> <p>The identification of the Structurally Weak Area must be based on spatial analysis, in compliance with national planning policy. Qualifying them for inclusion in the Structurally Weak Area, based on their inclusion in the Clár area, which was complete in 2006, is not considered appropriate. As outlined above and in the response to the</p>
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<p>Templebredon, Doon, Doon South, Doon West, Bilboa, Kilmeeedy, Ballynoe, Cloncagh.</p> <p>(viii) 3.7.4 Residential Density Objective HO O2: The submission raises concerns regarding a blanket statement to increase densities, without regarding the specific characteristics of the town, village or settlement and could lead to over concentration in some villages.</p> <p>(ix) Objective HO O9: Downsizing or right sizing should be matched with designation of sites, particularly in the Metropolitan Area and Newcastle West. The following is proposed: That the Council propose for adoption, within an agreed timeframe after the adoption of this Plan a Strategy for "Downsizing" and that the Council as part of that strategy will commit to the designation of sites at a number of agreed locations in the County and City.</p> <p>2. Chapter 4 A Strong Economy:</p> <p>(i) The bulk of the emphasis of Pages 76-84 appear to be on the city. Emphasising the city, should not be at the expense at the rest of the County. This Chapter must emphasise the</p>	<p>OPR, the Rural Settlement Strategy Map will be amended based on spatial analysis and updated.</p> <p>(viii) Increased densities have been complied in compliance with Section 28 Guidelines, which the Council are obliged to comply with. Planning applications will be determined on a case-by-case basis having regard to the specific characteristics of the town, village or settlement.</p> <p>(ix) Objective HO O9 supports the provision of specific purpose-built accommodation, including assisted living units and lifetime housing and adaptation of existing properties, which will include opportunities for ‘downsizing’ or ‘right sizing’ within their community. The identification of sites and the preparation of a strategy is not considered appropriate, as it presents an overly prescriptive position. Objective HO O1 sets out that it is an objective of the Council to ensure that new developments are socially inclusive and provide for a wide variety of housing types, sizes and tenure, throughout Limerick, to cater for the demands established in the Draft Housing Strategy and the Housing Need Demand Assessment. In accordance with this Objective, all housing schemes shall consist of a mix of units, which facilitates all sectors of society, rather than on specific designated sites.</p> <p>2. Chapter 4 A Strong Economy:</p> <p>(i) Chapter 4 sets out the overall economic strategy for Limerick, which will guide the development of Limerick from an economic perspective over the lifetime of the proposed Plan. The Draft Plan</p>
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<p>importance of revitalising towns and villages, the identification of schemes that have been put in place by Government to support Local Authorities, LEADER companies and local communities. The Council should put in place lists of key development sites in each local Electoral Areas.</p> <p>The goals of Limerick 2030 must be central. The Council must mandate Limerick 2030 to ensure the development of plans and a strategy to ensure equity of spending by the Special Purpose Vehicle between the County and the City over the lifetime of the Limerick Development Plan 2022-2028.</p> <p>Chapter 4 represents an opportunity to show collaboration with Shannon Airport, which should be referenced in a strategic way.</p> <p>(ii) Objective ECON O24: In relation to Data Centres, the following is proposed: That the Council propose for adoption, within an agreed timeframe after the adoption of this Plan, a Strategy for Data Centres and that the Council as part of that strategy will commit to the designation of</p>	<p>includes an array of policies to support the growth of the rural areas outside of Limerick City. The Council recognise the importance of LEADER companies to the rural areas and will continue to work with the relevant development companies through the Local Economic and Community Plan.</p> <p>The mandate of Limerick Twenty Thirty and the spending of the Designated Activity Company is beyond the scope of the proposed Development Plan.</p> <p>The Council recognises the importance of air travel for international connectivity and in improving the attractiveness of Limerick for business opportunities and development of the tourism industry. Limerick is strategically positioned within close proximity to Shannon International Airport. The Council supports the continued operation and growth of Shannon Airport as an important element of the transport and communications infrastructure of the region. Objective TR O31 sets out policy support for Shannon Airport.</p> <p>(ii) Objective ECON O24: It is an objective of the Council to facilitate the development of Data Centres on lands appropriately zoned for such purposes, subject to normal planning, development and environmental controls and the assessment of the potential impact on such development on adjacent land uses. The Council will zone</p>
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<p>sites at a number of agreed locations in the County and will work with the State Agencies for the delivery of critical Data Centres during the lifetime of this plan.</p> <p>(iii) 4.8.4 Tourism Facilities and Accommodation: Developments and tourist attractions should "generally be located in settlements..." could be used as a means to refuse applications in the Open Countryside (Level 7) or in areas where there is no viable site. This should be re-written. Glamping should also be included.</p> <p>3. Chapter 7 Objective IN O5 d): Regarding the difficulties in the treatment of wastewater in Newcastle West, financial support from the Council under the development levy contribution scheme should be examined.</p> <p>4. Chapter 8 Objective CAF 023: The statement that the Council will work with the OPW and others is welcomed.</p> <p>5. Chapter 9 Sustainable Communities and Social Infrastructure Objective SCSi O30: The Council should look to have a space for visual and performing Arts in the County. The following is proposed: That the Council propose for adoption, within an agreed timeframe after the</p>	<p>lands specifically for the development of a data centre in Limerick, a strategy for the development of data centres is not required at this stage.</p> <p>(iii) Growth of tourism accommodation in towns and villages is considered a more sustainable and appropriate approach to development rather than their development in on greenfield sites in the rural area. It is considered that the potential for growth in many of our towns and villages can be supported by tourism development both from a physical and economic perspective, thus improving viability and reducing vacancy and dereliction. The development of tourism facilities in towns and villages also support sustainable mobility and climate action measures.</p> <p>3. Chapter 7 Objective IN O5 d): The Development Contribution Scheme cannot support the development of infrastructure, which is the mandate of Irish Water. The Council will continue to work with Irish Water to develop the required infrastructure to support the growth of Newcastle West.</p> <p>4. Chapter 8 Objective CAF 023: Noted.</p> <p>5. Chapter 9 Sustainable Communities and Social Infrastructure: Objective SCSi O30: The Council recognises the importance of arts and culture throughout Limerick and wish to highlight that there are a number of performance spaces located in County Limerick. The Councils policy is set out in the Limerick Cultural Strategy, A</p>
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	<p>adoption of this Plan a Strategy for the Arts and that the Council as part of that strategy will commit to the designation of a site in the County for the visual and performing Arts.</p>	<p>Framework, 2016-2030. The Council has also prepared a Community Audit, which looked at community facilities and have identified that many of these community facilities shared many uses/functions, including arts and cultural purposes. The designation of a site in the county for the visual and performing arts would be subject to securing funding and it is not considered appropriate to identify a site in the proposed Development Plan, without any feasibility assessment or funding source. The Council continue to promote the sharing of community building and facilities for a multitude of uses.</p> <p>In response to other submissions the Council has also committed to undertake a dynamic database for a Cultural Audit and Map.</p>
Chief Executive’s Recommendations		
1. – 5. No change.		
SEA/ AA Response		
N/A		

Theme 10: Infrastructure

No. 22	Ref. & Name/ Group:	LCC-C62-22 Gas Networks Ireland (GNI)	
	Submission/ Observation Summary		Chief Executive’s Response
	GNI have no comment in regard to the Draft Plan. However, GNI have underground pipeline assets in Limerick and request that GNI be contacted in advance of any works to determine the impact (if any) on its pipeline infrastructure.		The comment is noted. The Council will continue to engage with Gas Networks Ireland as appropriate.
	Chief Executive’s Recommendations		
	No change.		
	SEA/ AA Response		
The plan includes a commitment to work with various service and infrastructure providers to ensure a coordinated approach to infrastructural assets. The importance of a combined approach to these issues were also highlighted in the Environmental report and issues papers which were prepared in the initial stages of the plan.			

No. 87	Name/ Group:	LCC-C62-87 Gas Networks Ireland	
	Submission/ Observation Summary		Chief Executive’s Response
1. Introduction: The submission is broken into two separate parts: Part A is in relation to policies and objectives set out in the Draft Plan and Part B is in relation to the former Gasworks site at Dock Road and O’Curry Street.		1. Introduction: Noted.	

2. Part A

(i) Chapter 6 - Sustainable Mobility and Transport: GNI welcome the development of CNG in Limerick as a mechanism for supporting sustainable transport. The rollout of the CNG network has commenced in line with the 2019 Climate Action Plan and supported by the RSES for the Southern Region, which refers to support for “the investment in the sustainable development of CNG refuelling stations as outlined in RPO 93. GNI requests the Council to consider the inclusion of wording in Chapter 6 as follows:

"Compressed Natural Gas (CNG) CNG is natural gas that has been compressed to fit into a vehicle's tank and is particularly suitable for use in commercial vehicles. The development of CNG Infrastructure will enable fuel switching from diesel to CNG for HGVs and buses. CNG is an established technology that is used in many countries around the world. CNG contains virtually no particulate matter (PM) and also has low emission levels of nitrogen oxides (NOx)² which is beneficial from an air quality perspective. CNG vehicles can be run on 100% renewable gas. This is a renewable and carbon neutral fuel, produced using anaerobic digestion technology from existing waste streams and a variety of sustainable biomass sources, including grass, animal waste, crop residues and food waste. Infrastructure development for CNG is already underway in Ireland, with 14 fast fill CNG stations being installed across the Core TEN-T road network via a project

2. Part A

(i) Chapter 6 - Sustainable Mobility and Transport: The Council recognise the importance of renewable energy sources and the transition to a low carbon society. It is considered appropriate to include a new Objective in Chapter 6 as suggested.

<p>called the Causeway Study that is supported by the European Commission through the CEF Transport Fund and the Commission for Regulation of Utilities (CRU). The Council will support the use of gas in transport by a presumption in favour of applications for CNG refueling infrastructure, provided planning and environmental criteria are satisfied”.</p> <p>(ii) Chapter 7 - Infrastructure: GNI welcome the provision of 7.6 Energy Networks, and Objective INO11. In this regard the submission notes that Biomethane produced by anaerobic digestion is a renewable and carbon neutral fuel that can be used in heat, transport and electricity production. It is identical in function to natural gas so the existing gas network can be used. The submission notes that there is potential for biomethane production in the region from sources including grass, animal waste, crop residue and other waste streams. Biomethane can help Limerick reduce its carbon emissions.</p> <p>(iii) Chapter 8 – Climate Action, Flood Risk and Transition to a Low Carbon Economy: Section 8.5 Renewable Energy refers to different types of renewable energy including biogas and references the 2019 Climate Action Bill. The submission refers to Action 54 in the interim Climate Action 2021 document which highlights developing biomethane grid injection infrastructure. GNI has the capability to develop biomethane grid injection</p>	<p>(ii) Chapter 7 - Infrastructure: The comments are noted and Chapter 8 addressed emerging technologies, in Objective CAF O37 which deals with Anaerobic Digestors and the Objectives seeks to facilitate and encourage such developments.</p> <p>(iii) Chapter 8 – Climate Action, Flood Risk and Transition to a Low Carbon Economy: The comments are noted. Chapter 8 addresses emerging technologies, in Objective CAF O37 and the Plan seeks to facilitate and encourage such developments.</p>
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<p>infrastructure. Noting increased climate action ambition, it is imperative that Ireland utilise as many resources of renewable energy as possible. Any technology being considered should be subject to full life cycle assessment.</p> <p>(iv) Chapter 11 – Development Management Standards: The submission broadly welcomes the approach in the Development Management Standards, with regard to biogas/bioenergy and biomass innovative energies.</p> <p>3. Part B – Lands at former Gasworks site, Dock Road:</p> <p>(i) The submission notes that GNI recently completed the remediation of the Gasworks site. With respect to the Draft Plan there are a number of issues which GHI seeks revisions on.</p> <p>(ii) Proposed Additions and Revisions to the Draft Plan: The submission considers the Building Height Strategy for the Docklands is vague and appears that there should be an established future strategic masterplan for the area. It also sets out that there are modifiers that apply for the area. It is set out that the Buildings Height Strategy for Limerick forms part of the statutory development plan and is therefore the appropriate document in which strategic guidance on height should be set out. It is set out that it would be inappropriate that the height would be established in a non-statutory future masterplan document.</p>	<p>(iv) Noted.</p> <p>3. Part B – Lands at former Gasworks site, Dock Road:</p> <p>(i) The Council recognise the importance of the development of the former Gasworks Site and welcome the remediation works that have been carried out on site.</p> <p>(ii) Proposed Additions and Revisions to the Draft Plan: The Council as part of the Draft Development Plan process prepared a Building Height Strategy for the City. The purpose of the Strategy is to drive general increases in building heights and ensure an appropriate mixture of uses, while also considering the quality of development and balancing amenity and environmental considerations. The Strategy sets out a series of tools to guide developers on the appropriate height for buildings in Limerick. In compliance with Section 28 guidance, it is not appropriate to place caps on sites in the Development Plan. The Draft Building Height Strategy sets out strategic guidance to enable development in Limerick City. The Strategy will not get into master</p>
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<p>It is requested that the ‘Recommended Height’ strategy for The Docklands make specific provision for 7+ storeys to be established on the northerly part of the site along the Dock Road/Lower O’Curry Street. (Revisions identified in red). The Docklands Character Area encompasses lands on both sites of the Dock Road, with that opportunity to increase height in the existing docks <u>and to north /nonwestern part of the former Gas Works site</u>. Where the <u>Gasworks</u> site adjoins existing residential units e.g. St. Alphonsus Street, generally local context height +2 storeys is likely to be acceptable, rising to 7+ storeys facing Dock Road and the lower part of O’Curry Street. Development should be subject to a Masterplan.</p> <p>(iii) Clarity on Masterplan Requirements and Timing of the Docklands/the Site: The submission notes that a single strategic masterplan for the entire Docklands Character Area is required which will set heights and uses in the area. Having regard to the foregoing the following revisions/clarifications within the Building Height Strategy provisions for the Docklands Character and set specific strategic height guidance for the Docklands area: including the former Gasworks site with the current statutory ‘<i>Building Height Guidelines for Limerick City</i>’ document</p> <p>(a) Confirms that a strategic Masterplan is to be prepared for the Docklands by the Planning Authority within 6 months of the adoption of the Development Plan, and that in the event of delay to same that planning applications</p>	<p>planning individual sites and will not set specific building heights, as it is contrary to national guidelines.</p> <p>(iii) Clarity on Masterplan Requirements and Timing of the Docklands/the Site: The Council will not carry out strategic masterplans for the Docklands Character Area. In response to Submission No.129, it is proposed to amend Objective CGR O3 Urban Lands and Compact Growth to require owners of large-scale urban sites to develop a masterplan for the coherent and sustainable development of such lands. Masterplans shall address issues of the sustainable use of available lands, preservation of existing residential amenity, access, urban design and connectivity. This revised objective would apply to the former Gasworks sites.</p>
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<p>can be brought forwards if they set out how the development proposals comply with the provisions set out in the <i>‘Building Height Guidelines for Limerick City’</i></p> <p>Or</p> <p>(b) Require the site-Specific Masterplans be prepared by individual landowners to accompany planning applications in accordance with the strategic guidance set out in the <i>‘Building Height Guidelines for Limerick City’</i>.</p>	
<p>Chief Executive’s Recommendations</p>	
<p>1. No change;</p> <p>2(i) Retitle Section 6.5.9 as follows: Electric Vehicles and Compressed Natural Gas Vehicles</p> <p>Insert the following text to be added before Objective TR O26</p> <p><u>Compressed Natural Gas (CNG) is natural gas that has been compressed to fit into a vehicle's tank and is particularly suitable for use in commercial vehicles. The development of CNG Infrastructure will enable fuel switching from diesel to CNG for HGVs and buses. CNG is an established technology that is used in many countries around the world. CNG contains virtually no particulate matter (PM) and also has low emission levels of nitrogen oxides (NOx) ² which is beneficial from an air quality perspective. CNG vehicles can be run on 100% renewable gas. This is a renewable and carbon neutral fuel, produced using anaerobic digestion technology from existing waste streams and a variety of sustainable biomass sources, including grass, animal waste, crop residues and food waste. Infrastructure development for CNG is already underway in Ireland, with 14 fast fill CNG stations being installed across the Core TEN-T road network via a project called the Causeway Study that is supported by the European Commission through the CEF Transport Fund and the Commission for Regulation of Utilities (CRU). The Council will support the use of gas in transport by a presumption in favour of applications for CNG refueling infrastructure, provided planning and environmental criteria are satisfied.</u></p> <p>Change Text of Objective TRO 26 as follows: Electric Vehicles and Compressed Natural Gas Vehicles:</p> <p><u>c) Encourage the switch to Compressed Natural Gas (CNG) vehicles through the roll-out of additional CNG points at appropriate locations, throughout Limerick, in association with relevant agencies and stakeholders.</u></p> <p>(ii) – (iv) No change;</p>	

	<p>3(i) – (ii) No change;</p> <p>(iii) Amend Objective CGR O3 Urban Lands and Compact Growth under Chapter 10 Compact Growth and Revitalisation as follows: (d) Require multiple owners of large-scale urban sites to develop a masterplan for the coherent and sustainable development of such lands, addressing issues of the sustainable use of available lands, preservation of existing residential amenity, access, urban design and connectivity. <u>These Masterplans shall set out the framework for the sustainable, phased and managed development of a particular area. The Masterplan should include the written consent of all landowners, a conceptual layout, infrastructure proposals including any consultation with service providers and phasing details.</u></p>
	SEA/ AA Response
	<p>The inclusion of CNG ensures a more complete response in the plan to both climate mitigation issues, but also encourages the adoption of lower emission fuel types. Compressed Natural Gas can be obtained from bio waste. From the point of view of Appropriate Assessment, the use of farm or other bio waste to produce bio-gas and digestate would result in more easily managed forms of nutrients. This could play a role in reducing artificial fertiliser usage and hence reduce pollution risk. This would have ecological benefits. It would also be part of the circular economy, which the plan encourages, with benefits for sustainable resource usage.</p> <p>The amendment of CGR 03 to require multiple users of sites to produce a master plan will ensure more balanced development and more efficient land use which is entirely consistent with compact growth and is in accordance with higher tier documents such as the NPF and the RSES.</p>

No. 113	Ref. & Name/ Group:	LCC-C62-113 Electricity Supply Board (ESB)
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Introduction: The submission sets out that the ESB broadly supports the vision of the Draft Plan. ESB note that there continues to be significant advancement in renewables technology and their submission outlines strategic issues that should be taken into consideration in the preparation of the final Plan 2022 - 2028.</p>	<p>1. Introduction: The comments are noted and the Council recognise the rapid advancements in renewable technologies. Chapter 8 of the Draft Plan comprehensively addresses issues arising in this area.</p>

2. Generation, Transmission and Distribution: It is the ambition that ESB will increase renewables to 50% of generation capacity by 2030, significantly contributing to the national target of 3.5GW of offshore wind, 8.3GW of onshore wind and 1.5GW of solar. ESB is committed to completely transforming their generation portfolio, replacing old Plant with a mixture of renewables and high efficiency gas. To support the transition of the electricity system to a low-carbon future, ESB is developing assets such as battery storage and flexible gas fired units at our existing generating sites that respond quickly to system demand, which will be key to facilitating large scale renewables in the future.

3. Roll-out of EV Infrastructure: ESB has developed a network of almost 1,100 electric vehicle charge points across the Island of Ireland. To help meet this increase in electric vehicles, ESB with the support of the Government’s Climate Action Fund is rolling out high power charging hubs across the country. These hubs will be capable of quickly charging between two and eight vehicles simultaneously and will facilitate vehicles travelling longer distances across Ireland’s National and Motorway routes. ESB’s Plans include investment in a green hydrogen production, storage and generation facilities by the end of this decade. A clean, zero-carbon fuel, green hydrogen will be produced from renewable energy.

2. Generation, Transmission and Distribution: The important role renewables technologies will play in energy production is a key element of the Draft Plan. The commitment for a green city region on the waterfront, is set out in the overall vision for the draft Plan. Chapter 8 of the Draft Plan sets out policy support for the development of many of the technologies identified and the Council will continue to work with energy providers in this regard.

3. Roll-out of EV Infrastructure: The Council supports the roll out of critical infrastructure to support the expansion of Electric Vehicles. Policy support is provided in the Plan in Section 6.5.9 of the Draft Plan.

<p>4. Generation and Renewables: In line with the Government’s strategies to reach Ireland’s 2030 reduced emissions targets ESB is increasing renewables in their power system from 30% to at least 70%. ESB note the Council’s support for the national policy shift to low carbon energy solutions for a greener future as outlined in Policy CAF P2. This is reinforced through Policy CAF P6 <i>Renewable Energy</i>.</p> <p>5. Onshore Wind Energy:</p> <p>(i) ESB support a Plan led approach to wind energy development through the identification of areas for wind energy development. ESB highlight that assessing the County Development Plans and Wind Energy Strategies of adjoining counties would strengthen the Plan. Implementation of Regional Policy Objective (RPO 98 and RPO 99) of the RSES would help ensure consistency across the region.</p> <p>(ii) The submission also highlights that there is an opportunity to strengthen the Plan with the inclusion of Development Objective to support the life-extension and repowering of existing wind farms. Existing wind farms have the benefit of acceptance by local communities and contribute economically to the County through the payment of rates and community benefit funds.</p>	<p>4. Generation and Renewables: Noted.</p> <p>5. Onshore Wind Energy:</p> <p>(i) The comments are noted and the Council agree that a regional strategy would provide an overall robust policy approach for the region, however, the role of carrying out regional strategies lies with the Regional Assembly and not an individual Local Authority. In the absence of a coordinated approach from the Assembly, the Council will continue to work with adjoining Local Authorities to coordinate an approach in so far as possible into the Development Plan.</p> <p>(ii) It is considered that the Plan would benefit from the inclusion of such a policy. An amendment shall be included to address this issue.</p>
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<p>6. Marine Renewable Energy and Offshore Wind: Floating offshore wind (FOW), it is a fast-maturing generation technology and is moving progressively and steadily towards a real commercial opportunity which could unlock the significant potential in Ireland’s deeper offshore areas. The creation of a new industry presents a major opportunity for economic growth on the Irish coastline and Limerick has the potential to be at the centre of that development as recognised in Chapter 4, Section 4, Marine Economy and under Objective ECON O42.</p> <p>7. Solar: The submission states that no single renewable energy technology will deliver Ireland’s transition to a low carbon economy but rather a diverse range of technologies will be required. Mapping for solar irradiation illustrates that Limerick ranks highly in terms of solar resource in Ireland. Policy support and guidance for solar as set out in the Draft Plan is welcomed. ESB wish to highlight that solar farms have potential to be built on agricultural land, whilst also accommodating the continued use of the land for grazing or for incorporating biodiversity measures within a project.</p> <p>8. Battery Storage & Hydrogen Energy: ESB are installing Battery Energy Storage Systems (BESS) at existing generating facilities across Ireland. In addition, ESB wish to highlight, that Green Hydrogen, which is produced from renewable energy sources, offers potential for large scale</p>	<p>6. Marine Renewable Energy and Offshore Wind: Noted and addressed in the Draft Plan, in Chapter 4 and in Chapter 8.</p> <p>7. Solar: Noted. The Draft Plan recognises that a combination of renewable energy technologies is required, to contribute towards meeting national targets. See response to Submission No. 1 from the OPR in this regard.</p> <p>8. Battery Storage & Hydrogen Energy: Noted, both are recognised in the Draft Plan with policy support.</p>
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<p>seasonal storage of variable renewable energy. This enables zero carbon backup to the power system when intermittent renewables such as wind and solar are not available.</p> <p>9. Hybrid Renewables: As recognised County Limerick is well served by the grid with existing 220kV and 110kV transmission lines providing a high-capacity path for power through the Mid-West and on to the East Coast. Utilising existing infrastructure will enable accelerated connection of onshore and offshore wind to the system. The concept of Hybrid Renewables in the Draft Plan under Section 8.5.3 is welcomed.</p> <p>10. Renewables Enabling Plant: Section 8.5.10 details the potential role of gas in Combined Heat and Power. The requirement for renewables-enabling Plant is not acknowledged in the Draft Plan. Given that Limerick City and County has access to Gas Network. The inclusion of the text below as a promotional Objective for the development of Renewable Enabling Plant will assist in the transition to a low carbon economy. <i>“It must also be recognised that natural gas, particularly renewable and indigenous gas, will continue to have a role to play in the transition to a low carbon economy. As such, renewable energy developments may require support from such sources in times of high energy demand.”</i></p>	<p>9. Hybrid Renewables: Noted.</p> <p>10. Renewables Enabling Plant: Noted, the Council consider that it is likely that such infrastructure will be necessary to compensate for the variable of renewable energy technologies, particularly in the absence of adequate battery storage, in the short and medium. While gas is a fossil fuel, it is also necessary in order to support the larger integration of renewables into the grid by balancing out inconsistencies in supply. In the longer term, it is likely that AD will play a greater part in gas supply which would mean that natural gas would be displaced in time. It is considered that the inclusion of the text as indicated would be a useful addition to the plan.</p>
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<p>11. Telecommunications: ESB supports the approach and the view of Limerick City and County Council that to facilitate the provision of telecommunications services at appropriate locations within the County, the applicant must demonstrate compliance with national guidance and be consistent with the updated guidelines (PL 07/2012) that facilitate the improved development of telecommunications infrastructure and promotion of a policy of co-location. The submission welcomes the emphasis on co-location in Objective IN O4.</p> <p>12. Sustainable Transport & Electric Vehicles: With Ireland's natural advantages in terms of wind and other renewables a large proportion of the power used by electric cars will be carbon free in the future. The standards as set out in Statutory Instrument No. 393/2021 – European Union (Energy Performance of Buildings) Regulations 2021 are adhered to under 11.8.6 of the Draft Plan.</p> <p>The submission concludes that Investment in infrastructure is crucial to the economic and social well-being of our country. Such investment creates jobs, stimulates economic activity and provides modern, efficient facilities to provide the services that people need including healthcare, education and community services amongst others. There is a significant multiplier effect from investment in infrastructure which means that it stimulates</p>	<p>11. Telecommunications: Noted.</p> <p>12. Sustainable Transport and Electric Vehicles: Noted</p> <p>Noted.</p>
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	growth in the local economy. This investment in infrastructure is also necessary to support EU and national policy on Climate Change adaptation and mitigation.	
Chief Executive’s Recommendations		
<p>1.– 4. No change;</p> <p>5(i) No change;</p> <p>(ii) Insert Objective in Section 8.5.4 as follows: <u>It is an Objective to support the life-extension and repowering of existing wind farms, where considered appropriate and subject to an appropriate level of environmental and planning assessment.</u>;</p> <p>6.– 9. No change;</p> <p>10. Amend Section 8.5.10 to include the following: <u>It must also be recognised that natural gas, particularly renewable and indigenous gas, will continue to have a role to play in the transition to a low carbon economy. As such, renewable energy developments may require support from such sources in times of high energy demand.</u>;</p> <p>11.– 12. No change.</p>		
SEA/ AA Response		
<p>Repowering of wind farms can often be achieved by fewer but more efficient turbines, which could have visual and ecological benefits. While gas is a fossil fuel, it is likely that such infrastructure will be essential in the short to medium term, in order to support the larger integration of renewables into the grid by balancing out inconsistencies in supply.</p> <p>In the longer term, it is likely that Anaerobic Digestion (AD) will play a greater part in gas supply which would mean that natural gas would be displaced in time. It is considered that the inclusion of the text as indicated would be a useful addition to the plan.</p> <p>From an NIS perspective, the large-scale use of Anaerobic Digestion (AD) with its use of organic wastes has the potential to result in more easily handled digestate material with more predictable nutrient content. This could help displace artificial fertilisers and with its organic content, contribute to soil health, while lessening the possibility of diffuse pollution from nutrient loadings on receiving lands.</p>		

No. 179	Ref. & Name/ Group:	LCC-C62-179 Eirgrid
Submission/ Observation Summary		Chief Executive’s Response

	<p>1. Electricity Transmission: The submission welcomes reference and emphasis placed on electricity transmission in the Draft Development Plan, particularly Chapter 7.6 which details Electricity.</p> <p>In relation to the specific Objective IN O11 (d), the submission states that EirGrid understands the principle underlying it and will always examine the feasibility for undergrounding. However, it is not always possible for high voltage transmission infrastructure to be located underground, even in urban areas, for a variety of reasons. A flexible approach in developing essential transmission grid infrastructure is required to support wider environmental, social and economic development. EirGrid carefully plans its routes and sites for new transmission grid infrastructure.</p>	<p>1. Electricity Transmission: The comments are noted. The Council recognises that challenges may arise in the development of critical infrastructure, for many reasons, including ecological factors, however, where possible, the policy shall remain to underground transmission grid infrastructure.</p>
	Chief Executive’s Recommendations	
	1. No change	
	SEA/ AA Response	
	N/A	

No. 205	Ref. & Name/ Group:	LCC-C62-205 Irish Water
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Introduction: Irish Water (IW) welcomes the opportunity to comment on the Draft Limerick Development Plan 2022-2028. The inclusion of many objectives in the Draft Plan that</p>	<p>1. Introduction: Noted, the Council will continue to engage with Irish Water in terms of the delivery of critical infrastructure for Limerick.</p>

<p>will support the delivery of IW plans, programmes and policies is welcomed. These policy objectives will also ensure the sustainable management of water and waste water in line with national and regional objectives.</p> <p>2. General Comments: This Section highlights to the provision of the Capital Investment Plan 2020-2024, The National Water Resources Plan, Drinking Water Source Protection, River Basin Management Plan. In addition to noting the following: Irish Water welcomes the inclusion of objectives supporting the implementation of Sustainable Urban Drainage Systems (SuDS) and the enhancement of green and blue infrastructure. The submission also highlights that early engagement in relation to planned road and public realm projects and is requested to ensure public water services are protected, enable Irish Water to plan works accordingly and ultimately minimise disruption to the public.</p> <p>3(i) Proposed Core Strategy and Availability of Water Services: It is stated that a high-level review of the land-use zoning maps for Limerick City and Environs and Level 4 settlements has been carried out. Available network information indicates network reinforcements e.g., extensions, may be required to service some zoned sites. Stormwater separation from combined sewers and the implementation of SuDS is strongly encouraged to remove surface water from combined sewers, thereby freeing up</p>	<p>2. General Comments: The Council recognise the importance of the Capital Investment Plan 2020-2024, The National Water Resources Plan, Drinking Water Source Protection, River Basin Management Plan for the delivery of infrastructure for Limerick and the Council are committed to ongoing engagement with Irish Water to deliver for Limerick. The Council will also continue to engage with Irish Water in relation to developments in terms of public realm and proposed road projects, as early as possible in project inception.</p> <p>3(i) Proposed Core Strategy and Availability of Water Services: Noted, the detailed Tiered Approach to Zoning for all sites in Limerick City and Environs and in the Level 4 Settlements have been complete. In Level 5 Settlements, limited development is likely to occur and, in some cases, this will be using serviced sites, with disposal of effluent to ground, where it is deemed acceptable. Stronger policies/objectives and guidance from a development management perspective have been incorporated into the Draft Plan.</p>
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<p>additional capacity. This is particularly relevant to achieving compact growth objectives in settlements. Within Level 5 Small Village boundaries, where a development is not serviced by existing infrastructure, the feasibility of extending the public network to unserviced sites would be assessed via Irish Waters New Connections process. Depending on the extent of development realised, localised network upgrades may also be required</p> <p>(ii) Wastewater Infrastructure -Wastewater Treatment Plants (WWTPs): <i>Wastewater Networks:</i> Irish Water and Limerick City and County Council will continue to monitor the performance of the networks to ensure that the most urgent works are prioritised as required. Limerick City and Environs is served by Bunlicky and Castletroy WWTPs, both of which currently have headroom and have projects underway to provide additional capacity. There are several WWTPs in Limerick County with limited or no spare capacity, including the Key Town of Newcastle West. In the case of Newcastle West, a project to upgrade the plant and provide capacity for growth is included in the 2020-2024 Investment Plan. WWTP upgrade projects are underway for Adare and Dromcollogher. Capital investment projects are also ongoing to provide WWTPs in the previously untreated agglomerations of Foynes and Glin.</p> <p>(iii) Wastewater Networks: Irish Water and Limerick City and County Council are continually progressing sewer</p>	<p>Separation of storm water and waste water is the approach that is taken in Limerick in dealing with disposal of surface and storm water.</p> <p>(ii) Wastewater Infrastructure - Wastewater Treatment Plants (WWTPs): <i>Wastewater Networks:</i> The Council are aware of deficiencies in Limerick and will continue to work with Irish Water to improve infrastructure. Since the publication of the Draft Plan IW have provided an update in relation to Kilbehenny therefore the text in Volume 2 Level 6 Settlements Rural Clusters Kilbehenny will be amended.</p>
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<p>rehabilitation activities, capital maintenance activities, storm water overflow upgrades, etc. A Drainage Area Plan (DAP) is underway for Limerick City and Castletroy agglomerations and is due to be completed in 2024. Network Development Plans have also been prepared for Limerick city and metropolitan area and Newcastle West, which will help inform how zoned sites within these settlements could be serviced. Reference is made to the Mungret Local Infrastructure Housing Activation Fund project and states that Irish Water is working with the Council to provide strategic water network infrastructure in the proposed road infrastructure, to deliver housing.</p> <p>(iv) Water Supply Infrastructure - Water Supply for Limerick: County Limerick is supplied by 28 water resource zones (WRZs). The submission notes that a number of groundwater intervention projects to secure a sustainable water supply are planned or ongoing, including in Adare, Rathkeale, Oola, Pallasgreen, Doon, Croom and Fedamore water resource zones. The full options assessment stage of the NWRP has been carried out in consultation with the water services department of LCCC. This has identified the preferred interim and long-term interventions required to ensure a sustainable water supply in Limerick, and nationally.</p> <p>(v) Water Networks: Irish Water and the Council are continually progressing leakage reduction activities, mains rehabilitation activities and capital maintenance activities.</p>	<p>(iii) Water Networks: The comments outlined by Irish Water are noted and the Council will continue to engage and work with Irish Water to deliver critical infrastructure for Limerick.</p> <p>(iv) Water Supply Infrastructure - Water Supply for Limerick: The Council are aware of deficiencies in Limerick and will continue to seek funding opportunities as they arise, to upgrade critical infrastructure.</p> <p>(v) Water Networks: The comments outlined by Irish Water are noted and the Council will continue to engage and work with Irish Water to deliver critical infrastructure for Limerick.</p>
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<p>Irish Water and the Council will continue to monitor the performance of the networks to ensure that the most urgent works are prioritised as required. Mains rehabilitation works have been carried out in recent years as part of the Leakage Reduction Programme on distribution and trunk mains throughout the county, totalling approx. 25km in total.</p> <p>4. Comments and Suggestions on the Draft Plan Text: Irish Water recommends the followings updates and changes to text as follows with omission and additions.</p> <p>(i) Amend Section 7.5.1 Water Services Act....The Commission for Energy Regulation (CER) <u>Commission for Regulation of Utilities (CRU)</u> is the economic regulator of public water services. The CER’s CRU’s role...</p> <p>(ii) Amend 7.5.1 Water Services Act 2013 IN O5 Water Services (b) Source Protection as follows: Collaborate with Irish Water in the protection of water supply sources <u>to avoid water quality deterioration and reduce the level of treatment required in the production of drinking water, in accordance with Article 7(2) of the WFD. Protection and restoration of drinking water at the source can have co-benefits for biodiversity and climate change.</u></p> <p>(iii) Comments on 7.5.1 IN O5 Water Services (d) Newcastle West - Newcastle West WWTP upgrade project is at concept design stage. The project will provide sufficient spare capacity (to WWDL ELV capability) to cater for the targeted</p>	<p>4. Comments and Suggestions on the Draft Plan Text:</p> <p>(i) Comments noted and amendment shall be included.</p> <p>(ii) Comments noted and amendment shall be included.</p> <p>(iii) Comments noted – it is considered that INO 5-part d) should remain in the policy.</p>
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<p>growth. It is anticipated it will be post 2025, but within the lifetime of the 2022-2028 Limerick Development Plan, before the WWTP project is completed. This will be subject to funding and other approvals. Newcastle West is served by the South-West Regional WRZ. It is envisaged that there is adequate capacity available to cater for the projected growth over the Plan period, although supply may be constrained during drought periods. Investment required in the medium-long term.</p> <p>(iv) Suggested amendment: 7.5.1 IN O5 Water Services e) Ensure that development proposals <u>connecting to the public water and/ or wastewater networks comply with Irish Water Standard Details and Codes of Practice</u> the standards and requirements of the Irish Water: Code of Practice for Water Infrastructure (December 2016) and any updated version of this document during the lifetime of the Draft Plan. <u>Where relevant</u>, ensure developments comply with the EPA Code of Practice for Domestic Waste Water Treatment Systems 2021.</p> <p>(v) Amend Section 7.5 Water Services and Surface Water Public water supply with the inclusion of additional text on public water supply. This submission contains relevant information on public water supply assets in Limerick as well as national initiatives e.g. NWRP and Drinking Water Source Protection.</p>	<p>(iv) Comments noted and amendment shall be included.</p> <p>(v) Add to section 7.5.3 additional text to support national initiatives e.g. NWRP and Drinking Water Source Protection.</p>
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<p>(vi) Replace IN O6 as follows: <u>Drinking Water Source Protection: Protect both ground and surface water sources, to avoid water quality deterioration and reduce the level of treatment required in the production of drinking water, in accordance with Article 7(2) of the Water Framework Directive.</u></p> <ul style="list-style-type: none"> • <u>New developments which could pose an unacceptable risk to drinking water sources will not be permitted.</u> • <u>New development should not conflict with the protection guidelines set out in the Limerick Groundwater Protection Scheme and/ or Groundwater Source Protection Zone reports</u> <p>(vii) Irish Water’s current 2019 wastewater treatment capacity register for County Limerick, states that there is capacity available in 41 no. of the 53-no. waste water treatment plants (WWTPs). These include Bunlicky and Castletroy WWTPs, which serve the Limerick City Metropolitan Municipal District. These WWTPs require some upgrading and it is envisaged by Irish Water that, with the completion of these upgrades, there will be sufficient spare capacity to accommodate the projected growth in Limerick city and environs, as set out in the RSES and the Core Strategy, over the lifetime of the Draft Plan, subject to planning and other approvals.... ..WWTP upgrades are also planned for Abbeyfeale, Adare and Dromcollogher.</p>	<p>(vi) Replace the text as suggested by Irish Water.</p> <p>(vii) Amend text as suggested, remove section which appears to include out of date information and update text in Section 7.5.3.</p>
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<p>(viii) Amend INO 10 to include: <u>To prohibit the discharge of additional surface water to combined (foul and surface water) sewers in order to maximise the capacity of existing collection systems for foul water.</u></p> <p>(ix) In relation to alternatives to public water services to service developments e.g. IN O7 Private Water Supply 7.5.4 Private Waste water treatment Systems, Domestic Wastewater Treatment Systems (DWWTS) including Septic Tanks 11.4.3 Serviced sites 11.9.4 Visitor Accommodation and Holiday Homes Irish Water welcomes the inclusion of IN O8 (d) applying a presumption against any development that requires the provision of private wastewater treatment facilities (i.e. Developer Provided Infrastructure) other than single house systems and in very exceptional circumstances.</p> <p>(x) Welcome the inclusion of buffers, the Draft Plan should allow for access to and maintenance of existing Irish Water infrastructure e.g. outfalls, pipelines, within these corridors. Similarly, provision of new assets may be required within riparian buffers in limited instances e.g. new outfalls, expansion of riverside WWTP sites, subject to proper planning and sustainable development.</p> <p>(xi) The Draft Plan proposes the completion of masterplans for a number of Opportunity Sites e.g. Parkway Valley. As part of this process, consideration should be given to servicing these sites and potential impacts on Irish Water</p>	<p>(viii) Include text as suggested.</p> <p>(ix) Noted.</p> <p>(x) It is considered that the Draft Plan addresses this issue with buffers located as appropriate.</p> <p>(xi) Details of this shall be discussed as part of the Development Management process, as consultation may be required with various stakeholders and would vary on a case-by-case basis.</p>
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<p>assets e.g. need to divert pipes. Developers should engage with Irish Water’s Connection and Developer Services team at the masterplan preparation stage.</p> <p>(xii) Burial Grounds: Provision should be made in the proposed Burial Ground Strategy for the protection of water quality, in particular drinking water sources.</p> <p>(xiii) Pre-planning discussion with Irish Water is required..... Water mains shall be located under footpaths where possible. New connections to public water and wastewater networks are subject to Irish Water’s Connections Charging Policy and Standard Details and Codes of Practice. Adequate separation between all utility mains (water/gas/sewer/electricity etc.) as required by the relevant authority shall be provided. The inclusion of the following objective is suggested: To support Irish Water in the promotion of effective management of trade discharges to sewers in order to maximise the capacity of existing sewer networks and minimise detrimental impacts on sewage treatment works.</p> <p>(xiv) Amend Section 11.6.10 In assessing an application for development (whether for a new quarry or an extension to anwill be considered, together with the following: Impact on water supply sources;</p>	<p>(xii) Amend Objective SCS1 O36 to include provision for the protection of water quality, in particular drinking water sources.</p> <p>(xiii) It is considered appropriate to amend as suggested.</p> <p>(xiv) It is considered appropriate to amend as suggested.</p>
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<p>(xv) Amend 8.5 Renewable Energy and 11.7.2 Renewable Energy Proposed renewable energy and low carbon economy developments should have due regard for, and not adversely impact, existing or planned water sources or other Irish Water infrastructure. Irish Water will engage via the planning process for such developments in its role as statutory consultee.</p> <p>5. Volume 2:</p> <p>(i) Amend 1.3.1 Settlement Tier 1 – Limerick City and Environs as follows: The [Clareville] Treatment Plant is operating below its design capacity of 87 million gallons <u>litres</u> per day.... At present there is significant spare capacity available at Bunlicky WWTP however the spare capacity at Castletroy WWTP is limited. Projects are underway to increase capacity at both Bunlicky and Castletroy WWTPs and will be completed within the lifetime of the Draft Plan, subject to statutory approvals.</p> <p>(ii) Update SE O3 in Level 4- Level 4 Settlements -Expansion of Services and Infrastructure as follows: It is an objective of the Council to facilitate the provision and expansion of all services and infrastructure <u>where required, to realise the development objectives of this Plan and</u> which would contribute positively to the attraction of the settlements for development.</p>	<p>(xv) It is considered that this would be addressed on a case-by-case basis at development management stage.</p> <p>5. Volume 2: Noted.</p> <p>(i) Amend 1.3.1 Settlement Tier 1- It is considered appropriate to amend as suggested.</p> <p>(ii) Update SE O3 in Level 4- It is considered appropriate to amend as suggested.</p> <p>(iii) Foynes- It is considered appropriate to amend as suggested.</p>
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<p>(iii) Foynes- Suggested additional objective: <u>Infrastructure Upgrades - It is the objective of the Council to support the provision of water and wastewater infrastructure to realise the development objectives of this Plan</u></p> <p>(iv) Hospital- The Council have identified <u>nominated</u> Hospital for <u>funding consideration</u> upgrade works on the Small Towns and Villages Programme, administered under Irish Water, which, <u>if successful</u>, could be delivered within the lifetime of the Plan...</p> <p>(v) Murroe- was nominated ninth in the prioritised list submitted by LCCC. Having regard to the available funding and cost estimates for the higher priority projects, Murroe may not progress under the Small Towns & Villages Growth Programme under this investment cycle, however this will be confirmed as part of the ongoing review process.</p> <p>(vi) Pallaskenry- Very limited capacity available in the Shannon Estuary WRZ, insufficient to cater for projected growth across the WRZ. Proposed solution to connect to Limerick City PWS however, this is not included in 2020-2024 current investment plan</p> <p>6. Volume 4:</p> <p>(i) The contents of this submission should be taken account of in the Environmental Reports. In the SEA, section 1.3.9 the text refers to a major extension of Clareville WTP being</p>	<p>(iv) Hospital- It is considered appropriate to amend based on success in securing funding.</p> <p>(v) Murroe- Objective included as per Submission No. 1 OPR.</p> <p>(vi) Pallaskenry- Include very limited capacity available in the Shannon Estuary WRZ, insufficient to cater for projected growth across the WRZ. Proposed solution to connect to Limerick City PWS however, this is not included in 2020-2024 current Investment Plan.</p> <p>6. Volume 4:</p> <p>(i) Environmental Reports will be updated accordingly.</p>
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<p>underway however, this is not the case. SEA 1.4 Information on available wastewater treatment capacity was provided in the 2019 WWCR, while latest information on WWTP compliance can be found in the Annual Environmental Reports.</p> <p>(ii) In addition to the above, Irish Water submitted a Water Services Summary Table outlining Water Supply and Waste Water Services Summary Table outlining Waste Water capacity throughout Limerick. The Tables outline constraints and deficiencies throughout Limerick for water and wastewater.</p>	<p>(ii) Tables are noted, the Council will continue to work with Irish Water to deliver critical infrastructure for Limerick.</p>
<p>Chief Executive’s Recommendations</p>	
<p>1 – 3(i) No change.</p> <p>3(ii) Amend the text in Volume 2 Level 6 Settlements Rural Clusters for Kilbeheny as follows: In terms of sewerage treatment there is spare capacity <u>The Kilbeheny WWTP listed in the Wastewater treatment capacity register serves a terrace of three houses adjacent to the National School, approximately 1.2km from the village centre and has no spare capacity. There is no public sewerage network in Kilbeheny village;</u></p> <p>3(iii)-(v) No change;</p> <p>4(i) Amend Section 7.5.1 as follows: The Commission for Energy Regulation (CER) <u>Commission for Regulation of Utilities (CRU)</u> is the economic regulator of public water services. The CER’s <u>CRU’s</u>;</p> <p>(ii) Amend IN O5 b) as follows: Collaborate with Irish Water in the protection of water supply sources <u>to avoid water quality deterioration and reduce the level of treatment required in the production of drinking water, in accordance with Article 7(2) of the WFD. Protection and restoration of drinking water at the source can have co-benefits for biodiversity and climate change.</u></p> <p>(iii) No change;</p> <p>(iv) Amend IN O5 e) as follows: Ensure that development proposals <u>connecting to the public water and/ or wastewater networks comply with Irish Water Standard Details and Codes of Practice</u> the standards and requirements of the Irish Water: Code of Practice</p>	

~~for Water Infrastructure (December 2016) and any updated version of this document during the lifetime of the Draft Plan.~~ Where relevant, ensure developments comply with the EPA Code of Practice for Domestic Waste Water Treatment Systems 2021

(v) Add to section 7.5.3 additional text to support national initiatives e.g. NWRP and Drinking Water Source Protection.

