

# DRAFT LIMERICK DEVELOPMENT PLAN 2022-2028

## Chief Executive's Report on Public Consultation on Material Alterations

Prepared in accordance with Section 12(8) of  
the Planning and Development Act 2000 (As Amended)

10 May 2022





## Contents

Part A - Introduction, Purpose and Consultation.....	3
1. Introduction .....	3
1.1 Format of the Report .....	3
1.2 Legislative Background for the Chief Executive’s Report.....	4
1.3 Purpose of the Chief Executive’s Report and Next Stage .....	4
1.4 Material Alterations Consultation.....	5
1.4.1 Webpage .....	5
1.5 Overview of Submissions Received.....	6
Part B – Submission Summaries, Chief Executive’s Responses and Recommendations .....	9
National Planning Policy .....	9
LCC-C101-30 Office of Planning Regulator (OPR) .....	9
Regional Planning Policy .....	36
LCC-C101-34 Southern Regional Assembly (SRA) .....	36
Theme 1 City and Environs .....	43
LCC-C101-2 Gerry McCormack.....	43
LCC-C101-5 Liam O’Connell.....	44
LCC-C101-7 Yvonne O’Connell .....	46
LCC-C101-8 Martin Flynn .....	47
LCC-C101-9 Michelle McCarthy .....	48
LCC-C101-10 Catheriona Hughes .....	49
LCC-C101-20 Dan and Mary Sheehan .....	50
LCC-C101-23 Barry McDonnell.....	53
LCC-C101-31 Frank Larkin .....	54
LCC-C101-37 John and Mary Mortell .....	55
LCC-C101-3 Tom Phillips and Associates on behalf of Voyage Property Limited .....	56
LCC-C101-17 Staff and Parents’ Association of the Model School .....	59
LCC-C101-21 Joe Murphy.....	60
LCC-C101-28 John Spain Associates on behalf of Clancourt.....	62
LCC-C101-13 Town & Country Resources Limited on behalf of Little Company of Mary.....	69
LCC-C101-14 Town & Country Resources on behalf of Milford Care Centre.....	70
LCC-C101-33 John O’Dwyer .....	72
LCC-C101-36 Tom Phillips and Associates on behalf of Snowvale Ltd.....	74
LCC-C101-18 Limerick Chamber.....	76

LCC-C101-26 Town & Country Resources Ltd. On behalf of Kirkland Investments Ltd. ....	91
LCC-C101-29 Gas Networks Ireland .....	92
Theme 2 Record of Protected Structures .....	94
LCC-C101-19 Pat Mitchell, Accutron Ltd. ....	94
Theme 3 Population and General Settlement Issues.....	95
LCC-C101-11 Coakley O’Neill Town Planning on behalf of Dairygold Agri Business Limited.....	95
LCC-C101-38 Tom O’Brien, Patrickswell Senior Hurling Players .....	96
Theme 4 Retail .....	99
LCC-C101-12 Avison Young on behalf of Tesco Ireland Limited .....	99
LCC-C101-27 Sheehan Planning on behalf of Irish Life Assurance PLC .....	100
Theme 5 Rural Settlement and Rural Housing.....	102
LCC-C101-39 Irish Creamery Milk Suppliers Association (ICMSA) .....	102
Theme 6 Community and Education.....	106
LCC-C101-32 Department of Education .....	106
Theme 7 Infrastructure .....	110
LCC-C101-4 Dublin Aviation Authority (DAA).....	110
LCC-C101-15 Irish Water .....	110
LCC-C101-24 Department of the Environment, Climate and Communications .....	126
LCC-C101-25 Electricity Supply Board (ESB).....	129
LCC-C101-35 Wind Energy Ireland .....	133
Theme 8 Transport.....	137
LCC-C101-6 Transport Infrastructure Ireland (TII) .....	137
LCC-C101-22 National Transport Authority (NTA) .....	146
Theme 9 Environment .....	152
LCC-C101-1 Environmental Protection Agency (EPA) .....	152
Theme 10 Climate and Flooding .....	155
LCC-C101-16 Office of Public Works (OPW).....	155
Appendix A: List of Late Submissions Received .....	162
Appendix B: Newspaper Notice .....	163
Appendix C: Proposed Minor Amendments .....	164
Core Strategy .....	175
Volume 2: Level 1 Limerick City and Environs Settlement Capacity Audit .....	178
Volume 4: Environmental Reports: Strategic Flood Risk Assessment .....	193
Addendum: Appendix B Justification Tests.....	193



## Part A - Introduction, Purpose and Consultation

### 1. Introduction

Limerick City and County Council published the Draft Limerick Development Plan 2022 – 2028 on the 26th of June 2021. 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 and will replace both the Limerick City Development Plan 2010 – 2016 (as extended) and the Limerick County Development Plan 2010 – 2016 (as extended). The Draft Plan and accompanying Environmental Reports were on public display from the 26<sup>th</sup> of June to the 6<sup>th</sup> of September 2021.

The Chief Executive's Report on submissions and observations received during the public consultation period was submitted to the Elected Members for their consideration on 26th November 2021. The Elected Members of Limerick City and County Council considered the Draft Limerick Development Plan 2022 – 2028 and the Chief Executive's Report on the 18<sup>th</sup> of February 2022 and approved proposed amendments to the Draft Plan, which were deemed to be Material