(vi) Replace IN O6 as follows:

~~Public Water Supply~~

~~It is an objective of the Council to:~~

~~a) Promote and support water conservation and demand management measures among all water users in new developments.~~

~~b) Restrict development within the zones of contribution for wells used as sources of water supply, except where established by Irish Water and to the Council’s satisfaction, that the development would not compromise the quality, quantity or pressure of the public supply extracting from the well.~~

Drinking Water Source Protection:

Protect both ground and surface water sources, to avoid water quality deterioration and reduce the level of treatment required in the production of drinking water, in accordance with Article 7(2) of the Water Framework Directive.

1. New developments which could pose an unacceptable risk to drinking water sources will not be permitted.

2. New development should not conflict with the protection guidelines set out in the Limerick Groundwater Protection Scheme and/or Groundwater Source Protection Zone reports.

(vii) Amend Section 7.5.3 Public Waste Water Treatment as follows:

~~Further analysis by the Council has identified the following: • 7.3% of settlements in Limerick have adequate wastewater capacity to facilitate future growth; • Three settlements that have limited wastewater capacity for future growth and currently do not comply with the Waste Water Discharge Licence granted by the EPA are Adare, Caherconlish and Kilfinane; • 20% of settlements have no spare wastewater capacity, including Newcastle West, Askeaton and Foynes; • There is chronic overloading of the Waste Water Treatment Plants (WWTP) in Askeaton, Hospital, Dromcollogher and Murroe.~~

Irish Water’s ~~current~~ 2019 wastewater treatment capacity register for County Limerick, states that there is capacity available in 41 no. of the 53-no. waste water treatment plants (WWTPs). These include Bunlicky and Castletroy WWTPs, which serve the Limerick City Metropolitan Municipal District. These WWTPs require some upgrading and it is envisaged by Irish Water that, with the completion of these upgrades, there will be sufficient spare capacity to accommodate the projected growth in Limerick city and environs, as set out in the RSES and the Core Strategy, over the lifetime of the Draft Plan, subject to planning and other approvals.

(viii) Amend Objective IN O10 Surface Water and SuDs to include m) To prohibit the discharge of additional surface water to combined (foul and surface water) sewers in order to maximise the capacity of existing collection systems for foul water.

(ix) – (xi) No change;

(xii) Amend Objective SCS1 O36 to include e) Ensure protection of water quality, in particular drinking water sources, with any proposed development.

(xiii) Amend Section 11.6.10 as follows: Pre-planning discussion with Irish Water is required..... Water mains shall be located under footpaths where possible. New connections to public water and wastewater networks are subject to Irish Water’s Connections Charging Policy and Standard Details and Codes of Practice. Adequate separation between all utility mains (water/gas/sewer/electricity etc.) as required by the relevant authority shall be provided. The inclusion of the following objective is suggested: To support Irish Water in the promotion of effective management of trade discharges to sewers in order to maximise the capacity of existing sewer networks and minimise detrimental impacts on sewage treatment works.

(xiv) Amend Section 11.6.10 In assessing an application for development (whether for a new quarry or an extension to anwill be considered, together with the following: • Impact on water supply sources;

(xv) No change;

5(i) Amend 1.3.1 Settlement Tier 1 – Limerick City and Environs as follows: The [Clareville] Treatment Plant is operating below its design capacity of 87 million ~~gallons~~ litres per day.... At present there is significant spare capacity available at Bunlicky WWTP however the spare capacity at Castletroy WWTP is limited. Projects are underway to increase capacity at both Bunlicky and Castletroy WWTPs and will be completed within the lifetime of the Draft Plan, subject to statutory approvals.

(ii) Update SE O3 in Level 4 – Large Villages Objectives -Expansion of Services and Infrastructure as follows: It is an objective of the Council to facilitate the provision and expansion of all services and infrastructure where required, to realise the development objectives of this Plan and ~~which would~~ contribute positively to the attraction of the settlements for development.

(iii) Include a new objective for Foynes as follows: Infrastructure Upgrades - It is the objective of the Council to support the provision of water and wastewater infrastructure to realise the development objectives of this Plan

(iv) Amend text on Hospital under Infrastructure as follows:

~~The Council have identified Hospital for upgrade works on the Small Towns and Villages Programme, administered under Irish Water, which could be delivered within the lifetime of the Plan.~~ Hospital was successful in securing funding under the Small Towns and Villages Scheme and the Wastewater treatment plant, will be upgraded within the lifetime of the Plan.

	<p><u>Insert New Objective in Hospital as identified by the response to Submission 1: HO O2: No significant development shall take place within the settlement, until such time as an adequate wastewater treatment system is in place.</u></p> <p><u>(v) Insert New Objective in Murroe as identified by the response to Submission 1: MU O2: No significant development shall take place within the settlement, until such time as an adequate wastewater treatment system is in place.</u></p> <p><u>(vi) Include the following text in the Infrastructure Section on Pallaskenry, <u>Very limited capacity available in the Shannon Estuary WRZ, insufficient to cater for projected growth across the WRZ. Proposed solution to connect to Limerick City PWS however, this is not included in 2020-2024 current Investment Plan.</u></u></p> <p>6(i) The Environmental Report and the Natura Impact Assessment will be fully updated following receipt of amendments by the Elected Members and prior to putting the Material Amendments to the Draft Plan on Public Display;</p> <p>(ii) No change.</p>
	SEA/ AA Response
	The additional details from the point of view of protection of water supply sources and specific mention of elements of the Water Framework Directive adds to the ecological protection of the plan policy contents. The proposed amendments for the Environmental Report specifically S1.3.9 and S1.4 will ensure that the up-to-date situation is presented.

No. 209	Ref. & Name/ Group:	LCC-C62-209 Wind Energy Ireland
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Introduction: Renewable energy provided 43% of Ireland’s electricity in 2020, with over 38% of this coming from wind energy. This is the highest share of electricity being provided by onshore wind in Europe. Onshore wind needs to continue growing in Ireland to meet future renewable energy targets with Ireland’s Climate Action Plan. The 2019 CAP provides a roadmap of what must be achieved and in relation to electricity, requires 70% of all our demand to come from renewable energy sources by 2030. This almost doubles the</p>	<p>1. Introduction: The Council recognise the challenges set out in the submission; the Draft Plan contains policy support for the development on wind energy, both onshore and offshore, see response to Submission No. 1 on targets for Limerick. The Council is committed to working with all stakeholders in the delivery of renewable energy.</p>

previous target of 40% by 2020. To achieve the 70% target, the CAP earmarks a target of 3.5GW off-shore wind and a doubling of existing on-shore wind from circa 4GW (today) to 8.2GW by 2030, signalling onshore wind as crucial in the roadmap to decarbonization. To put the scale of the ambition into further context it is noted that it has taken 20+ years to achieve the current level of renewable penetration onto the Grid. The challenge is now to achieve twice as much in half the time.

2. Chapter 1: Introduction Vision and Strategic Overview: WEI support the Council’s Strategic Vision for Limerick Key Ambition 1.2.1: *‘A Green Region: Limerick will develop as an environmentally sustainable and carbon neutral economy – a pioneer in sustainable growth’* and Strategic Objectives No. 2 and Strategic Objective No. 7. Highlighting the importance of delivering renewables, is an important element to be being considered for this draft plan.

3. Chapter 4: A Strong Economy: WEI supports the Council’s Section 4.9.1 on Offshore Renewable Energy and Objective ECON O45, however, recommends inclusion of a paragraph be added to this Section recognising the pending offshore wind developments that will be consented and managed under the new Marine Area Planning Bill. Any county coastal zone management strategy will need to have specific policies for managing offshore wind developments and the supporting infrastructure that these developments require.

2. Chapter 1: Introduction Vision and Strategic Overview: The comments are noted and welcomed.

3. Chapter 4: A Strong Economy: The Council note the comments made and recognise the evolving and uncertain policy context on off shore wind, it is considered that the Coastal Zone Management Plan will address this area.

<p>4. Chapter 5: Environment Heritage Landscape and Green Infrastructure: WEI is supportive of Council’s efforts to improve air quality in Limerick and specifically Objective EH O25.</p> <p>5. Chapter 8: Climate Action, Flood Risk and Transition to Low Carbon Economy: WEI is in support of Policy CAF P6 Renewable Energy, Objectives CAF O31, O32 and welcome the Council’s recognition of the importance of onshore and offshore wind energy as an energy source and the support the principle of wind energy development. The acknowledgement of the significant opportunity for Limerick to benefit from the development of Offshore Wind is noted and objective CAF O33 established LCCC’s commitment to this in the support for developing Foynes Port as a host for offshore wind. It is recommended that the Council should consider widening this objective to include the potential benefits from Foynes Port also servicing onshore wind farm development.</p> <p>6. Chapter 11. Development Management Standards: WEI welcome the Council’s reference to the Wind Energy Development Guidelines (WEDG) throughout the Draft Plan and in particular, Section 11.7.2.1, Development Management Standards and suggested that any subsequent updates be added to Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (2017).</p> <p>7. Regional Approach: The submission states that WEI has been advocating for a regional-approach to the spatial planning of</p>	<p>4. Chapter 5: Environment Heritage Landscape and Green Infrastructure: Noted.</p> <p>5. Chapter 8: Climate Action, Flood Risk and Transition to Low Carbon Economy: The comments are noted and it is considered that Objective CAF O33 addresses the issue adequately.</p> <p>6. Chapter 11. Development Management Standards: Noted and agreed, update Development Management Standards as appropriate.</p> <p>7. Regional Approach: The comments are noted and the Council agree that a regional strategy would provide an overall robust</p>
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<p>wind farm developments for some time, to compliment the Local Authority-level approach that has been the case to-date. The submission outlines the benefits of a regional approach including: compliments the Regional Spatial and Economic Strategies (RSES), a single, consistent methodology can be used, would ensure that the optimum locations for wind energy development are identified, it would ensure that national targets, objectives and requirements for the delivery of wind energy and landscape sensitivity, value and capacity can be assessed on a broader scale. It is set out that this approach was successful on the Regional Spatial and Economic Strategies (RSES’s) resulting in policy objectives being incorporated into the adopted RSES documents.</p>	<p>policy approach for the region, however, the role of carrying out regional strategies is with the Regional Assembly and not an individual Local Authority. In the absence of a coordinated approach from the Assembly, the Council will continue to work with adjoining Local Authorities to coordinate an approach in so far as possible into the Development Plan.</p>
Chief Executive’s Recommendations	
<p>1. – 5. No change; 6. Update Section Section 11.7.2.1, Development Management Standards to include the following text: Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (2017) and any subsequent updates. 7. No change.</p>	
SEA/ AA Response	
None. The updating of the text to include any subsequent updates ensures that up-to-date guidance will be taken into account.	

No. 248	Ref. & Name/ Group:	LCC-C62-248 Southern Region Waste Management Plan
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Introduction: The observer welcomes how the role of the Circular Economy, which is acknowledged in Chapter 7 Infrastructure and the references to the Circular Economy in</p>	<p>1. Introduction: The Council recognises the importance of the circular economy and the development and enhancement of this sector. The Draft Development Plan deals with the circular economy</p>

<p>Chapter 8 Climate Action, Flood Risk and Transition to a Low Carbon Economy and Chapter 11 Development Management Standards. The submission refers to Section 7.7.1.3 Economic Opportunities around the Circular Economy and notes the example given of activities of the Circular Economy operating within Limerick. The submission proposes a more relevant activity offered as an example could be the organisations involved in designing out waste and those in equipment lease, reuse and repair sectors and materials recycling.</p> <p>2. Inclusion of Circular Economy throughout the Plan: The submission notes the potential to include direct reference to the Circular Economy in other sections of the Plan in particular in Chapter 1 Introduction, Vision and Strategic Overview and in Chapter 4 A Strong Economy. The submission proposes the following text to be included in Chapter 1: <i>Limerick City and County Council plays a fundamental role in the transition from a linear to a circular economy as they are responsible for key policies in public services that affect citizens’ wellbeing, economic growth and environmental quality. This plan will foster the linkages to transition from linear model to a circular model which keeps resources in use for as long as possible.</i></p> <p>The submission refers to some of the content currently in subsection 7.7.1.3 Economic Opportunities around the Circular Economy noting it would fit better within Chapter 4. In addition, it is submitted that subsection 7.7.1.2 Circular</p>	<p>in a number of areas and attempts not to duplicate in terms of policies and objectives in the Draft Plan. Section 7.7.1.3 Economic Opportunities around the Circular Economy will be updated to include more relevant examples for Limerick, as suggested.</p> <p>2. Inclusion of Circular Economy throughout the Plan: As outlined above, the Council recognise the importance of the circular economy and it is proposed to include the text in the Strategic Objectives in Section 1.3 of Chapter 1. In relation to the Economic Opportunities set out in Chapter 7.7.1.3, it is considered that these fit better with the policy approach in Chapter 7. However, it is considered appropriate that the text in Section 7.7.1.2 be relocated to Chapter 11.</p>
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<p>Economy for Building Design and Construction Projects would be suitable content for Chapter 11 Development Management Standards.</p> <p>3. Reference to Guidelines: The upcoming National Waste Management Plan for a Circular Economy (NWMPCE) (due for completion Q1 2022) will include the new guidance document ‘Waste Management Infrastructure – Guidance for Siting Waste Management Facilities’. The submission notes that reference to this Guidance is included in Subsection 7.7.1.5, but recommends that reference be also made to it under Subsection 7.7.2 Waste Infrastructure</p> <p>The submission recommends reference is made to the Environment Protection Agency’s Draft Best Practice Guidelines for the preparation of Resource Management Plans for Construction and Demolition Waste Projects which supersede the ‘Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Demolition Waste Projects’.</p>	<p>3. Reference to Guidelines: Reference to National Waste Management Plan for a Circular Economy will include the new guidance document ‘Waste Management Infrastructure – Guidance for Siting Waste Management Facilities’ shall be included in Chapter 7. The submission notes that reference to this Guidance is included in Subsection 7.7.1.5. Development Management Standards shall also be updated to include reference to Environment Protection Agency’s Draft Best Practice Guidelines for the preparation of Resource Management Plans for Construction and Demolition Waste Projects.</p>
Chief Executive’s Recommendations	
<p>1. Change the text in Section 7.7.1.3 as follows: A current example is the potential for transferring jobs from peat extraction and processing to new green jobs, such as reinstatement and protection of wetlands and replace with <u>Current examples include organisations involved in designing out waste and those in equipment lease, reuse and repair sectors and materials recycling.</u></p> <p>2(i) The following text to be included in Chapter 1 at the end of Section 1.3 Point 7 <u>This plan will also foster the linkages to transition from linear model to a circular model which keeps resources in use for as long as possible.</u></p> <p>(ii) Relocate Section 7.7.1.2 Circular Economy for Building Design and Construction Projects to Chapter 11.</p>	

	<p>3(i) Include the following text in the relocated Section 7.7.1.2 An important source of information is the Environment Protection Agency’s Draft Best Practice Guidelines for the preparation of Resource Management Plans for Construction and Demolition Waste Projects.</p> <p>(ii) The National Waste Management Plan for a Circular Economy will include the new guidance document ‘Waste Management Infrastructure – Guidance for Siting Waste Management Facilities include reference in Subsection 7.7.1.5.</p>
	SEA/ AA Response
	<p>From an environmental perspective additional information on the circular economy and guidance on how to achieve better use of resources is very useful as it ties in with issues such as resource use and climate action which is central to the plan.</p> <p>From an AA perspective increased use of existing material will reduce the need for further extraction of new resources which would minimise ecological effects on the receiving environments. No environmental effects anticipated.</p>

No. 268	Ref. & Name/ Group:	LCC-C62-268 Nationwide Community Energy Ireland
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Introduction: Nationwide Community Energy Ireland CLG (NCEI) is the representative association of the community owned energy generation sector in Ireland. NCEI’s mission is to maximise the number of 100% community owned energy generation projects in the upcoming State power auctions. The company seeks to promote the local circular economy, via locally community owned & controlled energy generation projects. Sustainable community owned wind & solar farms, and hybrid generation/storage technologies, are the ideal vehicles by which to achieve the new Ireland and specifically in this context – the new Limerick. The</p>	<p>1. Introduction: The contents of the submission are noted, the Draft Plan seeks to support and strengthen sustainable local/community renewable energy networks, micro renewable generation, climate smart countryside projects and connections of such initiatives to the grid.</p>

submission sets out recommendations under four-chapter headings as follows:

2. Chapter 9 - Sustainable Communities and Social

Infrastructure: Page 222 makes a fleeting reference to renewable energy, namely that it “can be enhanced and sustained through community-led actions and projects”. As no quantitative data is provided in which to frame the prior statement – the observer feels it might be useful to provide one such as their project in Tipperary.

The observer is very much of the view that every village in Ireland, urban and rural, should have something similar-wind or solar or a combination of both. The observer states that the Council should to actively support 100% community owned RSES projects. Communal ownership of revenue generating assets in the public realm –a wonderful additional dimension to the new green and smart Limerick.

3. Chapter 8 – Climate Action, Flood Risk and Transition to Low Carbon Economy:

(i)The observer notes and endorses the Council’s support, as expressed in the Draft Plan Section 8.5, for renewable energy. In relation to Section 8.5.11 Community Investment in Renewable Energy, the observer particularly welcomes this statement. However, in relation to “diversity of ownership” set out in the draft Plan, the observer would like to draw attention to recent

2. Chapter 9 - Sustainable Communities and Social Infrastructure:

The Council acknowledge the work being carried out around the country and consider that the Draft Plan provides the policy support to enable community groups to develop renewable energy. Many communities throughout the country have embraced the concept, however, there are also many challenges/constraints that restrict communities from developing community renewable projects, such as ecological factors, lack of ability to connect to the grid etc. The Council will continue to work with community led renewable energy projects as they arise.

3. Chapter 8 – Climate Action, Flood Risk and Transition to Low Carbon Economy:

(i) The Council acknowledge the shift in Government approach in relation to community generation, however the Council consider that the policy support in the draft Plan supports the broader context and Government policy may well change within the lifetime of the Plan.

Government announcements, that all projects applying to the community category in future RSES auctions must be 100% community owned. The change from minimum 51% to 100% is a boon to communities across the country as it seeks to ensure the revenues and surplus, from such community projects, stay within the local circular economies.

(ii) Notwithstanding the Council’s and the Draft Plans support for offshore renewable energy The observer notes this support is couched in the context of large corporate development, and community participation is not envisaged in offshore renewable energy. The observer feels this is a missed opportunity for the Council, the Draft Plan and communities generally. The observer would urge the Council to seize the opportunity and partner with the communities in this offshore endeavour.

4. Chapter 7 – Infrastructure: NCEI is currently lobbying the various stakeholders in the sector e.g. DECC, CRU, TSO(Eirgrid), DSO etc to ring fence a small fixed percentage of all electricity grid upgrades for community generation projects. The observer believes this ring fencing, or positive discrimination, is vital for two reasons:

- To enable communities, specifically Limerick communities in this instance, to bring a commensurate share of their energy generation projects to fruition in parallel with private developer and corporate projects.

(ii) Objective CAF O32 sets out policy support for Off Shore Wind, it doesn't distinguish who makes the proposal. There is no doubt that there will be many consortiums seeking proposals for off shore wind in the future. The policy support is provided in the draft Plan.

4. Chapter 7 – Infrastructure: The comments are noted; however, this is beyond the remit of the Development Plan. This is a function of Eirgrid and the Council will continue to work with them to ensure adequate grid facilities are in place for Limerick.

- To maintain broad based community support for the energy transition, its targets and objectives as detailed in the governments Climate Action Plan. The observer requests the inclusion of the above ring fencing in Objective 13 in the Council’s Draft Plan.

The observer suggests the Council and the Draft Plan should take a more proactive approach in this regard and lobby for both Limerick and the Mid-West generally in terms of electricity grid resources and development.

5. Chapter 4 – Strong Economy: The observer welcomes the holistic approach as envisaged in the Strong Economy. However, the observer feels there is one key ingredient missing namely, community involvement in offshore renewable energy generation. The observer believes an opportunity now exists for the Council, perhaps in conjunction with counterparts in Clare and Kerry to explore with the communities and the NCEI how best to move forward in terms of an updated Offshore Renewable Energy Development Plan (OREDPA). Together with our community counterparts in Europe and the USA the observer will be making submissions to the stakeholders and the observer feels the time is right to encourage local authorities to be part of the community discussion in OREDPA. Given Limerick’s unique advantages in the estuary, and the transformative development that is the new Limerick, the observer feels an opportunity exists for

5. Chapter 4 – Strong Economy: As outlined above CAF O35 does not differentiate between who is seeking the proposal. It is considered that the policy support is in place to support the community development in all aspects of renewable energy development.

Limerick to play a catalytic role in the ORED sector. Potentially this is a USP for Limerick and the observer feels it should be reflected in the Draft Development Plan.	
Chief Executive’s Recommendations	
1. – 5. No change.	
SEA/ AA Response	
N/A	

No. 281	Ref. & Name/ Group:	LCC-C62-281 Dept. of Environment, Climate and Communications
	Submission/ Observation Summary	
	Chief Executive’s Response	
	1. Waste Management: The Local Authority should consult directly with their respective Regional Waste Management Planning Office regarding development of the final Plan.	1. Waste Management: The comments are noted. Ongoing consultation has taken place throughout the Plan making process.
	Chief Executive’s Recommendations	
	1. No change.	
SEA/ AA Response		
N/A		

Theme 11: Transport

No. 44	Ref. & Name/ Group:	LCC-C62-44 Department of Transport (DoT)	
Submission/ Observation Summary		Chief Executive’s Response	
<p>1. Policy Developments: A number of important policy developments are relevant to accessible and integrated public transport, since the previous plans were published. The Department of Transport consider these should be reflected in the proposed plan, particularly in Chapter 6 Transport and Movement. The policy documents are as follows:</p> <ul style="list-style-type: none"> – The publication of the ‘Whole of Government’ National Disability Inclusion Strategy (NDIS) 2017-2022, which includes specific actions assigned to Local Authorities, such as dishing of footpaths and accessible infrastructure (bus stops); – The ratification by Ireland in 2018 of the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) puts obligations on State Parties to ensure access for person with disabilities to, inter alia, the physical environment and transportation in both urban and rural areas; – DMURS Interim Advice Note – Covid-19 Pandemic Response – reference to the 2019 version of DMURS should be replaced with references to the 2020 DMURS Interim Advice Note – Covid – 19 Pandemic Response. 		<p>1. Policy Developments: The submission is noted. Policy developments outlined will be included in the plan.</p>	

- The inclusion of ‘Universal Design’ in TR O11 is welcomed. To make public transport fully accessible to people with disabilities requires a ‘whole journey approach’, which refers to all elements that constitute a journey from the starting point to destination, including footpaths, cycle paths, roads, pedestrian crossing points, town greenways and bus stops/shelters;
- The DoT welcomes the support of the Council for the National Transport Authority (NTA) of its ‘Local Link Rural Transport Programme Strategic Plan 2018-2020’, including TR P11.

2. Updated Policy: The DoT is carrying out a review of sustainable mobility (walking and cycling) policy. The new policy will deliver on the ambitions of the new Programme for Government and will replace the existing sectoral policy documents published in 2009- Smarter Travel, A Sustainable Transport Future 2009-2020 and the National Cycle Policy Framework.

Section 6.2.2 of the Draft Plan refers to current sectoral policy documents – (Smarter Travel, A Sustainable Transport Future 2009-2020 and the National Cycle Policy Framework 2009-2020). The DoT advises that new national sustainable mobility policy will build upon and replace these policies and the Council may wish to change the wording in the Draft Plan to reflect this.

2. Updated Policy: Noted, the new Programme for Government will be referenced in the Development Plan.

<p>3. Investment Framework: The DoT are also finalising a review of the 2015 Strategic Investment Framework for Land Transport, which will include a revised set of priorities to guide transport investment.</p> <p>4. Integrating Land Use and Transport Planning: The DoT supports the recognition in the Draft Plan of the importance of aligning land use and transport policies.</p> <p>5. Climate Change Mitigation: The Department’s policy approach to achieving a greener transport sector is aligned with the Avoid-Shift-Improve principle. One of the DoT’s published discussion papers outlined the current climate change challenges facing Ireland and the steps that are being taken in the transport sector to reduce emissions in line with climate action policies.</p> <p>6. Shannon Airport: The Draft Plan references Limerick’s close location to Shannon Airport, a critical piece of national infrastructure which has a role to play in the delivery and implementation of the Plan. The Draft Plan presents an opportunity to leverage synergies on important strategic objectives articulated in the Plan.</p>	<p>3. Investment Framework: Noted, policy support to be included in the Plan to support this framework.</p> <p>4. Integrating Land Use and Transport Planning: Noted.</p> <p>5. Climate Change Mitigation: Noted.</p> <p>6. Shannon Airport: Noted. The Draft Plan recognises the importance of Shannon Airport for Limerick and for the wider region and also recognises and supports the synergies that exist between Limerick City and the development of the airport. The Draft Development Plan will support high frequency connectivity with Shannon Airport in line with the draft LSMATS. Enhanced accessibility from Limerick to Shannon Airport is outlined in Objective TR 017 and TR 031.</p>
Chief Executive’s Recommendations	
<p>1(i) Amend the following sections to include the 2020 DMURS Interim Advice Note – Covid -19 Pandemic Response: Objective CGR 01; Objective TR 040; Under Section 6.2.2 National Guidance; Section 11.3.5 Roads, Footpaths, Water Services and Landscaping; and Appendix 1 Table A2 National Guidelines:</p>	

(ii) Insert the following text into Chapter 6 Section 6.5 Sustainable Mobility before Objective TR O11 - Universal Design: ‘A universal design approach, in line with the ‘Whole of Government’ National Disability Inclusion Strategy (NDIS) 2017-2022 and the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) will insure high-quality, accessible and permeable transport links are incorporated into all urban realm design’;

(iii) Insert reference to Whole of Government’ National Disability Inclusion Strategy (NDIS) 2017-2022 into the following: 6.2.2 National Guidance; Objective CGR O1; Chapter 11 Section 11.3.5 Roads, Footpaths, Water Services and Landscaping; 11.8.1 Access to Roads, Traffic and Transport Assessments (TTAs) and Road Safety Audits (RSAs); and Appendix 1 Table A2 National Guidelines.

2. Insert the following text under Section 6.5 Sustainable Mobility: The Department of Transport is carrying out a review of sustainable mobility policy which will deliver on the ambitions of the new Programme for Government replacing the existing 2009 policy document Smarter Travel, A Sustainable Transport Future 2009-2020 and the National Cycle Policy Framework. The new policy will be closely aligned with the national strategic outcomes of Project Ireland 2040, will support the actions in the Climate Action Plan and will also consider the impacts of COVID-19.

In addition, where reference is made to the Department of Transport’s Smarter Travel, A Sustainable Transport Future 2009-2020 in the Plan, the following text will be added ‘and subsequent updates’. This includes Policy TR P2 Promotion of Sustainable Patterns of Transport Use and Section 6.2.2 National Guidance;

3. Include new objective as follows: It is an objective of the Council to support the implementation of the Department of Transport’s National Investment Framework for Transport Investment.

4. - 5. No change.

SEA/ AA Response

The inclusion of the DMURS up to date advice note ensures that the content of the plan is compliant with higher tier guidance, which is consistent with Environmental Protection Objective HTP1, the purpose of which is to ensure compliance with higher tier plans. The inclusion of the National Disability Strategy is also consistent with EPO P1: Facilitate a good standard of quality of life for all of the population of Limerick through ensuring high quality residential, recreational, educational and working environments.

Similarly, the inclusion of text on up-to-date transport strategies and updates on successors to Smarter Travel and sustainable travel, means that the plan content is keeping abreast of the latest developments in sustainable transport. It is anticipated that there would be no adverse environmental effects from the updated text.

No. 70	Ref. & Name/ Group:	LCC-C62-70 Transport Infrastructure Ireland (TII)
Submission/ Observation Summary		Chief Executive’s Response
<p>1. Core Strategy:</p> <p>(i) The submission considers that the Core Strategy would benefit from reflecting strategic objectives relating to improvement to the national road network and safeguarding the strategic function of the existing national road network, and associated junctions. The following is proposed to be included as a new objective</p> <p>a) to maintain the strategic function, capacity and safety of the national roads network, including planning for future capacity enhancements, and</p> <p>b) to ensure that the existing extensive transport networks, which have been greatly enhanced over the last two decades, are maintained to a high level to ensure quality levels of service, safety, accessibility and connectivity to transport users.</p> <p>(ii) TII notes that the M8 in the south east of the County is not identified on Core Strategy mapping; Section 2.7 Core Strategy Map.</p> <p>2. Limerick – Shannon Metropolitan Area Transport Strategy:</p> <p>The submission requests the consideration of including reference to the implementation of LSMATS provisions in the Core Strategy of the Draft Plan and including a further to</p>		<p>1. Core Strategy:</p> <p>(i) The Council acknowledges the importance of the national road network in Section 6.7. of the plan. Policy TR P8 provides for the safeguarding and protection of the capacity of the national road network, having regard to all relevant Government guidance. Notwithstanding, the Draft Plan will include an additional policy within Chapter 2 to reflect the strategic objectives relating to improvement to the national road network and safeguarding the strategic function of the existing national road work, and associated junctions.</p> <p>(ii) Noted – The Core Strategy map shall be amended to incorporate the M8 motorway.</p> <p>2. Limerick – Shannon Metropolitan Area Transport Strategy: The importance of the implementation of LSMATS provisions in the Core Strategy is recognised. It is considered that a policy in recognition of the implementation of LSMATS in the Core Strategy is included.</p>

<p>commitment to review the Development Plan following the finalisation of LSMATS to include relevant associated provisions.</p> <p>3. Local Area Plans/Local Transport Plans/Area Based Transport Assessment:</p> <p>(i) TII notes Core Strategy Objective CSP P4 commits to a review of Local Area Plans following the adoption of the Development Plan and Policy TR P6 commits to undertaking a Local Transport Plan (LTP) for Newcastle West as part of the Local Area Plan process and for other settlements as deemed necessary. TII’s concurs that the preparation of a LTP should be undertaken in conjunction with or in advance of Local Area Planning and recommends that the LTP should be prepared in accordance with the TII/NTA Area Based Transport Assessment (ABTA) Guidelines.</p> <p>(ii) TII would support and welcome consultation on the preparation of Local Area Plans and the Local Transport Plans.</p> <p>4. Access to National Roads & Exceptional Circumstances:</p> <p>TII welcomes that Policy TR P8 outlines the Councils policy to protect the capacity of the national road network. Despite this policy outlined in Policy TR P8, Objective TR O35 includes provisions that TII consider directly conflict with the Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads</p>	<p>The proposal to include an objective to commit to a review of the Development Plan following the finalisation of LSMATS is noted. The inclusion of an objective is not considered necessary at this time; however, consideration will be given to a review of the Development Plan on finalisation of the Strategy, if required.</p> <p>3. Local Area Plans/Local Transport Plans/Area Based Transport Assessment:</p> <p>(i)The Newcastle West Public Realm and Movement Plan is currently being undertaken and is prepared in accordance with the principals of the TII/NTA Area Based Transport Assessment (ABTA) Guidelines</p> <p>(ii) Noted – The Council will consult with all relevant stakeholders in the preparation of Local Area Plans and Local Transport Plans.</p> <p>4. Access to National Roads & Exceptional Circumstances: The recommendations regarding Objective TR O35 are noted. In order to ensure there is no conflict with DECLG Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ it is recommended to omit Objective TR O35 (d) and to</p>
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<p>Guidelines for Planning Authorities’ DECLG, (2012). In TII’s opinion, the exception provided for members of the farming community outlined in Objective TR O35 (d) is at variance with the Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ (DoECLG, 2012). While the provision of ‘exceptional circumstances’ to the restriction on access to national roads is addressed in the DoECLG Guidelines, such provisions are required to be identified plan-led and incorporated into the Development Plan, not deferred to a case-by-case consideration subject to the development management function of the planning authority.</p> <p>The Draft Plan contains no identified plan-led proposals for ‘exceptional circumstances’ in accordance with Section 2.6 of the DoECLG Spatial Planning and National Roads Guidelines. The submission recommends a review of Objective TR O35 ‘National Roads’ to ensure compliance with the provisions of Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ (DoECLG, 2012) by deletion of Objective TR O35 (d).</p> <p>5. Rural Housing: In the interests of clarity, TII would welcome a cross reference include in Section 3.6 of the Draft Plan referring to Objective TR O35 (b) and the Council policy to avoid the creation of any new direct access points from development or the generation of increased traffic from existing direct access/egress points to the national road</p>	<p>amend Objective TR O35 (a) to include reference to exceptional circumstances as outlined in the Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’.</p> <p>5. Rural Housing: In the interest of providing clarification and early assistance to applicants in the preparation of any planning application where there may be implications for the strategic national road network, it is recommended to include a cross reference to Objective TR O35 within Section 3.6 Rural Housing.</p>
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network, to which speed limits greater than 60 km/h apply. In the interests of providing clarification and early assistance to applicants in the preparation of any planning application where there may be implications for the strategic national road network in the area and clearly identify, at an early stage, any policy conflicts related to access to national roads for the applicants to consider.

6. Development at National Road Junctions: TII would welcome amendment to Policy TR P8 to include specific reference to safeguarding the national road network, including associated junctions, in line with Section 2.7 of the DoECLG Spatial Planning and National Roads Guidelines as follows;

*‘It is a policy of the Council to: Protect the capacity of the national road network **and associated junctions**, 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...’*

7. Strategic Economic Development Locations: Limerick City and Environs: In relation to the zoning of additional lands at Raheen, TII acknowledges that strategic national road access will in the first instance be primarily provided via M20 Junction 3. The submission notes it will be critical that the existing and proposed lands are well served by public transport and active travel modes in accordance with

6. Development at National Road Junctions: Noted, in order to ensure the safeguarding of the national road network and associated junctions, Policy TR P8 shall be amended.

7. Strategic Employment Locations – City and Environs: The Council notes the significance in safeguarding the strategic function of the national road network and associated junctions. Reference is included in ECON O13(a) the promotion, facilitating and enabling all strategic employment locations within the City and Environs to be accessible by public and sustainable modes of transport. The delivery of a bus priority network from Raheen to the City Centre is included as a short

principles outlined in the Draft LSMATS, the SRA RSES and the DoECLG Spatial Planning and National Roads Guidelines. In addition, Appropriate Transport Assessment, including the cumulative impact of development, will need to be undertaken to ensure planned development can be accommodated complementary to safeguarding the strategic function of the national road network and associated junctions. TII would welcome the above provisions being included in Objective ECON O13 (c) in the interests of clarity.

8. Masterplans:

(i) The strategic importance of the Askeaton Industrial Park as referenced in Objective ECON O14 (a) is acknowledged.

The submission notes that access to the Strategic Development Location Site at Askeaton should be facilitated from the non-national road network.

(ii) Referencing the proposed masterplan for Askeaton, TII is of the opinion that where masterplans are proposed to be used to inform development management decisions, particularly in relation to areas with the potential to impact the strategic national road network, planning authorities should incorporate them in the development plan as set out in both the DoECLG Local Area Plan Guidelines and DoECLG Sustainable Residential Development in Urban Areas Guidelines. The submission considers that such issues can be addressed with collaboration and should be addressed in

to medium term project under the LSMATS implementation programme. The reference to an appropriate Transport Assessment is noted. It is recommended to include additional text into Objective ECON O13 in relation to Appropriate Transport Assessment.

8. Masterplans:

(i) The reference to Askeaton Industrial Park is noted. Any proposed applications on the site will be subject to a Traffic Impact Assessment and Road Safety Audit in accordance with Chapter 3 of the DoECLG Spatial Planning and National Roads Guidelines. In the interest of clarity Objective ECON O14 shall be amended as suggested.

(ii) Noted. There are currently no development proposals for the lands in Askeaton, in the event of the development proposal being identified a comprehensive masterplan of the site shall be prepared.

advance of adoption of the Draft Plan and respective Settlement Plans.

9. Shannon Foynes Port: Shannon Foynes Port is also identified as a Strategic Employment Location with locations identified in Map 4.3 and Map 4.4 as well as an extensive ‘Marine Related Industry’ zoning objective identified within the Foynes Settlement Plan Zoning Map. The submission requests that any development proposals would be brought forward in accordance with the provisions the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012) and complementary to safeguarding the strategic functions of the national road network in the area.

10. Rural County Limerick: The submission notes the location and potential nature of developments facilitated by policies promoting rural enterprise and economic development, including rural tourism, TII requests that an appropriate cross reference to Policy TR P8 and Objective TR O35 is included in Sections 4.7.14 to 4.7.20 and Section 4.8.2 of the Plan prior to adoption. Such an approach would assist in safeguarding the safety and operation of the national road network and would provide clarity for future applicants/developers, etc. in relation to relevant development proposals.

11. Retailing: TII acknowledges the support for the City Centre in relation to the location of retailing in the Limerick-Shannon

9. Shannon Foynes Port: Volume 2 of the plan includes the written statements, land use zoning maps and individual objectives specific to Level 4 settlements including Foynes. Objective FO O1 – Capacity of National Roads seeks to protect the carrying capacity of the national road. It is recommended to include as part of Objective FO O1 under the settlement of Foynes in Volume 2 Level 4 - Large Villages, Settlement Zoning and Development Objectives that all development proposals within the ‘Marine Related Industry’ land use zoning will be subject to a Traffic and Transport Assessment and Road Safety Audit in accordance with Chapter 3 of the DoECLG Spatial Planning and National Roads Guidelines at planning application stage.

10. Rural County Limerick: The request for cross reference of Policy TR P8 and Objective TR O35 to the promotion of rural enterprise and economic development is noted. It is considered appropriate to include a note at the end of Section 4.7.14 Rural Enterprise and Employment Opportunities cross referencing Policy TR P8 and Objective TR O35.

11. Retailing: This issue is addressed in ECON O1, ECON O2 and furthermore in the Draft Retail Strategy, in accordance with the Retail

Metropolitan Area outlined in Objective ECON O1 and the requirement to apply the sequential approach to retail development outlined in Objective ECON O2 of the Draft Plan. The submission recommends the inclusion of a new policy objective in the Development Plan to include the explicit presumption against large out of town retail centres located adjacent or close to existing, new or planned national roads/motorways reflecting policy outlined in the Retail Planning Guidelines, 2012.

12. Transport, Planning and National Road Schemes: The submission notes the Council will be aware that TII may not be responsible for the funding of any such schemes or improvements. Other specific road proposals identified as Key Enablers for Growth in Limerick included in Section 6.4 of the Draft Plan relate to;

- Objective TR O6 Limerick Northern Distributor Road, and
- Objective TR O8 Connecting Limerick’s Southside

In relation to the Limerick Northern Distributor Road (LNDR), TII has previously acknowledged that the LNDR is not a national road scheme. In relation to Objective TR O8 ‘Connecting Limerick’s Southside’, TII welcomes the Draft Plan objective.

The submission recommends the following:

(i) In all instances, national road improvement schemes should be developed complementary to safeguarding the

Planning Guidelines and the policy support set out in the Draft Plan and is considered sufficient to address the matter.

12. Transport, Planning and National Road Schemes:

(i) The Planning Authority acknowledges the role Transport Infrastructure Ireland play in ensuring the strategic function of the national road network is protected. Consultation and agreement with TII will be undertaken prior to any national road improvement schemes. Amend Policy TR P8 to include a reference to the continued engagement with relevant transport bodies in respect of any plans or projects that are located in proximity to national road infrastructure.

<p>strategic function of the national road network and proposals impacting on the national road network should be developed in consultation with and subject to the agreement of TII.</p> <p>(ii) TII has previously submitted observations to the Council on the proposed Limerick Northern Distributor Road and proposals outlined in Objective TR O8 ‘Connecting Limerick’s Southside’; the Authority’s position remains as set out in previous submissions.</p> <p>(iii) As previously advised in relation to the development of Industrial and Enterprise and Employment lands adjacent to Junction 2, Dock Road, TII recommends that the area to which Objective TR O41 applies should be identified on relevant Development Plan mapping. The area should be subject to detailed Area Based Transport Assessment (ABTA) in accordance with the NTA and TII ABTA Guidelines (TII Publications Technical Standard PE-PDV-02046) to be undertaken by the Council and required infrastructure limits/improvements identified plan-led.</p> <p>13. Integration of Land Use Planning and Transport: TII notes that Objective TR O40 requires the layout and design of new and improved link roads and junctions to apply standards included in the Design Manual for Urban Roads and Streets (DMURS). Complementary to DMURS is the TII Publication ‘The Treatment of Transition Zones to Towns and Villages on National Roads’ (TII Publications DN-GEO-03084). TII</p>	<p>(ii) TII’s position on the LNDR and Objective TR O8 Connecting Limerick’s Southside is noted.</p> <p>(iii) The Planning Authority acknowledge the need for a coordinated approach to assessing the impact of development in the vicinity of the Junction 2 at the Dock Road. In response to previous concerns raised by the OPW in relation to flooding in the vicinity during the preparation of the Southern Environs Local Area Plan 2021-2027, significant de-zoning has taken place which will benefit in protecting the capacity of the junction. Objective TR O41 which aims to protect the carrying capacity of Junction 2 shall be strengthened to ensure that any proposed development will be subject to relevant transport assessments.</p> <p>13. Integration of Land Use Planning and Transport: The reference to TII publication DN-GEO-03084 ‘The Treatment of Transition Zones to Towns and Villages on National Road’s is noted and will be included in the Plan.</p>
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recommend the incorporation of reference to TII Publications Standard DN-GEO-03084 ‘The Treatment of Transition Zones to Towns and Villages on National Roads’ in the Development Plan in association with reference to DMURS, in the interests of providing clarification that such a standard will be applied, in the interests of road user safety, on national roads.

14. Blue Green Infrastructure Strategy for Limerick City and Environs: The submission refers to Objective EH O13 which outlines that the Council is committed to the preparation of a Green and Blue Infrastructure Strategy for Limerick City and Environs. The submission would welcome consultation on the proposed Green and Blue Infrastructure Strategy for Limerick City and Environs, where there may be implications for the national road network in the area.

15. Park and Ride: The submission recommends that where there may be implications for the national road network in the area, TII would welcome consultation on the proposed Park and Ride proposals in the County.

16. Service Areas: The submission recommends the inclusion of a policy position reflecting the requirements outlined in Section 2.8 of the DoECLG Spatial Planning and National Roads Guidelines relating to the provision of service areas and roadside facilities on national roads in the Draft Plan and the

14. Blue Green Infrastructure Strategy for Limerick City and Environs: Noted. The Council will engage with all relevant stakeholders in the preparation of the Strategy.

15. Park and Ride: The content is noted. The Council will amend Objective TR O23 to ensure that in facilitating the provision of Park and Ride, the Council will co-operate closely with relevant transport bodies, authorities and agencies. See additional recommendations proposed for Objective TR O23 as recommended in Submission 247 National Transport Authority.

16. Service Areas: The content is noted. It is considered necessary to insert additional text into Chapter 11 Development Management Standards Section 11.6.3 Petrol Stations Table DM 5 in relation to the provision of off-line motorway service areas at national road junctions including road side service facilities on non-motorway national roads

<p>requirement for a forward planning approach to the provision of off-line motorway service areas at national road junctions.</p> <p>17. Grid Connection Routing and Renewable Energy Development:</p> <p>(i) Glint and Glare Assessments: The submission recommends that Solar Farm Renewable Energy Development proposals in the vicinity of the strategic national road network address the potential for glint and glare.</p> <p>(ii) Grid Connections: Grid connections accommodated on national roads have the potential, inter alia, to result in technical road safety issues and can impact on ability and cost of general maintenance and safety works to existing roads. TII would welcome an objective included in the adopted Development Plan in relation to renewable energy and in relation to safeguarding the national road network, indicating that grid connection routing options should be developed to safeguard the strategic function of the national road network in accordance with Government policy by utilising available alternatives.</p> <p>18. Traffic and Transport Assessment (TTA), Road Safety Audit (RSA) and TII Publications (Standards)</p> <p>(i) TII welcomes the inclusion of Objective TR O44 addressing the requirement for TTA. However, the submission notes that</p>	<p>and their junctions as per Section 2.8 of the Spatial Planning and National Road Guidelines for Planning Authorities</p> <p>17. Grid Connection Routing and Renewable Energy Development:</p> <p>(i) Glint and Glare Assessments: Reference to glint and glare assessments is a requirement of on all solar farm renewable energy development proposals as is outlined under Chapter 8 Section 8.5.3 Solar Energy and Chapter 11 Section 11.7.2.2 Solar. However, in the interest of clarity, it is recommended to update the text under Section 11.7.2.2 from Glint and Glare impacts on roads and other sensitive receptors.</p> <p>(ii) Grid Connections: The reference to grid connections and the impact on national road network is noted. In order to ensure the strategic function of the national road network is protected, it is considered appropriate to amend Objective IN O11.</p> <p>18. Traffic and Transport Assessment (TTA), Road Safety Audit (RSA) and TII Publications (Standards)</p>
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<p>no similar objective is included in relation to the requirement of Road Safety Audit, it is acknowledged that RSA is addressed in Section 11.8.1 of the Draft Plan in Development Management Standards. Similar to TTA, an Objective could be included in the Draft Plan advising of the requirement for RSA in accordance with TII Publications (Standards).</p> <p>(ii) The submission requests that all references in the Draft Plan to the NRA DMRB should be updated to TII Publications.</p> <p>19. Foynes Settlement Plan:</p> <p>(i) The submission notes that comments relating to the strategic employment context of Shannon Foynes Port are outlined in Section 2.5.3 above. These are repeated in this section of the submission.</p> <p>(ii) In relation to the ‘Marine Related Industry’ zoning objective in the Foynes Settlement Plan, TII notes that the subject lands adjoin the N69, national road, at a location outside where a 50 – 60kph urban speed limit applies. Access to the lands, to accord with the provisions of official policy, should be outlined and TII would welcome such clarification.</p> <p>TII would welcome a review of the zoning designation to confirm that the N21/N69 Limerick to Adare to Foynes Scheme is safeguarded in accordance with Objective TR P8 of the Draft Plan and the requirements of Section 2.9 of the</p>	<p>(i) In order to avoid repetition in this instance, guidance is provided within Chapter 11 Development Management Standards Section 11.8.1 on Road Safety Audits.</p> <p>(ii) Noted. All references in the Draft Plan to the NRA DMRB will be updated to TII Publications.</p> <p>19. Foynes Settlement Plan:</p> <p>(i) Noted, addressed above.</p> <p>(ii) Under previous recommendation from TII, Objective FO O1 is proposed to be amended in order to maintain the efficiency and functionality of the national road network, any proposals within the ‘Marine Related Industry’ zoning at Foynes be subject to a Traffic and Transport Assessment and Road Safety Audit in accordance with Chapter 3 of the DoECLG Spatial Planning and National Roads Guidelines at planning application stage.</p>
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<p>DoECLG Spatial Planning and National Roads Guidelines (DoECLG, 2012).</p> <p>20. Volume 2 Level 5 – Oola: The submission recommends review of the settlement boundary identified for Oola (N24). It appears from TII’s records that the proposed settlement boundary extends along the N24 to the north west of the village to encompass an area of commercial development outside the area to which the urban speed limit applies into a location subject to an 80kph speed limit.</p> <p>TII recommends a review of the settlement plans discussed to ensure development objectives are appropriately aligned with national road speed limits in the interests of road user safety and that proposals align with the application of official policy.</p>	<p>20. Volume 2 Level 5 – Oola: Objective TR O35 Access to National Roads outlines the prevention, except in exceptional circumstances as outlined in the Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ (DoECLG, 2012), of 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 junction.</p> <p>The commercial development located within the settlement boundary identified for Oola along the N24 to the north west of the village is an established development with an existing entrance. A planning history search indicates that the earliest planning application dated 2001 and the most recent was in 2007. It is considered that the commercial premises remain within the settlement boundary and any future planning applications are assessed on a case-by-case basis through the development management system and taking into account all relevant objectives within the Development Plan.</p>
<p>Chief Executive’s Recommendations</p>	
<p>1(i) Include the following as an policy in Chapter 2 Core Strategy Section 2.8</p> <p><u>Road Network – It is a policy of the Council to maintain the strategic function, capacity and safety of the national roads network, including planning for future capacity enhancements and ensure that the existing extensive transport networks, which have been greatly enhanced over the last two decades, are maintained to a high level to ensure quality levels of service, safety, accessibility and connectivity to transport users.</u></p>	

- (ii) Amend Core Strategy map to incorporate the M8 motorway;
2. Include the following policy in the recognition of the implementation of LSMATS provisions in the Core Strategy.
‘It is policy of the council to ensure that the Core Strategy is in line with the objectives of LSMATS and the integration of land use planning and transport in reducing the need to travel and promote modal shift from the use of the private car.’
3. No change:
4. Amend Objective TR O35 as follows:
 Objective TR O35 National Roads It is an objective of Council to:
- a) Prevent, except in exceptional circumstances as outlined in the Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ (DoECLG, 2012), 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 junction.
- b) Avoid the creation of any new direct access points from development, or the generation of increased traffic from existing direct access/egress points to the national road network, to which speed limits greater than 60kmph apply;
- c) Facilitate a limited level of new accesses, or the intensified use of existing accesses, to the national road network on the approaches to, or exit from, urban centres that are subject to a speed limit of between 50kmph and 60kmph. Such accesses will be considered where they facilitate orderly urban development and would not result in a proliferation of such entrances;
- ~~d) Consider permitting access where members of the farming community wish to build their houses for their own occupation, on their own land where the house is required for occupation by a member of the farming community, in connection with the working of the farm and where no reasonable alternative access is available to them and where that access is safe and the traffic levels generated are reasonably low. Such developments shall be subject to a Road Safety Audit.~~
5. Amend Section 3.6 Rural Housing of Chapter 3 to include the following note: Note: Consideration of planning applications for development in Rural Housing Category 1: Areas under Strong Urban Influence and in Rural Housing Category 2: Rural Areas Elsewhere will have regard to ~~TR O35~~ TR O38 National Roads in Chapter 6 Sustainable Mobility and Transport.
6. Amend Policy TR P8 a) to include the following text and associated junctions;
7. Amend Objective ECON O13(c) as a bullet point in relation to lands at Raheen Business Park:
‘All development proposals undertake an appropriate level of transport assessment, including an assessment of the cumulative impact of development, to ensure planned development can be accommodated complementary to safeguarding the strategic function of the national road network and associated junctions’;

8(i) Amend Objective ECON O14 (a) to include the following: Access to the Development Location Site at Askeaton should be facilitated from the non-national road network.

(ii) - (ii) No change

9. Amend FO O1 located in Volume 2 Level 4 - Large Villages, Settlement Zoning and Development to include the following: b) All development proposals within the ‘Marine Related Industry’ land use zoning will be subject to a Traffic and Transport Assessment and Road Safety Audit in accordance with Chapter 3 of the DoECLG Spatial Planning and National Roads Guidelines at planning application stage.

10. Include the following text in Section 4.7.14 Rural Enterprise and Employment Opportunities: Having regard to the location and potential nature of developments facilitated by policies promoting rural enterprise and economic development, including rural tourism, proposals for development shall have regard to Policy TR P8 and Objective TR O35 in chapter 6.

11. No change;

12(i) Include an additional Section under Policy TR P8 Safeguard the Capacity of National Roads as follows: c) Continue to engage, at an early stage, with relevant transport bodies, authorities and agencies in respect of any plans or projects that are located in proximity to national road infrastructure.

(ii) No change;

(iii) Amend Objective TR O41 to include the following: h) All development proposals undertake all relevant Transport Assessments, including the cumulative impact of development, to ensure planned development can be accommodated complementary to safeguarding the strategic function of the national road network and associated junctions.

13. Amend Objective TR O40 to include reference to: TII Publication DN-GEO-03084 ‘The Treatment of Transition Zones to Towns and Villages on National Road’s;

14. No change;

15. Amend Objective TR O23 to include the following text: In pursuing the objective to facilitate the provision of Park and Ride, the Council will co-operate closely with relevant transport bodies, authorities and agencies.

16. Insert additional text into Chapter 11 Development Management Standards Section 11.6.3 Petrol Stations Table DM 5 as follows: ‘The provision of off-line motorway service areas at national road junctions and road side service facilities on non-motorway national roads and junctions shall have regard to Section 2.8 of the DoECLG Spatial Planning and National Road Guidelines and the TII Policy on Service Areas’;

	<p>17(i) Update the text under Section 11.7.2.2 from ‘Glint and Glare impacts on roads and other sensitive receptors’ to <u>‘Glint and Glare Assessments on roads including in the vicinity of the strategic national road network, and other sensitive receptors.’</u></p> <p>(ii) Amend IN O11 to include a new bullet point as follows: <u>Ensure that in the delivery of energy infrastructure, the strategic function of the national road network is safeguarded in accordance with national policy by utilising available alternatives.</u></p> <p>18(i) No change;</p> <p>(ii) Update all references throughout the plan as follows: replace the Design Manual for Roads and Bridge (DMRB), with relevant <u>‘TII Publications’</u> in rural areas; the Design Manual for Urban Roads and Streets (DMURS) in urban locations and the Spatial Planning and National Roads - Guidance for Planning Authorities 2012 and TII guidance and publications;</p> <p>19(i) No change;</p> <p>(ii) See change proposed under TII recommendation under No. 9;</p> <p>20. No change.</p>
	SEA/ AA Response
	<p>Policies to maintain the efficiency and safety of transport networks have a role to play in ensuring the best use of transport infrastructure and ensuring that they do not suffer from premature obsolescence due to poor management of development in their vicinity. The emphasis on modal shifts echoes many of the concerns raised in other submissions (e.g., No.s 244 and 153) and is catered for in updated policy content. What is new in this submission is the introduction of the issues that renewable energy provision may have for transport infrastructure. This has resulted in amendments to Development Management guidance to take these into account. It is anticipated that there will be benefits, particularly in terms of public safety which is a concern of the SEA process.</p>

No. 75	Ref. & Name/ Group: LCC-C62-75 Peter Hennessy	
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Transport: There is no reference to Kilmallock Railway Station as in the County Development Plan in 2006 and Local Area Plan 2019 – 2025. Objective TR O21 (pg. 149) is too vague. This should be written down in print as in previous</p>	<p>1. Transport: The content of the submission received is noted. The Draft Development Plan sets out the policies and objectives for the overall development of Limerick. Objective TR O21 seeks to support and encourage new and upgrading of existing rail networks and railway</p>

	<p>plans as there is a new All Ireland Transport Review taking place at the moment. The Council should support Kilmallock Station in this review. The M20 road/rail project will include the rail station in its appraisal of Cork to Limerick rail options. If Kilmallock is a Key Town, key transport services are needed to see the town prosper for the better of locals and tourism.</p>	<p>stations and protect, as required, lands necessary for the upgrading of existing rail lines or stations. It is considered that the Objective addresses the issue raised in relation to the redevelopment of train stations.</p> <p>Kilmallock has been relocated to a Level 3 settlement on the Settlement Hierarchy, as per the recommendation of the OPR, see response to Submission No.225.</p>
Chief Executive’s Recommendations		
1. No change.		
SEA/ AA Response		
N/A		

No. 86	Ref. & Name/ Group:	LCC-C62-86 Cyclist.ie The Irish Cycling Advocacy Network
Submission/ Observation Summary		Chief Executive’s Response
<p>1. Chapter 6 Sustainable Mobility and Transport: The submission welcomes the plan’s commitment to providing attractive, inclusive and connected walking and cycling networks. Segregation and high-quality build should be added to these if we are to successfully encourage meaningful modal share targets for active and sustainable modes. The submission notes the need for a fast-tracked delivery of a connected, high quality and segregated cycle network as outlined in the 2016 ARUP Limerick Cycle Network Study. The submission notes disappointment in the lack of delivery of this programme referring to study’s</p>		<p>1. Chapter 6 Sustainable Mobility and Transport: The Draft LSMATS Cycle Network, published by the NTA fundamentally incorporated all the proposals contained within the Limerick Metropolitan Cycle Network Study with additional sections included. The final LSMATS when published, will incorporate all proposed cycle routes and a 5-year delivery programme. The Draft Plan outlines in TR O15, that it will implement in full the cycle network, which will be identified in the final LSMATS.</p>

modal shift target of 10% of trips via cycling been held up considerably by the lack of delivery.

2. Climate Action Plan 2019: The submission notes how transport accounts for 40% of our CO2 emissions and requests that projects that encourage or facilitate car usage must be reconsidered and delayed until active and sustainable modes are properly facilitated. To reduce emissions by 30% by 2030 and 50% by 2050, KPIs are needed that both promote active travel and penalise unnecessary private car use.

3. Policy TR P1 Integration of Land Use and Transport: The submission welcomes the commitment to sustained investment in active and sustainable modes. The submission proposes that this section be amended to include a commitment to deliver the key cycling arteries from each suburban city ward to the city centre in the first

2. Climate Action Plan 2019: The integration of land use and transportation is a fundamental principle of the Draft Plan, which supports the rebalancing of the transport system towards more sustainable modes of transport, in order to mitigate against the potential impacts of climate change and to remove congestion from our city, towns and villages. The Draft Plan acknowledges the promotion of use and increased delivery of sustainable modes of transport is fundamental to achieving Ireland’s carbon emission reduction requirements of 30% by 2030.

It is a policy of the Council to support the delivery of transport infrastructure identified within the National Planning Framework, National Development Plan, 2018 – 2027 (and any update) and the Regional Spatial and Economic Strategy for the Southern Region and to support enhanced connectivity within Limerick and inter-urban connectivity within the regions. In addition, changes are recommended to comply with OPR and NTA (submission 247) recommendations on modal split and baseline targets will be included as material alterations to the plan.

3. Policy TR P1 Integration of Land Use and Transport: The implementation of infrastructure proposed under LSMATS will be set out in a phased basis depending on the investment programme prepared by the National Transport Authority. This will be undertaken once LSMATS, which is at Draft stage, is finalised. The Draft Plan outlines in TR O15, that it will implement in full the cycle network, with

year of the Development Plan and the network is entirely delivered by 2025.

4. Policy TR P2 Promotion of Sustainable Patterns of Transport Use: Smarter Travel is a programme that has essentially finished. A new Sustainable Mobility Policy due for publication by the Dept. of Transport is a more relevant reference.

5. Policy TR P4 Delivery of Transport Infrastructure in line with National Policy: The observer is delighted to see sustainable and active travel and public transport identified and given priority. It is essential that the Draft Plan notes this priority and includes a commitment that this priority is upheld regarding delivery. The observer is disappointed that the positive preamble is not reflected in the objectives listed, which only facilitate motor vehicles and road building and do not match the vision or earlier promise. The following objectives should be included as priorities of the list and given priority above those already listed:

- Objective: Delivery of a comprehensive cycling and walking network for Limerick City Metropolitan Area;
- Objective: Delivery of the full BusConnects programme (inclusive of ticketing systems, bus corridors, additional capacity, new bus stops and bus shelters) for the Limerick City Metropolitan Area;

priority given in the short term to delivering the primary cycle network and cycle routes serving schools.

4. Policy TR P2: The Department of Transport is carrying out a review of sustainable mobility (walking and cycling) policy. The new policy will replace the existing sectoral policy documents published in 2009- Smarter Travel, A Sustainable Transport Future 2009-2020 and the National Cycle Policy Framework. This issue is further addressed in Submission No. 44 Department of Transport.

5. Policy TR P4 Delivery of Transport Infrastructure in line with National: The Council consider the delivery of sustainable and active travel infrastructure as key enablers to the growth of Limerick. TR013, TRO14, TRO15, TR016, TR017, TR O18, TR019 and TR O20 are all objectives based around the delivery of sustainable and active travel. It is acknowledged that the structure of the chapter needs to be revised to reflect the prioritisation of objectives and this is addressed in Submission No. 247 National Transport Authority.

-Objective: Development of a Park and Ride programme for Limerick, linked with the BusConnects Programme.

6. Policy TR P5 Sustainable Travel and Transport: The observation welcomes the commitment within Objective TR O11 to deliver cycling projects with Universal Design as a guiding principle.

7. Promoting Modal Shift: The submission notes the urgent need to prioritise the delivery of a safe and segregated cycle network as outlined in the ARUP Limerick Metropolitan Cycle Network Study and LSMATS if the dependence on the private car for school trips is to be broken. The submission states the following should be included directly targeted at schools:

- A 15kph limit on all streets which contain a school entrance or exit, with any traffic calming initiatives or infrastructure delivered within the first year of the Development Plan;
- The development of car free school streets at all urban and suburban schools;
- The banning and removal of any existing ‘drive-tru’ lanes within school grounds;
- Installation of covered bike parking that will facilitate a minimum of 20% of the school population to safely park their bikes;
- Bike parking must be given priority space near the main entrance door of each school with the removal of on-site car parking facilities if necessary;

6. Policy TR P5 Sustainable Travel and Transport: Noted.

7. Promoting Modal Shift: Objective TR O30 Behavioural Change Measures of the Draft Plan supports the implementation of behavioural change initiatives and the facilitation of school streets and school zones in the promotion of active travel options for Limerick’s children.

There are a number of Limerick schools involved in the ‘Safe Routes to School’ (SRTS) programme which is funded by the Department of Transport through the National Transport Authority and coordinated by An Taisce’s Green Schools (ATGS). 37 Limerick schools applied to be involved in the programme with eight picked for the first round. Once one of the schools have completed the project, another school will be taken from the waiting list. ATGS are currently doing consultation with all the chosen schools and will then, go on to prepare an outline delivery plan. This plan will then be submitted to the Council for detailed design and implementation. Any school that is part of the SRTS programme is eligible to apply for bike parking under that programme and it will be delivered by Green Schools.

In addition to the Safe Route, the Council are available to work with all schools in Limerick regarding mobility management planning. The interested school are welcome to contact the Council to develop proposal specific to their school.

-Commitment to develop a Bike Life report for Limerick in collaboration with the NTA.

8. Objective TR O15 Limerick Cycle Network The submission welcomes reference to DMURS. The Draft Plan should be amended to include:

- Completion of the main cycling arterial routes connecting each city ward suburb by the end of 2022;
- Prioritise the completion of the full Limerick Cycle Network by 2025;
- Prioritise our climate obligations to fully encourage modal shift by placing a moratorium on any road projects serving motor vehicles as their primary mode until the completion of the cycle network.

9. Objective TR O16 Limerick Regeneration Areas Sustainable Travel Infrastructure: The observation supports all efforts to address transport exclusion and lack of connectivity our communities in regeneration areas currently face. With low car ownership levels, the submission notes, it is essential that adequate footpaths, cycle lanes and public transport are prioritised. The submission outlines how the initial LSMATS did not adequately recognise the need for investment or inclusion of these communities. The observer hopes to see infrastructure and permeability options introduced to these communities as a priority.

8. Objective TR O15 Limerick Cycle Network: The implementation of infrastructure proposed under LSMATS will be set out in a phased basis depending on the investment programme prepared by the National Transport Authority. There is sufficient support in the Draft Plan to support the LSMATS programme.

9. Objective TR O16 Limerick Regeneration Areas Sustainable Travel Infrastructure: Extensive consultation has occurred between the Council and the NTA with regard to the Regenerations Areas. This is a matter for the NTA in the preparation of the updated LSMATS.

10. Objective TR O17 Enhanced Public Transport: It is suggested that this objective be amended to include the following: It is also an objective of the Council to support the enhancement of Limerick’s public transport fleet to ensure adequate bike parking within all city services to encourage multi-modal trips through the use of bikes and other micro-mobility devices for ‘first mile/last mile’ trips.

11. Objective TR O20 Transport Interchange: It is suggested that this objective be amended to include the following: Installation of safe and secure bike parking at all park and ride hubs.

12. Objective TR O30 Behavioural Change Measures: The submission recommends this objective should be amended to: To encourage behavioural change the Council will deliver the Limerick Metropolitan Cycle Network in full by end of year 2025.

13. Policy TR P7 Road Safety and Carrying Capacity of the Road Network: The submission notes that enhancing the road carrying capacity of the road network is in direct conflict with the Council’s obligations to reduce transport emissions and reduce the modal share given to private cars. This objective should be removed and replaced with: It is a policy of the Council, guided by our climate commitments, to seek improvements to road safety while reallocating the

10. Objective TR O17 Enhanced Public Transport: The provision of Limerick’s public transport fleet is outside the control of the Local Authority. However, Objective TR O17 supports and encourages public transport providers to enhance the provision of public transport. The Plan also outlines the Council’s commitment to the provision of multiple public transport modes and seeks to ensure that appropriate levels of cycle parking, cycle facilities and electric charging infrastructure are provided at public transport interchanges.

11. Objective TR O20 Transport Interchange: It is considered appropriate that the plan should seek to install safe and secure bike parking at all park and ride hubs.

12. Objective TR O30 Behavioural Change Measures: This issue has been responded to under content submitted under Policy TR P1 above.

13. Policy TR P7 Road Safety and Carrying Capacity of the Road Network: It is a policy of the Council (TR P4) to support the delivery of transport infrastructure identified within the National Planning Framework, National Development Plan, 2018 – 2027 (and any update) and the Regional Spatial and Economic Strategy for the Southern Region and to support enhanced connectivity within Limerick and inter-urban connectivity within the regions. Equal priority and focus is given to reduce dependency on the private car and secure a shift towards

existing carrying capacity of the road network throughout Limerick from motor traffic to active modes and public transport.

14. Policy TR P10 Sustainable Transport in Rural Areas: The Development Plan should also reference Cyclist.ie’s policy document ‘A Vision for Cycling in Rural Ireland’ in this policy.

15. Objective TR O43 HGV Restrictions: A goal of the Limerick Tunnel project was to eliminate HGV traffic through our city centre and family neighbourhoods. Any and all measures possible must be taken to divert this traffic to the underused tunnel. The objectives should be amended to read:

-It is an objective of the Council to identify specific lorry routes to eliminate HGV movements through Limerick City and neighbourhoods.

It is also suggested that the following objective be added:

-It is an objective of the Council to limit deliveries to businesses in the city core to before 11am each day to further improve the safety of pedestrians and active mode users and to facilitate better use of street space for business and of liveability for citizens.

sustainable modes of transport, including walking, cycling and public transport through the implementation of LSMATS and ongoing behavioural change and infrastructure initiatives carried out by the Council. Policy TR P5 Sustainable Travel and Transport; Objective TR O9 Climate Proofed Transport Infrastructure; Objective TR O12 Limerick – Shannon Metropolitan Area Transport Strategy are all relevant in this regard.

14. Policy TR P10 Sustainable Transport in Rural Areas: The draft plan has referenced all relevant national, regional and Section 28 Guidance.

15. Objective TR O43 HGV Restrictions: TR O43 outlines the Councils objective on HGV Restrictions: ‘It is an objective of the Council to identify specific lorry routes and/or time restrictions, to reduce peak-time HGV movements through Limerick City and neighbourhoods. In addition, the Council, in conjunction with the National Transport Authority has committed to the preparation of a City Centre Traffic Management Plan, which will also consider the issues further.

16. Objective TR O45 Car and Cycle Parking: This objective should be omitted and replaced with the following:

(i) It is an objective of the Council to support the provision of safe, secure and monitored bike parking in the city core;

(ii) With the abundance of off street car parking facilities, it is an objective of the Council to reduce the existing on street car parking spaces in order to reallocate space to improved pedestrian and cycle infrastructure within the city core, and also to provide space for improved public realm use.

16. Objective TR O45 Car and Cycle Parking:

(i) The Draft LSMATS outlines the plans for secure, long-stay cycle parking. This includes the provision of such in Colbert Station and other key transport nodes across the LSMA. The Draft Plan supports the implementation of LSMATS as is outlined in TR O12.

(ii) See response to Submission No. 247 in this regard.

Chief Executive’s Recommendations

1. No change;

2. Changes proposed in relation to modal share – see recommendations in submission 247;

3. No change;

4. See response to Objective No. 44 Department of Transport;

5. Amend Chapter 6 in terms of structure and layout - see recommendations in submission 247;

6. - 10. No change;

11. Include additional text in Section 6.5.5 to include reference to appropriate levels of safe and secure cycle parking;

12. - 16. No change.

SEA/ AA Response

The addition of policy content that supports sustainable forms of transport is expected to have environmental and health benefits for the population they serve.

No. 97	Ref. & Name/ Group:	LCC-C62-97 TFI Local Link Limerick Clare	
Submission/ Observation Summary		Chief Executive’s Response	
<p>The submission outlines how the Rural Transport Programme mission statement is ‘to provide a quality nationwide community based public transport system in rural Ireland which responds to local needs.</p> <p>1. Local Transport Plans: Policy TRP1 Integration of Land Use and Transport – The policy measures 89 to 92 outlined in Our Rural Future, Rural Development Policy 2021 – 2025 Chapter 7 Enhancing Public Service in Rural Ireland supports delivery of sustainable compact settlements, which are served by sustainable modes of transport. It is important that TFI Local Link are consulted in the preparation of Local Transport Plans (Policy TR P6) or form part of the working group to outline transport gaps throughout the County.</p> <p>2. Delivery of new bus stops/shelters: Chapter 6 Sustainable Mobility and Transport Policy TRP4 – Delivery of new bus stops and shelters for the Limerick City Metropolitan Area is critical to enabling growth. The observation requests extension of this growth into the County, which would support and facilitate implementation of an integrated, multimodal and accessible public transport network.</p>		<p>Noted.</p> <p>1. Local Transport Plans: The contents of the submission are noted. TFI Local Link will be consulted in the preparation of Local Transport Plans as outlined in Policy TRP6.</p> <p>2. Delivery of new bus stops/shelters: The Council are committed to the enhancement of Limerick’s rural transport provisions. It is recommended to include an objective in support of the provision of high quality and coherent system of bus facilities. In addition, see response and recommendation under Submission 247 National Transport Authority regarding the inclusion of an objective for the support and facilitating the on-going review and enhancements to the inter-city, regional and commuter services as is committed by the National Transport Authority.</p>	

Chief Executive’s Recommendations	
<p>1. No change;</p> <p>2(i) Include a new objective into Section 6.8 Rural Transport as follows: It is an objective of the Council to support and facilitate the on-going review and enhancements to the inter-city, regional and commuter services in conjunction with the National Transport Authority.</p> <p>(ii) Include a new objective into Section 6.8 Rural Transport as follows: It is an objective of the Council to support the development of bus shelters and bus stops that shall incorporate universal access and bicycle parking facilities where possible.</p>	
SEA/ AA Response	
It is anticipated the proposed policy support will have environmental benefits, in so far as it supports rural transport and sustainable travel means, accordingly reducing car dependency and associated emissions.	

No. 116	Ref. & Name/ Group:	LCC-C62-116 Limerick Enterprise Development Partnership (LEDP)
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Inbound access from the M20 Limerick Southern Ring Road to Carew Park Link Road: Limerick Enterprise Development Partnership (LEDP) supports the Draft Plan. The proposed M20 will create opportunities for growth in the ‘Atlantic Corridor’ and ease congestion on the eastern side of the country. Without a satisfactory motorway link Cork, Limerick and the South-West cannot realise their full potential. Investment will enable the region to grow, develop and create job opportunities, deliver a better-balanced Ireland, and improve the quality of life.</p> <p>The Regeneration areas in Limerick City South are relatively well served in terms of distributor roads, with Hyde Road</p>	<p>1. Inbound access from the M20 Limerick Southern Ring Road to Carew Park Link Road: The contents of the submission are noted. The Draft Plan acknowledges the physical transport disadvantages experienced in Limerick’s Regeneration Areas. Sustainable mobility, connectivity and permeability has an important role to play in integration of the Regeneration Areas and in creating high quality for pedestrians and cyclists, which are connected and safe.</p> <p>The Regional Spatial Economic Strategy for the Southern Region identified and prioritised a number of transport investment objectives</p>

<p>and Prospect Hill, and the Roxborough Road, providing direct connections into the city centre from Ballinacurra Weston and Southill respectively. However, these roads primarily serve through-traffic rather than good access for local residents and businesses.</p> <p>The lack of inbound access is having a detrimental effect on the economic viability and potential of the Limerick Enterprise Development Park and Roxboro (Thomond) Shopping Centre.</p> <p>Southill is a highly accessible location, strategically situated to present a new southern gateway to Limerick City. There is an opportunity to guide development towards the Childers Road, and develop the area as a medium density mixed use quarter, creating a new neighbourhood with a critical mass of people to support amenities and public transport. Southill presents an opportunity to form a new edge to the city.</p> <p>Opportunities exist to create new urban structures that make better use of existing topography, improve permeability and connectivity, and improve access to and from and between sites. These can only be realised with reintroduction of the inbound access from the M20. This crucial piece of infrastructure requires inclusion in the Development Plan.</p>	<p>through the Limerick Shannon Metropolitan Area Transport Strategy (LSMATS). This included improved accessibility to Limerick Southside, including the possible provision of a motorway interchange connection from the M20/M7 to Limerick Southside, subject to robust appraisal, planning and environmental assessment processes. The National Transport Authority in conjunction with Limerick City and County Council and Clare County Council have prepared a Draft Limerick – Shannon Metropolitan Area Transport Strategy (LSMATS), which is currently undergoing review and includes the promotion and/or consistency with RSES Policy Objectives including ‘improved accessibility to Limerick Southside, including the possible provision of a Motorway interchange connection from the M20/M7.</p> <p>Objective TR O8 connecting Limerick’s Southside, as set out in the Draft Plan, seeks to explore improved accessibility to Limerick’s Southside, including the possible provision of a motorway interchange connection from the M7/M20 subject to number of key criteria. The Council will continue to work with relevant stakeholders to explore options to achieve this connection.</p>
Chief Executive’s Recommendations	
1. No change	

	SEA/ AA Response
	N/A

No. 126	Ref. & Name/ Group:	LCC-C62-126 Avison Young on behalf of An Post	
	Submission/ Observation Summary	Chief Executive’s Response	
	<p>1. Future Provision of Postal Infrastructure: Due to changes arising from ecommerce, Covid 19 and population increases, An Post has assessed its portfolio of facilities to ensure the operational needs are met. The observation requests the Council provide a supportive policy framework for the future provision of postal infrastructure. Enhancement of An Post’s facilities and provision of new facilities could generate employment in the County, increasing economic development, reinvigorating redundant and underutilised lands and supporting climate change mitigation with the transition to e-vehicles.</p> <p>2. Operational and Supportive Requirements: An Post own/operate a number of postal services in Limerick City, Kilmallock and Newcastle West.</p> <p>The observation requests flexibility in the land use zonings and objectives in relation to An Post’s facilities and operational requirements. Zoning objective should allow for enhancement of existing facilities and development of new infrastructure. An Post retail and distribution/logistics</p>	<p>1. Future Provision of Postal Infrastructure: The Council acknowledge the important public service and economic role played by An Post. However, the Council consider that the Draft Plan sets out a comprehensive and robust strategy for reinvigorating redundant and underutilised lands and supporting climate change mitigation and the transition to e-vehicles.</p> <p>2. Operational and Supportive Requirements: The Council is supportive of the provision of public services at appropriate locations, particularly in the City Centre, Town/ Village Centres and designated District and Local Centres. Each of these centres include sufficiently flexible zoning objectives which can accommodate An Post retail services, subject to compliance with all relevant Development Management Standards and planning criteria.</p> <p>The Council considers that logistics/ distribution uses are not appropriate in every land use zone, particularly those of a residential</p>	

<p>operations are a necessity in urban locations to effectively provide an essential service. These uses work within tight urban constraints and amongst other land uses, including City, Town, District and Neighbourhood Centres.</p> <p>In the interests of compact urban growth, sustainable travel and employment, co-locating of different commercial activities in proximity to other urban uses can be achieved. The observer requests the inclusion for both An Post Retail and An Post Mails & Parcels (distribution/ logistics) as permissible or open for consideration land uses across all zoning objectives.</p> <p>3. Supportive Policies: The observation requests the inclusion of a supportive policy framework to facilitate enhanced postal services, assist delivery of future An Post projects and assist investment, such as:</p> <p>The observation requests the recognition of specific operational requirements with regard to the operation of Post Offices and mail sorting offices.</p> <p>4. Car Parking: An Post requires c.3,000 vehicles on a daily basis to operate. Due to the increasing number of parcels being processed, this requirement will increase over time and greater levels of parking spaces, including EV charging points, will be required. Parking is also required for staff</p>	<p>or community/ educational use. However, such uses are “Open for Consideration” and “Permitted in Principle” in the Mixed Use, High Tech, Enterprise and Employment, Industry and Retail Warehousing zones. 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. It is considered that sufficient flexibility is available within the existing land use zoning classes to facilitate the provision of An Post facilities and No change to the zoning matrix is necessary.</p> <p>3. Supportive Policies: This issue is addressed in point 1 raised above.</p> <p>4. Car Parking: Section 11.8.3 Car and Bicycle Parking Standards Parking includes the accommodation of flexibility in exceptional circumstances. The Council do not consider it necessary to include policy support with reference to a specific workplace. Any future development proposals will be assessed on a case-by-case basis</p>
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	<p>vehicles. The observation requests flexibility in car parking standards for postal facilities, which require sufficient parking to operate in an efficient manner. A greater quantum of parking may be required due to growing postal trends to ensure the future proofing of the long-term viability.</p> <p>5. Delivery & Access:</p> <p>(i) The observation requests the Council to engage with An Post should any future area plan propose to amend delivery hours in town/city centre locations.</p> <p>(ii) It is important that a sufficient level of access is maintained and loading bay space is provided to accommodate collection/delivery and customers. The observation requests the Council to consult with An Post during the preparation of future public realm and movement strategies to maintain a sufficient level of access whilst improving appearance and function of town centres.</p>	<p>through the development management process. Applicants are advised to avail of pre-planning consultations with the Planning Authority, prior to submitting planning applications.</p> <p>5. Delivery & Access:</p> <p>(i) Noted.</p> <p>(ii) The issues raised are noted. The Council will continue to prepare transport and public realm strategies, there will be opportunities for An Post to engage as part of the consultation process as appropriate.</p>
Chief Executive’s Recommendations		
1. – 5. No change.		
SEA/ AA Response		
N/A		

No. 132	Ref. & Name/ Group:	LCC-C62-132 John Spain on behalf of South West Regional Shopping Centre Promotions Association
	Submission/ Observation Summary	Chief Executive’s Response

	<p>1. Directional Signage to the Crescent Shopping Centre: The submission seeks a specific objective in the Plan for directional signage to the Crescent Shopping Centre at appropriate locations in the Southern Environs. Examples cited included Mahon Point Cork and Liffey Valley Dublin. Dooradoyle District Centre is an important retail, employment, service centre for its catchment. The submission gives a brief analysis of locations at St. Nesson’s Road/ Dooradoyle Road Junction, Dooradoyle Road/ Dooradoyle Link Road Junction, Dooradoyle Interchange – northern roundabout, and Dooradoyle Interchange – southern roundabout</p>	<p>1. Directional Signage to the Crescent Shopping Centre: The request for directional signage is an operational issue for the Council and is outside the remit of the Development Plan. It is not considered appropriate to include an objective to facilitate the development of signage to serve such developments.</p>
	Chief Executive’s Recommendations	
	1. No change.	
	SEA/ AA Response	
	N/A	

No. 145	Ref. & Name/ Group:	LCC-C62-145 Limerick Pedestrian Network
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Integration of Land Use and Transport Planning: (i) The submission notes that rural development will shift towards town centres and village hubs, centralising development and moving away from sprawl or ribbon development. The submission states that until we address the issue of private car priority on rural roads, high speeds and lack of basic footpaths, we will fail to hit any targets for</p>	<p>1 Integration of Land Use and Transport Planning: The Draft Plan sets out a policy shift towards compact growth and consolidating town and villages in line with national and regional policy. The Draft also sets out ambitious targets for modal shift away from the private car towards more sustainable modes of travel.</p>

<p>Limerick to increase active travel and decrease private transport emissions.</p> <p>(ii) The submission requests that a 1km radius around all towns in Limerick be made accessible for pedestrians through installation of appropriate infrastructure.</p> <p>(iii) The submission requests that a reduction of speed limits on local and regional roads where space is not available for pedestrian infrastructure and residents are sharing the road space with private vehicles in the zones on the outskirts, or approach to, the towns and villages.</p> <p>2. Policy TR P1:</p> <p>(i) Concern is expressed about Chapter 6, Policy TR P1. It is set out that the statement: “the draft plan will also facilitate improvements in road infrastructure to cater for these (car) movements” represent a clear signal that transport</p>	<p>(ii) Policy TR P10 Sustainable Transport in Rural Areas outlines the Draft Plans support in the objectives of Our Rural Future: Government’s Blueprint to Transport Rural Ireland. The Programme for Government places an emphasis on improving our transport infrastructure to ensure that people can travel more safely by bicycle or by walking in our towns and cities. The Government has committed a €50 million fund in 2021 for Local Authority investment in high-quality walking and cycling infrastructure, specifically targeted at towns and villages across the country. The policy document includes a number of key deliverables in support of sustainable transport in rural Ireland. The Draft Plan supports the implementation of the documents policies including the development of high-quality walking and cycling infrastructure specifically targeted at towns and villages.</p> <p>(iii) Reduction in speed limits on local and regional roads is not within the remit of the Development Plan.</p> <p>2. Policy TR P1:</p> <p>(i) The Draft Plan supports the rebalancing of the transport system towards more sustainable modes of transport, in order to mitigate against the potential impacts of climate change and to remove congestion from our city, towns and villages. The Draft Plan</p>
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<p>development will continue to be focused exclusively on private cars and that this is in direct conflict with the stated transport policies, objectives and principles of all national frameworks and plans. There is no evidence that this section is guided by the requirement to reduce carbon emissions by 50% by 2030 and to be fully carbon neutral by 2050.</p> <p>(ii) The submission requests that this section is substantially reworked with a clear priority for public and active transport as the primary focus of rural transport development in Limerick</p> <p>3. Walking and Cycling:</p>	<p>acknowledges the promotion of use and increased delivery of sustainable modes of transport is fundamental to achieving Ireland’s carbon emission reduction requirements of 30% by 2030. It is a policy of the Council to support the delivery of transport infrastructure identified within the National Planning Framework, National Development Plan, 2018 – 2027 (and any update) and the Regional Spatial and Economic Strategy for the Southern Region and to support enhanced connectivity within Limerick and inter-urban connectivity within the regions.</p> <p>The Planning Authority acknowledges that a change in approach is needed to address the dispersed pattern of settlement, which reinforces the reliance on cars to make daily journeys. In order to focus growth in our towns and villages and in doing so, reducing further reliance on the private car and protecting local environments. It is considered necessary to strengthen Policy TR P7 <i>Road Safety and Carrying Capacity of the Road Network</i> to include reference to safe guarding the carrying capacity of minor local roads which are substandard in terms of width and alignment and require significant investment and direct development to our settlements in line with the principles of compact growth.</p> <p>(ii) It is acknowledged that the structure of the chapter needs to be revised to reflect the prioritisation of objectives and this is addressed in Submission No. 247 National Transport Authority.</p> <p>3. Walking and Cycling</p>
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<p>(i) Objective TR 013 aspires to delivering modal shift towards sustainable modes of transport but is vague in how this will be achieved. It is noted that while the plan identifies eight separate road projects, there is not a single walking or cycling project identified in the plan or assigned an objective.</p> <p>It is set out that this objective can be strengthened and the multiplicity of benefits in creating compact walkable neighbourhoods are set out.</p> <p>(ii) That the Plan will identify and complete at least 3 projects during the lifetime of its implementation, one in a town in Limerick County, one in Limerick City Centre / inner suburbs, and one in Limerick’s outer suburbs.</p> <p>(iii) That these projects are measured and assessed fully, including before, during and after surveys of traffic volumes, modal split, air quality, and Pedestrian Route Directness (PRD).</p>	<p>(i) Policy TR P4 Delivery of Transport Infrastructure in line with National Policy outlines a number of proposed deliverables as key to enabling growth in Limerick, which include cycling and walking, as well as development of sustainable transport modes. The first three bullet points are sustainable travel related:</p> <ul style="list-style-type: none"> • Delivery of a comprehensive cycling and walking network for Limerick City Metropolitan Area • Delivery of the full BusConnects programme (inclusive of ticketing systems, bus corridors, additional capacity, new bus stops and bus shelters) for the Limerick City Metropolitan Area; • Development of a Park and Ride programme for Limerick, linked with BusConnects Programme; <p>The Council are committed to the measures identified in the Draft LSMATS and will support the implementation of the final document on completion.</p> <p>(ii) The LSMATS will identify numerous projects within the Limerick Metropolitan Area, which will be complete over the lifetime of the Plan, similarly the Local Transport Plan for Newcastle West will identify project for Newcastle which will be delivered within the lifetime of the Plan, which will support sustainable transport.</p> <p>(iii) The Council acknowledge the value in measuring active travel projects with respect to impact on traffic volumes, modal split, air quality and pedestrian route directness. A new Limerick active travel unit, which is funded by the Department of Transport, is in initial stages of being established within Limerick City and County Council. The</p>
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<p>4. Policy TR P4: The Limerick Pedestrian Network welcomes the preamble contained within this policy section, which focuses on BusConnects, park and ride facilities and the development of a comprehensive walking and cycling network. However, the submission sets out that it is shocking that the draft makes no reference to the imminent Climate Action Plan and Climate Budgets that will form the key guidelines to future transport developments over the term of the Development Plan.</p> <p>The submission requests the following:</p> <p>(i) That Policy TR P4 would be redrafted to read: It is a policy of the Council to support the delivery of transport infrastructure identified within the National Planning Framework, National Development Plan, 2018 – 2027 (and any update) and the Regional Spatial and Economic Strategy for the Southern Region with a focus on the primacy of active, sustainable and public transport. We will be guided by our Climate Responsibilities as outlined in the Climate Action Plan, subsequent Climate Budgets and Limerick Council’s formal declaration of a climate and biodiversity emergency as we move away from the private car and towards delivering active, sustainable and public transport networks as our primary goal.</p>	<p>Active Travel unit will monitor the impact of various projects over the lifetime of the Plan.</p> <p>4. Policy TR P4: The Draft sets out in Chapter 8, the approach to Climate Action and cross references the Chapters to ensure that all issues are considered from a Climate Action perspective. The Council is committed through a number of measures to comply with climate targets.</p> <p>(i) Policy TR P4 outlines the support of the delivery of transport infrastructure as identified in the NPF and NDP 2018-2027. The National Planning Framework supports commitments to achieve the transition to a low carbon economy and a climate resilient society. National Strategic Outcome 08 sets out the policy position in this regard. Furthermore, the NPF sets out the principles of sustainable, compact growth coupled with sustainable transport choices, as a means of reducing emissions, delivering more sustainable communities and futureproofing the development of the Country. In Chapter 8: Climate Action, Flood Risk and Transition to Low Carbon Economy, Objective CAF O1 Compliance with Higher Tier Climate Legislation and Guidance outlines the following: <i>It is an objective of the Council to support the National Adaptation Framework 2018 and the National Climate Change Strategy, including the transition to a low carbon future, taking account of flood risk, the</i></p>
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<p>(ii) Delivery of the full BusConnects programme (inclusive of ticketing systems, bus corridors, additional capacity, new bus stops and bus shelters) for the Limerick City Metropolitan Area.</p> <p>(iii) Development of a Park and Ride programme for Limerick linked with BusConnects Programme.</p> <p>(iv) Delivery of a comprehensive cycling and walking network for Limerick City Metropolitan Area.</p> <p>5. Promoting Active Travel (TR 030): This section calls for urgent action by LCCC to deliver a significant modal shift in how children travel to and from school in Limerick City and County referring to the need to address childhood obesity. The current level of car dependency noted in the Plan a clear target must be to identify the specific need for multiple cars per household and target delivery of active travel infrastructure to reduce car dependency.</p>	<p><i>promotion of sustainable transport, soil conservation, the importance of green infrastructure, improved air quality, the use of renewable resources and the re-use of existing resources. Cognisance shall be had to the Limerick Climate Change Adaptation Strategy (2019) and any revised or forthcoming adaptation, mitigation or climate action strategies or plans at local, regional and national level in the formulation of any plans or policies.</i></p> <p>(ii) This issue is addressed in response to Submission 247 National Transport Authority regarding recommended amendment to TR O18 and TR O19 with proposed new additional objectives in association with BusConnects.</p> <p>(iii) Objective TR 023 sets out the Councils objective to facilitate the provision of Park and Ride facilities in line with the final LSMATs.</p> <p>(iv) Objective TR 014 outlines the Councils objective in relation to cycling and walking network for the City Metropolitan Area.</p> <p>5. Promoting Active Travel: The contents of the submission are noted and the Council are committed to implementing active travel measures and have been doing so, through Smarter Travel, since its introduction.</p>
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<p>The submission requests the following:</p> <p>(i) The immediate implementation of safe areas around all schools in the city and county such as School Streets /School Zones and these areas audited for safety and access, and active travel modes prioritised.</p> <p>(ii) Specific walking modal shift targets for each education sector.</p>	<p>(i) Objective TR O30 Behavioural Change Measures of the Draft Plan supports the implementation of behavioural change initiatives and the facilitation of school streets and school zones in the promotion of active travel options for Limerick’s children.</p> <p>There are a number of Limerick schools involved in the ‘Safe Routes to School’ (SRTS) programme which is funded by the Department of Transport through the National Transport Authority and coordinated by An Taisce’s Green Schools (ATGS). 37 Limerick schools applied to be involved in the programme with eight picked for the first round. Once one of the schools have completed the project, another school will be taken from the waiting list. ATGS are currently doing consultation with all the chosen schools and will then, go on to prepare an outline delivery plan. This plan will then be submitted to the Council for detailed design and implementation. Any school that is part of the SRTS programme is eligible to apply for bike parking under that programme and it will be delivered by Green Schools.</p> <p>In addition to the Safe Route, the Council are available to work with all schools in Limerick regarding mobility management planning. The interested school are welcome to contact the Council to develop proposal specific to their school.</p> <p>(ii) Limerick’s third level institutions are all NTA Smarter Travel Campus’s which includes working with both the NTA and LCCC in the implementation of site specific transport plans including a commitment to undertaking travel surveys on an ongoing basis.</p>
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- (iii) Safe, segregated footpaths and active travel corridors routes to all primary, secondary and further and higher educational institutions in city & county. To include increased permeability of residential neighbourhoods.
- (iv) Detailed survey of households with multiple car ownership to identify what specific infrastructure is required to allow reduced car dependency for school & associated trips
- (v) Annual updating of the targets achieved and measures needed to address shortcomings with regular meetings including active travel advocacy groups and education stakeholders.

6.Compact Growth and Revitalisation

In accordance with the ambition of the Plan to achieve compact growth it is set out that there is an opportunity here to concretise this ambition in an Objective which would recognise walkability in every aspect of compact growth. The submission requests the following:

- (i) The inclusion of a reference to walkability in Objective CGR O1 Place-making, Universal Design and Public Realm, to read: “It is an objective of the Council to: d) Ensure that all developments prioritise walkability in design, in order to create healthy, attractive, and accessible compact communities. “

- (iii) - (v) The Planning Authority acknowledge the value in requesting measuring active travel projects with respect to impact on traffic volumes, modal split, air quality and pedestrian route directness. A new Limerick active travel unit, which is funded by the Department of Transport, is in initial stages of being established within Limerick City and County Council. Such recommendations do not come under the remit of the Draft Plan; however, the proposed recommendations will be raised with this section for consideration.

6. Compact Growth and Revitalisation

The Draft Plan sets out the Council’s ambition for Limerick in terms of achieving compact growth and key to this is the integration of land use and transport planning.

- (i) Objective CGR O1 includes bullet point (a) Ensure that all developments are designed to the highest quality with respect to the principles of place-making, universal design and public realm including the guidance set out under the Urban Design Manual – A Best Practice Guide (2009) and the Design Manual for Urban Roads and Streets (2013). See response to Submission No. 44 Department of Transport and updating policy. DMURS aims to put well designed streets at the heart of sustainable communities to create connected physical, social

<p>(ii) That Limerick City and County Council commit within the Plan to becoming a signatory of the WALK21 International Charter for Walking. This is a common policy reference that cities, organisations, neighbourhood groups and individuals can sign up to and encourage more everyday walking and greater walkability in communities.</p>	<p>and transport networks that promote real alternatives to car journeys, namely walking, cycling or public transport. Inclusion of the principals of DMURS in overall designs ensures the creation of healthy, attractive and accessible compact communities.</p> <p>(ii) WALK21 International Charter: The Council acknowledge the value in committing to the WALK21 International Charter for walking and will raise this with the relevant sections of the Local Authority for consideration.</p>
<p>Chief Executive’s Recommendations</p>	
<p>1(i) - (ii) No change;</p> <p>2(i) Insert the following text into Policy TR P7 <i>Road Safety and Carrying Capacity of the Road Network</i> It is a policy of the Council to seek improvements to road safety and enhance the carrying capacity of the road network throughout Limerick, through minimising existing traffic hazards, <u>including access onto roads, which are substandard in terms of width and alignment and</u> preventing the creation of additional or new traffic hazards in the road network.</p> <p>(ii) Amend Chapter 6 in terms of structure and layout - see recommendations in submission 247;</p> <p>3. No change;</p> <p>4(i) No change;</p> <p>(ii) Replace objectives TR O18 and TR O19 with new objective on Limerick BusConnects – see recommendation in submission 247;</p> <p>(iii) - (iv) No change;</p> <p>5.-6. No change.</p>	
<p>SEA/ AA Response</p>	
<p>See SEA/ AA Response to Submission No. 247</p>	

No. 158	Ref. & Name/ Group:	LCC-C62-158 Iarnród Éireann
Submission/ Observation Summary		Chief Executive’s Response
<p>1. Existing Limerick Rail Network and Services: The submission outlines the existing rail network servicing Limerick, including a rail network map. The submission notes that movement within the environs of Limerick, which the railway serves in part, is characterised by high dependency on private transport, thus leading to the low-density settlement patterns and poor integration of public transport facilities and services.</p> <p>2. Need for Sustainable Mobility Solutions and the Role of Rail: The submission refers to the role that rail can play in supporting the sustainable growth and prosperity of Limerick City and County, and by extension the Mid-West Region. The submission outlines the strategic vision for rail and transport in Limerick City and the Limerick-Shannon Metropolitan Area set out in the Draft Limerick-Shannon Metropolitan Area Transport Strategy (LSMATS).</p> <p>3. Priorities for the future in Limerick: The submission outlines Iarnród Éireann’s priorities for key expansion projects and enhancements to the rail network to 2027. The submission notes the Department of Transport and the Department of Infrastructure (Northern Ireland) all-island Strategic Rail Review which will be prioritised by IE and request the Development Plan considers and supports the</p>		<p>1. Existing Limerick Rail Network and Services: Noted</p> <p>2. Need for Sustainable Mobility Solutions and the Role of Rail: Section 6.5.6 Rail Connections of the Draft Plan outlines the Council’s support to new and upgrading of existing rail networks and stations and the intermodal transfer between rail and other modes including Objective TR O21 Rail Network; Objective TR O22 Limerick to Foynes Line; Objective TR O20 Transport Interchange; Objective TR O19 Bus Lanes/Quality Bus Corridors. This issue is addressed in response to Submission No. 247 National Transport Authority.</p> <p>3. Priorities for the future in Limerick: The key priorities for Irish Rail in Limerick are noted.</p>

<p>outcome of the study. The key projects and enhancements to the rail network in Limerick include:</p> <p>(i) Implementation of the Limerick/Shannon Metropolitan Area Transport Strategy:</p> <p>(ii) The development of Colbert Station Transport Hub: The submission outlines how the Development Plan presents an opportunity to prioritise the phased development of rail and bus services at Colbert Station and transport interchange in tandem with LSMATS, and with the Colbert Station Quarter development and regeneration plan.</p> <p>(iii) Increased passenger service levels: The submission welcomes Objective TR O21 Rail Network. The submission notes that Iarnród Éireann will include the outcomes on Intercity and inter-regional connectivity from the all-island Strategic Rail Review by DoT/DfI(NI) as part of this priority once they are known.</p> <p>(iv) Colbert Station Quarter Development: Iarnród Éireann’s operational and currently disused railway lines penetrate the site of the Colbert Quarter development.</p>	<p>(i) The Council recognizes the potential of rail in transport planning in Limerick. Submission No. 247 National Transport Authority, referred to the change in emphasis of land use planning policy in Limerick to include the delivery of a commuter rail network as identified in the Draft LSTMATS. This issue is addressed in response to Submission No. 247 National Transport Authority.</p> <p>(ii) The Council supports the development of quality public transport interchanges, including Colbert Station, as a key transport hub and the central role it plays in encouraging and enabling modal shift in Limerick as outlined in Section 6.5.5 Public Transport Interchange. Through the implementation of the LSMATS, opportunities will be created for intermodal transfer between rail, bus, taxi and other sustainable modes of transport, such as walking and cycling.</p> <p>(iii) Noted and welcomed.</p> <p>(iv) The Draft Development Plan sets out policy support for the development of Colbert Station Quarter and also supports sustainable transport infrastructure and services.</p>
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<p>The submission notes the opportunity here to provide the Colbert Station Quarter development with access to a high-level of service of both Intercity and suburban rail services at an integrated transport hub at Colbert Station. The submission requests that Colbert Station Quarter and the supporting sustainable transport infrastructure and services should continue to be considered as key deliverables in the Development Plan.</p> <p>(v) Electrification – Intercity and Suburban Services: The submission outlines that the Limerick to Dublin mainline is a high potential line for investment in intercity electrification to de-carbonise the rail network.</p> <p>(vi) Re-introduction of Rail Freight (includes map of disused rail route between Limerick and Foynes): As part of the targeted growth for rail freight, Iarnród Éireann strongly believe there is a possibility for the reintroduction of rail freight in the Limerick Area with the reopening of the Foynes Line to service the Tier 1 Shannon Foynes Port. Objective TR O22 Limerick to Foynes Line is welcomed noting the reinstatement of the rail connection to the Port of Foynes will be fundamental to the growth objectives for both intermodal and bulk traffic at the port. The submission outlines how final Development Plan should include a firm commitment to examining and re-opening of the Foynes line for freight traffic.</p>	<p>(v) Noted and welcomed.</p> <p>(vi) Noted – The Draft Plan includes Objective TR O22 in support of the Limerick to Foynes Line. Timelines for the delivery of the Foynes to Limerick Rail Line is outside the remit of the Development Plan.</p>
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<p>(vii) Accessibility Programme: The submission requests support within the Plan on the further expansion of IE’s Accessibility Programme.</p> <p>(viii) The submission requests support within the Plan for Iarnród Éireann’s Customer Information Services (CIS) Strategy Report.</p> <p>(ix) The observer believes the Development Plan should support the implementation of the Sustainable Interchange Programme.</p> <p>(x) Park and Ride Strategy: The submission is in support of Objective TR O23 Park and Ride Facilities. The submission notes how IE are currently engaged with the NTA and Local Authorities in the implementation of a Park and Ride Strategy and request that the Development Plan support the implementation of a Park and Ride Strategy.</p> <p>4. Suburban Rail Possibilities in Limerick: The submission notes the rail possibilities in the Limerick Area:</p> <ul style="list-style-type: none"> - Re-opening the Foynes Branch to Adare and/or Mungret - Possible new station and Park and Ride at Ballysimon per the draft LSMATS, and/or Lisnagry 	<p>(vii) Iarnród Éireann’s Accessibility Programme is welcomed. Policy support for universal design and accessibility in relation to transport is provided in Objective TR O11 Universal Design.</p> <p>(viii) The proposals for enhanced information systems and information flow is welcomed. Objective TR O21 provides the policy support for such enhancement projects.</p> <p>(ix) The provision support for multimodal transport interchange is outlined in Objective TR O20. This issue is addressed in response to Submission No. 247 National Transport Authority.</p> <p>(x) The Planning Authority recognizes the importance of ensuring the policy provision is incorporated into the plan in support of Park and Ride in Limerick. LSMATS provides the commitment to the preparation of a Park and Ride Strategy for the Limerick Shannon Metropolitan Area as recommended in the Climate Action Plan. A Park and Ride Strategy will be determined by the National Transport Authority and the Local Authority following the preparation of other strategies including LSMATS.</p> <p>4. Suburban Rail Possibilities in Limerick: The Council will have regard to the outcomes of the revised LSMATS, which is due for publication in the coming months.</p>
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- Potential turnback and/or passing loop at either Sixmilebridge or Cratloe
- 3 possible new stations on the line to Ennis/Galway
- Construction of a new rail line to Shannon Airport

The submission recommends that the Development Plan should include a requirement to undertake an immediate feasibility study to map timelines and phasing of the rail possibility proposed during the first year of the adopted Plan.

5. Existing Iarnród Éireann Projects: The submission outlines the benefit of the DART+ programme on services from Dublin to and from Limerick improving intercity and inter-regional infrastructure capacity. In addition, the planned fleet enhancements when delivered, will allow for improvements in capacity and frequency on intercity services including Limerick, enhancing regional connectivity from Limerick County.

6. N/M20: The submission wishes to note that Iarnród Éireann is engaged with Phase 2 Option Selection assessment for the N/M20, which is ongoing. The submission encourages any road options progressed to be integrated with the railway along the route where possible, especially at a potential future Strategic Park and Ride’s such as the Ballysimon Site along with the Mallow and Blarney/Stoneview. The submission notes that connectivity

5. Existing Iarnród Éireann Projects: Noted and welcomed.

6. N/M20: The Draft Plan provides policy support for the delivery of infrastructure projects such as the N/M20 Cork to Limerick Project (Objective TR O1). The detail of the schemes is outside the remit of the Development Plan.

<p>to Cork directly by rail should be considered as an objective in the final Plan.</p> <p>7. Protected Structures: The submission notes that Iarnród Éireann has not received notice of any new structures to be added to the Register of Protected Structures and presume that there are no additions on railway property.</p> <p>8. Level Crossings: The submission outlines how IE would welcome the continued support of Limerick City and County Council where it is identified that opportunities exist to eliminate level crossings, in order to enhance safety on both the rail and road network, and to local residents and landowners.</p> <p>9. Impact of COVID-19: The submission outlines how from the perspective of developing a sustainable integrated transport system, COVID-19 does present an opportunity to change habits, and the promotion and priority of a sustainable rail centred integrated transport as key driver for the recovery of growth should be considered in the new Limerick Development Plan for the period 2022- 2028.</p> <p>The submission includes additional supportive material: Appendix A: LDA Colbert Station Quarter Site showing ownership and railway lines Appendix B: Comparator Possibility Maps Appendix C: Extent of DART+</p>	<p>7. Protected Structures: Where new additions were proposed to the Record of Protected Structures owners / occupiers were notified.</p> <p>8. Level Crossings: Noted. This is outside the remit of the Development Plan and will be addressed on a case-by-case basis.</p> <p>9. Impact of COVID-19: Content is noted.</p>
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Chief Executive’s Recommendations	
<p>1. No change;</p> <p>2. Amend Objective TR O21 to include reference to rail-based development – see recommendation in submission 247;</p> <p>3(i) -(viii) No change;</p> <p>3(ix) Omit the following text from Objective TR O20 - see recommendation in submission 247;</p> <p>3(x) No change;</p> <p>4. – 9. No change.</p>	
SEA/ AA Response	
See SEA/ AA Response to Submission No. 247	

No. 164	Ref. & Name/ Group:	LCC-C62-164 Stephan Murray
	Submission/ Observation Summary	
	Chief Executive’s Response	
	<p>1. Chapter 6 Sustainable Mobility and Transport: The submission stated the Development Plan should include a commitment to reduce car dependency. It is simply unfair to expect everyone to own a car in order to participate fully in society. The bus services must be improved. Limerick should develop connected network of cycle lanes built to higher standards than the few cycle lanes we have at present. The cities of Dublin and Cork are considered to be more advanced in this respect than Limerick.</p>	<p>1. Chapter 6 Sustainable Mobility and Transport: The Draft Plan includes a specific chapter addressing transport mobility, including facilitating modal shift from cars to more sustainable modes of transport including public transport, walking and cycling. Throughout the Plan there is the recurring theme of developing compact settlements through re-development of brownfield/infill sites, higher densities, transport hubs and interchanges between a number of modes of movement. This aligns with national and regional policy – both the NPF and RSES. The following policies are contained in Chapter 6 and have supporting objectives in same: Policy TRP1 Integration of Land Use and Transport Planning, Policy TRP2 Promotion of sustainable Patterns of Transport Use, Policy TRP3 Sustainable Mobility and Regional Accessibility and Policy TR P 4 Delivery of Transport Infrastructure in line with National Policy.</p>

Chief Executive’s Recommendations	
1. No change.	
SEA/ AA Response	
N/A	

No. 190	Ref. & Name/ Group:	LCC-C62-190 Cllr. Sasa Novak	
	Submission/ Observation Summary	Chief Executive’s Response	
	<p>1. Green Roofs: The submission seeks an objective of green roofs considering the benefits such as reducing surface water run-off and flood risk, cultivating wildlife habitats, sustainable drainage solutions improving water quality, visual amenity, noise reduction and temperature control properties, protection of roof membranes and dust and pollution absorption function, and opportunities for amenity and well-being.</p> <p>2.Sustainable Travel Emphasis: The Plan should have more focus on sustainable travel options for short-trip (<2km) and less emphasis on expanding the road network, which is costly in terms of maintenance, depletes air quality and contributes to inactive, unhealthy lifestyles and exacerbates traffic congestion.</p>	<p>1. Green Roofs: See response to Submission No. 155 in this regard.</p> <p>2. Sustainable Travel Emphasis: The Draft Plan supports the rebalancing of the transport system towards more sustainable modes of transport, in order to mitigate against the potential impacts of climate change and to remove congestion from our city, towns and villages. The Draft LSMATS sets out a framework for investment in transport for the Limerick Shannon Metropolitan Area for the next 20 years and includes proposals for the significant development of the cycle network and enhancement of bus services and infrastructure. One of the main focus areas of the plan is to achieve a modal transfer from short duration car mode trips to more active and public transport</p>	

	<p>3. Bike Parking: There are a lack of safe bicycle parking spaces adequate storage and security. All multi-storey car parks should be required to provide high quality bike parking similar to Drury Street Car Park. Similarly, these facilities should be available in Council car parks and public buildings. The submission suggests a pilot project for paid parking boxes to accommodate 10 bicycles.</p> <p>4. Recycling Facility: A recycling facility is required in the City Centre, whereby transport by car is not required.</p> <p>5. Electric Charging Points: Electric charging points should be mandatory in all planning applications.</p>	<p>modes. The BusConnects Limerick programme, included within the Strategy will provide a reliable, high frequency public transport service to improve connectivity of Limerick City and suburbs. In addition, the planned cycling network focuses on connecting key attractors, such as education, residential and employment areas.</p> <p>3. Bike Parking: The Draft Plan facilitates the implementation and delivery of LSMATS, which includes an objective in support of a significant uplift in provision of high quality, secure, short-stay cycle parking in the City Centre, metropolitan town centres, schools, rail and bus stations, public buildings, shopping areas and workplaces.</p> <p>4. Recycling Facility: The land use zoning objectives of the Draft Plan will generally permit recycling facilities on lands zoned Enterprise and Employment, Industry and Utilities. It is considered that there are sufficient zoned lands to facilitate the development of a recycling facility in close proximity to the City Centre.</p> <p>5. Electric Charging Points: The Council recognises the need for the development of infrastructure to support Electric Vehicle, however, it is not considered appropriate that every planning application will require the installation of a charging point. The text in Chapter 11 Development Management Section 11.8.6 on EV Charging Points requires updating to support the development of EV charging points.</p>
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<p>6. Residential Parking Design: The submission requests that in large housing estates parking should not be permitted at the front door as research has demonstrated people are less likely to use a car if parked further from the front door.</p> <p>7. Pedestrian Footpaths: The submission requests continuous footpaths in housing estates, the city centre and on high volume pedestrian routes are essential for ease and safety of movement. They are more inclusive and less discriminatory than the conventional footpaths.</p> <p>8. Fastfood/takeaways: The submission outlines how the Council should consider producing a strategy that limits the granting of permission for fast food and take away outlets to commercial areas, restrict their number and size, and prescribe acceptable distance to schools and residential areas.</p>	<p>6. Residential Parking Design: The Section 28 Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns & Villages) provides national guidance on residential parking. The guidelines outline that parking can be provided in an on-curtilage arrangement or in a grouped format depending on the type of layout proposed. The Draft Plan sets out maximum car parking standards for the first time, with an overall reduction in the required carparking across all classes of use. The location of car parking will be dealt with through the Development Management process.</p> <p>7. Pedestrian Footpaths: The Draft Plan recognises walking and cycling as the most sustainable forms of transport and the creation of safe, inclusive and attractive spaces to walk around is fundamental to achieve good place-making. However, there is a need to dish footpaths to allow for safe access and egress to property, to facilitate universal access and to ensure road safety, continuous footpaths are not appropriate in all instances.</p> <p>8. Fastfood/takeaways: It is an objective of Limerick City and County Council to prevent an excessive concentration of takeaways and to ensure that the intensity of any proposed takeaway is in keeping with both the scale of the building and the pattern of development in the area. Chapter 11 Section 11.6.2.2 outlines the development management standards for Takeaways/Restaurants/Kiosk/ Popup (Container) Trading Units and notes the provision of such facilities will be strictly controlled having regard to a number of conditions including the number/frequency of such facilities in the area, particularly in close proximity to schools. Planning applications will be assessed on a case-</p>
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		by-case basis, having regard to the Development Management Standards and also Section 28 Guidelines which require Planning Authorities, when assessing planning applications to give careful consideration of the appropriateness and or location of fast food outlets in the vicinity of schools and parks.
Chief Executive’s Recommendations		
<p>1. Update IN O10 and Section 11.3.11 to include: <u>Require green roofs for all roof areas for the following development types and encourage for all other types of development unless otherwise agreed with Limerick City and County Council's planning department:</u></p> <ul style="list-style-type: none"> - <u>Apartment Developments;</u> - <u>Employment Developments;</u> - <u>Retail Developments;</u> - <u>Leisure Facilities;</u> - <u>Education Facilities;</u> <p><u>All roofs of 300m² or greater to provide a minimum of 60% green roof coverage, unless exempted/ partially exempted.</u></p> <p>2. – 4. No change;</p> <p>5. Chapter 11 Development Management Section 11.8.6 as follows: All new car parks (other than residential development) will provide the necessary wiring/ducting capable of accommodating electric vehicle charging points at a rate of 10% of the total car park spaces and to the requirements of the ESB Networks and IEC 61851 Standard for Electric Vehicles Conductive Charging Points. This will also apply to applications seeking extensions to existing car parks. In new residential developments, each dwelling will be provided with charging point infrastructure and all parking spaces in an apartment/ duplex complex will be provided with EV infrastructure by the developer.</p> <p><u>Infrastructure for Electric Vehicles will be integrated into developments in line with national requirements. New applications for non-residential developments are to provide for at least one recharging point and the installation of up to 10% of the total car parking spaces for EV recharging for developments consisting of more than 10 car parking spaces (or as required by national policy should such requirement specify a higher provision). In all new residential developments and residential developments undergoing major renovations, a minimum of one car parking space per ten car parking spaces shall be equipped with one fully functional EV Charging Point. Where parking is provided within the curtilage of the dwelling, charging point infrastructure shall be provided to</u></p>		

	<p><u>accommodate future charging points. The Council will liaise with other agencies to secure the retrospective provision of EV recharging points within the public realm of settlements where appropriate.:</u></p> <p>6. - 8. No change.</p>
	<p>SEA/ AA Response</p> <p>See SEA/ AA Response to Submission No. 155 in relation to green roofs.</p> <p>See also SEA/ AA Responses to Submission No. 244 above in relation to sustainable transport links. As noted above dished and non-continuous footpaths are required to allow other forms of movement e.g., easy buggy access or to facilitate crossing points where footpaths and roads might intersect. To ensure more permeable and integrated transport infrastructure, variation in footpath design is required.</p> <p>The issue of the proliferation of takeaways and its effect on local amenity is recognised.</p> <p>Any policy changes resulting from the submission will be beneficial from an environmental perspective.</p>

No. 236	Ref. & Name/ Group: LCC-C62-236 Lisa Ruttle	
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Electric car charge points: This observation requests that electric car charge points and related infrastructure are mandatory in all builds and refurbishments across all developments.</p>	<p>1. Electric car charge See response to Submission No. 190 in this regard. The Council recognises the need for the development of infrastructure to support Electric Vehicle, however, it is not considered appropriate that every planning application will require the installation of a charging point. The text in Chapter 11 Development Management Section 11.8.6 on EV Charging Points requires updating to support the development of EL charging points.</p>
	Chief Executive’s Recommendations	
	<p>1. Amend Chapter 11 Development Management Section 11.8.6 in relation to EV charging points - see recommendation to Submission 190.</p>	
	SEA/ AA Response	

See SEA/ AA Response to Submission No. 190

No. 247	Ref. & Name/ Group:	LCC-C62-247 National Transport Authority	
	Submission/ Observation Summary		Chief Executive’s Response
	<p>1. Strategic Overview: The submission refers to the in-dept analysis of the forecast demand for Travel in the Limerick Shannon Metropolitan Area, including Limerick City and Suburbs, that was undertaken. The most effective way to encourage a modal shift from the private car to sustainable modes was to deliver a comprehensive high-quality bus network and a safe, convenient and comprehensive cycle network. The NTA recommends that the role of bus and cycling in meeting Limerick’s obligations in relation to transport emissions, and the associated need for investment in these modes in the immediate term, is fully highlighted in the Development Plan.</p> <p>2. Consolidation of Development: (i) The submission notes extension to Raheen as provided for in the Southern Environs LAP, and new zonings for Enterprise and Employment at Moyross and on the old Ballysimon Road. It is recommended that the zoning objectives of the Draft Development Plan are reviewed to ensure the following: Development of peripheral land shall incorporate sustainable transport measures from the outset and will be</p>		<p>1. Strategic Overview: The contents are noted. The Council recognise the level of analysis that has been carried out in the preparation of the LSMATS and the role that sustainable transport measures will play in the future development of Limerick. The Council is committed to working with the NTA to finalise and implement the approved LSMATS document on completion.</p> <p>2. Consolidation of Development: (i) The Council recognises the importance of compact growth for both residential and employment uses and the sequential approach to development. The formulation of the Draft Limerick Development Plan has very much centred around this approach to development, in line with the NPF and the RSES. The draft plan also places a strong emphasis on integration of land-use, transport planning, and had particular regard to the Draft Limerick – Shannon Metropolitan Area Transport Strategy. However, for Limerick to become a centre of scale as proposed in the NPF there is a need for sufficient enterprise and employment zoned lands.</p>

<p>designed in such a way as to confer an advantage on public transport, walking and cycling;</p> <p>(ii) The Enterprise and Employment zoning objective should exclude office development and shall be limited to low-intensity employment uses only. Only exceptional cases, where it has been demonstrated that the proposal could not be accommodated in the city centre and where there are imperative reasons for its development, may be permitted. This zoning objective should also state that development proposals shall be subject to a transport plan which demonstrates how the development will operate in a sustainable manner whereby public transport, walking and cycling are the principal modes, and in a manner which does not generate significant numbers of car trips on the local road network and does not impact materially on the carrying capacity of the national road network.</p> <p>3. Rail Based Development: The submission refers to the change in emphasis of land use planning policy in Limerick to include the delivery of a commuter rail network as identified in the Draft LSMATS. The submission recommends that the land use policies and objective, and the overall thrust of the Limerick Development Plan – which seeks to consolidate development into the city centre and existing urban footprint – is maintained in the</p>	<p>Response to recommendation 12 of the OPRs submission (submission no. 225) deals with this issue further.</p> <p>(ii) The concerns regarding the Enterprise and Employment zoning objective are noted. The Council consider office development as ‘open for consideration’ on lands zoned Enterprise and Employment, 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. ECON O22 deals specifically with office development and outlines that the appropriate location for office development would generally be on appropriately zoned lands in employment zoned areas, Limerick City Centre, Town Centres and District Centres in accordance with the zoning matrix. Each application will be assessed on a case-by-case basis, having regard to all policies set out in the Draft Development Plan, including policies in relation to sustainable transport and modal shift.</p> <p>3. Rail Based Development: Noted. The plan will be amended to set out that the Council commits to the explore a pathway to rail-based development in the review of the RSES and MASP in conjunction with the NTA and Southern and Western Regional Assembly.</p>
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<p>finalisation of the plan, and that a policy objective is inserted stating that the Council will cooperate with the NTA and Southern and Western Regional Assembly in exploring a pathway to rail-based development in the review of the RSES and MASP.</p> <p>4. Transport Policy: The submission welcomes the broad thrust of Policies TR P1-4. It is noted, however, that prominence is given in the text to major road schemes as Key Enablers for Growth under Objectives TR01 to TR08. The submission makes the following recommendations:</p> <p>(i) Commitment to the emerging recommendations of the Five Cities Demand Management Study should be incorporated as a policy objective;</p> <p>(ii) Commitment to the emerging recommendations of the National Investment Framework for Transport Investment should be incorporated as a policy objective;</p> <p>(iii) Objectives TR01 to TR08 should be removed from Section 6.4 and placed into the Roads Section</p> <p>5. LSMATS Transport Investment Priorities: The submission makes the following recommendations:</p>	<p>4. Transport Policy: The contents are noted and the Council recognise the concerns highlighted. The Chapter will be amended to take account of the prominence of road projects and emphasis the sustainable transport priorities that the Chapter contained and also to emphasis the commitment of the Council to sustainable transport and modal shift.</p> <p>(i) The Local Authority is committed to addressing the carbon, congestion and air quality challenges facing Limerick. In that regard, an objective will be included to support the recommendations emerging from the Five Cities Demand Management Study.</p> <p>(ii) This issue has also been addressed in response to Submission No. 44 and the plan will be updated as requested.</p> <p>(iii) In the interest of clarity and legibility, a review and update of the entire structure of Chapter 6, will be undertaken.</p> <p>5. LSMATS Transport Investment Priorities:</p> <p>(i) Noted; see response to 4(iii) above.</p>
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<p>(i) Objective TR O12 and supporting text is moved to a new section covering Metropolitan Transport Planning;</p> <p>(ii) Remove “in the summer of 2021” from the text relating to the review of LSMATS;</p> <p>(iii) Provide clarity on the text of Objective TR O12 and Policy TR P6 as there may be a drafting error;</p> <p>(iv) Remove reference to the LSMATS in terms of identifying specific pedestrian linkages in Objective TR014;</p> <p>(v) Include a list of cycle routes within TR O15 which the Local Authority considers a priority for delivery within the lifetime of the Development Plan;</p> <p>(vi) Consider removing Objectives TR O18 and TR O19 and replacing with one overarching Objective to deliver the BusConnects Limerick Programme, with reference to the following;</p> <ul style="list-style-type: none"> - An improved Metropolitan Bus Service Network which will deliver a step change in the quality of the bus service across the city and suburbs; - A programme of Core Bus Corridors which will seek to provide end-to-end full bus priority on key bus routes via measures such as new bus lanes; bus 	<p>(ii) Noted; text will be deleted as suggested.</p> <p>(iii) Objective TR O12 and TR P6, will be updated to incorporate the comments.</p> <p>(iv) Objective TR O14 will be updated to incorporate the comments.</p> <p>(v) The LSMATs will set out the cycle network to be developed within the life time of the plan and Objective TR O15 supports the implementation of this programme, with priority given in the short term to delivering the primary cycle network and cycle routes serving schools. It is not considered necessary to amend the objective.</p> <p>(vi) Objective TR O 18 and TR O19 shall be omitted and replaced with one new objective.</p>
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	<p>gates and bus priority signals, in order to ensure that bus services are no longer subject to traffic congestion impacts in Limerick, with the following corridors a priority:</p> <ul style="list-style-type: none"> - from the M7/Dublin Road junction to the City Centre; - from Mungret, Raheen and Dooradoyle to the City Centre; - on the Ennis Road to the City Centre; - on the Ballysimon Road from the proposed Park and Ride site to the City Centre; and - on Childers Road between Parkway Roundabout and Ballinacurra Road; <ul style="list-style-type: none"> o To provide for further bus priority measures on radial routes into the city centre, as identified by the NTA and Limerick City and County Council as part of BusConnects Limerick; o To provide for bus priority measures through the development site to the rear of Colbert Station, as part of an emerging masterplan to be agreed between the NTA, Limerick City and County Council, the landowner, and other stakeholders; o To provide for bus priority through Limerick City Centre linking the Dublin Road Bus Corridor to the Raheen/Dooradoyle corridor, with a preference for O’Connell Street as the most direct route into the centre, delivering passengers as close as possible to their destinations; 	
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<ul style="list-style-type: none"> o To increase the capacity of Sarsfield Bridge by reallocating the carriageway to the movement of buses, cyclists, pedestrians and taxis; o To carry out any minor works required to facilitate additional and altered service patterns arising out of a review of the service network under BusConnects Limerick; and o To prepare a strategy for the management of coaches in collaboration with the NTA. <p>(vii) Maintain an objective to safeguard the proposed Core Bus Corridors from inappropriate development and ensure adequate set back is maintained to facilitate the implementation of the programme, in consultation with the NTA;</p> <p>(viii) In relation to Limerick County, outside the Metropolitan area, the NTA is committed to ongoing review and enhancements to the inter-city, regional and commuter services. It is recommended that an objective is included in the Draft Development Plan reflecting the requirement to facilitate such improvements;</p> <p>(ix) Remove “with the rail network and proposed Park and Ride services” from Objective TR 020 as the term ‘interchange’ relates to bus-bus interchange and cycle-bus as well as bus-rail;</p>	<p>(vii) The new amended Objective will incorporate the policy support, which was identified in TR 019 to safeguard proposed core bus corridors from inappropriate development and ensure adequate set back is achieved.</p> <p>(viii) The Local Authority is committed to facilitating enhancements to the inter-city, regional and commuter services. An additional objective will be under Section 6.8 Rural Transport in support of this commitment by the National Transport Authority;</p> <p>(ix) Noted, will be carried out in compliance with recommendation;</p>
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<p>(x) Insert a new objective, or amend Objective TR O21 stating that the Local Authority will facilitate the investment in new rail stations and services across the County as identified in the LSMATS</p> <p>6. Limerick City Centre Traffic Management Plan: The submission welcomes the commitment given to the progress and completion of the Limerick City Centre Traffic Management Plan. The submission notes some of the key challenges/issues for consideration: the one-way traffic system, the current environment and the significant challenges for cycling and on-street parking. The NTA recommends that Objective TR O42 is amended to include a specific commitment to review, as part of the Limerick City Centre Traffic Management Plan, the one-way traffic system and the quantum, location and layout of on-street parking, with the aim of providing for safe and convenient movement by walking and cycling.</p> <p>7. Parking Standards: The submission welcomes the use of maximum parking standards and the application of a zonal approach.</p> <p>(i) In relation to Zone 1, Limerick City Centre, the NTA is of the view that development could proceed here without the provision of parking. The submission recommends that an additional policy objective is inserted into the Development Plan which states that car-free developments will be considered in Zone 1, and changes made to all parts</p>	<p>(x) Noted, new objective shall be included as recommended.</p> <p>6. Limerick City Centre Traffic Management Plan: Noted. It is considered necessary to amend Objective TR O42 to include reference to a review of the traffic system and the quantum, location and layout of on-street parking, with the aim of providing for safe and convenient movement by walking and cycling.</p> <p>7. Parking Standards:</p> <p>(i) The Council is committed to support the shift away from car dependency and to support the modal shift to alternative modes of transport. In this regard, Table DM 8(a) and 8(b) in Chapter 11 Development Management Standards shall be amended to include reference to the consideration of car free developments in Density Zone 1. Clarification shall also be provided in the text with regards to maximum and minimum standards.</p>
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of Table DM 8(a) to highlight the potential for such an approach.

(ii) The submission notes concern related to the Bicycle Parking Standards, in particular how the minimum standards are set to 10% for all locations for employment uses and proposes a zonal based approach be applied. The submission recommends that bicycle parking standards are revisited with a view to a more ambitious level of provision being required.

8. Electric Vehicles: The submission outlines how it is essential that this Development Plan sets out a clear pathway as to how the Local Authority, within its remit, will contribute to the decarbonisation of the transport fleet. The NTA therefore welcomes the commitment to the provision of EV charging points as set out in the plan. The submission includes a recommendation that the approach to Electric Vehicles as set out in the Draft Development Plan is maintained in the finalisation of the plan.

9. Mode Share Targets: The submission supports Objective TR013 as complementary to the objectives of the LSMATS. The submission refers to the figures quoted and notes they are not targets, but outcomes of the modelling process used in the Draft LSMATS. The submission notes that in reviewing the Draft LSMATS, the NTA are now satisfied that targets for walking and cycling can be included in the

(ii) Bicycle Parking Standards shall be amended to include an increase to the minimum standards set for locations for employment uses.

8. Electric Vehicles: The text in relation to Electric Vehicles has been enhanced in Chapter 11, to provide greater clarity with regard to implementation, see response to Submission No.190.

9. Mode Share Targets: The Council notes the concerns of the NTA in relation to mode share targets and acknowledge that the OPR have raised similar concerns. A revision of Mode Share Targets, including baseline figures for modal share for the overall county and modal share targets for the plan period is proposed for inclusion.

<p>Development Plan. The submission recommends the inclusion of mode share targets for all trips in the Development Plan for Limerick City and Suburbs for the year 2040: Walking – 35% & Cycling – 15-20%.</p>	
<p>Chief Executive’s Recommendations</p>	
<p>1. – 2. No change;</p> <p>3. Amend Objective TR O21 to include the following: Objective TR O21 - Rail Network - It is an objective of the Council to: Objective (Revised TR O16) (Old Objective TR-O21) - Rail Network - It is an objective of the Council to: <u>(a) Explore a pathway to rail-based development in the review of the RSES and MASP in conjunction with the National Transport Authority and the Southern and Western Regional Assembly</u> <u>(b) Support and encourage, and facilitate new and upgrading of existing rail networks, railway stations and services across Limerick as identified in LSMATS and protect, as required, lands necessary for the upgrading of existing railway lines or stations, which would improve journey times and enable an increase in the frequency of services and connections</u> 4(i) Include the following new section under Transport Policy and associated objectives. <u>The Five Cities Demand Management Study - The Five Cities Demand Management Study identifies transport demand drivers, and assesses the suitability of measures to reduce demand in Ireland’s five largest urban centres—Dublin, Cork, Waterford, Limerick, and Galway. As part of the Study, measures were examined using insight from international best practice and national stakeholder engagement in order to assess their impact in reducing emissions, tackling congestion, improving air quality, and improving the overall urban environment of the five cities. The Strategy provides a focused and evidence-based approach to addressing the carbon, congestion and air quality challenges facing Irish Cities.</u> (i) Insert new Objective as follows: <u>It is an objective of the Council to support the recommendations of the Department of Transport’s Five Cities Demand Management Study in addressing the carbon, congestion and air quality challenges facing Limerick;</u> (ii) Insert new objective as follows: <u>It is an objective of the Council to support the implementation of the Department of Transport’s National Investment Framework for Transport Investment.</u> (iii) Amend the overall layout and structure of Chapter 6. 5. (i) See recommendation 4(iii); (ii) Amend Section 6.5 Sustainable Mobility to remove the following text in the summer of 2021. (iii) Correct error made to TR O12 and separate text from objective - see overall layout and structure Change to Chapter 6.</p>	

(iv) Amend Objective TR O14 as follows: Objective TR O14 Walking and Cycling Infrastructure It is an objective of the Council to: a) Improve and provide clear, safe and direct pedestrian linkages, cycle networks ~~as identified in the final Limerick Shannon Metropolitan Area Transport Strategy~~, including the greenways and primary segregated cycle routes, between the employment zones, shopping areas and residential areas throughout Limerick; b) Maintain and expand the pedestrian route network, infrastructure and where possible retrofit cycle and pedestrian routes into the existing urban road network, to provide for accessible safe pedestrian routes within Limerick.

(v) No change;

(vi) Remove Objectives TR O18 and TR O19:

~~**Objective TR O18 Protect Existing Bus Services** It is an objective of the Council to support the operation of bus services, by facilitating the provision of improved facilities and services for bus users in Limerick, including the provision of set down areas for coaches and bus shelters at bus stops, where feasible.~~

~~**Objective TR O19 Bus Lanes/Quality Bus Corridors** It is an objective of the Council to: a) Support and facilitate implementation of an integrated, multi-modal and accessible public transport network, catering for all members of society across the Metropolitan Area, including a future BusConnects Limerick programme and investment in the rail network that will be identified in the LSMATS; b) Safeguard the proposed quality bus corridors from inappropriate development and ensure adequate set back is maintained to facilitate the implementation of the programme, in consultation with the Local Authority.~~

Include new Objective as follows: It is an objective of the council to support the implementation of the Limerick BusConnects programme including the following:

(i) An improved Metropolitan Bus Service Network which will deliver a step change in the quality of the bus service across the city and suburbs;

(ii) A programme of Core Bus Corridors, which will seek to provide end-to-end full bus priority on key bus routes via measures such as new bus lanes; bus gates and bus priority signals, in order to ensure that bus services are no longer subject to traffic congestion impacts in Limerick, with the following corridors a priority:

- from the M7/Dublin Road junction to the City Centre;
- from Mungret, Raheen and Dooradoyle to the City Centre;
- on the Ennis Road to the City Centre;
- on the Ballysimon Road from the proposed Park and Ride site to the City Centre; and
- on Childers Road between Parkway Roundabout and Ballinacurra Road;

- (iii) To provide for further bus priority measures on radial routes into the city centre, as identified by the NTA and Limerick City and County Council as part of BusConnects Limerick;
- (iv) To provide for bus priority measures through the development site to the rear of Colbert Station, as part of an emerging masterplan to be agreed between the NTA, Limerick City and County Council, the landowner, and other stakeholders;
- (v) To provide for bus priority through Limerick City Centre linking the Dublin Road Bus Corridor to the Raheen/Dooradoyle corridor, with a preference for O’Connell Street as the most direct route into the centre, delivering passengers as close as possible to their destinations;
- (vi) To increase the capacity of Sarsfield Bridge by reallocating the carriageway to the movement of buses, cyclists, pedestrians and taxis;
- (vii) To carry out any minor works required to facilitate additional and altered service patterns arising out of a review of the service network under BusConnects Limerick

Include new Objective as follows: It is an objective of the Council to prepare a strategy for the management of coaches in collaboration with the National Transport Authority.;

(vii) Include new Objective as follows: It is an objective of the Council to safeguard the proposed Core Bus Corridors from inappropriate development and ensure adequate set back is maintained to facilitate the implementation of the programme, in consultation with the NTA;

(viii) Include the following objective under Section 6.8 Rural Transport: It is an objective of the Council to support and facilitate the on-going review and enhancements to the inter-city, regional and commuter services.;

(ix) Omit the following text from Objective TR O20

Objective TR O20 Transport Interchange It is an objective of the Council to facilitate the provision of quality transport interchanges ~~with the rail network and proposed Park and Ride services,~~ in order to facilitate focused access to multiple public transport modes and to maximise the movement of people via sustainable modes;

(x) Amend and update in Objective TR O21: Rail Network It is an objective of the Council to

Objective (Revised **TR O16**) (Old Objective **TR O21**) - **Rail Network** - It is an objective of the Council to:

(a) Explore a pathway to rail-based development in the review of the RSES and MASP in conjunction with the National Transport Authority and the Southern and Western Regional Assembly

(b) Support ~~and encourage~~, and facilitate new and upgrading of existing rail networks, railway stations and services across Limerick as identified in LSMATS and protect, as required, lands necessary for the upgrading of existing railway lines or stations, which would improve journey times and enable an increase in the frequency of services and connections

6. Amend Objective TR O42 as follows: Limerick City Centre Traffic Management Plan It is an objective of the Council to facilitate the completion and implementation of the Limerick City Centre Traffic Management Plan, for the rebalancing of the City’s Street network towards sustainable modes of transport and management of all transportation modes, in compliance with the principles of LSMATS.

This will include a review of the traffic system and the quantum, location and layout of on-street parking, with the aim of providing for safe and convenient movement by walking and cycling.

7. Parking Standards: Amend Table DM 8(b) as follows:

(i) ~~Parking requirements may be relaxed in exceptional circumstances.~~

Car free developments will be considered for all proposals in Zone 1 on a case-by-case basis. In some limited circumstances, a higher or lesser standard may be appropriate. Proposals for the provision of car parking for residential development at a reduced rate to the maximum standards will be considered where the Planning Authority are satisfied that good public transport links are already available or planned. The developer will submit a Justification Assessment in the Mobility Management Plan providing the rationale for the deviation from the parking standards above and of national planning guidance for their proposed development. Applicants are advised to avail of pre-planning consultations with the Planning Authority prior to submitting planning applications.

Exceptional circumstances may include:

- Limited/Restricted site area - Site size whereby refurbishment on sites of any size or urban infill schemes on sites of up to 0.25ha, car parking provision may be relaxed in part or whole, on a case-by-case basis, subject to overall design quality and location;
- ~~Proximity to public transport service;~~
- Sustainable travel infrastructure supported by a Mobility Management Plan;
- Availability of car sharing and bike/e-bike sharing facilities on-site and in the vicinity;
- Existing car parking in the vicinity, including on street and the potential for dual use subject to agreement and management details;
- Impact on traffic safety and the capacity of the road network;
- Urban design, regeneration and civic benefits of the proposal including enhancement of public realm

(ii) Amend the Bicycle Parking Standards to include an increase to the minimum standards set for locations for employment uses.

This has been increased to 20-25% for all locations for employment uses.

Remove the following text from Section 11.8.3 as follows:

~~Parking for cars and bicycles will be provided at a minimum in accordance with DM Table 8a/8b below~~

8. See recommendation to Submission No.190 in relation to EV charging points.

9. Relocate Section 6.5.13 and associated Objective TRO30 to new Section named ‘Active Travel’. In addition, amend and update Section 6.5.1 as follows:

Active Travel

Active travel includes only those forms of transport that require using your own energy to travel. This includes walking, cycling or other non-motorised wheel-based transport modes for purposeful travel rather than for leisure reasons. Active travel is usually focused on shorter trips as a natural choice for every day journeys such as to school, work, social or shopping. There are many positive health, environmental and economic benefits from participating in active travel including reduced road congestion, improved air quality, addressing climate change and reduced social exclusion.

Following the announcement of significant funding by the Department of Transport, a new Limerick active travel unit has been established within Limerick City and County Council. The Council is committed to supporting active travel measures including the investment in sustainable infrastructure to better connect communities creating new walking and cycling links and reducing the physical barriers that currently exist.

Redesigning our streets to prioritise walking, cycling and other non-motorised wheel-based modes is just one crucial aspect of enabling and creating a modal shift from the private car, we also need to support individual citizens to make the switch to active travel through behavioural change projects and support initiatives.

New Subsection: Promoting Modal Split

A key priority for the Draft Plan is the development of a sustainable transport system, promoting measures to increase the use of public transport, while also increasing the modal share for walking, cycling and car share/pool schemes in the City, towns and villages across Limerick. A transition towards more sustainable modes of transport is essential to reduce Ireland’s carbon emissions and reach the Government’s goal of a 50% reduction in carbon emissions by 2050.

In order to achieve more sustainable travel patterns, a significant focus on reducing car dependency and increasing permeability is required. One of the main focus areas is to achieve a modal transfer from short duration car mode trips to more active and public transport modes. More focused investment (be it infrastructure or behavioural change measures) on increasing walking and cycling for short trips is required to increase uptake of sustainable transport options and in doing so, reducing car mode share.

To ensure the effective planning, implementation and monitoring of the development plan in relation to sustainable mobility and transport, it is important to first look at where Limerick is with regards to existing baseline modal split. Analysis of POWSCAR data for Limerick shows the obvious imbalance of our transport system to the private car for all trips. It also presents where opportunities exist for movements to more sustainable and active transport options. A full breakdown of baseline modal split is provided in Table XX. There is significant scope to achieve modal shift to sustainable modes of transport. In particular, there are opportunities to convert many of the shorter journeys (under 2km) from the private car to walking and cycling.

On analysis of POWSCAR trip data for education and work based travel, the following travel patterns were established.

- The most popular means of travel for those living in Limerick City and Environs was by car (44%) which increased to 64% for those travelling for work purposes only.
- 37% of those living in Limerick City and Environs travelling for work purposes are travelling within six minutes of their workplace (15,424 people); 22% use walking as their primary mode for work and school (16% to work, 33% educational) and 4% are travelling by bike (4% to work, 3% for educational purposes).
- The most popular means of travel for Newcastle West was by car 52%, however, 56% of those commuting for work purposes are within a 7-minute journey time of their workplace; 476 people living in Newcastle West are within a 4-minute drive of their workplace. 14% of workplace/educational trips were made by walking. This increased to 24% for education purpose trips only.
- The most popular means of travel for those living outside Limerick City and Environs is by car at 54% but this increases to 80% for work purposes only. Total number of those who travel by walking for work and/or school purposes is 7% (Work (4%), Education (12%)). Trips taken by bike are at 1% for both education and work purposes.

Table XX: Baseline Mode Share

Baseline Mode Share (%) for Commuting to Work/Educational Purposes

Settlement	Walk	Cycle	Public Transport	Car
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Limerick and Environs (All Work/Education Trips)	22	4	8	44
Work Trips	16	4	16	64
Edu Trips	33	3	13	8
Newcastle West (All Work/Education Trips)	14	1	4	52
Work Trips	9	1	1	73
Edu Trips	24	1	11	56
Settlement Levels 3- 6/Rural Areas (All Work/Education Trips)	7	1	8	54
Work Trips	4	1	1	80
Edu Trips	12	1	19	57

Table XX provides the 2028 mode share target for commuting to work and education and includes walking/cycling/public transport mode share targets for the LSMATS study area, Limerick City and Environs, Newcastle West and the remainder of the County.

Following consultation with the National Transport Authority, both work and school trips have been considered for both baseline and modal share targets. Based on existing scenarios and in line with LSMATS, the Council are confident that the targeted modal shift is achievable. It is noted that the target audience is not just workplace and educational based travel but all transport associated travel.

POWSCAR modal split data is the most robust data available and is shown in Table X below. The majority of people driving to work travel relatively short distances. This group will offer the greatest potential for modal shift, as these journeys can be most easily shifted to walking and cycling.

Table XX: Target Mode Share

LSMA Mode Share Targets (%) for Commuting to Work/Educational Purposes

Settlement	Walk		Cycle	
	2040	2028	2040	2028
Limerick Shannon Metropolitan Study Area	35	15-20	15-20	7-10
Mode Share Targets (%) for Commuting to Work/Educational Purposes (2028)				
Settlement	Walk		Cycle	Public Transport
Limerick and Environs (All Work/Education Trips)	30%		10%	14%
Newcastle West (All Work/Education Trips)	20%		5%	7%
Settlement Levels 3-6/Rural Areas (All Work/Education Trips)	15%		5%	12%
<p>The data confirms and highlights the challenges facing Limerick, in both the urban and rural context, with regard to promoting a modal shift away from the private car. The Draft Plan will strive to reduce the reliance on the private car, by promoting and facilitating more sustainable modes of transport and supporting development in locations, which can support compact growth. In facilitating the delivery of the objectives of the final LSMATS and in pursuing the objective of encouraging modal shift, the Council will co-operate closely with other relevant agencies and stakeholders, including the NTA and TII.</p> <p>The Draft Limerick Shannon Metropolitan Area Transport Strategy sets out a number of key outcomes for walking, cycling and public transport in Limerick. A 2.1% increase in walking, 2.1% increase in cycling and 5.1% increase in public transport use are sought by 2040. The Council will seek to deliver on the targets identified in the Draft LSMATS for all urban areas within Limerick</p>				
Relocate TR O13 and TR O30 to follow the above text in the restructuring of Chapter 6.				

	SEA/ AA Response
	See SEA/ AA Response to Submission No’s 244, 137 and 153.

Theme 12: Environment

No. 25	Ref. & Name/ Group:	LCC-C62-25 Dealga O’Callaghan
Submission/ Observation Summary		Chief Executive’s Response
<p>1. Trees, Landscape and Green Infrastructure:</p> <p>(i) The submission outlines concerns regarding the lack of joined up thinking around trees in the Draft Plan. While there is emphasis on the protection of health and wellbeing, climate change and air quality, there is little or no mention of the significant role that trees play in these areas.</p> <p>(ii) The submission outlines how the Draft Plan does not contain any policies about trees despite all the benefits they provide and the fundamental role in the terrestrial ecosystem. The Plan should contain tree policy statements for the following areas:</p>		<p>1. Trees, Landscape and Green Infrastructure:</p> <p>(i) The impact of climate change is recognised throughout the Draft Plan and is a common theme across each chapter. Whilst there is no specific policy/objective with respect to the significant role that trees play in health, wellbeing, climate change and air quality, the Draft Plan acknowledges the significant role of natural heritage (including trees) in the future development of Limerick.</p> <p>Also, the Council are currently preparing a ‘Draft Tree Policy’ which aims to ensure a planned approach to the management of the Council’s tree stock and represents a significant change in how the Council manage trees, with the development of a more strategic, proactive, planned approach to inspection, planting, maintenance and management.</p> <p>(ii)The Draft Plan sets out a number of interlinked strategic objectives. Strategic Objective 8 of the Draft Plan states: Protect, enhance and connect areas of natural heritage, green infrastructure and open space for the benefits of quality of life, biodiversity, protected species and habitats, while having the potential to facilitate climate change adaptation and flood risk</p>

<ul style="list-style-type: none"> i. General tree management policies; ii. Policies for the management of street and highway trees; iii. Policies for trees in parks and open spaces; iv. Woodland management policies; v. Policies for trees on private land; vi. Trees and development policies; vii. Policies for tree planting, design and establishment; viii. Tree biosecurity policy to prevent the introduction of exotic pests and diseases such as Chalara ash decline and the my phythophthora species. 	<p>measures. In support of Strategic Objective 8, there are a number of specific polices/objectives across the individual chapters of the Draft Plan.</p> <p>The Draft Plan recognises that the conservation and enhancement of and access to Limerick’s heritage has the potential to contribute to individual well-being, shared community identities, social cohesion and the liveability of our towns and villages as well as our visitor economy. This is reinforced in Policy EH P2 Sustainable Management and Conservation which states that, it is a policy of the Council to ensure the sustainable management and conservation of areas of natural environmental and geological value within Limerick and to protect, enhance, create and connect, where ecologically suitable, natural heritage, green spaces and high-quality amenity areas for the benefit of biodiversity.</p> <p>With respect to Trees, Section 5.3.5 Trees, Tree Preservation Orders and Hedgerows sets out the importance of trees, hedgerows and woodlands to the landscape of Limerick, in addition to supporting a wide range of wildlife. The Draft Plan recognises that trees, at different stages of growth, provide multiple habitats for the creatures that depend on them. Section 5.3.5 sets out that the retention of existing tree cover is a priority for the Council, not just for the amenity and ecological value, but also because of the carbon storage capacity of older trees. In addition, planting trees can serve as part of climate mitigation.</p>
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	<p>Section 5.3.5 also establishes that where trees and groups of trees are of particular importance in a local area and may be at risk from surrounding activities, consideration will be given to the making of Tree Preservation Orders.</p> <p>Section 8.2.3 Climate Adaptation sets out factors to be considered in terms of climate adaptation including:</p> <ul style="list-style-type: none">• Encourage the adoption of nature-based solutions and the provision of blue –green infrastructure in all situations;• Require new developments to demonstrate that climate risk and energy efficiency has been considered in the design of buildings and the site layout and ensure that the location, layout and design of new development accommodate predicted future climate change impacts. <p>This section could be enhanced with the inclusion of the following: <u>including the retention and integration of existing natural landscape features such as trees and hedgerow into the design of all new development.</u></p> <p>Furthermore, Chapter 11 Development Management establishes a number of standards to be adhered to when assessing planning application where trees are present on site. The Draft Plan provides for appropriate measures to manage and protect trees as part of all new developments and measures to address urban greening, nature based play solutions, implementation of the All-Ireland Pollinator Plan and the</p>
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	<p>(iii) A tree policy should include the following aims and objectives:</p> <ul style="list-style-type: none"> - To protect and care for Limerick’s trees; - To plant more trees in the right places; - To promote education and awareness of trees; - To cooperate and engage with communities and relevant stake holders. 	<p>integration of green infrastructure SUDs solutions, including tree root systems.</p> <p>In the context of the overriding policies/objectives and supporting text of the Draft Plan across the entire document, the Council consider adequate recognition has been given to the health, wellbeing, climate change and air quality and the role that trees play in this regard. However, the lack of emphasis on the retention of trees in terms of policy provision is recognised. Accordingly, it is proposed to amend Objective EH O10 Trees and Hedgerows to seek to retain trees in so far as possible.</p> <p>(iii) The Council are currently in the process of preparing a Tree Policy for Limerick. The policy document when completed will address in more detail the amenity, ecological and health benefits of trees and put forward suggestions for the expansion, management and protection of tree stocks within Limerick. The Strategy will establish a clear distinction between park land trees, street trees and trees in public and private ownership and set out proposals for appropriate management in each case. The policy document will also have content in relation to trees and climate change and the incorporation of trees into SUDs projects. The Council through various initiatives are engaged in education and training and will continue to work with all relevant stakeholders to progress the Tree Policy for Limerick.</p> <p>(iv) The recruitment and staffing of the Council are outside the remit of the Development Plan. Refer to item (iii) above.</p>
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<p>(iv) Limerick should appoint a suitably qualified person such as an Arboricultural/Tree Officer to advise and address all issues concerning trees and to write a Tree Policy/Strategy document.</p> <p>(v) A biosecurity policy should also be produced.</p>	<p>(v) Biosecurity is will be addressed in the Tree Policy document. Refer to item (iii) above.</p>
Chief Executive’s Recommendations	
<p>1(i) - (ii) No change;</p> <p>(iii) - Update Section 8.2.3 to include the following: <u>including the retention and integration of existing natural landscape features such as trees and hedgerow into the design of all new development.</u></p> <p>Amend Objective EH O10 Trees and Hedgerows to include the following:</p> <p>It is an objective of the Council to:</p> <p><u>a) Retain and protect amenity and biodiversity value of the County and City by preserving as far as possible trees, woodlands and hedgerows, having regard to the significant role that trees and hedgerows play in local ecology, climate change and air quality and their contribution to quality place making and the associated health and wellbeing benefits</u></p> <p>b) Require, in the event that mature trees or extensive mature hedgerow is proposed to be removed, that a comprehensive tree and hedgerow survey be carried out by a suitably qualified individual, demonstrating that the subject trees/hedgerow are of no ecological or amenity value <u>tree specialist to access the condition, ecological and amenity value of the tree stock/hedgerow proposed for removal and to include mitigation planting and management scheme. The Council will seek in all cases to ensure when undertaking development or when permitting development that the loss of or damage to existing trees is minimised.</u></p> <p>c) Require the planting of native trees, hedgerows and vegetation and the creation of new habitats in all new developments and public realm projects. The Council will avail of tree planting schemes administered by the Forest Service, in ecologically suitable locations, where this is considered desirable</p> <p><u>d) To identity and prepare TPO’s where trees of exceptional amenity, cultural or environmental value are identified which warrant a high level of protection</u></p> <p><u>e) To implement the Limerick City and County Tree Policy when completed and review as appropriate</u></p> <p>(iv) - (v) No change.</p>	
SEA/ AA Response	

The identification of the contribution that trees and hedgerows make to local ecology, climate action and amenity is welcomed and adds clarity to the policy content.

No. 39	Ref. & Name/ Group:	LCC-C62-39 Environmental Protection Agency	
	Submission/ Observation Summary		Chief Executive’s Response
	<p>1. General: The submission acknowledges receipt of the proposed plan and outlines the role of the EPA, which is to promote the full and transparent integration of the findings of the environmental assessment into the Plan and advocate that the key environmental challenges for Ireland are addressed as relevant and appropriate to the proposed Plan. Guidance and resources are available to the Local Authority in preparing SEAs.</p> <p>Limerick City and County Council should ensure that the Plan aligns with key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments of the National Planning Framework and the Southern Regional Spatial and Economic Strategy.</p> <p>2. Non-Technical Summary: The summary table included as part of Section 8 Monitoring in the Environmental Report should be titled and given a table number.</p> <p>3. Assessments of Alternatives: There is merit in treating 4.5 Consideration of Alternative Strategies as a Section in its own</p>		<p>1. General: The content of the submission received is noted. The Draft Plan has been prepared in compliance with the NPF and the RSES.</p> <p>2. Non-Technical Summary: Noted. The table in the SEA shall be numbered and given a title.</p> <p>3. Assessments of Alternatives: Noted. Section 4.5 of the SEA will be included as a separate section. The alternative strategies</p>

<p>right, rather than a subsection of Section 4. Having described the alternative strategies considered and how the selection and assessment of these has led to the selection of the preferred alternative strategy, the alternative strategies should be assessed against the ‘Environmental Protection Objectives’ identified in the SEA ER. A brief summary/ conclusion paragraph outlining the reasons for the preferred alternative strategy, as appropriate should be included here and in the Non-Technical Summary.</p> <p>4. Assessment of Environmental Effects: The full range of likely significant environmental effects of implementing the Plan, including the potential for cumulative effects in combination with other relevant Plans/ Programmes and Projects should be assessed and documented.</p> <p>5. Mitigation Measures: Where the potential for likely significant effects is identified, appropriate mitigation measures to avoid or minimise these should be provided. The Plan should include clear commitments to implement the mitigation measures. The SEA/ER reference that both a monitoring programme and mitigation measures are included in the Natura Impact Report. Any relevant monitoring or mitigation in the NIR should be reflected in the SEA/ER, as appropriate.</p> <p>6. Monitoring: The Monitoring Programme should be flexible to take account of specific environmental issues and</p>	<p>will be assessed against the Environmental Protection Objectives identified in the Environmental Report and a summary outlining the reasons for the preferred alternative strategy, will be included in the Environmental Report and in the Non-Technical Summary.</p> <p>4. Assessment of Environmental Effects: Noted. This section will be updated to reflect the emergence of new plans and strategies and will assess the cumulative effects in combination with other relevant plans and programmes.</p> <p>5. Mitigation Measures: Noted. The Environmental Report will be updated to reflect mitigation measures set out in the Natura Impact Statement.</p> <p>6. Monitoring: The Environment Report will be updated to take account of amended Chapter 13 – Monitoring and</p>
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<p>unforeseen adverse impacts should they arise. It should consider and deal with the possibility of cumulative effects and monitoring of both positive and negative effects should be considered. The monitoring programme should set out the various data sources, monitoring frequencies and responsibilities. If the monitoring identifies adverse impacts during the implementation of the Plan, Limerick City and County Council should ensure that suitable and effective remedial action is taken.</p> <p>7. State of the Environment Report – Ireland’s Environment 2020: In finalising the Plan and integrating the findings of the SEA into the Plan, the recommendations, key issues and challenges described in our State of the Environment Report Ireland’s Environment – An Integrated Assessment 2020 (EPA, 2020) should be considered. This should also be taken into account, in preparing the Plan and SEA.</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’: On adoption, an SEA Statement should be prepared summarising:</p> <ul style="list-style-type: none"> • How environmental considerations have been integrated into the Plan; 	<p>Implementation, the Plan will seek to clearly identify a monitoring regime in line with the Draft Development Plan Guidelines published in 2021, which will link to the SEA monitoring regime.</p> <p>7. State of the Environment Report – Ireland’s Environment 2020: Noted.</p> <p>8. Future Amendments to the Plan: Noted. This will be carried out on any amendments that will result from the submissions received during the public display period.</p> <p>9. SEA Statement – ‘Information on the Decision’: Noted. This will be prepared following adoption of the plan.</p>
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<ul style="list-style-type: none"> • 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 the light of other reasonable alternatives dealt with; and, • The measures decided upon to monitor the significant environmental effects of implementation of the Plan. <p>A copy of the SEA Statement should be sent to any environmental authority consulted during the SEA process.</p>	
<p>Chief Executive’s Recommendations</p>	
<p>1. No change; 2. - 6. The Environmental Report and the Natura Impact Assessment will be fully updated following receipt of amendments by the Elected Members and prior to putting the Material Amendments to the Draft Plan on Public Display; 7. – 9. No change.</p>	
<p>SEA/ AA Response</p>	
<p>The Monitoring Table will be updated with a title and table number in the Material Alterations updated Environmental Report. There will be an updated Chapter 13 Implementation and Monitoring included in the Material Alterations, which will set out details on monitoring and implementation and supplementing the Environmental Report, which will be updated accordingly. A separate section will be included for consideration of alternative strategies. The text will be updated taking into account the Draft SEA and Draft Development Plan Section 28 guidance. Additional text from both the Limerick 2030 Update and the Colbert Station Quarter will be included in the Environmental Report, in addition to the new guidance referenced above. Monitoring material from the NIS will be included in the ER. An additional section will be included in the ER Introduction, outlining how the suggested changes to the report have been included.</p>	

No. 85	Ref. & Name/ Group:	LCC-C62-85 Limerick Branch BirdWatch Ireland
Submission/ Observation Summary		Chief Executive’s Response
<p>1. Biodiversity:</p> <p>(i) BirdWatch Ireland together with other conservation groups and individuals is working to help halt declines in breeding Swift populations. One of the major issues is the loss of nest sites in buildings. Swifts nest in man-made structures where they can find access to narrow cavities, where they will construct a small nest cup. They are most often found within old and historic buildings. As a result of renovation, redevelopment and demolition, many Swift nest colonies have been lost. Swifts can be helped by protecting sites where they are already nesting, through good planning and construction practices, as well as by supplying new, safe and permanent nesting opportunities in existing buildings or incorporating nest sites in new build designs.</p> <p>(ii) It is illegal under The Wildlife Act 1976 (amendments) to intentionally kill or cause harm to nesting bird species. Therefore, to comply with Irish legislation and to follow</p>		<p>1. Biodiversity:</p> <p>(i) Noted. The Council have taken a proactive approach in relation to the protection of Swifts in Limerick, particularly in the City Centre, as part of its projects as European Green Leaf City 2020, the Council embarked on a Swift Conservation Programme. The Council in collaboration with BirdWatch Ireland have identified a number of sites to provide specialised Swift Nest boxes at five locations across the city, Swifts like to have neighbours, so 39 possible nest boxes have been provided. It is the intention of the Council to carry out a swift survey over the next 2 years to properly inform planning responses.</p> <p>The Draft Plan sets out in Policy EH08 Roosting Habitats that it is Council policy to support the provision of alternative roosting or settlements facilities for species including swift boxes. Policy EH03 Ecological Impact Assessment also calls for adequate ecological assessment of sites, prior to development which would detect nesting sites and recommend appropriate mitigation measures.</p> <p>The Council has also supported the production of the Saving Swifts guide, produced by BirdWatch Ireland.</p> <p>(ii) Noted, the Council recognise the legal implications and are proactively seeking to safeguard Swifts, through the development management process, to ensure that adequate surveys and</p>

	<p>best practice the following actions should be carried out in accordance with best practice identified below and in particular by the Local Authority during their own operations and by contractors:</p> <ul style="list-style-type: none"> - When working on buildings where Swifts are nesting (during nesting season): - Always carry out a nesting Swift survey in advance of works. - Limit work to outside nesting season (end April – end August), if work must take place it must be limited to areas where Swifts will not be affected (internal work), or disturbed. Wholesale removal of roof structures and masonry is to be avoided within nesting season. - Do not block nest access with scaffold, or wrap/net areas of scaffold close to elevations or roof-plates where nest entrances are active. - When working on buildings where Swifts are nesting (outside of nesting season): - Preserve the nest access holes or make new ones to match. - If existing nest entrances can’t be retained, mitigation by externally fixed specialised Swift nest boxes should be made. - When working on new builds or renovations to buildings that do not have Swifts nesting: - At the planning stages for all new public buildings (over 5 metres), built-in Swift bricks (preferable), or externally fixed Swift nest boxes should be incorporated. - At the planning stages of all new 	<p>assessments are carried out to safeguard the species and planning conditions are put in place to manage hours of construction.</p>
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	<p>private buildings (over 5 metres) built in Swift bricks, or externally fixed Swift nest boxes should be stipulated by planners.</p> <p>(iii) The Kildare County Development Plan ‘Requires all new developments to identify, protect and enhance ecological features by making provision for local biodiversity (e.g. through provision of Swift nest boxes or towers, bat boxes, green roofs, etc.) and providing links to wider Green Infrastructure network as an essential part of the design process’. The provision has led to the stipulations for Swift nest boxes and bricks in several new developments. BirdWatch Ireland encourages Limerick City and County Council to adopt a similar policy.</p>	<p>(iii) Noted. Objective EH O8 (Roosting Habitats) and Objective EH O3 (Ecological Impact Assessment) address all species including Swifts, which utilise buildings and structures for nesting. It is considered more appropriate to include all species in the policy context, rather than individual species.</p>
Chief Executive’s Recommendations		
1. No change.		
SEA/ AA Response		
N/A		

No. 89	Ref. & Name/ Group:	LCC-C62-89 BirdWatch Ireland
Submission/ Observation Summary		Chief Executive’s Response
1. Biodiversity: This submission includes the same content as submission No. 85. See Summary No. 85 above.		1. Biodiversity: See response to Submission No. 85 above.
Chief Executive’s Recommendations		
1. No change.		
SEA/ AA Response		

N/A

No. 120	Ref. & Name/ Group:	LCC-C62-120 Gary Gill
	Submission/ Observation Summary	
	Chief Executive’s Response	
	<p>1. Biodiversity:</p> <p>(i) This submission includes the same content as submission No. 85. See Summary No. 85 (i) above.</p> <p>(ii) The observer hopes that Limerick Council will continue its support for the prospective swift colony at St. Michael’s Church on Barrington Street. Perfectly located, it has potential to become one of Ireland’s largest swift colonies. As an urban bird, swifts were once prevalent in Irish urban areas, and it is hoped that their reappearance will help to alleviate the separation of nature from the built environment.</p> <p>A widespread approach in the U.K. is the mandatory provision of built-in swift nest boxes and bricks. This has been successfully adopted in Mayo, in new school building extensions and other public buildings. This project is long-term and helps maintain a core breeding population in towns. The success of the built-in nest boxes in Mayo has been dramatic and emphasises the almost spotlessly clean nature of this bird when nesting. It may take several years for swifts to occupy new custom-made nest sites, but the</p>	<p>1. Biodiversity:</p> <p>(i) See response to Submission No. 85 above.</p> <p>(ii) See response to Submission No. 85 above.</p>

	<p>critical factor in the maintenance of core populations is the availability of these suitable, stable nesting sites. Not every building or gable is suitable – but selection of suitable buildings and careful location of boxes can make dramatic differences.</p> <p>(iii) This submission includes the same content as submission No. 85. See Summary No. 85 (ii) above.</p> <p>(iv) This submission includes the same content as submission No. 85. See Summary No. 85 (iii) above.</p>	<p>(iii) See response to Submission No. 85 above.</p> <p>(iv) See response to Submission No. 85 above.</p>
Chief Executive’s Recommendations		
1. No change.		
SEA/ AA Response		
N/A		

No. 88	Ref. & Name/ Group:	LCC-C62-88 MacCabe Durney Barnes on behalf of Glencore Zinc Ireland Ltd.
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Introduction: Limerick is host to some of the country’s largest zinc deposits, namely the Pallas Green deposit, substantially higher than the former mines’ reserves at Galmoy (4.02mt) and Lisheen (10.58mt).</p> <p>The submission outlines the economic, social and environmental benefits of mining and quotes reports, which have been completed to assist in highlighting the</p>	<p>1. Introduction: The Council recognise the importance of mining and recognise the significance of the deposits located at Pallasgreen. The Council also recognise the economic importance of mining for Ireland and policy support is set out in Chapter 4 of the Draft Plan for mineral extraction in ECON O32 Mineral Extraction and Environmental Impacts, while also having regard to environmental considerations and impacts.</p>

<p>importance of mining. Through Corporate Social Responsibility programmes, mining companies contribute to local life with funding for sporting events, community activities and organisations. Positive effects on the environment are also included such as rehabilitation resulting in direct benefits to water quality and biodiversity and investment in wind farms benefitting renewable energy, carbon emissions and supplying energy.</p> <p>2. Current Planning Policy: The NPF includes NPO 23 and NPO 21 which contribute to the achievement of NSO 3 – Strengthened Rural Economies and Communities. The Draft Policy Statement on Mineral Exploration and Mining in Ireland, gives a positive indication of the need for and importance of mining. It is also supportive of the transition of the circular economy and achieving net-zero emissions.</p> <p>3. (i) Chapter 1 Introduction and Strategic Vision: The observation supports the aim of developing A Green Region. This will require transformation of energy, industrial and land use systems. Decarbonisation of the global energy demand will be assisted through providing metals essential to the transition to a low carbon economy. It would be beneficial for the Plan to reference the Draft Policy Statement on Mineral Exploration and Mining in Ireland, which highlights the critical role of minerals in realising the implementation of Development Plans and</p>	<p>2. Current Planning Policy: The contents are noted, the Draft Plan is also supportive of mineral extraction.</p> <p>3.(i) Chapter 1 Introduction and Strategic Vision: The vision statement sets out to deliver a greener region, which covers a multitude of areas. The Council recognises the importance of the mining industry however, it is dealt with further in Chapter 4 of the Draft Plan.</p> <p>The Plan will be updated to reference Draft Policy Statement on Mineral Exploration and Mining in Ireland.</p>
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<p>meeting goals supporting Ireland’s transition to a circular and resource efficient economy.</p> <p>(ii) Chapter 2 Core Strategy: There are a number of settlements in the immediate vicinity of the ore body which would benefit from its development, including Caherconlish, Pallasgreen and Dromkeen. These settlements should be self-sustaining, providing employment opportunities in close proximity, reducing the need to travel and reinforcing population and service targets.</p> <p>(iii) Chapter 3 Settlement Strategy and Housing: Caherconlish requires consolidation and investment in services, infrastructure, suitable transport options, amenities, employment, whilst balancing housing delivery to become more self-sustaining. The exploration and exploitation of the mineral resource in the area will significantly contribute to the realisation of Objective SS 09 Level 3 Towns.</p> <p>(iv) Chapter 4 A Strong Economy: Objective ECON 028 relates to facilitating employment opportunities in rural areas. Mineral extraction is detailed in section 4.7.12 and Objective O32.</p> <p>Objective ECON 032 Mineral Extraction and Environmental Impacts - The preamble only relates to aggregates and</p>	<p>(ii) Chapter 2 Core Strategy: The comments are noted and the Council welcome the potential growth of employment opportunities and population in those settlements in line with the Core Strategy projections.</p> <p>(iii) Chapter 3 Settlement Strategy and Housing: Noted.</p> <p>(iv) Chapter 4 A Strong Economy: Noted.</p> <p>The Council recognizes the importance of mining for both aggregates and minerals and the Plan shall be updated to reflect this importance.</p>
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there is no reference to the importance of mining and mineral development, or the need to safeguard these deposits for future extraction. The need for environmental protection is accepted. This objective should reference the objectives of the Draft Policy Statement on Mineral Exploration and Mining in Ireland, which states the importance of sustainable development of this nationally important resource sector.

The observation requests the following amendments:
 -Section 4.7.12 ‘It is recognised that the exploration and extraction of minerals, aggregates (stone, sand and gravel) and concrete products industry contribute to economic development, ~~and~~ are essential building materials and are required for sustainable industrial processes. However, they can give rise to land use and environmental issues which are required to be mitigated and controlled through the planning process’;
 -Objective ECON O32: It is an objective of the Council to:
 A) Protect access to mineral and aggregate resources;
 B) Minimise environmental and other impacts of mineral extraction through rigorous application of development management and enforcement requirements for quarry and other developments...’.

(v) Chapter 11 Development Management: Section 11.6.10 relates to the Extractive industry. However, it only refers to aggregates and not minerals. The extraction of

(v) Chapter 11 Development Management: Expand Section 11.6.10 to include mining for minerals.

<p>minerals will have to comply with the environmental protection criteria set out in the Plan. The Planning Authority should consider including reference to mining developments in this section.</p> <p>(vi) Chapter 12 Land Use Zoning: Extractive industries/ quarrying is permitted in principle in Industrial zones and open for consideration in Agricultural zones. The zoning only relates to those settlements/areas covered by zoning maps for settlements in Volume 2 and Local Area Plans.</p>	<p>(vi) Chapter 12 Land Use Zoning: The zoning matrix applies to all zoned lands set out in the Draft Plan and Local Area Plans. Planning applications for extractive industries on un-zoned lands will be considered on a case by case basis in accordance with all Development Management Standards, Section 28 Guidance and all relevant planning criteria.</p>
<p>Chief Executive’s Recommendations</p>	
<p>1. - 2. No change; 3(i) Update Section 11.6.10 to include reference to the Draft Policy Statement on Mineral Exploration and Mining in Ireland. (ii) - (iii) No change; (iv) Update Section 4.7.17 of the Plan as follows: <u>The Council recognises and distinguishes between aggregate and mineral extraction and mining. The Council also recognises the importance of Scheduled Minerals as defined in the Minerals Development Act 1940-1999. Minerals are important to the economy and in particular to renewable energy and battery technology. Both these areas of technology are hugely important in terms of achieving local and national climate mitigation targets. Map XX shows the location of mineral desposits in Limerick. Further details of minerals and aggregates can be found on the Geological Survey of Ireland Website, https://www.gsi.ie</u></p> <p>‘It is recognised <u>that the exploration and extraction of minerals</u>, aggregates (stone, sand and gravel) and concrete products industry contribute to economic development, and are essential building materials <u>and are required for industrial processes</u>. However, they can give rise to land use and environmental issues which are required to be mitigated and controlled through the planning process’; -Update Objective ECON O32 as follows: <u>a) The Council recognises the potential of the extractive, mineral and mining industries to contribute to Limerick’s economy and will endeavor to protect access to these resources, where known.</u></p> <p>(v) Update Development Management standards, section 11.6.10 as follows:</p>	

	<ul style="list-style-type: none"> • Description of development works including buildings, mine shafts, fixed and mobile plant, roads, fuel tanks, stockpiles, storage of soil, overburden and waste materials, settling ponds; • Estimated working life of quarry or mine, including phasing programme; • Water supply, de-watering and discharge requirements; <p>The Planning Authority will support the extractive and mineral extraction industry by issuing planning permission that extends over the estimated life of the quarry or mine. It will be necessary, however that the applicant sets out a phasing proposal for the development to assess the time-scale of the proposal. The Planning Authority will impose strict conditions on planning permissions relating to the appropriate mitigation measures to control the impacts on the environment and surrounding area. Limited duration on permissions may be issued by the Council to allow for re-evaluation of the development in light of unforeseen implications or changes in environmental standards and technology.</p> <p>A standard contribution and in certain circumstances, a special contribution under the Development Contribution Scheme and a financial bond will be required to ensure appropriate restoration and reinstatement works are undertaken within 12 month of the cessation of works. It is obligatory for new mining developments to obtain an Integrated Pollution Control Licence Industrial Emissions Licence from the EPA. All aspects of air and water pollution, noise and waste are covered by this single integrated licence. Refer to dcaae.gov.ie/Minerals-Exploration-Mining.</p> <p>(vi) No change.</p>
	SEA/ AA Response
	The revised wording to include specific mention of mining is expected to add clarity to the plan content, clearly indicating that mining is subject to the planning guidance contained in the Draft Plan. No change to SEA or AA.

No. 93	Ref. & Name/ Group:	LCC-C62-93 Geological Survey Ireland (GSI)
	Submission/ Observation Summary	Chief Executive’s Response
	1. Geology: Geological Survey Ireland encourages use of and reference to GSI datasets.	1. Geology: Noted, these datasets would be useful for Development Management purposes in particular.

<p>2. Geoheritage: GSI has begun an audit of Limerick County Geological Sites (CGSs), which is due to be completed by the end of 2021. GSI welcome the undertaking to include the final report and CGSs into the SEA once completed.</p> <p>3. Key Comments: The submission welcomes the inclusion of Objective EH 09 ‘Geological Sites’, and areas of geological value included in Policy EH P2 ‘Sustainable Management and Conservation’, in Chapter 5 ‘Environment, Heritage, Landscape and Green Infrastructure’.</p> <p>(i) In addition to the sustainable management and conservation of areas of natural environmental and geological value in the Geological Heritage Programme of Geological Survey Ireland, the following wording would address the need to protect geological heritage: <i>"to protect from inappropriate development the scheduled list of geological heritage sites [Appendix X]."</i> Or <i>"to protect from inappropriate development the following list of County Geological Sites"</i>.</p> <p>(ii) Culture and Tourism: The importance of geology in Irish tourism is noted. Ireland currently has three UNESCO Global Geoparks, and a number of other geotourism projects. GSI would encourage the Council to use the</p>	<p>2. Geoheritage: Noted, the final draft of the audit will be complete in November 2021 for inclusion in the Plan.</p> <p>3. Key Comments: Noted.</p> <p>(i) The Council recognises the importance of management and conservation of geological sites and accordingly it is recommended appropriate to include the additional text.</p> <p>(ii) Culture and Tourism: Comment are noted and the Council recognise the tourism potential of geology and will seek to promote these assets throughout Limerick.</p>
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<p>geological audit information and encourage geology to be a significant part of any tourism initiatives.</p> <p>(iii) Dimension Stone/Stone Built Ireland: Stone Built Ireland is a 2-year research project aimed at documenting building and decorative stone to inform government agencies, building owners and conservationists of the sources. This project would be of benefit to Section 5.5 ‘Archaeology and Built Heritage’ in Chapter 5 ‘Environment, Heritage, Landscape and Green Infrastructure’. The inventory will aid the public in complying with part 4 of the Planning and Development Act 2000 and assist issuing of Section 57 Declarations.</p> <p>(iv) Groundwater: GSI recognise the undertaking in part c of Objective EH O15 and use of their Groundwater Vulnerability map and mention of the Groundwater Source Protection Reports within the SEA report. Proposed developments need to consider any potential impact on specific groundwater abstractions and on groundwater resources in general. GSI recommend using the groundwater maps on their Map viewer. GW Climate is a groundwater monitoring and modelling project that aims to investigate the impact of climate change on groundwater. This dataset would be of benefit to Section 8.3 ‘Flooding, Flood Risk Management and Water Management’ in Chapter 8 ‘Climate Action, Flood Risk and Transition to Low Carbon Economy’.</p>	<p>(iii) Dimension Stone/Stone Built Ireland: The Council welcome the formulation of this project, which will be of particular use to the Development Management section of the Planning Authority.</p> <p>(iv) Groundwater: Noted. This dataset will be of particular use to the Development Management section of the Planning Authority.</p>
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<p>(v) Geothermal Energy: Referencing Section 8.5.6 ‘Geothermal Energy’, GSI welcome the reference to their publication ‘An Assessment of Geothermal Energy for District Heating in Ireland’ and are pleased to see geothermal energy included as Objective CAF O36 within the development plan. Geothermal Suitability maps and documents could be considered as part of the renewable energy potential for the new CDP.</p> <p>(vi) Natural Resources (Minerals/Aggregates): With reference to minerals and aggregates in Chapter 4 ‘A Strong Economy’, Section 4.7.17 ‘Mineral Extraction’, the GSI would welcome the inclusion under Objective ECON O32 ‘Mineral Extraction and Environmental Impacts’, the assurance that development for aggregates/mineral extraction does not significantly impact on County Geological Sites / Sites of geological interest.</p> <p>In Chapter 11 ‘Development Management Standards’ Section 11.6.10 ‘Extractive Industry’, the inclusion of ‘Geological Heritage Guidelines for the Extractive Industry’ document is welcomed. The Active Quarries, Mineral Localities and the Aggregate Potential maps are available on our Map Viewer.</p> <p>(vii) Geochemistry of soils, surface waters and sediments:</p>	<p>(v) Geothermal Energy: Noted.</p> <p>(vi) Natural Resources (Minerals/Aggregates): The Council notes the comments of the GSI in this regard. It is recommended that objective ECON O32 Mineral Extraction and Environmental Impacts should be updated as suggested.</p> <p>(vii) Geochemistry of soils, surface waters and sediments: Noted.</p>
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<p>GSI provides baseline geochemistry data as part of the Tellus programme, a national-scale mapping programme, which provides multi-element data for shallow soil, stream sediment and stream water.</p> <p>(viii) Geophysical data: The Geochemistry and Geophysical datasets would be of benefit to the Geology and Soils section of the Volume 4 SEA Report.</p> <p>(ix) Physiographic Units: GSI would encourage use of the physiographic units map data in Chapter 5 ‘Environment, Heritage, Landscape and Green Infrastructure’, Section 5.4 Landscape and Visual Amenity,’. They delineate physical regions showing internal uniformity with respect to one or more environmental attributes that can be clearly differentiated from neighbouring regions. They are valuable for regional land-use planning, and in studies of the influence of physical landscape on the ecological environment.</p> <p>(x) Marine and Coastal Unit: Our marine environment is hugely important to our bio-economy, transport, tourism and recreational sectors and an important indicator of the health of our planet. Of particular interest to tourism is the extensive database of shipwrecks mapped. GSI recommends use of Marine and Coastal Unit datasets, of benefit to Section 4: ‘Marine Economy’, in Chapter 4 ‘A</p>	<p>(viii) Geophysical data: Noted. It is recommended to update the SEA Environmental Report to incorporate the details from the Geochemistry and Geophysical datasets.</p> <p>(ix) Physiographic Units: Noted, the details will be considered and the SEA Environmental Report updated accordingly.</p> <p>(x) Marine and Coastal Unit: The Draft Plan sets out the importance of the marine economy to Limerick and the potential to further develop and enhance the industry. The map layers have been reviewed and noted.</p>
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	Strong Economy’ and Section 8.3 ‘Flooding, Flood Risk Management and Water Management’ in Chapter 8.	
Chief Executive’s Recommendations		
<p>1. No change;</p> <p>2. The Environmental Report and the Natura Impact Assessment will be fully updated following receipt of amendments by the Elected Members and prior to putting the Material Amendments to the Draft Plan on Public Display;</p> <p>3. (i) Amend Objective EH O9 Geological Sites to include: a) <u>To protect from inappropriate development the County Geological Sites contained in the Limerick Geological Heritage Survey 2021;</u></p> <p>(ii) - (v) No change;</p> <p>(vi) Update Objective ECON O32 to include part c) <u>The Council shall seek to ensure that development for aggregates/mineral extraction does not significantly impact on County Geological Sites / Sites of geological interest;</u></p> <p>(vii) No change;</p> <p>(viii) - (ix) The Environmental Report and the Natura Impact Assessment will be fully updated following receipt of amendments by the Elected Members and prior to putting the Material Amendments to the Draft Plan on Public Display;</p> <p>(x) No change.</p>		
SEA/ AA Response		
The recommended SEA Updates will be included. Both the GSI submission and the Geological Heritage Survey of 2021 have better informed the plan content as it relates to the Geological heritage and resources in Limerick.		

No. 106	Ref. & Name/ Group:	LCC-C62-106 Maigne Rivers Trust
Submission/ Observation Summary		Chief Executive’s Response
<p>1. Introduction: The Maigne Rivers Trust commissioned the study ‘An Exploration of the Recreation & Amenity Potential of the Maigne Rivers’ to establish the recreation and amenity potential. The study documents current facilities and services, addresses information gaps and</p>		<p>1. Introduction: The Council acknowledge and welcome the work being carried out by the Maigne Rivers Trust and support the research being carried out.</p>

	<p>prescribes a range of potential developments likely to be effective if developed.</p> <p>2. Study and Findings: Part 1 of the study established the baseline information. Part 2 identified specific development considerations for recreational and leisure activities on and around the rivers in the Maigue catchment. The findings provide data for the future management of the development in/near the catchment rivers for the benefit of biodiversity, water quality and recreational and other uses by local communities and visitors.</p> <p>The core objectives of this project were to identify recreational and amenity facilities, focused primarily on walking, cycling, boating, angling and nature/ wildlife observation. The Recreation and Amenity Report specifically mentions the Development Plan. The findings of the Report are relevant for addressing UN Sustainable Development Goals: SDG3 Good Health and Well-Being, SDG 11 Sustainable Cities/Towns and Communities, SDG 13 Climate Action, SDG 14 Life Below Water, SDG 15 Life on Land. The report also addresses the National Strategic Outcomes: NSO 2 Enhances Regional Accessibility, NSO 3 Strengthened Rural Economies and Communities, NSO 7 Enhanced Amenity and Heritage.</p>	<p>2. Study and Findings: The study prepared by the Maigue Rivers Trust is useful for the purposes of supporting the key objectives set out in the Draft Plan. The core objectives of this project were to identify a suite of recreational and amenity facilities, focused primarily on walking, cycling, boating, angling and nature/ wildlife observation. This aligns with Chapters 5 and 9 of the Draft Plan, which seeks to safeguard the environment and also seek to deliver and develop sustainable communities.</p>
Chief Executive’s Recommendations		
1. – 2. No change.		

	SEA/ AA Response
	N/A

No. 137	Ref. & Name/ Group: LCC-C52-137 Bruce Harper
	Submission/ Observation Summary
	<p>Strategic Environmental Assessment (SEA):</p> <p>1. The SEA methodology should be published with mitigation measures in Volume 4 Environmental Reports with a clear and coherent assessment of schemes.</p> <p>2. Section 8 Monitoring in the SEA should be revised and completed. For example, ‘review of plan’ is insufficient for frequency of monitoring.</p> <p>3. The submission questions sections on air and climate suggesting ‘non-attainment of targets set out in LCEA energy audit’ as a remedial action.</p> <p>4. Table 8 Sustainable Mobility and Transport Policies and Objects in the SEA require revision and clarity regarding the methodology use to ascribe +, +, - and --.</p>
Chief Executive’s Response	
	<p>Strategic Environmental Assessment (SEA):</p> <p>1. Noted, the Environmental Report will be updated to include the SEA Methodology.</p> <p>2. Noted, the review of the plan is part of the statutory process of the plan making and monitoring. The Environment Report will be updated to take account of amended Chapter 13 – Monitoring and Implementation. The Plan will seek to clearly identify a monitoring regime in line with the Draft Development Plan Guidelines published in 2021, which will link to the SEA monitoring regime.</p> <p>3. The SEA Environmental Report will be updated to take account of specific targets as outlined in the OPR submission.</p> <p>4. The SEA Environmental Report will be updated to reflect the modal shift identified in Chapter 6 Sustainable Mobility and Transport and associated targets.</p>

	<p>5. The submission identifies inconsistencies e.g. Objective IN O2 Digital Connectivity conflicts with Objectives TR O1 – TR O8 - N20/M20, N69 upgrade, N21 improvements, N24, O’Connell Street, and improvement schemes connecting Limerick’s Southside. These improvements are rated as neutral, but how was neutral rating deduced? Objectives for improving public realm and active travel networks are rated neutral, but these are important to meet climate and biodiversity goals. TR O37 – TR O41 are rated negative and stated as requiring ‘careful assessment and mitigation’. Mitigation measures should be specific, achievable, measurable, realistic, time-bound and included in the revised SEA as per EPA Guidelines. Suggests alternative wording for Objective TR01 – 06, TR08, TR12, TR13, TR 34, TR 39, TR40, P7 – P9 as follows: ‘.....where this is consistent with national and sectoral greenhouse gas emission budgets reducing to net zero by 2050.’</p>	<p>5. The SEA Environmental Report will be updated. Objectives to improve public realm and active travel, which involve works can cause ecological damage and hence these have been rated as neutral as they will, in time lead to less Green House Gas emissions.</p> <p>As yet Objectives TR O37- TR O41 do not have fine project detail which would form the basis of more detailed assessment, which in turn informs mitigation. It is likely that these would be available at design stage, hence the mention of careful assessment which would be possible at project rather than plan stage. Policy EH O5 mentions that new infrastructure should have features incorporated from the design stage to help with the dispersal and conservation of species. This policy is designed to minimise the adverse ecological effects of infrastructure projects.</p>
Chief Executive’s Recommendations		
<p>1. - 4. The Environmental Report and the Natura Impact Assessment will be fully updated following receipt of amendments by the Elected Members and prior to putting the Material Amendments to the Draft Plan on Public Display;</p> <p>5. No change.</p>		
SEA/ AA Response		
The SEA will benefit from the recommended updates.		

No. 157	Ref. & Name/ Group:	LCC-C62-157 Department of Housing, Local Government and Heritage	
Submission/ Observation Summary		Chief Executive’s Response	

<p>1. Archaeology: Chapter 5 Environment, Heritage, Landscape and Green Infrastructure should include an objective to support the Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage 2019, as published by the Department of Culture, Heritage and the Gaeltacht. In particular, the following recommendations are made:</p> <ul style="list-style-type: none"> • To promote awareness and the appropriate adaptation of Ireland’s built and archaeological heritage to deal with the effects of climate change. • To identify the built and archaeological heritage in local authority ownership and areas at risk from climate change including, but not necessarily restricted to, the Record of Monuments and Places, protected structures and architectural conservation areas designated in the Development Plan. • To undertake climate change vulnerability assessments for the historic structures and sites in its area. • To develop disaster risk reduction policies addressing direct and indirect risks to the built and archaeological heritage in its area. • To develop resilience and adaptation strategies for the built and archaeological heritage in its area. • To develop the skills capacity within the local authority to address adaptation/mitigation/emergency management issues affecting historic 	<p>1. Archaeology: Noted. The Council acknowledges the importance of protection of archaeology in the Draft Plan. The suggested objective shall be included in the Plan.</p>
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<p>structures and sites in order to avoid inadvertent loss or damage in the course of climate change adaptation or mitigation works.</p> <p>2. Nature Conservation:</p> <p>(i) The Department welcomes the Draft Plan and the addressing of many concerns raised at issues paper stage. The plan comprehensively covers a wide range of nature conservation concerns. The Department suggests the following:</p> <p>(ii) Objective EH01 in relation to protected sites and species (section 5.3.2) could be extended to include a commitment to make every effort to restore designated sites where they have been damaged by unauthorized development.</p> <p>(iii) A further objective could be added committing to conserving Natural Heritage Areas (NHAs) and proposed Natural Heritage Areas (pNHAs) and not permit developments which would diminish the nature conservation value of these sites.</p> <p>(iv) The Department notes and welcomes the various measures to promote conservation outside of designated sites.</p>	<p>2. Nature Conservation:</p> <p>(i) Noted.</p> <p>(ii) It is recommended to amend the objective as suggested.</p> <p>(iii) Noted, it is considered that this is already covered in Policy EHP1(b) Protection of Natural Heritage and Biodiversity which states that it is a policy of the Council to: b) Maintain the conservation value of all Natural Heritage Areas and proposed Natural Heritage Areas (pNHAs) for the benefit of existing and future generations.</p> <p>(iv) Noted.</p>
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(v) In relation to Blue Green Infrastructure (BGI), the Department acknowledges and welcomes the commitments to conserving and improving it and the understanding that inappropriate developments could damage BGI. In this regard, part b) of Objective EH 012 could include a commitment that the new plan will not permit projects which are detrimental to existing BGI.

(v) Amend Objective EH 012 Blue Green Infrastructure to include a commitment that the policy will not permit projects which are detrimental to existing BGI.

Chief Executive’s Recommendations

1. Add new objective to Section 5.5.3 as follows: It is an objective of the Council to support the Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage 2019, as published by the Department of Culture, Heritage and the Gaeltacht and any subsequent guidance or plans for dealing with climate change and archaeological heritage and the Council shall see to:

- Promote awareness and the appropriate adaptation of Ireland’s built and archaeological heritage to deal with the effects of climate change;
- Identify the built and archaeological heritage in local authority ownership and areas at risk from climate change including, but not necessarily restricted to, the Record of Monuments and Places, protected structures and architectural conservation areas designated in the development plan;
- Undertake climate change vulnerability assessments for the historic structures and sites in its area, subject to resources and funding;
- Develop disaster risk reduction policies addressing direct and indirect risks to the built and archaeological heritage in its area;
- Develop resilience and adaptation strategies for the built and archaeological heritage in its area;
- Develop the skills capacity within the local authority to address adaptation/mitigation/ emergency management issues affecting historic structures and sites in order to avoid inadvertent loss or damage in the course of climate change adaptation or mitigation works;

2(i) No change;

(ii) Add the following text to Objective EH 01: The Council, will through the planning enforcement process where applicable, seek to restore the ecological functions of designated sites, where they have been damaged through inappropriate development;

(iii) - (iv) No change;

(v) Amend Objective EH O12 with the inclusion of the following text at the end of part b) **Projects which would be detrimental to existing Blue – Green Infrastructure features will not be permitted.**

SEA/ AA Response

The inclusion of climate considerations for architectural heritage and additional biodiversity policy is welcomed. It increases the range of policy responses to climate change and biodiversity loss in the plan. This is anticipated to be beneficial.

No. 161	Ref. & Name/ Group:	LCC-C62-161 Aine Barry on behalf of Lough Gur Development	
Submission/ Observation Summary		Chief Executive’s Response	
<p>1. Chapter 5 Environment, Heritage, Landscape and Green Infrastructure: Concern is expressed with the continuing eutrophication of Lough Gur and the submission requests Objective EH013 Blue Green Infrastructure be included as a core objective, resolved within the lifetime of the Plan and seeks information as to how the Council will deal with eutrophication.</p> <p>The Blue Green Infrastructure Strategy should be developed in consultation with local community/ landowners within the lifetime of the Plan. A number of sites of international archaeological importance (Knockdoon, Bouchiers Castle, Circles O and P) are not preserved sufficiently. It is requested that the Council, OPW and landowners produce maintenance plans for each site within the lifetime of the Plan.</p> <p>2. Chapter 7 Infrastructure: The submission requests that the Council will secure funding to upgrade all non-conforming waste treatment facilities including the system serving the visitor centre and public toilets.</p> <p>3. Chapter 4 A Strong Economy: The submission seeks consideration of ecologically sensitive tourist accommodation at an appropriate location within the Lough</p>		<p>1. Chapter 5 Environment, Heritage, Landscape and Green Infrastructure: Noted. It is likely that much of the eutrophication is natural in origin, as a report dating back to the 1970s indicated the presence of algal blooms. The Council will play its part in dealing with aspects of eutrophication that fall within its remit.</p> <p>The Council is currently preparing a Blue – Green Infrastructure Strategy for Limerick City and Environs, it is considered that the key learnings from this Strategy will apply outside of the City and Environs, however it is not envisaged that additional Strategies will be completed within the lifetime of the Plan.</p> <p>The Council prepared the Lough Gur Management Plan in 2009 and continues to work with Lough Gur to protect, enhance and develop Lough Gur in an appropriate manner.</p> <p>2. Chapter 7 Infrastructure: This is an operational matter for the Council and outside the remit of the Development Plan.</p> <p>3. Chapter 4 A Strong Economy: Careful consideration would have to be given to the development of tourist accommodation in Lough Gur,</p>	

<p>Gur area. Objective ECON 038 Tourism Facilities and Environmentally Sensitive Areas conflict with Objective EH033 and Map 5.3 Lough Gur Special Control Area. No development should be permitted within the red boundary, except tourist development.</p> <p>4. Chapter 6 Sustainable Mobility and Transport: The submission seeks the de-prioritisation of vehicle use on the lake-front in favour of cyclists and pedestrians, and provision of mobility assistance parking spaces and cycle bays. The submission seeks a traffic management plan to address congestion and to reduce parking on the lakefront. The submission requests the Council to resolve roadside drainage, hedge and grass verge issues prohibiting vehicles over 3.5 tonne and the provision of lay-bys. The submission seeks a Sli na Slainte linking Lough Gur to Bruff via ‘Shared Road Space’ and upgraded to a Greenway. The submission seeks the extension of a footpath to Grange Cross and Holycross in the interest of active travel options. The submission requests reduction of the 80kmph at Grange to Bottle Ink in the interest of traffic safety at the busy junction (R512 and L1504). The re-alignment of the Patrickswell to O’Callaghan’s Cross is requested. A ‘linked up strategy’ with the Bruff Development Plan is requested in relation to safety and access</p>	<p>having regard to the lack of service infrastructure to accommodate it and the extremely sensitive nature of the setting.</p> <p>4. Chapter 6 Sustainable Mobility and Transport: The Council acknowledge the issues raised, however, all of these matters are operational issues and outside the remit of the Development Plan.</p>
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5. Chapter 3 Settlement and Housing Strategy: Concern is expressed regarding the sustainability of the community, if housing is prohibited within red line boundary. This prohibition exacerbates decreasing enrolment numbers in Lough Gur NS. It is requested that Patrickswell be designated a Level 6 Rural Cluster whereby a 15% population growth is permitted. Currently, with the designation as Open Countyside only 7.8% population growth is permitted. The submission states infill sites are available in Patrickswell for housing as a Level 6 Cluster.

Objective SS019 Refurbishment of Traditional Rural Dwellings, HO004 Re-use of Existing Buildings and conflicts with the Landscape Character Area LCA05 Lough Gur, which states any structures in ruinous condition will not be allowed to be re-development or adapted for housing. This stipulation is requested to be removed.

5. Chapter 3 Settlement and Housing Strategy: The Council recognise the challenges that the policies in the Draft Plan present, however, it is in the interest of the community to safeguard Lough Gur for further generations.

Level 6 settlements are ‘Rural Clusters’ which are generally settlements with limited essential infrastructure and services and do not have a settlement boundary. They generally have one or more existing community or other local facilities. Development within Rural Clusters will be limited to incremental local growth appropriate to their size and character. The Draft Plan anticipates that each rural cluster can cater for a small population increase from their current population base over the period of the Draft Plan. In deciding to designate Patrickswell (Lough Gur) as a settlement the Council must have regard to the extent of infrastructural deficits, water services, transport and community facilities immediate to the area. Such amenities are key factors when considering additional population/housing growth. Patrickswell (Lough Gur) is a small settlement and contains a School, Church and the Honey Fitz Theatre and will therefore be included as a level 6 settlement.

It is considered in line with national and regional planning policy that this restriction be removed.

	<p>6. Chapter 8 Climate Action, Flood Risk and Transition to Low Carbon Economy: The submission requests the Council collaborate with local GWS regarding harvesting of rainwater.</p>	<p>6. Chapter 8 Climate Action, Flood Risk and Transition to Low Carbon Economy: The request is noted, however, it is outside the remit of the Development Plan.</p>
Chief Executive’s Recommendations		
<p>1. - 4. No change;</p> <p>5. <u>Designate Patrickswell (Lough Gur) a Level 6 Settlement, include the following text and Map in Volume 2: Patrickswell (Lough Gur) has approximately 4 dwellings. Its services include a primary school, church and the Honey Fitz theatre. The settlement is served by a Group Water Scheme and has no wastewater treatment facilities.</u></p> <p>- Amend Landscape Character Area LCA05 Lough Gur to remove the following: e) any structures in ruinous condition will not be allowed to be re-development or adapted for housing.</p> <p>6. No change.</p>		
SEA/ AA Response		
<p>The changes proposed to the Plan will enhance environmental conditions, in so far as it proposes to consolidate development in the settlement and reuse existing vacant and derelict properties in line with national and regional policy.</p>		

No. 172	Ref. & Name/ Group:	LCC-C62-172 George Finch
Submission/ Observation Summary		Chief Executive’s Response
<p>1. Lough Gur: The observer raises a number of queries and questions with respect development in and around Lough Gur. Is Lough Gur included in the 2030 Plan for Limerick? If so what is the vision for Lough Gur and its environment within the lifetime of this plan?</p> <p>2.Settlement Hierarchy: Is Lough Gur to be included in Level 6? It is set out that any future plans for Lough Gur</p>		<p>1. Lough Gur: The Limerick 2030 Plan deals mainly with urban areas, such as Limerick City, Newcastle, Kilmallock and Croom. The Draft Limerick Development Plan sets the vision for Limerick, as a whole. The Draft Plan is the first consolidated Plan for Limerick and it seeks to develop Limerick as a single entity.</p> <p>2.Settlement Hierarchy: See response to Submission No. 161 above.</p>

<p>should also take into account the needs and desires of the local community.</p> <p>3. Derelict Buildings: Clarification is sought that the derelict buildings in the Lough Gur area also come under Objective SS O19.</p> <p>4. Tourism:</p> <ul style="list-style-type: none"> - Objective ECON O38: Is this in conflict with the area of developmental control around Lough Gur? Here it seems to say ‘No’ to developments, while in the section on Lough Gur, it seems to say ‘yes’ to development? - Objective ECON O40 Tourism Accommodation: It is set out that a suitable ecological camping/glamping site be encouraged/identified in the Lough Gur area. In addition, it is stated that a more suitable location be found for Lough Gur Heritage Centre which could incorporate an archaeological museum of the artefacts found at Lough Gur, both real and pictorial. <p>5. Natural Heritage and the Environment: It is suggested that the degradation of the waters of Lough Gur Lake be tackled now. The lake should be dredged over a defined period so that the ecosystems will not be adversely affected.</p> <p>Objective EH O16: It is suggested that the Council secure funding for the Lough Gur area so that all non-conforming</p>	<p>3. Derelict Buildings: The Draft Plan as set out currently restricts redevelopment of derelict buildings, it is proposed to amend this objective, see response to Submission No. 161 above.</p> <p>4. Tourism: See response to Submission No. 161 above.</p> <p>Noted. In relation to the Heritage Centre the question of relocation had been explored in the Lough Gur Management Plan.</p> <p>5. Natural Heritage and the Environment: See response to Submission No. 161 above.</p>
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<p>waste treatment facilities within the area of special control be upgraded so as to comply with EPA 2021.</p> <p>6. Dark Skies: If this status is achieved, what are the implications for the wider Lough Gur community?</p> <p>7. Objective LCA O5 e): This should be removed.</p> <p>8. Objective EH O30 Views and Prospects: It is set out that ‘Views and Prospects’ apply to new farm buildings as they do to private dwellings.</p> <p>9. Preservation of Sites: The observer requests that Teampall Nua (Newchurch) Church and Cemetery be fully preserved within the lifetime of this plan. All sites of archaeological significance should be protected within the lifetime of this plan.</p> <p>10. Conservation and Management Plan (Lough Gur): The area of the Plan should include the land-mass within the area of developmental control and also the ‘core-settlement’ of Patrickswell. Is there a Vision for Lough Gur by the end of this plan?</p>	<p>6. Dark Skies: International Dark Sky is a world-renowned recognition of pristine skies and were Lough Gur lucky enough to achieve the designation, it would be an important tourism feature in terms of attracting visitors to Lough Gur.</p> <p>7. Remove Objective LCA O5 e): See response to Submission No. 161 above.</p> <p>8. Objective EH O30 Views and Prospects: EH O30 sets out an exception for farm buildings and appropriate tourism developments.</p> <p>9. Preservation of Sites: The preservation of sites has complex legal and archaeological issues that will be addressed through the Council archaeologist and relevant experts from state agencies.</p> <p>10. Conservation and Management Plan (Lough Gur): Patrickswell is to be included in Level 6 of the settlement hierarchy emphasizing its importance as a local settlement cluster. See response to point 1 of this submission regarding the vision.</p> <p>11. Protected Structures: The thatched cottage is listed on the RPS</p>
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<p>11. Protected Structures: The submission requests that the thatched cottage (Maura’ Cottage) near Lough Gur Cross be protected. The roof is in danger of collapse.</p> <p>12. Lough Gur Cycleway: It is suggested that the following circuit on local roads be considered as a cycleway: Lough Gur/ Ballingoola/ Raleighstown/ Lower Grange/ Old Road Grange/ Rahin/ Cahirguillamore/ Rockbarton/ Lough Gur and that the Sli na Slainte walkway from Bruff to Holycross be upgraded to Cycleway status and that this status be applied to the ‘Shared Road Space’ from Holycross to Lough Gur Lake.</p> <p>13. Objective TR O78: The submission request that the:</p> <ul style="list-style-type: none"> • Patrickswell Crossroads be re-aligned to ‘Staggered Junction’. • Link Roads and the road from Pallasgreen to Holycross be upgraded. • That the ‘Shared Road Space’ from Holycross to Lough Gur Cross be restricted to vehicles under the 3,500k limit. <p>14. Objective CAF 03: The submission requests that:</p> <ul style="list-style-type: none"> • The Council should investigate a pilot development project in the environs of the Core Settlement at Patrickswell Cross (Lough Gur). 	<p>RPS reference 562 - 'Pinschmidt's', Lough Gur. The structure is also listed on the National Inventory of Architectural Heritage under NIAH Reg. Ref. 21903210.</p> <p>12. Lough Gur Cycleway: These are operational matters outside the remit of the Development Plan.</p> <p>13. Objective TR O38: These are operational matter and is outside the remit of the Development Plan.</p> <p>14. Objective CAF 03: These issues are outside the remit of the Development Plan.</p>
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<ul style="list-style-type: none"> • The Council should investigate ways to support Group Water Schemes in the County, providing infrastructure for rain-water harvesting. <p>15.Objective CAF O2 Climate Action: The Council need to form a partnership approach with service providers i.e. Group Water Schemes within the County.</p> <p>16. Objective CAF O36 Geothermal Energy: A Pilot Development Project for Patrickswell could include the use of this energy source.</p> <p>17.Objective SCSi O27 New Amenity Walkways: Requests that during the lifetime of this plan:</p> <ul style="list-style-type: none"> • A dedicated walkway be developed at Lough Gur, in co-operation with local landowners. • All approach roads to Lough Gur Lake receive special attention and maintainance from the Council. <p>18.Objective SCSi O28 Trails and Hiking Routes: Requests that during the lifetime of this plan a dedicated climbing route be developed to the summit of Knockfennel - “Limerick’s Stairway to Heaven”.</p>	<p>15.Objective CAF O2 Climate Action: This issue is outside the remit of the Development Plan.</p> <p>16. Objective CAF O36 Geothermal Energy: This issue is outside the remit of the Development Plan.</p> <p>17.Objective SCSi O27 New Amenity Walkways: This issue is outside the remit of the Development Plan. However, under Chapter 9 Sustainable Communities and Social Infrastructure the Draft Plan sets out policy support (Objective SCSi O27) for development of trails and walkways.</p> <p>18.Objective SCSi O28 Trails and Hiking Routes: This issue is outside the remit of the Development Plan. However, under Chapter 9 Sustainable Communities and Social Infrastructure the Draft Plan sets out policy support (Objective SCSi O28) for development of trails and walkways.</p> <p>19.Serviced Site: This issue is outside the remit of the Development Plan. This would be subject to permission and funding.</p>
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	<p>19.Serviced Site: Requests that during the lifetime of this plan a number of serviced sites be developed within the ‘Core Settlement’ of Patrickswell (Lough Gur). This is to counteract the developmental restrictions placed on Lough Gur by successive plans.</p>	
<p>Chief Executive’s Recommendations</p>		
<p>1. No change; 2. Designate Patrickswell (Lough Gur) a Level 6 Settlement, include the following text and Map in Volume 2: Patrickswell (Lough Gur) has approximately 4 dwellings. Its services include a primary school, church and the Honey Fitz theatre. The settlement is served by a Group Water Scheme and has no wastewater treatment facilities; 3. Amend Landscape Character Area LCA05 Lough Gur to remove the following: e) any structures in ruinous condition will not be allowed to be re-development or adapted for housing. 4. - 6. No change; 7. Change as outlined in No. 3 above in response to this submission; 8. - 9. No change; 10. Change as outlined in No. 2 above in response to this submission; 11. - 19. No change.</p>		
<p>SEA/ AA Response</p>		
<p>See SEA/AA Response to Submission No. 161 above.</p>		

<p>No. 184</p>	<p>Ref. & Name/ Group:</p>	<p>LCC-C62-184 SLR Consulting Ireland on behalf of Roadstone Limited</p>
<p>Submission/ Observation Summary</p>		<p>Chief Executive’s Response</p>
<p>1. Introduction: Roadstone Limited has a number of property assets in Limerick at Ballinleeny, Ballyneety, Barrigone, Creeves, Gooig, Hogans and Shanagolden. These contain aggregate resources and have provided/provide</p>		<p>1. Introduction: The contents of the submission are noted.</p>

aggregates and added value construction materials to support the local, regional and national economy.

2. Policy Context: The importance of the extractive industries to the wider economy and the need to protect the operations of working quarries and proven aggregate resources is firmly established in national and regional planning policy. The NPF’s NPO 23 is supportive of the extractive economy. The RSES supports implementation of the NPF and economic policies and objectives of the Government through a regional framework. This document highlights to government the need for a national planning policy for aggregates, which will underpin local and regional planning policy and ensure the sustainable supply of aggregates for Project Ireland 2040 and beyond.

3. Chapter 2 Core Strategy: The extractive industry should be considered crucial to unlock the County’s potential, providing the raw materials for the majority of building and infrastructure development. Limerick has significant, but finite mineral resources. The Draft Plan should safeguard areas of significant resources from incompatible developments.

4. Chapter 4 A Strong Economy: Section 4.7.17 Mineral Extraction is welcomed. However, there is no emphasis regarding the socio-economic benefits of the sector. The Draft Plan could be revised to outline the economic value

2. Policy Context: The Council recognise the importance of the aggregates industry and the value to the economy, the Draft Plan seeks to reflect the national and regional policy in this regard.

3. Chapter 2 Core Strategy: See response to Submission No. 88 for additional policy support to be provided in the Plan.

4. Chapter 4 A Strong Economy: The role of the Development Plan is to set out policy and objective support.

of construction and development supply chains, in support of meeting the population and housing delivery targets.

The Draft Plan should include a policy objective with respect to the after use of quarry and extractive sites. An after-use policy could include biodiversity, sustainable forestry, agriculture, recreation/amenities, industrial, commercial and residential type uses. The following policy is proposed: ‘To encourage the rehabilitation of disused quarries and extractive sites, to include backfilling with inert soil and stone, to possible uses including habitat restoration, sustainable forestry, agriculture, recreation/amenities, commercial, industrial, and residential, or a combination of same, subject to normal planning and environmental considerations.

5. Chapter 11 Development Management Standards:

Section 11.6.10 Extractive Industry is considered reasonable.

6. Other: Planning systems in England and Wales include ‘safeguarding of reserves’ - ‘Since minerals are a non-renewable resource, minerals safeguarding is the process of ensuring that non-minerals development does not needlessly prevent the future extraction of mineral resources, of local and national importance’. Planning Authorities should adopt a systematic approach for safeguarding mineral resources. The observer suggests that

Section 11.10.6 in the Development Management Standards sets out the requirement of the developer to prepare a restoration/aftercare proposals/scheme. Each individual quarry will present different scenarios; therefore, one size will not fit all, it is therefore not considered appropriate to insert an objective as proposed.

5. Chapter 11 Development Management Standards: Noted.

6. Other: The Council note the approach in the England and Wales. It is also noted that this approach is not recognised or supported in current planning legislation in Ireland, however, the OPR has requested the inclusion of a mineral deposits map in the Plan.

the Draft Plan highlights areas containing proven deposits on an appropriate map to protect them from future development of incompatible land use.

Chief Executive’s Recommendations

1. - 2. No change;

3. Update Section 4.7.17 of the Plan as follows: The Council recognises and distinguishes between aggregate and mineral extraction and mining. The Council also recognises the importance of Scheduled Minerals as defined in the Minerals Development Act 1940-1999. Minerals are important to the economy and in particular to renewable energy and battery technology. Both these areas of technology are hugely important in terms of achieving local and national climate mitigation targets.

-‘It is recognised that the exploration and extraction of minerals, aggregates (stone, sand and gravel) and concrete products industry contribute to economic development, ~~and~~ are essential building materials and are required for industrial processes. However, they can give rise to land use and environmental issues which are required to be mitigated and controlled through the planning process’;

-Update Objective ECON O32 as follows: a) The Council recognises the potential of the extractive, mineral and mining industries to contribute to Limerick’s economy and will endeavor to protect access to these resources, where known.

- Update Development Management standards as follows:

- Description of development works including buildings, mine shafts, fixed and mobile plant, roads, fuel tanks, stockpiles, storage of soil, overburden and waste materials, settling ponds;
- Estimated working life of quarry or mine, including phasing programme;
- Water supply, de-watering and discharge requirements;

The Planning Authority will support the extractive and mineral extraction industry by issuing planning permission that extends over the estimated life of the quarry or mine. It will be necessary, however that the applicant sets out a phasing proposal for the development to assess the time-scale of the proposal. The Planning Authority will impose strict conditions on planning permissions relating to the appropriate mitigation measures to control the impacts on the environment and surrounding area. Limited duration on permissions may be issued by the Council to allow for re-evaluation of the development in light of unforeseen implications or changes in environmental standards and technology.

A standard contribution and in certain circumstances, a special contribution under the Development Contribution Scheme and a financial bond will be required to ensure appropriate restoration and reinstatement works are undertaken within 12 month of the

	<p>cessation of works. It is obligatory for new mining developments to obtain an Integrated Pollution Control Licence Industrial Emissions Licence from the EPA. All aspects of air and water pollution, noise and waste are covered by this single integrated licence. Refer to dcaae.gov.ie/Minerals-Exploration-Mining.</p> <p>4. - 5. No change;</p> <p>6. Include a Mineral Deposits Map/Aggregates Map in the Plan.</p>
	SEA/ AA Response
	<p>The updating of the text is for clarification purposes, as it relates to mining and mineral extraction. The existing Limerick County Development Plan 2010 – 2016 (as extended) concentrates on aggregate extraction. The inclusion of minerals and mining gives greater clarity, particularly in relation to the need to manage the environmental issues that may arise from these activities. See also response to 88 above.</p>

No. 228	Ref. & Name/ Group:	LCC-C62-228 Environmental Trust Ireland
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Introduction: The submission states that Limerick City should be prioritised and facilitated with incentives under the Spatial Plan to take full advantage of what are clearly unique attributes of Limerick and its citizens, for the economic and social benefit of the entire country. In particular the submission recommends the following:</p> <p>(i) Quality of Life:</p> <ul style="list-style-type: none"> • Need for additional hospital/large extension to UHL; • It is imperative that Limerick learns from the mistakes of the past and that it rejects high-density large-scale housing, which will inevitably lead to 	<p>1. Introduction: The Draft Development Plan recognises the importance of Limerick City and the Metropolitan Area, this will be further enhanced in the Plan, with a dedicated chapter, which will bring together all the policy support from the strategies guiding the development of Limerick.</p> <p>(i) The Draft Plan ensures that there are sufficient zoned lands to support the development and expansion of medical facilities.</p> <p>National planning policy and Section 28 Guidelines seek increased density, however increased density doesn’t mean poor quality design</p>

<p>ghettoisation and enormous future socio-economic issues.</p> <p>(ii) New City Park/Social Recreation:</p> <ul style="list-style-type: none"> • There is demand for a new all-weather soccer pitch to replace the pitch facing Lidl on Rosbrien Road. • Consideration could be given to extending the People's Park on the side facing Hyde Road. This would result in a high quality, large amenity area for residents and visitors. <p>2. Bunlicky Treatment Works: There is a need to upgrade and ensure adequate tertiary treatment systems are available at Bunlicky. Inadequately treated wastewater can have enormous detrimental effect on water quality and habitats in the Shannon Estuary.</p> <p>3. Transport/Roads:</p> <ul style="list-style-type: none"> • New Street: The possibility of making New Street a One-Way Street should be considered. • Pedestrian Crossings: There is a lack of Pedestrian Crossings throughout the City. • Suburban Light Rail: The feasibility of suburban light rail link from Mungret to City Centre stopping at Crescent Shopping Centre, after Railway gates should be given serious consideration. 	<p>and standard of housing. It is imperative that the policy seeks to deliver high quality housing supported by services and spaces to ensure a high quality of living for all citizens.</p> <p>(ii) Policy support is provided in the plan in Chapter 9 Sustainable Communities and Social Infrastructure to support the delivery of sporting facilities.</p> <p>The Council are currently preparing a Blue – Green Strategy for Limerick City and Environs, which will identify deficiencies and opportunities in open space in the area.</p> <p>2. Bunlicky Treatment Works: Irish Water is currently carrying out a project to increase capacity at Bunlicky Treatment Plant, however, there currently is sufficient capacity to cater for demand.</p> <p>3. Transport/Roads: The National Transport Authority in conjunction with Limerick City and County Council and Clare County Council are progressing the Draft LSMATS, coupled with the City Centre Traffic Management Plan, which will address these issues.</p>
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<ul style="list-style-type: none"> • Climate Change Mitigation: Ensuring free flow of traffic is imperative to mitigate the impact of climate change. • Road and Footpath Safety Measures: With the Objective of ensuring the safety of pedestrians, cyclists, road and footpath users, all mechanically propelled vehicles including electric bicycles, scooters etc, with the exception of disability scooters should be licensed and insured. • Transport Policy: It is recommended that any Transport Policy adopted is subjected to a thorough risk assessment. <p>4. Industrial Emissions: It should be an objective to ensure that industrial emissions and discharges of Nitrates, Sulphates and various oxides and other compounds of Nitrogen and Sulphur shall not exceed recommended EU, EPA and WHO thresholds.</p> <p>It should be an Objective to prohibit large scale incineration, burning of tyres and waste material and to prohibit any increase in quantum, where such developments are granted.</p> <p>It should be a policy of Limerick City and County Council to refuse planning permission to industrial and commercial</p>	<p>4. Industrial Emissions: Industrial emissions are not within the remit of the Council, but rather it is the EPA which governs them under an Industrial Emissions (IE) licensing system. The Council works with EPA in this regard, where planning applications combine elements of planning and emissions licensing.</p> <p>The Draft Limerick Development Plan must comply with the Regional Waste Management Plan 2015 – 2021. The Regional Plan policy allows for incineration and the Draft Plan must comply with this higher order plan in accordance with the Planning and Development Act 2000 (as amended).</p> <p>Each planning permission should be assessed on its own merits.</p>
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<p>developments where derogations are sought from the provisions of EU Directives.</p> <p>5. Previous Refusal of Planning on Environmental Grounds: It should be a policy of Limerick and County Council to refuse planning permission on sites where planning permission has been refused previously on environmental grounds, including water quality.</p> <p>6. Roadside Hedge Cutting: It should be a policy of Limerick City and County Council to prevent roadside hedge cutting by mechanical hedgecutters, to prevent spread of invasive species such as Japanese Knotweed. It should be a policy to formally notify all landowners in writing with sufficient notice where it is intended to cut or trim any roadside vegetation boundaries to enable representations be made in order to ensure that protected species are not adversely affected unless emergency works are required.</p> <p>7. Large Scale Water abstraction from River Shannon: Environmental Trust Ireland urges Limerick City and County Council to use its best endeavors with a view to ensuring that water is not abstracted from the River Shannon for the Dublin Metropolitan area and surrounding counties.</p> <p>8. City Centre: Objectives should be included to promote and ensure the attractiveness of Limerick City Centre as a vibrant retail, commercial, tourist and cultural Centre.</p>	<p>5. Previous Refusal of Planning on Environmental Grounds: Each planning application should be considered on its own merits.</p> <p>6. Roadside Hedge Cutting: The Council has been proactively offering training and education in this regard. The National Parks and Wildlife Service also has a role in management of alien invasive species.</p> <p>7. Large Scale Water abstraction from River Shannon: This is beyond the remit of the Development Plan.</p> <p>8. City Centre: There are a number of objectives in the Draft Plan to support Limerick City Centre at the top of the retail hierarchy, the Council is committed to working with traders in the recovery from the</p>
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<p>Limerick City Centre should not be allowed to degenerate to coffee shops, pubs and night clubs.</p> <p>9. Trees and Hedgerows: Any developments requiring removal of 5 or more trees should be subject to a tree survey and where appropriate, an ecological survey. All tree surveys should be accompanied by a map showing the location of individual tree species in a proposed development, both existing and proposed. It should be an Objective not to allow large scale destruction of trees and hedgerows.</p> <p>10. Tower Blocks: A Policy is required preventing large scale tower block buildings.</p> <p>11. Shannon Airport: Any attempts to downgrade the international status of Shannon airport and its travel routes should be strongly resisted. In addition, contingency plans need to be put in place which may involve improved road and rail links, and development of Foynes Port.</p> <p>12. Milk Market: Environmental Trust Ireland supports the Milk Market submission on markets. The market should not be fragmented or diluted for newly created markets or</p>	<p>COVID 19 pandemic and to revitalise the City Centre, as a desirable place, to live, work and visit.</p> <p>9. Trees and Hedgerows: The proposal that any application to remove 5 or more trees to be accompanied by a tree survey is not appropriate. One tree proposed for removal may require a tree survey, dependent on age, scale, value, etc. The Council is currently preparing a Tree Policy, which will assist in this regard.</p> <p>10. Tower Blocks: National policy states that it is inappropriate to place caps on the height of buildings, accordingly, the Council prepared a draft Building Height Strategy to support developers in designing and placing buildings of scale in the City Centre. The document sets out the appropriate scale of buildings in the various character areas in the City Centre.</p> <p>11. Shannon Airport: The draft Plan recognises the importance of Shannon Airport for Limerick and the wider region. However, downgrading the status or routes of the airport is outside the scope of the Development Plan. Policy support is contained in the Draft Plan for rail and road options to Foynes Port.</p> <p>12. Milk Market: The Council recognises the importance of Limerick’s Milk Market for the City Centre and policy support is contained in the Draft Plan to protect and enhance the Milk Market.</p>
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casual trading, which may be unsustainable in the long term.	
Chief Executive’s Recommendations	
1 - 12. No change.	
SEA/ AA Response	
N/A	

No. 241	Ref. & Name/ Group:	LCC-C62-241 Councilor Sean Hartigan
	Submission/ Observation Summary	
	Chief Executive’s Response	
	<p>1. Conservation outside Protected Sites: The submission requests inclusion of the following under Section 5.3.3 Conservation Outside Protected Sites: Require all new developments to identify, protect and enhance ecological features by making provision for local biodiversity (e.g. through provision of Swift nest boxes or towers, bat boxes, green roofs) and providing links to wider Green Infrastructure Network, as an essential part of the design process.</p> <p>2. Green Roofs: The submission requests new text within Objective IN O10 Surface Water and SuDs: Require the provision of Green Roofs in all development of Apartments, Employment Developments, Retail and Ancillary Shopping, Leisure Developments and Education Facilities with a roof area in excess of 300sqm. In all cases, the Green area shall cover a minimum of 60% of the Roof area.</p>	<p>1. Conservation outside Protected Sites: Noted. While not every site will be suitable for the development of Swift boxes, it is considered that where possible the encouragement of biodiversity should be encouraged. It is therefore recommended to include additional text in the Draft Plan in this regard.</p> <p>2. Green Roofs: See response to Submission No. 155.</p>

3. Student Accommodation/Houses in Multiple

Occupation: Referring to Objective HO O8 Student Accommodation, the submission outlines issues associated with high density rental units and the impact on sustainable communities and family unit renting. The submission requests that a ‘change of use’ application should be considered for residential units that are changing from family housing to Houses in Multiple occupation/student rentals and applications should be resisted where adequate demonstration of an overprovision of family homes is provided.

The Development Plan should include a commitment to undertake a Student Accommodation Strategy and a separate land use zoning for student accommodation/houses in multiple occupation.

Any further expansion of third level institutions in Limerick should only be allowed if there is sufficient student specific accommodation in close proximity to the institution.

4. Sustainable Mobility and Transport: The submission requests that there is a less emphasis on building of roads to reduce the contribution of transportation to climate change. The focus should be on making short trips (less than 2km) less dependent on car travel.

3. Student Accommodation/Houses in Multiple Occupation: See response to Submission No. 210.

4. Sustainable Mobility and Transport: Road infrastructure is important to ensure regional connectivity, roads can also serve as routes for public transport and may also play an important role in the provision of cycling and pedestrian routes and connectivity. The roads identified in the Draft Plan are considered critical enablers in terms of infrastructure

<p>The council should prescribe private multi storey car parks operators to dedicate an area to secure bike parking, including electric charging points and non-standard bikes (trikes, cargo bikes, scooters). The same standard should be applied to all Council owned and operated car parks. The Council should trial and install secure, paid bike parking boxes that allow for multiple bike parking.</p> <p>5. Development Management Standards: Electric charging points should be a condition attached to all planning grants. In large housing developments car parking should be physically separated from the living area/entrances.</p> <p>6. Circular Economy: Referring to Section 7.7.1.2 Circular Economy for Building Design and Construction Projects, the submission requests that the word ‘encouraged’ be replaced with ‘required’ as follows: ‘To adopt the principle of the circular economy more fundamentally, applicants shall be encouraged required to submit a Resource Management Plan, including a Circular Economy Statement, covering different phases of the project from initial design through to construction and end-use functioning.’</p> <p>7. Strategic Objectives: Referring to the interlinked Strategic Objectives contained in Section 1.3, the submission requests that ‘existing residential developments’ are also included in Objective 3. The</p>	<p>and contribute to the permeability of urban areas, it is likely that there will be a continued need for them, even in a more sustainable future where they would be used by more environmentally friendly modes of travel.</p> <p>5. Development Management Standards: See response to Submission 164 in this regard. It is not considered appropriate that every grant of planning permission require a car charging point.</p> <p>6. Circular Economy: Noted. This amendment is considered acceptable.</p> <p>7. Strategic Objectives: It is considered that the objective is a catch all for new and existing residential development. However, it is considered appropriate to insert the word existing residential, which will offer clarify to the objective.</p>
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following text is proposed: ‘Ensure that changes of use, planning applications and developments in existing residential communities will not interfere with the ability of these communities to be of the highest quality, enabling life cycle choices and physical, community, recreation and amenity infrastructure and to be sustainable, healthy, inclusive and resilient communities’.

8. 10-Minute City and Town Concept: The submission refers to Policy TR P5 Sustainable Travel and Transport and proposes that the Council needs to identify communities that can be models for the 10-minute city/town concept. The submission considers the community surrounding the University of Limerick to be an ideal candidate.

10-Minute City and Town Concept: The Draft Plan supports all communities in the evolution and achievement of the delivery of the 10- minute city/town concept.

Chief Executive’s Recommendations

1. Amend Section 5.3.3 as follows: The Council will require all new developments, where possible to identify, protect and where appropriate enhance ecological features by making provision for local biodiversity and providing linkages to wider habitats;
2. Amend Objective IN O10 and Section 11.3.11 to include: Require green roofs for all roof areas for the following development types and encourage for all other types of development unless otherwise agreed with Limerick City and County Council's planning department:

- Apartment Developments;
- Employment Developments;
- Retail Developments;
- Leisure Facilities;
- Education Facilities;

All roofs of 300m² or greater to provide a minimum of 60% green roof coverage, unless exempted/ partially exempted;

3. Amend Objective HO O8 as follows: It is an objective of the Council to:

A) Support the provision of high quality, professionally managed purpose-built student accommodation either on campus, or in appropriate and accessible locations on public transport or cycle networks. All forms of student accommodation shall respect and protect the existing residential amenities of the area in which it is proposed. Student accommodation shall be and of appropriate design, in accordance with the Department of Education and Science ‘Guidelines on Residential Development for Third Level Students’ (1999), and (2005) ~~National Student Accommodation Strategy (2017)~~ and any subsequent updates. Applications for change of use from student housing to any other form of housing use shall be strongly resisted, without adequate demonstration that there is no longer a need for such use in the area and an over-provision of student housing exists’.

B) Ensure that all applications for new off campus purpose built student accommodation, the change of use to student accommodation in existing residential areas, or extensions to existing dwellings to facilitate student accommodation, must include details outlining the presence and distribution of any permanent residential occupiers, the extent of students renting in the private housing market and the presence of any other housing catering primarily for students and short term lets in the area/estate. The application should address any potential impacts of the proposal on residential amenity and any permanent residents in the area.

C) Require all applications for off campus purpose built student accommodation to be accompanied by a Student Management Plan outlining how the scheme will be professionally managed. The Plan shall demonstrate how the development will be managed so as to avoid potential negative impacts from occupants on surrounding properties and neighbourhoods and ensure the maintenance of safe, secure and clean environments for the community, occupants and nearby residents.

D) Ensure permissions for student accommodation will be subject to a condition requiring planning permission for a change of use to any other type of use, including short term holiday letting. Future applications for this type of change of use will be resisted. Where it is demonstrated that such form of housing is no longer required a planning application will require details of a proper management plan for the non-student use of the units to prevent adverse impacts on traditional residential estates.

4. No change;

5. Update Chapter 11 Development Management Section 11.8.6 as follows: ~~All new car parks (other than residential development) will provide the necessary wiring/ducting capable of accommodating electric vehicle charging points at a rate of 10% of the total car park spaces and to the requirements of the ESB Networks and IEC 61851 Standard for Electric Vehicles Conductive Charging Points. This will also apply to applications seeking extensions to existing car parks. In new residential developments, each dwelling will be provided with charging point infrastructure and all parking spaces in an apartment/ duplex complex will be provided with EV infrastructure by the developer.~~

- Infrastructure for Electric Vehicles will be integrated into developments in line with national requirements;

	<ul style="list-style-type: none"> <u>New applications for non-residential developments are to provide for at least one recharging point and the installation of up to 10% of the total car parking spaces for EV recharging for developments consisting of more than 10 car parking spaces (or as required by national policy should such requirement specify a higher provision);</u> <u>In all new residential developments and residential developments undergoing major renovations, a minimum of one car parking space per ten car parking spaces shall be equipped with one fully functional EV Charging Point. Where parking is provided within the curtilage of the dwelling, charging point infrastructure shall be provided to accommodate future charging points;</u> <u>The Council will liaise with other agencies to secure the retrospective provision of EV recharging points within the public realm of settlements where appropriate</u> <p>6. Amend wording in Section 7.7.1.2 To adopt the principle of the circular economy more fundamentally, applicants shall be encouraged<u>required</u> to submit a Resource Management Plan, including a Circular Economy Statement;</p> <p>7. Insert the word <u>existing (residential)</u> into Strategic Objective 3;</p> <p>8. No change.</p>
	SEA/ AA Response
	Amendments to Section 5.3.3 would confer additional benefits for local ecology throughout the plan area. The amended wording for Section 7.7.1.2 would strengthen the requirement for the Circular Economy and reduce the need for the use of alternatives, which in the longer term would mean better use of materials and their embodied energy. No change to the Environmental Report is required. See also response to 244.

No. 243	Ref. & Name/ Group:	LCC-C62-243 Keep Ireland Open
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Formatting/General: The following are recommended:</p> <ul style="list-style-type: none"> An index is provided, as recommended in the Development Plan Guidelines (5.15), and that the page numbers where topics are primarily dealt with should be bolded. 	<p>1. Formatting/General: The contents of the submission are noted, the final formatting of the Plan will be completed at the end of the Plan making process. However, some of the points raised here are not appropriate to the layout of the plan. It is noted that the OPR have not raised issues in relation to these items.</p>

- The Design and Development Standards should be dealt with at the end of each section.
- Policy and Chapter should be cross referenced.
- Chapter numbers should be placed on each page
- Provisions that are prefixed with ‘contribute to’ to be deleted as interpreted that these provisions aren’t the primary responsibility of Council.
- Reference to “subject to the availability of financial resources”, added to some objectives should be deleted.
- The Draft Plan fails to comply with, have regard to or take into account: Planning and Development Acts Plans in adjoining Counties (including Draft) DoECLG Guidelines Heritage Act 1995 National Heritage Plan, Southern Region RSES Development Plan Guidelines.
- In Chapter 11 Development Management Standards, replace bullet points with alphabetical points as in the other sections of the Draft Plan.

2. Introduction, Vision and Strategic Overview: The submission proposes the following:

- The Planning and Development Act Sec 9(4) requires that the Plan have regard to plans in adjoining counties.
- This Plan must conform to the RSES for the Southern Region.

2. Introduction, Vision and Strategic Overview: The Council consider that all of the points have been addressed in the preparation of the Draft Plan, extensive consultation has taken place with and will continue throughout the process with adjoining Local Authorities, Southern Regional Assembly, OPR, OPW, NTA, NRA and other key stakeholders.

- Strive to secure the financial resources to implement the policies and objects of the Plan.
- Shall ensure that the development plan is consistent with the strategy of the NTA.

3. A Strong Economy:

(i) Under Section 4.8.2, the following objectives are proposed to be included:

- ‘Protect the landscape from inappropriate tourism development by ensuring that developments and other activities associated with tourism or recreational activity do not cause damage, be detrimental to or detract from the traditional character or appearance of areas of scenic or visual amenities and ensure that the layout, design and associated infrastructure are of highest quality. Developments must be sensitively located, and be sympathetic in manner with the environment, heritage and amenities. They must ensure the protection, maintenance and conservation of amenities, be compatible with their intensity, scale, and balance and ensure that are not located where they would be detrimental to environmentally sensitive landscapes. Ensure the highest quality standards of design and materials so that there are no significant adverse impact on the environment in coastal areas, Natura 2000 sites, historic or archaeological sites, maritime

3. A Strong Economy:

(i) It is considered that this is addressed in Chapter 4 A Strong Economy Section 3, including Objectives such as ECON O36 Tourism and ECON O38 Tourism Facilities and Environmentally Sensitive Areas.

heritage or the countryside generally. They must be integrated, assimilated and absorbed into the landscape to take advantage of natural screening and topography.’

- Tourism and recreational development shall be assessed against the nature and scale appropriate to the character of the area and shall be located to be visually sympathetic to its surroundings.
- Direct tourist-based developments such as information centres and cultural centres into existing settlements where there is adequate Infrastructure to service these activities.

(ii) Commercial Developments in the Countryside: It is proposed that an additional sub section is added on Commercial Developments in the Countryside with the following objective: Only grant planning permission for new buildings or the expansion of existing industrial business enterprises in the countryside where the development would not cause a detrimental impact or erode rural character and is compatible with neighbouring land use. Any new building will be required to respect the appearance of and character of the landscape. It will not be acceptable where it is unduly prominent in the landscape, where it results in build-up of development when viewed with existing and/or approved building or where the impact of the ancillary works, including the creation of visibility splays would damage rural character

(ii) Commercial Developments in the Countryside: Noted. Objectives are set out in Chapter 5 Environment, Heritage, Landscape and Green Infrastructure, which relate to the integration of proposed developments into each Landscape Character Area.

or impact negatively on the environment or which fails to protect Natura Sites, conservation areas, natural heritage or the environment or fails to protect and improve or is injurious to amenities (including visual amenities). Buildings should be kept simple and finished with material appropriate to rural settings and should reflect the size, scale and pattern of development in the area. Buildings of excessive height will not be permitted and should be sited to make use of existing hedgerows and topography to provide natural screening.

(iii) Extractive Industry: The following is proposed under Extractive works:

- Applications for new development for aggregate extraction, processing and associated processes, shall identify existing public rights of way and walking routes which may be impacted on or are adjacent to the development site. They shall be kept free from development as a Rights of Way/Walking Routes.
- Restrict development of aggregate extraction, processing and associated concrete production which could impinge or impact on public rights of way or walking routes and satisfactorily address the potential impact on recreational activities.
- Recognising that the development for aggregates/mineral extraction, processing and associated developments can impose adverse

(iii) Extractive Industry: Public rights of way are identified in Chapter 9 Sustainable Communities and Social Infrastructure. Any planning application for the mining industry will be assessed on its own merits, including any consideration of public rights of way as appropriate.

In relation to Mineral Extraction and Environmental Impact Objective ECON O32 as set out in Chapter 4 A Strong Economy addresses this matter.

impacts on amenities, ensure the protection, conservation, preservation and safeguarding of recorded monuments and areas in their vicinity, World Heritage Sites (including Tentative Sites), NHA’s, Euro Sites, Nature Reserves, scenic views and prospects archaeological sites and features, natural heritage, natural environment, features of natural beauty or interest and prescribed sites, geological sites and areas of geological/geomorphological or historic interest and areas of high scenic amenity from inappropriate development that might be detrimental to them.

- Require that development proposals on or in proximity to a quarry site should investigate the nature and extent of the risks associated with the development together with appropriate mitigation.
- In assessing applications for new quarries or extension to existing quarries the council will have regard to visual impact on sensitive landscapes.

(iv) Commercial Forestry: The following objectives to be included on Commercial Forestry:

- Recognising the contribution that forestry makes to wellbeing, develop, promote, provide, protect, improve and encourage the provision of greater public access to new and existing forestry, both state and private, for recreational activities such as walking, hiking, cycling, and other non-noise

(iv) Commercial Forestry: Noted. The regulation of forestry lies largely outside the provisions of the Planning Authority. However, Chapter 9 Sustainable Communities and Social Infrastructure sets out policy support for the development of walkways and trails and requires consultation with all relevant stakeholders.

generating activities and the provision of nature trails, as part of connected network of walking and cycle routes in cooperation/consultation with Coillte, the Forest Service, private landowners, local interest groups and other relevant stakeholders and agencies.

- Retain existing rights of way and identify them and established walking routes before planting commences and maintain them as rights of way/walking Routes.
- Ensure that existing public rights of way, traditional walking routes are not obstructed.
- Forestry must not be visually obtrusive in the landscape so as to ensure that development is appropriate in its character, nature and scale and that it is carefully managed so that it doesn’t result in damage to visual amenity or have a negative visual effect on the rural environment and character of the countryside.
- No new or replacement coniferous forests will be allowed on summits generally above 250 mtrs.
- The submission notes this also applies to Tree Preservation Orders and Hedgerows.

(v) Agriculture: The following text to be included:

- Commonage and other rough grazing land should be regarded primarily as an important recreational, environmental and amenity resource.

(v) Agriculture: It is considered that the policy support in Chapter 4 A Strong Economy addresses Agriculture adequately.

- Recognise and support the role of farmers as custodians of the natural resources of the countryside and of rural landscapes.
- Promote, at national level, the adoption of a Land Use Strategy.
- Protect and conserve rural amenities, archaeological and natural heritage, landscape and the environment generally, from adverse impacts of agricultural practices and development particularly in high amenity areas.

4. Environment, Heritage, Landscape and Green Infrastructure:

(i) It is submitted to include the following policies:

- Restrict development within a pNHA to development that is directly related to the area’s amenity potential subject to the protection and enhancement of natural heritage, visual amenities and the landscape.
- Maintain the conservation value of Council owned land within designated or proposed NHA’s and promote the conservation value of adjoining council-owned land.
- Apply the precautionary principle in relation to proposed developments in environmentally sensitive areas to ensure that all potential adverse impacts on a designated NHA or Natura 2000 Site

4. Environment, Heritage, Landscape and Green Infrastructure:

(i) Policy EH P1 Protection of Natural Heritage and Biodiversity sets out policy support in Chapter 5 in this regard and addresses the points raised. Any planning application in the vicinity of a designated site will be assessed in accordance with relevant planning and development legislation and guidance.

arising from any proposed development or land use activity are avoided, remedied or mitigated.

- Protect the conservation value of designated sites identified by the Minister for DAHG and any other sites that may be proposed for designation during the lifetime of this plan.
- Development on or adjacent to a proposed or designated National or European Site will be permitted only where an assessment has been carried out to the satisfaction of the Council in consultation with the NPWS and where the overall integrity of the site will not be compromised or adversely affected.
- Conserve and protect the integrity of and maintain the favourable conservation value/status of Ramsar Sites, Statutory Nature Reserves, Biogenetic Reserves, and Wildfowl Sanctuaries.
- Protect plant, animal species and habitats identified by the Habitats Directive including Annex 1, Birds Directive Annex 2, Wildlife Acts 1976 to 2000 and the Flora Protection Order S.I No 94 of 1999.
- Maintain or restore the favourable conservation condition of designated or proposed sites under the control of the Council.
- Identify and protect local areas of high nature conservation value and support the management of landscape features which are of major

importance for wild fauna and flora in accordance with Art 10 of the Habitats Directive.

- No project giving rise to significant cumulative, direct, indirect or secondary impacts on Natura sites due to their size, scale, land take, proximity, resource requirements, emissions, transportation, duration of construction, decommissioning or from any other effects shall be permitted on the basis of this Plan (either individually or in combination with other plans or projects (except as provided for in Sec 6(4) of the Habitats Directive).

(ii) Under National Heritage and the Environment, the following are proposed for inclusion:

- Recognizing the role played by natural amenities and landscapes as major resources as part of our heritage, identify, provide, support, maintain, actively promote, encourage, protect, preserve, improve, facilitate, safeguard and enhance public access to heritage sites and features, natural heritage and amenity areas, including Natura 2000 sites, nature reserves, mountains, uplands, moorlands, forests, rivers, lakes, valleys, scenic areas, areas of natural beauty and other natural amenities for active recreational activities such as mountaineering and hill-walking, which have been traditionally used for outdoor recreation, and to the countryside generally, by creating a meaningful

(ii) Policies and objectives set out in Chapter 5 Environment, Heritage, Landscape and Green Infrastructure addresses the points raised. Chapter 9 also addresses Public Rights of Ways and includes an objective to preserve existing public rights of way in the plan area.

network of access routes as the opportunity or need arises. This will be done in co-operation, consultation and consensus with state agencies, landowners, community groups other interested bodies.

- Designate traditional walking routes to the uplands as public rights of way.
- Seek to negotiate access to lands using access agreements, where appropriate and feasible, in order to provide access to lands for amenity purposes.
- Encourage and support sensitive development which provides for the provision of access to natural habitats and heritage features.
- Recognising the important role of the environment through diversity, quality, integrity and quality of life by promoting the protection, conservation and enhancement of the natural environment by prohibiting intrusive development that would detrimentally impact on natural heritage.
- Impose “Precautionary Principles” which are an integral component of planning policies on environmental and heritage matters. Where uncertainty exists regarding the potential impact of a proposed development on natural heritage, full account shall be taken of these Principles.
- Adopt a regional approach to the protection, conservation and management of the environment

by co-operating with adjoining councils to ensure that the natural environment is maintained to encourage a collaborative and consistent policy that could identify threats to the integrity of such sites through a transboundary approach.

- Preserve the open character of commonage land and other hill land and secure access over paths and tracks through consensus with landowners, particularly in mountain areas.
- Encourage and support sensitive development which provides access to natural habitats subject to nature conservation considerations.

(iii) Under Section 5.3.4 Areas of Geological Interest, the following objectives are proposed for inclusion:

- Promote, encourage, facilitate and support access and public rights of way to geological and geomorphological features of interest in cooperation with landowners (where appropriate).
- Promote, encourage, facilitate and support access and public rights of way to geological and geomorphological features of interest in cooperation with landowners (where appropriate).

(iv) Under Section 5.3.5 Tree Preservation Orders and Hedgerows, it is proposed to include the following objectives:

(iii) Noted. This is a matter for individual landowners and is outside of the remit of the Planning Authority, it is therefore not appropriate for inclusion in the Plan.

(iv) See response to Submission No. 25, which provides for additional text in relation to this item.

- Protect groups of trees from inappropriate development that would impact adversely on them and affect their natural heritage amenity value. Manage, maintain, enhance, promote and facilitate, as far as practicable, the preservation and retention of the existing network of native woodlands along the Shannon in the vicinity of Mulkear and the University of Limerick for their contribution to the environment including landscape character and landscape conservation.
- Where appropriate, protect mature trees not formally protected by TPOs.
- Recognising the recreational potential of forestry, including Coillte’s “open forest” policy, protect and encourage access to forestry and woodlands, in co-operation with Coillte, private landowners and other stakeholders for walking routes (including long distance and looped walks) mountain and nature trails and hiking.

(v) Under Section 5.3.10 Wetlands the following objective is proposed for inclusion:

- In partnership with the NPWS, WI and other stakeholders facilitate public access to wetlands and support and protect the recreational and amenity potential of wetlands.

(v) Facilitating public access to wetlands needs careful consideration due to their ecological sensitivity in many cases and should be considered on a case-by-case basis.

(vi) Under Section 5.4 Landscape and Visual Amenity, the following objectives are proposed for inclusion:

- Provide and increase managed public access to interesting and attractive landscapes or to semi-natural and landscape amenity areas for recreational purposes.
- Preserve, maintain, enhance important landscapes and protect the amenity value, visual integrity of upland areas. Discourage inappropriate development in open countryside and prohibit developments which are likely to have material adverse visual impacts, either individually or cumulatively, on the character of the uplands. Preserve the status of traditionally open/unfenced landscapes including commonages and other hill land.
- Adopt a regional approach to the protection of the landscape in cooperation with neighbouring counties.
- In areas of high landscape sensitivity, the design and location of proposed development will be critical.

(vii) Fencing of Hitherto Open Land: The submission proposes an additional subsection to be included on fencing of hitherto open land with the following text and objective:

(vi) Noted. Many of these concerns are contained in the Landscape Character Area content of Chapter 5 Environment, Heritage, Landscape and Green Infrastructure, which addresses each landscape area of the County.

(vii) Fencing of Hitherto Open Land: In relation to the fencing of lands, this is largely governed by legalisation issued by the Department of Agriculture and is outside of the remit of the Local Authority. It is therefore not appropriate to address this item in the Plan.

- It is a requirement of the Planning Regulations 2001 Art 9(l)(a)(x) that the fencing or enclosure of land open to or used by the public during the ten years preceding such fencing or enclosure for recreational purposes or as a means of access to any seashore, mountain or other place of natural beauty or recreational utility, requires planning permission.
- Wire fencing constitutes visual pollution and destroys the “away from it all” feeling which makes upland areas such an attraction.
- There has been a large increase in the amount of new fencing in upland areas. Barbed wire has been used in most of this new fencing, which, in the absence of stiles or gates, makes access for recreational users of our countryside almost impossible. Traditional hill-sheep farming rarely required fencing, but since the introduction of AEOS, sheep-farmers must, in certain circumstances, stock-proof their land. The challenge is to ensure that such fencing will be done in a manner that will meet the requirements of AEOS without impinging on access for walkers and other recreational users.
- Objective: As new fencing of land open to or used by the public during the ten years preceding is not exempt development in accordance with Art 9(l)(a)(x) of the Planning and Development

Regulations the following criteria will be used when considering/assessing planning applications for new fencing of hitherto open land: Fencing, particularly in upland, highly scenic or amenity areas, will not normally be permitted.

(viii) Prospective Special Amenity Area Orders: The following objective is proposed for inclusion:

- Review the possibility of selecting a particular area as being suitable for designation during the lifetime of the Plan.

(ix) Heritage: The submission proposes the following objectives for inclusion:

- Publish a list with maps of heritage sites which are open to the public.
- Prepare and implement a strategy for access to heritage routes by identifying, promoting and supporting the development of a network of walking and cycling routes and heritage trails, with a focus on publicly accessible heritage sites and attractions in co-operation community groups, landowners and other stakeholders incorporating features of heritage interest.

(x) Inland Waterways: The submission recommends the inclusion of a table of existing or potential riverside

(viii) Prospective Special Amenity Area Orders: Noted. This issue will be addressed, if necessary and where adequate resources are available within the lifetime of the Plan.

(ix) Heritage: A list of publicly accessible sites are available from other sources, such as Limerick City and County Councils website, limerick.ie and the OPW website. It is not necessary to replicate them in the Plan.

(x) Inland Waterways: The Council are currently progressing the development of the Limerick Greenway and exploring potential extension and connections. As set out under Chapter 4 A Strong Economy, ECON O37 Limerick Greenway includes policy support for the

walks/cycles routes and proposes the inclusion of the following objectives:

- In partnership with the NPWS, WI, Councils, community groups, landowners and other relevant stakeholders, provide, protect, promote, encourage, develop, maintain, facilitate, manage, increase and improve public access to the inland waterways including rivers, lakes and riparian/waterway corridors in partnership with the NPWS, WI and other relevant stakeholders.
- In partnership with the NPWS, WI, Councils, community groups, landowners and other relevant stakeholders, provide, protect, promote, encourage, develop, maintain, facilitate, manage, increase and improve public access to the inland waterways including rivers, lakes and riparian/waterway corridors in partnership with the NPWS, WI and other relevant stakeholders.
- Support and facilitate the development of Greenways and Trails along (named) rivers.
- Provide land adjacent to river and canal banks and lakeshores free from development and reserved/preserved/set aside for public access as an undisturbed buffer zone between new development and river corridors and other water bodies to facilitate the creation of linear parks to accommodate walking/cycling routes that could be linked to the wider network of green infrastructure

development of Greenways and opportunities will arise for additional Greenways within the lifetime of the Plan.

The inclusion of development into riparian areas needs to be carefully managed, not least having regard to flood management aspects. Objective EH 018 sets out the objective in relation to Riparian Buffers.

and any established settlements in their vicinity and to encourage increased public access and recreational opportunities.

- Take into account any proposal to increase and enhance public access to inland waterways as a condition of any development granted.
- Strengthen the network of waterways at regional level.
- Promote the natural, historic and amenity value of watercourses to address the long-term management and protection and strengthen regional links.
- Recognising the importance of inland waterways, both navigable and non-navigable, work with State Agencies, landowners, local communities and other relevant groups/stakeholders to ensure the protection, management, maintenance, preservation, conservation, improvement and enhancement of waterbodies and watercourses, rivers, streams, river valleys, lakes, springs and associated undeveloped riparian strips/zones, buffer zones distinctive linear sections of water corridors and the amenity of the shoreline of river corridors, canal and river banks, river and stream valleys and riverine wetland areas, fens wildlife habitats from degradation and damage and the visual impact of dispersed and highly visible development.

- All proposed developments shall be in accordance with the Birds and Habitats Directives and other relevant EC Directives.
- Protect and maintain the amenity and recreational value of walking and cycling routes by prohibiting the intrusion of development along these routes. Seek to ensure that new development will not have a negative impact on established walking routes and public rights of way along inland waterways.
- Normally only permit development proposals associated with water sports adjacent to waterways (including lakes) where the proposed facilities are compatible with existing use of water including non-recreational uses, which will not result in damage to important features of archaeological heritage or Natura Sites, can be satisfactorily integrated into the landscape or will not have an unacceptable impact on visual or environmental amenities and especially in areas of high amenity or scenic importance and will not result in excessive noise and nuisance.
- As water sports cover a wide range of activities from tranquil uses such as sailing, canoeing, rowing and sail boarding to powered activities such as water-skiing and powerboat uses, the Council may require management plans for particular areas to address the compatibility of such varying demands.

- Adopt bye laws prohibiting or restricting jet-skiing, water skiing and any other noise generating activities within one year of the adoption of the Plan.
- When considering development applications relating to activities such as the use of jet-skis and power boats, have regard to the recommendations of any national guidelines which may come into force with respect to their potential impacts on nature conservation.
- In areas adjacent to inland waterways, lakes, canals, rivers, where planning permission is sought, the applicant must ensure that full public access to waterways is retained or conditions may be attached requiring retention of this access to facilitate creation or extension of walking/cycle routes.
- Adopt a regional approach to the protection of watercourses in co-operation with neighbouring counties.
- Require that development along rivers set aside land for pedestrian routes that could be linked to established settlements.
- The line of development within river valleys shall be strictly controlled so as to maintain the integrity of the natural topography. The maintenance of natural river banks shall be required to be without physical or visual encroachment.

- Potential applicants will ensure that full public access to lands along waterways which are in private ownership is maintained.
- Protect, enhance and improve existing public rights of way and, where possible, provide additional access to inland waterways including lake shores, river banks, through the acquisition of land for public rights of way and parking and lay-by facilities, through agreement with existing landowners.
- Reserve land adjacent to canal and river banks and other waterbodies to promote and facilitate the creation of waterside linear parks to link with existing parks and open spaces and to facilitate the provision of walking/cycling routes along canals and watercourses.

(xi) Canals: The submission proposes the following objectives:

- Provide public access to canal corridors, where feasible and use the potential of canal towpaths for designated walking and cycle routes, both as recreational amenities and the promotion of links with any designated walking cycling routes, existing or proposed.
- Ensure the conservation of canal corridors and require that developments abutting the canal

(xi) Canals: Access to the Park Canal in Limerick City has been enhanced through the provision of an additional walkway. There is policy support in the Draft Plan to protect all water course from inappropriate development.

relate to the context of the adjacent environment and contribute to its overall amenity.

- Protect and enhance the natural heritage and landscape character of the canal corridor and maintain it free from inappropriate development.

(xii) The submission proposes the following objectives:

- Promote, extend, develop and facilitate the provision of increased access to lakes and lakeshores to extend public walking and cycling routes.
- Maintain the amenity value of major lakes and their environs by restricting and regulating development that would prejudice use of these areas.

(xiii) Rivers:

- Promote and develop the towpaths along the River Shannon Navigation to expand recreation and in co-operation with WI.
- Protect and preserve the landscape of the River Shannon and floodplains, including the callows and views of special interest, from inappropriate development.

(xv) Peatlands: The following objectives are proposed in relation to peatlands:

(xii) Noted. The Local Authority recognise the importance of promoting access to rivers and lakes and also the importance of protecting them from inappropriate development. Objectives are included in chapter 4 of the draft plan which supports the development of areas for the public in a sustainable manner.

(xiii) Rivers: Development of such walkways is taking place currently along both the Shannon and Mulcair Rivers. Areas such as the Corbally meadows have been indicated as being valuable semi-natural grassland habitats (callows) and are designated as open space.

(xv) Peatlands: Noted. Policies are set out in Chapter 8 Climate Action, Flood Risk and Transition to Low Carbon Economy for the protection of bogs under Objective CAF O10 Woodland Creation, Forestry and

- Protect, conserve and manage the character, appearance, heritage and amenity values of peatland landscapes by promoting high environmental standards in conjunction with the BnM, NPWS, Coillte, IPCC and NGOs.
- The Council recognises the importance of raised bogland as a major natural, archaeological and amenity resource and will liaise with the relevant Government departments and NGOs to try to secure the conservation of original peatland areas.

(xvi) Coastal: The following objectives are proposed:

- Promote, plan, develop and support, in conjunction with the Councils in adjoining counties and other partner agencies the development and use of a strategic waymarked coastal path/greenway along the entire coastline.
- Provide, support, actively promote, maintain, protect, improve and enhance public access to the coast, beaches, seashore, coastal heritage and scenic landscapes in co-operation with landowners, relevant stakeholders and local groups and with statutory and relevant organisations for recreational activities including walking and cycling. Examine the designation of traditional walking routes thereto as public rights of way. Where feasible, develop walkways/ cycleways between the coast and green spaces in built-up areas.

Preservation of Bogs and Objective CAF O38 Carbon Capture. There are four NHAs that have been designated in Limerick due to their importance as bog or peatland habitats. Objectives to protect these designated sites are set out under Chapter 5 Environment, Heritage, Landscape and Green Infrastructure.

(xvi) Coastal: Noted. In terms of developing links between green areas in urban areas a Blue Green Infrastructure Strategy is currently being developed. The protection of coastal areas is a feature of development management activities and the coastal zone in the Draft Plan is regarded as being of scenic and environmental importance.

- Work to protect beaches, within dunes and in other vulnerable areas manage and control car parking and vehicular movements.
- Prohibit inappropriate development where such development which could cause damage to, or degradation of, beaches, estuaries, sand dunes, protected/designated landscapes, amenity areas and their recreational and amenity values or where it might affect their character and quality. Proposals for tourism development in coastal areas must demonstrate that there will be no negative impacts on amenities or the integrity of the natural environment.
- Prohibit mineral extraction along the coast, particularly in proximity to estuaries, exceptional circumstances, where it can be demonstrated that there will be significant adverse impact on the environment, visual amenity, heritage or the conservation objectives of Euro Sites.
- Prohibit development of facilities for fishing and leisure developments where the siting of such installations and their supporting infrastructure could cause landscape and environmental degradation or instability, have adverse effect natural heritage or designated sites or detract from the visual amenity of an area or public access to beaches.

- Introduce bye-laws restricting or prohibiting jet-skiing and water skiing.
- Protect established rights of way to coastal areas.
- In assessing proposals for Water Sports development, ensure that the following criteria are satisfied: that proposals are fully compatible with existing use, will not result in damage to nature conservation or archaeological features, can be fully integrated into its seascape landscape, or will not have an unacceptable impact on visual amenity or important scenic areas, or unduly restrict access.

(xvii) Referring to Section 5.5 Archaeology and Built Heritage, include the following objectives:

- Protect and secure the preservation in situ, or in exceptional cases, preservation by record of all archaeological remains and sites of historic importance such as National Monuments, Recorded Monuments, their settings, caves, features and context in accordance with Section 12 of the National Monuments (Amendment) Act 1994 and in accordance with the recommendations of the Framework and Principles for the Protection of Archaeological Heritage DAHG (1999) or any superseding national policy document.

(xvii) Noted. See response to Submission No. 157 in this regard.

- The council will continue to develop a programme of survey and management of Council-owned monuments and structures of historic interest.
- Promote, provide and encourage appropriate signage to publicly accessible archaeological sites and National Monuments listed in the RMP.
- Traditional access routes will be designated as public rights of way. In other cases, routes will be acquired by agreement with landowners or by way of compulsory powers.

(xviii) Architectural Conservation Areas: It is submitted to include the following as a sub section: Mass Rocks and Holy Wells with the associated objective:

- Preserve, protect and, where necessary, enhance mass rocks and holy wells

(xix) World Heritage Sites: The following objectives are proposed:

- Recognising and respecting potential of Lough Gur support, pursue, progress, facilitate, encourage and promote their designation as UNESCO WHS in collaboration/partnership with the appropriate Government Department, landowners, local communities and other stakeholders, to assist in the preservation of the natural heritage.

(xviii) Architectural Conservation Areas: Many of these monuments are designated Recorded Monuments under the National Monument's Act, or are on the Record of Protected Structures and are therefore afforded the necessary protection.

(xix) World Heritage Sites: Lough Gur was the subject of an unsuccessful application a number of years ago for World Heritage Status.

- Protect, preserve and maintain the Outstanding Universal Value of sites included in the tentative list of WHS from inappropriate development.

(xx) Historic Graveyards and Burial Grounds: Proposed objective:

- Protect, preserve, enhance, conserve and maintain the natural heritage of archaeological/historic graveyards and their settings and historic burial grounds (including those identified in the RPM) and those in the guardianship of the Council, through improved access and preserve their heritage value. Encourage and promote local involvement and community stewardship in the care, upkeep, maintenance, management rehabilitation and conservation of these graveyards in accordance with legislation, best conservation and heritage principals and best practice guidelines. Maintain all burial grounds in the Council’s charge in good condition.

5. Sustainable Transport and Mobility:

(i) Walking: The following objectives are proposed for inclusion:

- Promote and facilitate the continuing development of a regional and local network of Ways and Permissive Access Routes that provide a network of long-distance walking, running and hiking trails

(xx) Historic Graveyards and Burial Grounds: Noted. Such initiatives are already being carried out though the efforts of the Local Authority’s Archaeologist.

5. Sustainable Transport and Mobility:

(i) Walking: The Council has developed the Limerick to Kerry Greenway and is also planning further enhancements of that route. It has also supported the establishment of forest walks. In relation to scenic uplands, the Galtee walks extend across the county boundary to Tipperary. It is possible to walk from Anglesborough in Limerick to Cahir

and routes. Encourage the re-routing of existing trails off public roads.

- In view of the obesity and diabetes crisis, support, improve, develop, upgrade and facilitate Slí na Sláinte routes. These should be waymarked/signposted, where feasible.
- Support the provision of proposed long distance walking trails that provide access to scenic uplands, riverine and coastal features.
- Research and map existing network of traditional paths used for leisure purposes to determine their legal status. Employ a Walks officer under the control of the Council.
- Ensure the protection of and co-ordinate the continuation of strategic walking routes and trails.
- Established walking routes shall be identified prior to any new forestry planting, new infrastructural, energy/telecommunications or golf course developments.
- Preserve and protect and, where possible enhance, the integrity of existing public walking and access routes (including long distance walking routes) which contribute to the general amenity by ensuring that development does not impinge on these routes particularly at seashores, mountains, lakeshores river banks or other places of natural beauty or recreational activity and those in scenic

in Tipperary. Similarly other walkways exist in the Ballyhouras, some of which cross the Limerick Cork border.

Forestry is largely outside the control of planning and hence the Local Authority but, as indicated elsewhere, the Council has helped fund local groups in establishing forest walks.

and high amenity areas and along inland waterways.

- Protect listed walks from development that creates or has the potential to create dis-amenities.
- Take the potential impact of proposed development into account when considering/ assessing applications for permission in the vicinity of established walking routes that might impinge on walking routes (including long distance) or potential walking routes.
- Protect access routes to upland walks and public rights of way.

(ii) Cycling: Include the following objectives:

- Promote, facilitate, support, improve and encourage the development, enhancement and expansion of an integrated coherent network of safe cycle routes (including long distant routes) by facilitating the construction of cycleways. Support the development of the National Cycle Network and The National Cycle Network Scoping Study (2010) and enhance and maintain these routes with better signposting and road surfaces separated from vehicular traffic.
- Assign an officer at appropriate senior level as a “Cycling Officer”.

(ii) Cycling: Noted. This issue is dealt with in Chapter 6 Sustainable Mobility and Transport with the following text: “In order to enhance the convenience and attractiveness of cycling, routes need to be continuous and direct to facilities, places of work and interchanges. The Council will continue to develop a network of high quality, continuous cycle routes throughout Limerick, improve the permeability of the road network for cyclists and create a more cycle friendly environment, through reducing the volume and speed of motorised traffic”.

- Promote and facilitate the development of cycle routes in accordance with the National Cycle Network Scoping Study 2010.
- Support the development, maintenance and enhancement of trails and routes in co-operation with Sports Council, NTA, NTO, NWMWAC, Heritage Council and other bodies to develop cycle touring routes including those linking with adjoining counties particularly in areas of high amenity.
- Produce cycle maps.
- Support community, authority or agency led projects that would deliver identified strategic cycling links.
- Support the policies of the National Cycle Framework 2009.
- Develop the NCN Corridor from Limerick to Carrick on Shannon.

(iii) Walking and Cycling: The following objectives are proposed for inclusion:

- Support, promote, establish and actively encourage the provision, development, extension and design of off road interlinked walkways and cycleways (mention routes) including medium and long distance walkways and particularly those with historic associations in, conjunction with the Irish Sports Council, IW and other stakeholders to link

(iii) Walking and Cycling: Chapter 6 Sustainable Mobility and Transport includes the following objectives:

Objective TR O14 Walking and Cycling Infrastructure: It is an objective of the Council to:

- a) Improve and provide clear, safe and direct pedestrian linkages, cycle networks as identified in the final Limerick Shannon Metropolitan Area Transport Strategy, including the greenways and primary segregated

with a strategic network of trails from residential areas, open spaces and existing or new public rights of way to facilitate the creation of a secure and safe greenways network to provide access to scenic, mountain, lakeshore and river features and to link with adjoining counties, including cross border counties in partnership with their councils, the state, private and voluntary sectors.

- Support, promote, facilitate and develop a comprehensive network of greenways, linking parks and public open spaces and work with the NTA, adjoining councils and all stakeholders to develop a co-ordinated approach to the selection, delivering and servicing of future national and regional greenways, in order to achieve improve external linkages, to achieve maximum impact and connectivity and to provide alternative routes for pedestrians and cyclists.
- Support the delivery of cycle routes and Greenway projects having regard to the Strategy for Regional and National Greenways Networks.
- Provide, create, promote, plan, support, maintain, enhance, encourage, extend, facilitate and support the development and improvement of walking, rambling and cycling in conjunction/co-operation with the Irish Sports Council, walking and cycling groups, landowners, farmers, local groups and

cycle routes, between the employment zones, shopping areas and residential areas throughout Limerick;

b) Maintain and expand the pedestrian route network, infrastructure and where possible retrofit cycle and pedestrian routes into the existing urban road network, to provide for accessible safe pedestrian routes within Limerick.

Objective TR O15 Limerick Cycle Network: It is an objective of the Council to implement in full, the Cycle Network, which will be set out in the final LSMATS, with priority given in the short term to delivering the primary cycle network and cycle routes serving school.

communities and other relevant organisations and bodies.

- Seek opportunities for the development of suitable walking routes, cycle tracks and bridle paths along historic access routes. Explore the potential of inter county routes. Augment existing networks and trails at key heritage sites.
- Develop and promote a Walking and Cycling Policy/Strategy within two years of the adoption of the Plan, working in partnership with statutory bodies, private and voluntary sectors, landowners and other stakeholders with a view to establishing a register of walking routes and the legal status of same, the mapping and promotion of guided walks developing links with adjoining counties.
- Provide adequate car parking and/or lay-bys for walkers and cyclists, (from your local knowledge name important locations) and other appropriate points to facilitate access to amenity/scenic areas from 9am until dark.
- Develop a strategy to support and underpin funding for the development, extension and enhancement of walking/cycling trails, greenways and continue to engage with funding agencies such as DoTTS, NTA, Heritage Council and associated transport agencies and LEADER.
- Encourage and support the enhancement and extension of existing walking and cycle routes by

utilising links from residential areas, parks and open spaces and existing and new public rights of way to facilitate the creation of a secure green network to provide access to scenic mountain, lakeshore and river features.

- Ensure that walking and cycling routes and the public footpaths network are maintained and where feasible improved.
- Support alternative “quiet” routes which are signposted for cycling and walking to improve the experience and uptake of active travel.
- Protect the integrity, extent, scenic quality, visual setting and functionality of existing Greenways and walking and cycle routes.
- Protect the routes of, and prohibit development which would hinder the creation and development of future Greenways, walking and cycling routes including those identified in the Plan.
- Ensure that development proposals protect the routes of potential linkages such as linear paths footpaths trails, greenways and cycleways through a site where the Council considers that an opportunity to provide a linkage to or between adjoining areas.
- Protect established walking and cycling routes and keep them free from development which would adversely impact upon them.

(iv) Disused Railways: The following objectives are proposed for inclusion:

- Protect and preserve routes of former railway lines (named) by enhancing, conserving, safeguarding and preserving potential greenway routes as long distance walking and cycling routes along or near these rail lines which could compromise their development as walking/cycle routes in the future. Along these corridors other uses shall not be considered.
- While it should be possible to provide most routes along the existing track alignment, there may be a need for diversions and deviations following detailed survey and design work and consultation with landowners. The aim is to include these routes in a map in the Plan. Meanwhile adequate protection needs to be given to abandoned rail lines so as to avoid inappropriate development that could compromise their viability.
- Where feasible, provide separate trails for walkers and cyclists in the interests of safety and convenience with appropriate surfaces for each type of user.

6. Infrastructure:

(i) Referring to Section 7.4.2 Telecommunications Support Structures, Antennae and Domestic Satellite Dishes, the following objectives are proposed for inclusion:

(iv) Disused Railways: This has long been a feature of previous Development Plans which has resulted in the development of the Limerick Greenway.

As set out under Chapter 6, Sustainable Mobility and Transport, Objective TR022 Limerick to Foynes Line gives support to preserve this line as a strategic link to the port. This will not be developed as a greenway, but rather will be re-developed at some future stage as a freight line connecting with the port.

6. Infrastructure:

(i) A list of Public Rights of Ways are set out in Chapter 9, Sustainable Communities and Social Infrastructure. Objective SCS1 O38 Public

- Require the identification of Public Rights of Way and established walking routes prior to any new telecommunication developments (including associated processes) which will be prohibited if they impinge or impact thereon or on recreational amenities or public access to the countryside or on the natural environment.
- The Council shall, in assessing an application, take into account the impact on established walking routes.

(ii) Referring to Section 7.6 Energy and Gas Networks, the following objectives are proposed for inclusion:

- The Council should ensure that transmission lines are located in non-scenic areas, where possible, thereby avoiding landscapes of high value or sensitivity, areas of nature conservation and archaeological interest so that that the visual impact is minimised.
- The undergrounding of transmission lines (including telephone and TV cables) shall be considered first as part of a detailed consideration and evaluation of all available options.
- If, for whatever reason Council has decided to permit overhead powerlines and television cables, it is acknowledged that these powerlines can have an adverse/ negative impact on the natural environment and the character of its setting, and

Rights of Way encourages the preservation of existing public rights of way. Each planning application will be assessed on its own merits.

(ii) Noted. In some situations, the Council have required sections of cables to be installed underground. The undergrounding of long connections should only be carried out after careful assessment in that such underground ducting can become drainage routes, which might not be appropriate in areas such as bogs or close to wetland habitats. These developments are also subjected to scrutiny for their possible effects on visual amenity as a matter of course. Policies and objectives for the protection of natural heritage (Policy EH P1), views and prospects (Objective EH O30) and designated sites (Objective EH O1) are set out under Chapter 5 Environment, Heritage, Landscape and Green Infrastructure. Objective IN 011 also sets out the objective in relation to Energy and Gas Networks.

natural heritage, ensure that they are designed to have regard to possible interference with or damage to heritage sites, areas of archaeological importance, pNHAs, cSACs, SPAs or sites of nature conservation. Minimise their obstructive impact, their obtrusiveness and their visual intrusiveness particularly in mountainous areas, by their being integrated with their surroundings and that proposed development is consistent with international best practice.

- Landscape Impact and Visual Assessments shall be submitted where a proposed development is located in lands in high amenity and mountain areas or have the potential to impact upon county landscape designations and important designated sites. They shall be screened for potential impacts on Natura 2000 sites.

(iii) Referring to Section 8.5.2 on Hydro-power, the following objectives are proposed for inclusion:

- In assessing hydro energy scheme proposals, the Council will take into account the impact on public rights of way and walking routes.
- Development must not have a negative effect on the surrounding environment, landscape and local amenities.

(iii) Noted. A list of Public Rights of Ways are set out in Chapter 9, Sustainable Communities and Social Infrastructure. Objective SCS1 O38 Public Rights of Way encourages the preservation of existing public rights of way. Each planning application will be assessed on its own merits.

(iv) Noted. National guidance on the topic of solar energy would be welcomed by the Planning Authority. It is noted that the Department of

(iv) Referring to Section 8.5.3 Solar Energy: The following objectives are proposed:

- Make representations to the appropriate government department to make Planning Guidelines for ground mounted solar farms.
- Development must safeguard and protect the natural heritage and must have no significant adverse impact on the surrounding natural environment or on the visual character of the landscape and amenities. There is a presumption against their being located in sensitive areas such as Natura 2000 sites. Development must have regard to its effect on scenic routes, its possible cumulative effect and the potential for mitigation through screening with hedges.

(v) Referring to Section 8.5.4 Wind Energy: The following objectives are proposed for inclusion:

- Undertake an analysis of suitable areas for wind energy and prepare a map showing the Landscape Suitability for Wind Energy Development in accordance with national guidelines including section 3.5 of the Wind Energy Guidelines (2006) and any subsequent revisions and as recommended in the LCA.
- Prepare a Wind Energy Development Strategy and publish it as a proposed variation of this plan

Housing, Local Government and Heritage are in the process of preparing aviation safeguarding maps for airports and aerodromes which is expected to be completed by Q4 2021. Such maps will be used to form the basis for the preparation of solar energy guidelines at some future point by the Department.

(v) The analysis of areas suitable for wind energy was originally carried out for the existing Development Plan and is largely restricted by designated areas. This has been further altered in the Draft Plan to move wind energy development back from the estuary, because of its ecological and scenic sensitivity.

following the review of the DECLG’s Wind Energy Development Guidelines.

- Identify existing public rights of way and established walking routes and maintain and preserve them free from development.
- Restrict large scale wind energy structures in the rural hinterland and mountain areas to protect their overriding visual and environmental values.
- All applicants should include a LIA dealing with possible impacts on any existing rights of way or established walking routes.
- Ensure that the assessment of wind energy development proposals will have regard to the impacts on public rights of way and walking routes.

7. Sustainable Communities and Social Infrastructure:

(i) Referring to Section 9.10 Sports and Recreation, the following objectives are proposed for inclusion:

- Support development, in co-operation with various stakeholders to promote, preserve, improve, encourage public access to lakes, beaches, coasts, riversides, uplands and other areas that have been traditionally used for outdoor recreation and extend recreational amenities including riverside and canal walks and walking and cycling routes.
- Promote and encourage the recreational use of coastline, rivers and the development of blueways

7. Sustainable Communities and Social Infrastructure:

(i) Noted. The promotion of public access to the uplands must be done on a case-by-case basis, as many of these are sensitive ecological sites (SACs and SPAs and NHAs) and would be vulnerable to public intrusion.

which provide opportunities for walkers, cyclists and canoers.

- Protect and preserve recreational attractions such as scenic beauty, woodlands and waterways, coastal areas and beaches, natural heritage, the character and distinctiveness of scenic landscape and the environmental quality.
- Ensure that golf course development does not impinge on existing public rights of way and walking routes by identifying them prior to development.
- Development proposals for Noise Generating Sports will not normally be permitted unless there is no conflict with the enjoyment of areas used for informal recreation.
- Adopt Bye-laws banning the use of motor bikes and quads (except for bona fide agricultural purposes) in privately- owned areas of rough grazing (including commonage) and motorised para gliders.

(ii) Public Rights of Way: Referring to Section 9.18, the following text to be included:

- The above list is not exhaustive. The omission of a right of way from this list shall not be taken as an indication that such a right of way is not a public right of way. The public right of ways mentioned in

(ii) Noted. A list of identified Public Rights of Ways are set out in Chapter 9, Sustainable Communities and Social Infrastructure. It is likely that this list will change over time and will be reflected in future drafts of the Development Plan.

See also responses above, which sets out the Council aims to develop further cycle and pedestrian networks.

the Plan are based on evidence of their existence and validity.

- Public Rights of Way have existed over the centuries and constitute an important recreational amenity. They enable the enjoyment of high-quality landscape, natural and archaeological heritage and provide links to rivers lakes, bogs, forests and places of natural beauty.
- A PROW or highway is a physically defined route over which the public have a right of passage even if the route is not in public ownership. It is described as “a user as of right” and confers an unrestricted right of the general public to pass and repass at all times of the day or night and at all seasons without notice to, or permission from the landowner. The most common characteristic of a PROW is that it follows a defined route which may be sub-divided amongst different branches.
- Where a list of public rights of way is included in the Plan the following rider should added: The public right of ways mentioned in the Plan are based on evidence of their existence and validity. It does not affect the validity of other public right of ways not included in the Plan.

(iii) Referring to Objective SCS1 O38 Public Rights of Way: It is submitted that the first phrase should be replaced

(iii) Noted, it is the purpose of Objective SCS1 O38 Public Rights of Way to preserve public rights of way, where this is possible. In relation to mapping rights of way on an ongoing basis, this will be examined

with ‘Preserve Public Rights of Way’. The following objectives are proposed for inclusion:

- Existing Public Rights of Way shall be identified prior to any new forestry planting, new infrastructural, energy/ telecommunications or golf course developments.
- Identify and map, on an ongoing basis, public rights of way and incorporate them in the Plan by way of a Variation. Where appropriate links to established public rights of way in adjoining counties will be identified.
- In accordance with the provisions of either Sections 206 or 207 of the Planning and Development Act 2000 encourage and facilitate the creation of additional rights of way and extend existing ones for pedestrian or amenity reasons, by investigating named areas to facilitate the development of waymarked ways and looped walks, by undertaking a review/survey of green links and cycling routes and by bringing forward proposals within two years of the adoption of the Plan.
- Ensure the provision of, and improvement to signposting and waymarking on all public rights of way.
- Designate Pilgrim Paths as public rights of way.
Note: We submit that as these Paths have been

during the course of the Development Plan cycle and any revisions to the list will be included in the next Development Plan.

walked for many centuries their case for designation is surely irrefutable.

- Identify mass paths and routes to holy wells, mass rocks and penal mass stations and consider designating them as public rights of way.
- Encourage the provision, for the common good, of a network of Public Rights of Way to traditional outdoor amenities, including heritage sites and features of archaeological interest, national monuments, mountains, hills, rivers, forests, lakes, geological and geomorphic systems, water corridors, places of natural beauty and other natural amenities.
- Council recognises the importance of promoting and supporting the preservation, protection, enhancement, maintenance and improvement, for the common good, of all public rights of way particularly those giving/ providing access to seashores, mountains, uplands, lakes, water corridors river banks, archaeological sites and National Monuments, geomorphological features of heritage value, and other places of natural beauty or recreational utility/activity by ensuring that development doesn’t impinge thereon.
- Prohibit development that might have a negative effect on public rights of way and keep them free from obstruction, particularly those at seashores, mountains, lakeshores, along inland waterways

riverbanks or other places of natural beauty or recreational activity and take legal action if necessary, to prevent any attempt to close them off.

- Look favourably on planning applications which include proposals to improve the condition and appearance of existing rights of way.
- Development will not be permitted where a public right of way might be prejudiced, unless specific arrangements are made for suitable alternative linkages and that the developer can demonstrate that the level of amenity is maintained by: (i) The footpath/bridleway being diverted by the minimal practical distance and the route continues to be segregated from vehicular traffic; (ii) Appropriate legal procedures have been undertaken to extinguish the existing right of way and to establish the new right of way to replace it; (iii) The diverted route is of at least equal character and convenience.
- Where, in the interests of proper planning and development, the extinguishment of an existing right of way becomes expedient, the Council may require the provision of a suitable alternative.
- The Council will utilise its relevant statutory powers to preserve as practicable the character of listed public rights of way for amenity purposes.

- Protect and promote Greenways and consider designating them as public rights of way.
- Preserve and maintain existing public rights of way in order to link amenities.

Chief Executive’s Recommendations

1. - 3. No change;

4(i) - (v) No change;

(vi) Update Section 8.2.3 to include the following: including the retention and integration of existing natural landscape features such as trees and hedgerows into the design of all new development;

-Amend Objective EH O10 Trees and Hedgerows as follows:

It is an objective of the Council to:

a) Retain and protect amenity and biodiversity value of the County and City by preserving as far as possible trees, woodlands and hedgerows, having regard to the significant role that trees and hedgerows play in local ecology, climate change and air quality and their contribution to quality place making and the associated health and wellbeing benefits;

b) Require, in the event that mature trees or extensive mature hedgerow is proposed to be removed, that a comprehensive tree and hedgerow survey be carried out by a suitably qualified tree specialist to access the condition, ecological and amenity value of the tree stock/hedgerow proposed for removal and to include mitigation planting and management scheme. The Council will seek in all cases to ensure when undertaking development or when permitting development that the loss of or damage to existing trees is minimised;

c) Require the planting of native trees, hedgerows and vegetation and the creation of new habitats in all new developments and public realm projects. The Council will avail of tree planting schemes administered by the Forest Service, in ecologically suitable locations, where this is considered desirable;

d) To identify and prepare TPO’s where trees of exceptional amenity, cultural or environmental value are identified which warrant a high level of protection;

e) To implement the Limerick City and County Tree Policy when completed and review as appropriate;

(vii) - (xx) No change;

5. – 7. No change.

SEA/ AA Response

The changes to the plan involving the inclusion of new text on trees and hedgerows and landscape features will benefit the environment and ecology, enhance the plan content and provide clarity. No change to Environmental Report or NIS is required.

No. 246	Ref. & Name/ Group:	LCC-C62-246 Cllr. Bridie Collins	
Submission/ Observation Summary		Chief Executive’s Response	
<p>1. Introduction: The recognition of the importance of trees, biodiversity and blue green infrastructure in the Draft Plan is welcomed. However, the submission outlines that the draft plan needs to ensure that the policy is in place to safeguard, enhance and maximise the value of Limerick’s biodiversity.</p> <p>2. Trees: It is submitted that the importance of tree planting, management and protection is not emphasised enough in the Draft Plan. Trees require maintenance, management and renewal in a more proactive and planned manner. The submission proposes the need for a tree policy document, with support policy in the Development Plan for its implementation.</p> <p>3. Blue Green Infrastructure: The submission notes a Blue-Green Strategy is under preparation for the City and Environs and outlines the many assets that exist beyond this boundary. The submission requests that the full county be included in its implementation.</p>		<p>1. Introduction: The contents of the submission are noted and will be addressed below.</p> <p>2. Trees: The Council are currently preparing a Tree Policy which will seek to address all the issues raised in the submission. See response to Submission No. 25 outlined above.</p> <p>3. Blue Green Infrastructure: The establishment of blue green infrastructure will be carried out on phased basis. It is considered that the learnings from the Blue – Green Infrastructure Strategy will be reflected in development outside of the City and Environs.</p>	

<p>4. Water Quality and Biodiversity: The submission requests the Development Plan include the commitment to the development of a strategy and supporting policy around the maintenance, protection of water quality, biodiversity and enhancement of our rivers and tributaries. The submission proposes the inclusion in the Draft Plan for the support policy to prepare a strategy for the inclusion of biodiversity corridors on road development projects.</p> <p>5. Green/Open Space: The submission requests that the Development Plan consider in further detail the way in which green/open space is to be provided in new residential development. Clearer policy should be provided in terms of the delivery of open and green space for new communities, particularly in light of the impacts of the COVID pandemic on individuals and communities throughout Limerick.</p>	<p>4. Water Quality and Biodiversity: The Draft Plan sets out under Chapter 5 Environment, Heritage, Landscape and Green Infrastructure, Policy EH O5 New Infrastructure Projects, support for the inclusion of bio-diversity corridors in new infrastructure projects. It is proposed to supplement Objective EH O15 Ground Water and Surface Water Protection and River Basin Management Plans to strengthen the policy support for protecting water quality, with respect to the Blue Dot Catchments Programme, a key action under the River Basin Management Plan 2022-2028.</p> <p>5. Green/Open Space: The Council recognises the importance of Open Space provision. The existing Draft Plan sets out a number of policy supports for open space/green space provision and improvements.</p>
Chief Executive’s Recommendations	
<p>1. No change;</p> <p>2. Update Section 8.2.3 to include the following: <u>including the retention and integration of existing natural landscape features such as trees and hedgerow into the design of all new development;</u> Amend Objective EH O10 Trees and Hedgerows to include the following: It is an objective of the Council to: a) <u>Retain and protect</u> amenity and biodiversity value of the County and City by preserving as far as possible trees, woodlands and hedgerows, <u>having regard to the significant role that trees and hedgerows play in local ecology, climate change and air quality and their contribution to quality place making and the associated health and wellbeing benefits</u></p>	

b) Require, in the event that mature trees or extensive mature hedgerow is proposed to be removed, that a comprehensive tree and hedgerow survey be carried out by a suitably qualified tree specialist to assess the condition, ecological and amenity value of the tree stock/hedgerow proposed for removal and to include mitigation planting and management scheme. The Council will seek in all cases to ensure when undertaking development or when permitting development that the loss of or damage to existing trees is minimised;

c) Require the planting of native trees, hedgerows and vegetation and the creation of new habitats in all new developments and public realm projects. The Council will avail of tree planting schemes administered by the Forest Service, in ecologically suitable locations, where this is considered desirable;

d) To identify and prepare TPO’s where trees of exceptional amenity, cultural or environmental value are identified which warrant a high level of protection;

e) To implement the Limerick City and County Tree Policy when completed and review as appropriate;

3. No. change;

4. Amend Objective EH O15 Ground Water and Surface Water Protection and River Basin Management Plans to reflect the importance of Blue Dot Catchments with the addition of (d) The Blue Dot Catchments programme is a key action under the River Basin Management Plan for Ireland 2022-2028. The aim of the programme is to protect and restore high ecological status to a network of rivers and water bodies in Limerick. In Limerick the following rivers and water bodies are Blue Dot Catchments Bleach Lough, the Ogeen River and the Behanagh River.

The Council will take a precautionary approach to development which might affect water quality in these areas in line with requirements of the Water Framework Directive.

Amend EH O15 to reference the River Management Cycle ~~2018 – 2021~~ 2022 –2028;

5. No change.

SEA/ AA Response

The inclusion of reference to the Blue Dot Catchments will provided an enhanced approach to maintaining water qualities in these areas, while the inclusion of text to protect local ecological features in residential development will contribute to better local ecological networks. No change to SEA/NIS is required.

Theme 13: Climate and Flooding

No. 28	Ref. & Name/ Group:	LCC-C62-28 Eamonn Baker
	Submission/ Observation Summary	
	<p>1. Net Zero Transition: The submission refers to the Net Zero Transition. Hundreds of cities and private companies have pledged to get to “net zero”, removing as much CO2 as they produce by 2050. It is proposed that Limerick should set a goal to be the first Net Zero City in Ireland calling it LNZ 2040 Project (Limerick Net Zero by 2040).</p>	
	Chief Executive’s Response	
	<p>1. Net Zero Transition: In March 2021, the Government approved the legislation to set Ireland on the path to Net Zero emissions by 2050 and to achieve 51% reduction in emissions by the end of this decade. The Bill will also provide the framework for Ireland to meet its international and EU climate commitments and to become a leader in addressing climate change. In support of this legislation, the draft Plan includes Policy CAF P1 Climate Action Policy as set out under Chapter 8, which states ‘It is a policy of the Council to implement international and national objectives, to support Limerick’s transition to a low carbon economy and support the climate action policies included in the Draft Plan’.</p> <p>The Draft Plan sets out the Council’s commitment to climate action and transition to a low carbon economy and to support measures to build resilience to climate change throughout Limerick, to address impact reduction, adaptive capacity, awareness raising, providing for nature-based solutions and emergency planning. It also supports the development of a regional decarbonisation plan and measures, such as carbon sequestration and carbon capture and storage.</p>	
	Chief Executive’s Recommendations	
	<p>1. No change.</p>	

	SEA/ AA Response
	N/A

No. 30	Ref. & Name/ Group: LCC-C62-30 Eamonn Baker
	Submission/ Observation Summary
	<p>1. Measures to prevent flooding: The observer notes the publication of the Global Climate Report and the expectation of more severe weather including future flooding events.</p> <p>Limerick is vulnerable to flooding from the River Shannon. The Development Plan should include measures to prevent flooding. Longer term consideration is needed to address rising sea levels and the impact of water levels in the City Metropolitan Area and the River Shannon.</p>
Chief Executive’s Response	
<p>1. Measures to prevent flooding: The Planning Authority notes the content of the Global Climate Report and the issues raised therein.</p> <p>In relation to flood risk and the protection of Limerick, a Strategic Flood Risk Assessment (SFRA) has been carried out to inform the preparation of the draft Plan. The SFRA considers climate change risk and identifies a number of settlements across Limerick which could be at significantly greater risk when future climate change scenarios are considered. These settlements are mainly on the Shannon Estuary and tidal extents of the River Shannon, where between a 0.5m and 1m rise in sea level should be allowed for.</p> <p>The SFRA provides a broad assessment of all types of flood risk to inform strategic land use planning decisions. The SFRA has facilitated the preparation of the land use zoning Maps for the settlements across Limerick. The SFRA has enabled the Local Authority to undertake the sequential approach, including the Justification Test to allocate appropriate zoning of sites for development, where considered appropriate and in line with the Section 28 Guidelines ‘The Planning System and Flood Risk</p>	

	<p>2. Need to control water levels: The observer questions whether consideration/measures are needed to control water levels in the river, such as a confluence of adverse events including rising sea levels, higher tide levels, storms or high winds behind high tides creating storm surges, or flood water levels coming downstream after high rainfall/low pressure systems. These events need to be modelled and their implications understood, with sufficient protections or flood mitigation measures put in place. There is insufficient attention to Limerick’s vulnerability to flooding. An expert group to study this and actions are required to protect the city and wider Metropolitan Area from extreme flood events.</p>	<p>Management (2009)’. This has resulted in dezoning of lands at risk of flooding outside of the core city / town centre and designation of the lands as green or open space in response to identified flood risk. These areas can therefore function as flood residence areas.</p>
	<p>2. Need to control water levels: The OPW in conjunction with Limerick City and County Council are currently preparing a flood relief scheme for Limerick City and Environs. The OPW have prepared an Options Report examining all options to best address flooding in Limerick, Consultants have been engaged to progress the design of the flood scheme and they will consider a detailed design to address the flood situation in Limerick, the proposed scheme will be progressed in line with the relevant stakeholders and managed by the OPW.</p>	
	Chief Executive’s Recommendations	
	1. No change.	
	SEA/ AA Response	
N/A		

No. 35	Ref. & Name/ Group:	LCC-C62-35 Eamonn Baker
	Submission/ Observation Summary	Chief Executive’s Response

	<p>1. Zoning of land in flood risk areas: The submission refers to the publication of the Global Climate Report and the expectation of future severe weather including flooding events. Limerick is vulnerable to flooding and no new land should be zoned for housing in areas where there is a risk of flooding, particularly adjacent to the River Shannon where future severe weather may increase the risk of flooding.</p>	<p>1. Zoning of land in flood risk areas: The draft Plan sets out in Policy CAF P5 Managing Flood Risk states that ‘It is a policy of the Council to protect Flood Zone A and Flood Zone B from inappropriate development and direct developments/land uses into the appropriate lands, in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009 (or any superseding document) and the guidance contained in Development Management Standards. Lands located at the core of Limerick City and zoned City Centre and lands adjacent to the City Centre, have been justified in the SFRA, as being critically important in supporting the development of the City Centre. Any development proposal will need to be accompanied by a Development Management Justification Test and site-specific Flood Risk Assessment in accordance with the criteria set out under The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009 and Circular PL2/2014 (as updated/ superseded). Where this cannot be fulfilled permission will not be granted. In other areas, outside of the city centre, lands are not zoned where a risk of flooding has been identified in the Strategic Flood Risk Assessment.</p>
Chief Executive’s Recommendations		
1. No change.		
SEA/ AA Response		
N/A		

No. 46	Ref. & Name/ Group:	LCC-C62-46 Richard Rice
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Submission/ Observation Summary	Chief Executive’s Response
<p>1. Flood Protection Measures: The submission refers to the Climate Change (IPCC) Report. The development of flood protection measures for the Shannon Estuary is an easier project to deliver than most other coastal locations, both nationally and beyond. The combined efforts of both Limerick and Clare Local Authorities can offer future security for Limerick, Ennis and the region, including major strategic facilities such as Shannon Airport and Foynes Port.</p> <p>2. Flood Risks: There are two main flood risks that apply to Limerick City, Ennis and estuary edge generally, tidal flooding and storm surge on the Shannon and Fergus Rivers. The increase in sea levels combined with the projected increase in rainfall effectively means the current approaches being taken in development of flood defences will always be challenged by storm surge and will require ongoing modification to retain effective flood defence.</p> <p>3. Shannon Estuary Flood Barrier: The Shannon Estuary has the potential to accommodate a flood barrier west of Foynes/Kildysert to protect Limerick City, Ennis, Shannon and Foynes from the impacts of sea level increases and negates the need for each of the conurbations to be constantly improving and extending flood defences</p>	<p>1. Flood Protection Measures: The Council acknowledge the publication of the Climate Change (IPCC) Report and the importance of the development of robust flood defences. The Council will continue to work with adjoining Local Authorities and Stakeholders to safeguard Limerick from flooding.</p> <p>2. Flood Risks: These risks have been long recognised and reflected in the content of the Limerick Climate Adaptation Strategy which was prepared in 2019. The risk of storm surges to what is a mud-based estuary has been known for a long period of time with academic studies (e.g. in 2008) indicating its vulnerability to storm surges and more extreme climate related events.</p> <p>3. Shannon Estuary Flood Barrier: The OPW in conjunction with Limerick City and County Council have engaged Flood Consultants to develop a Flood Relief Scheme for Limerick City and Environs, which will identify the optimum solution for the study area in terms of flood relief. All options will be considered in safeguarding Limerick City from flooding. Objective CAF 022 sets out in the draft Plan, the need to work with other agencies in delivering large-scale flood control measures.</p>

	4. Regional Strategy on Flood Defence: There are many locations around Europe and the world which will have to displace. A clear regional strategy for the Shannon Region would allow attraction of growth from this displacement and be seen as a strategic location where the impacts of global warming have been addressed.	4. Regional Strategy on Flood Defence: The Council is committed to working with all relevant stakeholders and bodies to develop a robust flood relief scheme for Limerick. The OPW have prepared flood modelling based on river catchment area, which is considered a more appropriate response to addressing flooding than by regional approach.
	Chief Executive’s Recommendations	
	1. - 4. No change.	
	SEA/ AA Response	
N/A		

No. 102	Ref. & Name/ Group: LCC-C62-102 Frank Larkin	
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Climate Change, Flood Risk and Transition to a Low Carbon Economy: The observer welcomes and supports proposals in Chapter 8 of the Draft Plan. In particular, the commitment to protect Flood Zones A and B from inappropriate development and new dwellings will not be permitted in these zones.</p> <p>2. Zoning: The observer welcomes and supports the proposal to rezone land at the Condell Road in Clonmacken from Residential to Open Space and Recreation and Agriculture. These lands are in Flood Zone A and should never have been zoned for Residential.</p>	<p>1. Climate Change, Flood Risk and Transition to a Low Carbon Economy: The Council note the comments made in this regard.</p> <p>2. Zoning: The Council note the comments made in this regard. The lands have been dezoned in line with the recommendations of the SFRA with regard to flood extents in the area.</p>

<p>3. Roads: The observer welcomes the Council’s decision not to proceed with a proposed road through Flood Zone A from the Condell Road to the Caherdavin District Centre, which would serve no useful purpose and require enormous amounts of infill creating displacement flood risk to nearby housing.</p>	<p>3. Roads: The Council note the comments made in this regard. Having regard the dezoning of lands in the vicinity, it is considered that the development of a road at this location is not currently warranted.</p>
<p>Chief Executive’s Recommendations</p>	
<p>1. – 3. No change.</p>	
<p>SEA/ AA Response</p>	
<p>N/A</p>	

<p>No. 109</p>	<p>Ref. & Name/ Group:</p>	<p>LCC-C62-109 Cáit Ní Cheallacháin</p>
<p>Submission/ Observation Summary</p>		<p>Chief Executive’s Response</p>
<p>1. Environment Heritage landscape and Green Infrastructure: Paragraph 1.5.7 says that the 2030 plan is ‘under review and will complement the Draft Plan’ and that this review is being carried out with regard to Climate Change and Sustainability. Particular reference is made to the plan to demolish Sarsfield House to build a park and to demolish the 30 years old Arthurs’ Quay Park.</p>		<p>1. Environment Heritage landscape and Green Infrastructure: In tandem with the preparation of the draft Development Plan, the Council have commenced a review and update of the Limerick 2030 Spatial and Economic Plan. The update seeks to review the work progressed to date and update the Plan to take account of new opportunities in Limerick. The Plan Review is a high-level document identifying key sites and opportunities, the option appraisal and detailed design will consider specific details of each site, having regard to the site specifics of each opportunity site.</p>

2. Climate Action, Flood Risk and Transition to a Low Carbon Economy: 8.1.1 has been prepared with Climate Action, and transition to a Low Carbon Economy as key considerations. It is set out that the demolition of an existing building and all the carbon it embodies and the felling of all the 30-year-old trees, which are just now contributing hugely to our carbon sink; go against all the aspirations of the Development Plan. The submission highlights two key sites in Limerick City, that would appear to be at conflict with the policies in terms of Climate Action policies and objectives. These include the proposed demolition of Sarsfield House, and the removal of Arthurs Quay Park. Sarsfield House could easily be re-imagined and re-clad, upgrading the thermal environment as well as the appearance of the building. The building itself could remain as offices or be re-purposed. The removal of Arthurs Quay Park is also considered in appropriate and it would be folly in the extreme to fell all these trees - which have taken 30 years to reach their present mass – and to replace them with a building.

3. Sustainable Management and Conservation: Policy EH P2 sets out that, it is a policy of the Council to ensure the sustainable management and conservation of areas of natural environmental and geological value within Limerick, the submission has a number of suggestions to support the policy including the following: appoint a tree officer; it should set in place a process to identify and locate all trees and

2. Climate Action, Flood Risk and Transition to a Low Carbon Economy: The review and update of the Limerick 2030 Plan, will be further amended to seek to provide a framework plan for the entire block at this location, which will include Sarsfield House, Arthur’s Quay Park/Debenhams (Roches Stores) and potentially the UL sites. The updated 2030 Plan will seek a master planning framework approach to the overall block, supported by appropriate appraisal / surveys and options analysis to support the overdevelopment of the area. Section 10.4.2.5 and Objective AQ 01 will also be amended to reflect these changes.

3. Sustainable Management and Conservation: The Council are currently preparing a ‘Draft Tree Policy’ which aims to ensure a planned approach to the management of the Council’s tree stock and represents a significant change in how the Council manage trees, with the development of a more strategic, proactive, planned approach to inspection, planting, maintenance and management.

<p>stands of trees in the city and county over a number of years; Identify locations for and to set about planting trees to keep Limerick up to date with the National Plan to plant twenty-two million trees by 2040, in accordance with our Climate Change policy and the Tree Officer’s should have input in the planning process to protect our existing trees and to ensure that new ones are planted. The submission also highlights the lack of consideration and knowledge in the Council with regard to tree maintenance.</p> <p>4. Dark Sky Parks and Reserves – The draft Plan sets out policy support for this initiative in Policy EH 024 - Limerick City and County Council should ensure that all their departments are aware of these policies.</p>	<p>4. Dark Sky Parks and Reserves: The Council recognises the importance of such initiatives and the dissemination of the policies and objectives of the Development Plan, will be progressed on adoption throughout the organisation and beyond.</p>
<p>Chief Executive’s Recommendations</p>	
<p>1. No change; 2. Amend Limerick 2030 Review and Update document to to include the requirement of an overall framework plan for the area, including Arthur’s Quay / Debenhams (Roches Store) and potentially the UL site. Section 10.4.2.5 and Objective AQ 01 will also be amended to reflect these changes (this will be incorporated into the new chapter 3); 3. – 4. No change.</p>	
<p>SEA/ AA Response</p>	
<p>The preparation of an overall framework plan for the area will result in more coherent patterns of development and ensure best use of urban spaces, which is in line with higher tier plans such as NPF and RSES.</p>	

No. 135	Ref. & Name/ Group:	LCC-C62-135 Greensource	
	Submission/ Observation Summary		Chief Executive’s Response
	<p>1. Climate Action, Flood Risk and Transition to Low Carbon Economy: The submission concurs with the strategic aim of Chapter 8 in relation to renewable energy and low carbon society. The draft plan highlights the requirements for further decarbonising of the economy and the development of additional renewable energy projects in the county. Greensource appreciates that the Development Plan seeks to achieve regional balance between areas and accept that some areas are not suitable for wind farm development. The economic activity associated with renewable energy projects is vital for redressing the trend of rural de-population, leading to more sustainable and vibrant communities.</p>		<p>1. Climate Action, Flood Risk and Transition to Low Carbon Economy: The Council note the contents of the submission.</p>
	Chief Executive’s Recommendations		
	1. No change.		
	SEA/ AA Response		
	N/A		

No. 141	Ref. & Name/ Group:	LCC-C62-141 Míde Power on Behalf of Not Here Not Anywhere	
	Submission/ Observation Summary		Chief Executive’s Response
	<p>1. Climate Change: The submission sets out that there is a need to avoid the severe impact of climate change and that action is required to decarbonise our energy systems.</p>		<p>1. Climate Change: The draft Development Plan sets out the Council’s commitment to renewable energy and climate action throughout. The Council is committed to working with all relevant stakeholders to deliver on national targets for decarbonisation and climate change.</p>

There is a need to encompass processes for carbon proofing major decisions, programmes and projects.

2. Fossil fuels and new fossil fuel infrastructure: The submission sets out a number of key considerations, which should be included in the development Plan including: ensure a rapid phasing out of all fossil fuels, including gas across the county, not allow the expansion of the gas grid, ban fracked gas in its energy mix and any new large scale fossil fuel infrastructure projects must be mandated to undertake climate impact assessment to ensure they are consistent with Ireland’s fair share net cumulative carbon dioxide (CO₂) quota in line with the Paris agreement.

3. Data Centres: The submission sets out that new data centres in Limerick must be powered entirely by onsite or new off-site renewable energy, existing centres should be required to transition rapidly to onsite or new off-site renewables, where technically possible, heat generated from a data centre should be utilised for district heating systems and a national cap on the level of data centre demand that can be accommodated by the grid to 2030, while meeting our renewable energy and climate emissions targets consistent with our obligations under the Paris Agreement, must be set out in national policy. It is crucial that every City and County Council takes into consideration the cumulative impact of data centres’ energy demand on

2. Fossil fuels and new fossil fuel infrastructure: The Council recognises the challenges that many of these issues present in the context of addressing climate change, however, the Development Plan must comply with national and regional policy provision in this regard.

3. Data Centres: Powering of data centres is a complex issue, policy support in the draft Development Plan seeks to promote co location of data centres with renewable energy sources at appropriate locations subject to proper planning and sustainable development considerations. There also exists the question of continuity of supply which is often discontinuous in the case of renewables. There is a clear commitment to the use of battery and energy storages technologies in the plan to help overcome the intermittent nature of the renewable energy supply.

	<p>a nationwide basis, as opposed to examining impact solely on a case-by-case basis.</p> <p>4. Public Participation and People Led Policy: The submission goes on to highlight the importance of public participation and supporting communities. The submission outlines the need to lead annual local climate dialogues, which serve to inform communities about the ongoing transition to a low carbon society and seek their opinions, ideas and consent.</p> <p>The need for Climate Action and Environment office, or equivalent, within the Council must be adequately resourced, publicised and staffed. The need for the Council to ensure that there is adequate public participation and that special outreach efforts must be made to include disadvantaged or marginalised groups in participatory processes and support and establish community energy projects throughout the lifetime of the County Development Plan.</p>	<p>4. Public Participation and People Led Policy: The Council is committed to actively engage with the public throughout the plan making process and have taken many steps to enable the public to input into the process and will continue to facilitate engagement. There will be opportunities for the public to engage with the Council in the preparation of documents directly relating to climate action, outside of the Development Plan making process.</p> <p>The draft Development Plan sets out policy support and strengthen substantiable local/community energy networks and micro renewable generation, climate smart countryside projects and connections from such initiatives to the grid. The Council will continue to works with community groups to progress such projects as appropriate and subject to resources.</p>
Chief Executive’s Recommendations		
1. – 4. No change.		
SEA/ AA Response		
N/A		

No. 144	Ref. & Name/ Group:	LCC-C62-144 Fehily Timoney and Company on behalf of Harmony Solar Ireland Limited
Submission/ Observation Summary		Chief Executive’s Response

<p>1. Solar: Harmony Solar believes that utility scale solar development will be a key instrument in assisting Ireland to meet its legal commitments in respect to renewable energy production allows rapid deployment with few environmental or amenity issues. The technology does require a significant quantum of space, and this is likely best located in rural areas, however this does not mean utility scale solar development is in competition with or will inhibit agriculture.</p> <p>The submission includes reference to national and international policy on climate change, planning precedents, decommissioning, timescales, key enablers to growth and sets out the following six key recommendations in relation to the Solar PV developments:</p> <p>(i) Recommendation 1: Harmony Solar request that the Limerick Development Plan fully elaborates further on National and International policy for climate change and provision of renewable energy and that the plan includes a firm policy framework that supports renewable energy proposals and recognises the specific development requirements to facilitate large, grid scale renewable energy projects at suitable locations in the County.</p> <p>(ii) Recommendation 2: Harmony Solar is supportive of the principles in respect of Solar Energy and requests that the</p>	<p>1. Solar: The Council are committed to supporting the development of renewable energy throughout Limerick subject to proper planning and sustainable development. The draft Development Plan sets out in Chapter 8 policy support for the development of a large array of renewable energy sources including solar energy. To date a number of solar energy developments have been permitted throughout Limerick and Section 8.5.3 Solar Energy of the draft Plan sets out the policy support for such developments.</p> <p>(i) Recommendation 1: Chapter 8 sets out the Council’s approach to Climate Action. There is many policy documents setting out national and international policy and it is not considered appropriate to rehash all of this information in this document. The overall approach to climate change will align with national and international policy as required. It is considered that the draft Development Plan sets out a robust approach to renewable energy developments.</p> <p>(ii) Recommendation 2: Noted. While there is a specific mention of Solar Energy in Section 8.5.3 of the plan, there is no objective to</p>
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<p>Limerick Development Plan 2022-2028 inserts a specific policy objective which: "<i>Support utility scale solar PV development at suitable locations where it can demonstrated that there are no significant adverse to or local amenity</i>".</p> <p>It is also considered that the potential economic and employment opportunities that development of solar PV development can bring to local economies should be highlighted in upcoming development plan.</p> <p>(iii) Recommendation 3: Harmony Solar requests that in preparing the Renewable Energy Strategy for the county as part of the forthcoming Limerick Development Plan 2022-2028 that Limerick City and County Council do not adopt an overly restrictive approach in establishing the acceptable or suitable locations for solar PV developments but rather assess developments on their merits on a case-by-case basis, following engagement with the Planning Authority at preplanning stage.</p> <p>(iv) Recommendation 4: Harmony Solar are generally supportive of Limerick City and County Council's requirement in assessing solar energy schemes for details in respect of 'Decommissioning statement' However it is considered that a decommissioning plan should be agreed closer to the decommissioning date. It is thus considered that the following text be amended in Section 11.7.2.2 of Chapter 11:</p>	<p>support its development. It is considered appropriate that an objective be included to support solar energy developments.</p> <p>(iii) Recommendation 3: The approach to development of renewable energy is set out in the draft Plan and Section 8.5.3 of Chapter 8 and Section 11.7.2.2 of Chapter 11 – Development Management Standards. This sets out a comprehensive approach to the assessment of solar and each application will be assessed on a case-by-case basis on its own merits.</p> <p>(iv) Recommendation 4: Sufficient details of decommissioning should be provided at the planning applications stage to ensure that adequate measures are in place at the end of the development's life span. Replace the word statement with plan in Section 11.7.2.2.</p>
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“A Decommissioning ~~statement for a plan~~ should be included as a standard condition attached to a grant of planning permission for utility scale solar PV to be submitted to the Planning Authority three months prior to the decommissioning of the site and its associated technologies”

(v) Recommendation 5: Harmony Solar request that Limerick City and County Council include specific objectives within Chapter 11, Section 11.7.2.2 of the 2022 - 2028 Development Plan should state that: *“The duration of the permission for solar PV developments (The period the development can be completed), should be for a up to ten years from the date of grant of planning permission. Furthermore, it is considered that an objective should be included that states: -
The lifetime for future solar PV developments be granted planning permission for an operational period between 35-40 years”*

(vi) Recommendation 6: When assessing applications for solar PV developments, Harmony Solar supports and reiterates the view that Limerick City and County Council should consider the siting/location of new developments on a case-by-case basis, recognising that there is a necessity in some instances for larger scale solar developments to be fragmented across a large site area on account of ecological considerations, access requirements,

(v) Recommendation 5: The Council consider the approach set out in the submission to be overly prescriptive, the duration of the permission, is at the discretion of the applicant seeking the planning permission and the duration of permission to be determined by the consenting authority, it is not considered appropriate to include such stipulations and each application will be assessed on a case-by-case basis and determined on its merits.

(vi) Recommendation 6: The contents of the recommendation is noted, but appears to be incomplete. The Council will assess each application on its own merits.

<p>flood related concerns, land suitably residential amenity consideration.</p> <p>The submission also sets out that another area and aspect of the Draft Plan that requires further attention, is that of the proposed and ongoing planning of the N24 Cahir to Limerick Junction Upgrade. At present the N24 upgrade has identified a study area and "Option corridors" of potential routes for the upgraded road within said study area. The submission stated that given the multiple options at present that it would be premature to apply a reservation corridor to the study area currently published.</p> <p>The submission requests that Limerick City and County Council confirm that the study area published for the N24 upgrade is not a reservation corridor. If any reservation corridor is identified for the scheme, the spatial extent of these corridors will need to be identified and reflected within the Development Plan.</p>	<p>Noted. The inclusion of option corridors for the upgrade of a national road project is not considered appropriate in the Development Plan and accordingly will not be included.</p>
<p>Chief Executive’s Recommendations</p>	
<p>1(i) No change;</p> <p>(ii) Amend Chapter 8 Section 8.5.3 to include: <u>Support utility scale solar PV development at suitable locations where it can be demonstrated that there are no significant adverse impacts;</u></p> <p>(iii) No change;</p> <p>(iv) Update Section 11.7.2.2 Development Management Standards to seek a <u>decommissioning plan</u> rather than a decommissioning statement.</p> <p>(v) – (vi) No change.</p>	
<p>SEA/ AA Response</p>	

The updated policy in relation to utility scale solar installations is useful, as the plan needs to be updated to ensure that solar energy can help play a part in climate mitigation.

No. 155	Ref. & Name/ Group:	LCC-C62-155 Michael Hennessy and Denis Tierney	
	Submission/ Observation Summary		Chief Executive’s Response
<p>1. Green Roofs: Limerick needs to be at the forefront of innovation when it comes to society, sustainable transport, climate action, public realm, etc. All tools must be available to make plans/ objectives a reality, including measures that will be used in the future. Green Roofs are one of these measures and are important in the planning process.</p> <p>Require green roofs for all roof areas for the following development types and encourage for all other types of development unless otherwise agreed with Limerick City and County Council's planning department:</p> <ul style="list-style-type: none"> • Apartment Developments; • Employment Developments; • Retail Developments; • Leisure Facilities; • Education Facilities; <p>All roofs of 300m² or greater to provide a minimum of 60% green roof coverage, unless exempted/ partially exempted.</p>		<p>1. Green Roofs: Green roofs have many benefits including the reduction in energy costs by absorbing heat instead of attracting it and providing natural insulation for buildings. Plants on green roofs remove air particulates, produce oxygen and provide shade. Additionally, this natural protection against extreme heat enables green roofs to last twice as long as traditional rooftops and green roofs have the ability to reduce and slow stormwater runoff in urban environments.</p> <p>The Executive of the Council proposed the inclusion of the policy support for green roofs, as outlined below which was subsequently removed by the Elected Members, prior to publication of the Draft Plan citing concerns of additional construction cost on developers. It is considered that having regard to the benefits outlined above that the long terms gain in terms of developing green roofs would outweigh the initial costs, to both the developer and the environment.</p> <p>The plan shall be amended as suggested.</p>	

	Limerick needs to show the way forward and by having this tool, it shows that it is serious about ensuring our buildings are future-proofed and we take mitigation measures to aid climate action seriously.	
	Chief Executive’s Recommendations	
	<p>1. Update IN O10 and Section 11.3.11 to include: <u>Require green roofs for all roof areas for the following development types and encourage for all other types of development unless otherwise agreed with Limerick City and County Council's planning department:</u></p> <ul style="list-style-type: none"> - <u>Apartment Developments;</u> - <u>Employment Developments;</u> - <u>Retail Developments;</u> - <u>Leisure Facilities;</u> - <u>Education Facilities;</u> <p><u>All roofs of 300m² or greater to provide a minimum of 60% green roof coverage, unless exempted/ partially exempted.</u></p>	
	SEA/ AA Response	
	See SEA/ AA Response to Submission No. 244 above.	

No. 263	Ref. & Name/ Group:	LCC-C62-263 Office of Public Works
	Submission/ Observation Summary	Chief Executive’s Response
	<p>1. Introduction: The OPW welcomes the acknowledgement of the Guidelines on the Planning System and Flood Risk Management (DECLG/OPW, 2009) and the proposed measures set out in the Flood Risk Management Plans (FRMPs) based on the work undertaken for the CFRAM Programme, and the preparation of a Strategic Flood Risk assessment (SFRA). The OPW welcome the inclusion of a</p>	<p>1. Introduction: Noted.</p>

<p>number of policies with regard to flooding as outlined in the Draft Plan.</p> <p>2. Settlements Level 5 and 6: The OPW welcomes the commentary on Settlements Level 5 and 6, which states that as the Justification Test has not been applied or passed that new, highly and less vulnerable development should be located within Flood Zone C and only minor development as per Section 5.28 (as amended) of the Guidelines and water compatible uses will be permitted in Flood Zones A and B.</p> <p>3. Undeveloped Land: The OPW welcomes the commitment in Section 6.1 of the SFRA which states <i>“With the exception of zoned City Centre, Town or Village Centres, new development within Flood Zones A or B does not pass the Justification Test and will not be permitted. Whilst lands may have retained a zoning objective which would include development, applying the guidance in Section 5 means such development is restricted to Flood Zone C, with water compatible uses located within Zone A and B.”</i> and states that it would be beneficial if it was supported by a policy objective.</p> <p>4. Justification Tests: The OPW provides in-depth analysis of the justification tests. The OPW welcomes the inclusion of Plan-making Justification Tests supplied in the SFRA for Limerick City and Surroundings. However, proposed land</p>	<p>2. Settlements Level 5 and 6: Noted</p> <p>3. Undeveloped Land: The Council have prepared a Strategic Flood Risk Assessment, which considers the overall approach to flooding in Limerick, it is not appropriate to pick elements of the Assessment and incorporate them in the Plan, the document supports and informs the preparation of the Draft and will remain an element of the Plan. Accordingly, it is not considered appropriate to include this element of the SFRA.</p> <p>4. Justification Tests: The Council is committed to complying with the Section 28 Flood Guidelines with regard to the Flood Justification Test for Plan Making. Justification Tests will be applied for proposed land use zoning, where there is a risk of flooding.</p>
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<p>use zonings, some of which are classified as highly vulnerable development in the Guidelines are shown within Flood Zones A and B in the settlement zoning maps.</p> <p>5. National Indicative Fluvial Mapping (NIFM): NIFM has been used as dataset in producing the flood risk mapping. It is stated in Table 4-1: Dataset Review of the SFRA that these maps are predictive flood maps, however it should be noted that these maps are indicative maps and are not predictive.</p> <p>6. Flood Relief Schemes: OPW welcomes Objectives CAF 023 and CAF 024 – but additionally recommends that the text in these objectives could be clarified to ensure zoning or development proposals support and do not impede or prevent the progression of these measures.</p> <p>7. Update Table 3.2: Formal Flood Defence Infrastructure lists Foynes as the only complete scheme. There are also completed schemes in Clancy Strand, Dromcolliher, Harry’s Mall (Limerick), Mulkear River (Cappamore), and Newcastle West</p> <p>8. Arterial Drainage Schemes: No commentary has been provided on the Deel, Groody, Maigne or Maigne Outfall Arterial Drainage Schemes. The OPW recommend that consideration be given in zoning land for development to ensure that access requirements are preserved for the</p>	<p>5. National Indicative Fluvial Mapping (NIFM): Noted, the relevant text will be updated in the SFRA and the draft Plan as appropriate.</p> <p>6. Flood relief Schemes: Noted, objectives will be updated to include additional text to ensure development proposals support and do not impede or prevent the progression of flood relief measures.</p> <p>7. Update Table 3.2: Noted Table 3.2 of the SFRA will be updated accordingly.</p> <p>8. Arterial Drainage Schemes: Noted. Objective EH 018 requires buffers along rivers to allow access and also from a biodiversity perspective. Therefore, it is not considered necessary to zone additional lands.</p>
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<p>maintenance of Arterial Drainage Schemes and Drainage Districts.</p> <p>9. Consideration of Climate Change Impacts: OPW welcomes the discussion on climate change in the SFRA and in particular the consideration of future scenarios when assessing flood risk and the allowance for climate change in setting finished floor levels.</p> <p>10. Coastal Change: It should be noted that the Government has established an Inter-Departmental Group on Coastal Change Management to scope out an approach for the development of a national coordinated and integrated strategy to manage the projected impact of coastal change to our coastal communities, economies, heritage, culture and environment.</p> <p>11. Mitigation Measures: The Flood Mitigation Measures at Site Design outlined in Section 5.10 of the SFRA are welcomed by the OPW.</p> <p>12. SuDS and Nature Based Solutions: The OPW welcomes the inclusion of a number of objectives, which have been included dealing with SuDS, buffers and riparian zones. The Guidelines recommend that the SFRA provide guidance on the likely applicability of different SuDS techniques for managing surface water run-off at key development sites, and also that the SFRA identifies where integrated and</p>	<p>9. Climate Change: Noted.</p> <p>10. Coastal Change: Noted.</p> <p>11. Mitigation measures: Noted.</p> <p>12. SuDS and Nature Based Solutions: Noted, the Council are currently preparing a Surface Water Management Plan and a Blue Green Infrastructure Strategy for Limerick City and Environs, which will seek to provide guidance to developers in terms of appropriate solution for addressing surface water management.</p>
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area-based provision of SuDS and green infrastructure are appropriate in order to avoid reliance on individual site by site solutions.

13. CFRAM Update: In Section 9 of the SFRA Review and Monitoring, it is noted in Table 9-1: Possible Timescales that the CFRAM Studies run on a six yearly cycle. The CFRAM Programme has been completed and implementation of the outputs from this work is underway.

14. Applications for Development in Areas at Risk of Flooding: The OPW welcomes the guidance for all development proposals in Section 5.8.2 of the SFRA.

15. Historic Flood Events: Table 4-1 in the SFRA references historic flood events from www.floodmaps.ie, this website is no longer available but are now available on www.floodinfo.ie.

16. Comments on Specific Locations:

(i) Limerick City Centre and Surroundings: The Flood Maps in Volume 2 are unclear and it is difficult to assess the zonings/sites that may be at flood risk. It appears that Flood Zone A has been omitted. Industrial and Enterprise and Employment zoned lands adjacent to the Dock Road it is stated that - “much of this industrial and enterprise use is marine based and therefore exempt from the Justification Test”, this is not consistent

13. CFRAM Update: Noted, the SFRA will be updated to reflect this position.

14. Applications for Development in Areas at Risk of Flooding: Noted.

15. Historic Flood Events: Noted. The SFRA will be updated to reflect this change.

16. Comments on Specific Locations:

(i) Limerick City Centre and Surroundings: Higher quality flood mapping is available and includes both Flood Zone A and B and these will be provided for the Metropolitan Area as per the response to the OPR. The Industrial and Enterprise and Employment designations are amongst those less vulnerable types of development and are also a reflection of historic development patterns in this area. In this

<p>with the Guidelines. Both Industrial and Enterprise and Employment zonings can allow for less vulnerable usage, a Plan Making Justification Test is required prior to zoning these lands in Flood Zone A.</p> <p>Highly Vulnerable Existing Residential, New Residential and City Centre which could include highly vulnerable development have been zoned in Flood Risk areas. Highly vulnerable development is not appropriate in Flood Zone A and B, unless a Plan-making Justification Test completed by the Local Authority can be satisfied.</p> <p>(ii) Caherdavin/Moyross: Highly Vulnerable Existing Residential, Education & Community Facilities and District Centre, which can include highly vulnerable development, and Enterprise and Employment which can include less vulnerable development have been zoned in Flood Risk Areas. Highly vulnerable development is not appropriate in Flood Zone A and B, and less vulnerable development is not appropriate in Flood Zone A unless a Plan-making Justification Test completed by the Local Authority can be satisfied.</p> <p>(iii) Coonagh/Clondrinagh: Highly vulnerable Existing Residential, District Centre which can include highly vulnerable residential, and less vulnerable Enterprise & Employment have been zoned in Flood Zones A and B.</p>	<p>situation a Plan Making Justification Test will be provided on all lands that are zoned for development.</p> <p>In relation to residential and highly vulnerable uses, within the City Centre, the Council consider that in order to meet the requirements of the NPF and RSES, in terms of significant population growth within the city core and in compliance with the Flood Guidelines that these lands can be justified for growth, Plan Making Justification Tests will be provided in accordance with the Guidelines.</p> <p>(ii) Caherdavin/Moyross: The approach that has been taken in general to zoning outside of the City Centre is the precautionary approach. Many of the zoned sites that have been highlighted, were zoned to reflect existing uses that are in place. A plan making test will be carried out for these lands.</p> <p>(iii) Coonagh/Clondrinagh: The approach that has been taken in general to zoning outside of the City Centre is the precautionary approach. Many of the zoned sites that have been highlighted, were zoned to reflect existing uses that are in place. One brownfield site</p>
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<p>Highly vulnerable development is not appropriate in Flood Zone A and B, and less vulnerable development is not appropriate in Flood Zone A unless a Plan-making Justification Test completed by the local authority can be satisfied. District Centre and Enterprise & Employment zonings can be managed using the sequential approach it would be beneficial if this was supported with policy objectives.</p> <p>(iv) Limerick Southern Environs: It is stated that areas zoned Semi-Natural Open Space and Agriculture located within Flood Zones should be maintained until the Limerick Flood Relief Scheme is in place. It should be noted that as Flood Zones are based on the undefended scenario, areas within should be assigned appropriate zonings regardless of whether there is a flood relief scheme in place.</p> <p>(v) Castletroy: Highly vulnerable Existing Residential, Education & Community Facilities which can allow highly vulnerable uses. High Tech\Manufacturing which can allow less vulnerable usage have been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate in Flood Zone A and B, and less vulnerable development is not appropriate in Flood Zone A unless a Plan-making Justification Test completed by the Local Authority can be satisfied.</p>	<p>has been zoned at Coonagh and an objective included for a site-specific flood risk assessment to be carried out. A plan making test will be carried out for these lands.</p> <p>(iv) Limerick Southern Environs: The approach that has been taken in general to zoning outside of the City Centre is the precautionary approach. Many of the zoned sites that have been highlighted, were zoned to reflect existing uses that are in place. A plan making test will be carried out for these lands.</p> <p>(v) Castletroy: The approach that has been taken in general to zoning outside of the City Centre is the precautionary approach. Many of the zoned sites that have been highlighted, were zoned to reflect existing uses that are in place. A plan making test will be carried out for these lands.</p>
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<p>(vi) Ballingarry: Highly vulnerable Existing Residential, and Town Centre which can include highly vulnerable development have been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate in Flood Zone A and B, unless a Plan-making Justification Test completed by the local authority can be satisfied.</p> <p>(vii) Bruff: Highly vulnerable Existing Residential has been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate in Flood Zone A and B, unless a Plan-making Justification Test completed by the Local Authority can be satisfied.</p> <p>(viii) Bruree: Highly vulnerable Existing Residential has been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate in Flood Zone A and B, unless a Plan-making Justification Test completed by the local authority can be satisfied.</p> <p>(ix) Cappamore: Highly vulnerable Existing Residential, Town Centre, which can include highly vulnerable development, and Enterprise & Employment which can include less vulnerable development have been zoned in Flood Zones A and B, and Education & Community Facilities which can include highly vulnerable development has been zoned in Flood Zone B. Highly vulnerable development is not appropriate in Flood Zone A and B, and less vulnerable development is not appropriate in Flood Zone A unless a</p>	<p>(vi) Ballingarry: The approach that has been taken in general to zoning outside of the village centre is the precautionary approach, which has avoided lands within flood zone A or B.</p> <p>(vii) Bruff: The approach that has been taken in general to zoning outside of the town centre is the precautionary approach, which has avoided lands within flood zone A or B.</p> <p>(viii) Bruree: The approach that has been taken in general to zoning outside of the village centre is the precautionary approach, which has avoided lands within flood zone A or B.</p> <p>(ix) Cappamore: The approach that has been taken in general to zoning outside of the town/village centre is the precautionary approach. Many of the zoned sites that have been highlighted, were zoned to reflect existing uses that are in place. A plan making test will be carried out for these lands.</p>
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<p>Plan-making Justification Test completed by the local authority can be satisfied. Arterial Drainage Scheme benefitted lands extend into settlement centre, and their extents exceed those of the flood zones. Applications for development on land identified as benefiting land may be prone to flooding, and as such site-specific flood risk assessments may be required in these areas.</p> <p>(x) Doon: Highly vulnerable Existing Residential, and Town Centre and Community & Educational Facilities, both of which can include highly vulnerable development, and Enterprise & Employment which can include less vulnerable development have been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate in Flood Zone A and B, and less vulnerable development is not appropriate in Flood Zone A unless a Plan-making Justification Test completed by the local authority can be satisfied.</p> <p>(xi) Dromcolliher: Highly vulnerable Existing Residential, Community & Educational Facilities, Town Centre and Utilities which can include highly vulnerable development, and less vulnerable Enterprise & Employment have been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate in Flood Zone A and B, and less vulnerable development is not appropriate in Flood Zone A unless a Plan-making Justification Test completed by the local authority can be satisfied. It is noted that</p>	<p>(x) Doon: The approach that has been taken in general to zoning outside of the village centre is the precautionary approach, which has avoided lands within flood zone A or B.</p> <p>Additional flood mapping has been prepared for Doon and shall be incorporated into Volume 2.</p> <p>(xi) Dromcolliher: The approach that has been taken in general to zoning outside of the village centre is the precautionary approach, which has avoided lands within flood zone A or B.</p>
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<p>where Town Centre zoned lands intersect with flood risk areas, risks can be managed using the sequential approach, it would be beneficial if this were to be supported with a policy objective.</p> <p>(xii) Foynes: Highly vulnerable Existing Residential, New Residential and Utilities; Community & Educational Facilities and Town Centre which can include highly vulnerable development, and less vulnerable Enterprise & Employment have been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate in Flood Zone A and B, and less vulnerable development is not appropriate in Flood Zone A unless a Plan-making Justification Test completed by the local authority can be satisfied. It is stated that major development in the settlement will be premature until such time as the fluvial scheme has been completed, when the restriction of Existing Residential to minor works can also be reappraised. Flood Relief Schemes are designed to mitigate the risk of flooding to existing communities and properties only. Future scenario mapping shows increases to flood zone extents in Foynes. Consideration might be given to policy objectives in relation to climate change and flood risk.</p> <p>(xiii) Glin: Highly vulnerable Existing Residential and less vulnerable Enterprise & Employment lands have been zoned in Flood Zones A and B. Highly vulnerable</p>	<p>(xii) Foynes: The approach that has been taken in general to zoning outside of the village centre is the precautionary approach, which has avoided lands within flood zone A or B.</p> <p>Lands in the Port have been zoned for Marine related uses, in accordance with the SIFP. The SFRA has had regard to Climate Change.</p> <p>(xiii) Glin: The approach that has been taken in general to zoning outside of the village centre is the precautionary approach, which has avoided lands within flood zone A or B.</p>
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<p>development is not appropriate in Flood Zone A and B, and less vulnerable development is not appropriate in Flood Zone A unless a Plan-making Justification Test completed by the local authority can be satisfied.</p> <p>(xiv) Hospital: Highly vulnerable Existing Residential, Utilities, and Community & Educational Facilities which can allow highly vulnerable development have been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate in Flood Zone A and B unless a Plan making Justification Test completed by the local authority can be satisfied. Arterial Drainage Scheme benefitted lands extend into settlement centre, and their extents exceed those of the flood zones. Applications for development on land identified as benefiting land may be prone to flooding, and as such site-specific flood risk assessments may be required in these areas.</p> <p>(xv) Kilfinane: Highly vulnerable Existing Residential, and Community & Educational Facilities which can allow highly vulnerable development have been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate in Flood Zone A and B unless a Plan-making Justification Test completed by the local authority can be satisfied.</p> <p>(xvi) Pallasgreen: Highly vulnerable Existing Residential and less vulnerable Enterprise & Employment lands have been zoned in Flood Zones A and B. Highly vulnerable</p>	<p>(xiv) Hospital: The approach that has been taken in general to zoning outside of the town centre is the precautionary approach, which has avoided lands within flood zone A or B.</p> <p>(xv) Kilfinane: The approach that has been taken in general to zoning outside of the town centre is the precautionary approach, which has avoided lands within flood zone A or B.</p> <p>(xvi) Pallasgreen: The approach that has been taken in general to zoning outside of the village centre is the precautionary approach, which has avoided lands within flood zone A or B.</p>
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<p>development is not appropriate in Flood Zone A and B, and less vulnerable development is not appropriate in Flood Zone A unless a Plan-making Justification Test completed by the local authority can be satisfied. It is noted that Enterprise & Employment zoned lands are within flood zones risks be managed using the sequential approach. It would be beneficial if this were to be supported with policy objectives.</p> <p>(xvii) Pallaskenry: Highly vulnerable New Residential, Existing Residential, and Community & Educational Facilities which can allow highly vulnerable development have been zoned in Flood Zones A and B. Highly vulnerable development is not appropriate in Flood Zone A and B unless a Plan-making Justification Test completed by the local authority can be satisfied.</p> <p>For all of the areas above: It is noted where there is existing residential zoning within Flood Zone A or B, new development should be limited to minor development only. It would be beneficial if this were to be supported with a policy objective.</p>	<p>(xvii) Pallaskenry: The approach that has been taken in general to zoning outside of the village centre is the precautionary approach, which has avoided lands within flood zone A or B.</p> <p>Noted.</p>
<p>Chief Executive’s Recommendations</p>	
<p>1. – 3. No change; 4. The SFRA will be amended to include flood justification tests; 5. Update the SFRA to note that the National Indicative Fluvial Maps are indicative and not predictive maps; 6. Amend Objectives CAF O23 and O24 as follows: Objective CAF O23 Flood Relief Schemes</p>	

It is an objective of the Council to support and facilitate the development of Flood Relief Schemes as identified in the CFRAM 10 Year Investment Programme and ensure development proposals do not impede or prevent the progression of these measures.
Objective CAF O24 Minor Flood and Mitigation Works and Coastal Protections Schemes

It is an objective of the Council to support and facilitate the Office of Public Works Minor Flood and Mitigation Works and Coastal Protections Schemes and ensure development proposals do not impede or prevent the progression of these measures.

7. Update Table 3.2 of the SFRA to clarify Flood Relief Schemes which have been complete, including Clancy Strand, Dromcolliher, Harry’s Mall Limerick, Mulkear River (Cappamore) and Newcastle West;

8. – 12. No change;

13. SFRA will be updated to reflect the position in relation to the CRFAM and update Table 9.1 and state that The CFRAM programme has been complete and implementation of the outputs from this work is underway;

14. No change;

15. The SFRA will be updated to remove reference to www.floodmaps.ie and replace with www.floodinfo.ie;

16(i) - (xvii) The SFRA will be amended to include flood justification test for Cappamore. New flood mapping shall be included for Doon in Volume 2.

SEA/ AA Response

The SFRA is being updated to include Plan Making Justification Tests to ensure compliance with Section 28 Guidelines – The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009). Additional text changes including outlining completed flood relief schemes and updates to the status of the CFRAM programme will ensure that the information presented in the plan is the most up to date available. This will be mentioned in the SEA/NIS.

Appendix A: List of Late Submissions Received

No.	Name/ Representative/ Group
1	Kevin O’Sullivan on behalf of Griffin College Limerick
2	John Leddin
3	Tom Spillane

Appendix B: Newspaper Notice



PUBLIC NOTICE

**PLANNING AND DEVELOPMENT ACT 2000 (AS AMENDED)
PLANNING AND DEVELOPMENT REGULATIONS 2001 (AS AMENDED)
NOTICE OF THE PUBLICATION OF THE DRAFT LIMERICK
DEVELOPMENT PLAN 2022-2028**

Notice is hereby given, that Limerick City and County Council has, pursuant to Section 12 of the Planning and Development Act, 2000 (as amended) prepared a Draft Development Plan for Limerick for the period 2022 – 2028. The Draft Plan includes amendments to the Record of Protected of Structures.

It is intended that the new Development Plan 2022 – 2028 will be the first consolidated plan for the entire functional area of Limerick City and County Council. The new Development Plan will also incorporate the functional areas which are currently covered by the Bruff, Hospital, Cappamore, Kilsnane, Castleberry and the Southern Environs Local Area Plans. Upon adoption of the new Development Plan, these Local Area Plans will be revoked.

The Draft Plan is accompanied by a Strategic Environmental Assessment (SEA) Environmental Report, prepared in accordance with the SEA Directive (2001/42/EC) and the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. No. 436 of 2004) (as amended) and an Appraisal Assessment (AA) Natura Impact Report pursuant to the Habitats Directive (92/43/EEC) and the Planning and Development Act 2000 (as amended). A Strategic Flood Risk Assessment also accompanies the new Plan.

The Draft Plan consists of the following:

- Volume 1: Written Statement;
- Volume 2: Settlements and Zoning Maps;
- Volume 3: Record of Protected Structures and Architectural Conservation Areas;
- Volume 4: Strategic Environmental Assessment, Strategic Flood Risk Assessment and Appropriate Assessment/Natura Impact Statement;
- Volume 5: Designated Sites and Record of Monuments and Preservation Orders;
- Volume 6: Housing Strategy, including Housing Need Demand Assessment, Rural Strategy, Building

Height Strategy, Strategic Integrated Framework Plan for the Shannon Estuary and a review and update of the Limerick 2030 – A Spatial and Economic Strategy.

The Draft Plan will be placed on public display on Sunday, 26th June to the 6th September 2021 (inclusive) and will be available to view online at www.limerickcityandcountycouncil.ie/development-plan and also in the following venues by appointment only and subject to Covid 19 restrictions at the time:

- Limerick City and County Council Corporate Headquarters, Merchants Quay, Limerick;
- Limerick City and County Council, Courty Hall, Doonadyske, Limerick;
- Limerick City and County Council Municipal District Offices in Newcastle West, Kinnelock and Rathfriland.

The Draft Plan will also be available in all Limerick City and County Council Libraries, throughout Limerick.

As part of the draft process public meetings will be held, **by appointment only** and subject to government guidance in relation to Covid 19, on the following dates:

- 29th June 2021 – Limerick City and County Council Corporate Headquarters, Merchants Quay, Limerick from 10.00 am – 7.00pm;
- 1st July 2021 – Cappamore – Kinnelock Municipal Office, Ann Marston Seoghe Kinnelock, Co. Limerick from 2.00pm – 7.00pm
- 5th July – Limerick City and County Council Corporate Headquarters, Merchants Quay, Limerick from 10.00 am – 7.00pm;
- 7th July 2021 – Cappamore Community Centre, Cappamore, Co. Limerick from 2.00 pm to 7.00 pm;
- 8th July 2021 – Newcastle West Municipal Office, Ann William Smith O'Brien, Newcastle West, Co. Limerick from 2.00pm to 7.00pm;
- 12th July 2021 – Rathfriland House Hotel, Rathfriland, Co. Limerick from 2.00pm to 7.00pm;
- 14th July 2021 – Limerick City and County Council Corporate Headquarters, Merchants Quay, Limerick from 10.00 am – 5.00pm;

The public are advised that an appointment shall be booked in advance by emailing development@limerickcityandcountycouncil.ie or about 061 – 5545504, due to Covid – 19 restrictions.

A webinar will be hosted by Limerick City and County Council **on Thursday 15th July 2021 at 6pm**, on the Draft Limerick Development Plan 2022 – 2028, log onto www.limerickcityandcountycouncil.ie/development-plan for more information.

Written Submissions

Limerick City and County Council hereby invites any interested parties to make a submission/observation on the Draft Limerick Development Plan 2022 – 2028, between the 29th June 2021 and the 6th September 2021 inclusive, via the following mediums:

- Online at www.limerickcityandcountycouncil.ie
- Email to development@limerickcityandcountycouncil.ie or
- In writing to Forward/Strategic Planning, Economic Development Directorates, Limerick City and County Council, Merchants Quay, Limerick

In respect of making a submission or observation please note the following:

- Submission/observations should include your name and address, a map (if required for identification purposes) and, where relevant, details of any organisation, community group or company etc., which you represent.
- Children, or groups or associations representing the interests of children, are particularly encouraged to make submissions or observations regarding the foregoing.
- Please be advised that all submissions received will be published online in accordance with the requirements of the Planning and Development Act, 2000 (as amended). You should ensure that no verbatim, libellous or confidential information, including confidential information relating to a third party (in respect of which the third party has not, expressly, or impliedly in the circumstances, consented to its disclosure) is included in your submission. The Planning Authority reserves the right to redact any submission or part thereof that does not comply with this requirement. Please be advised that the submission will be published in full.
- The Planning Authority is required to send certain written submissions and observations to the Member. Your written submission/observation, together with your name and address, may therefore be sent to the Member where requested.
- Please make your submission by one medium only, i.e. hard copy, email or website. Written submissions or observations with respect to the Draft Plan that are made to the Planning Authority within the period stated will be taken into consideration before the making of the Plan.

Vincent Murray
 Director of Services, Economic Development Directorates
 Date: 26th June 2021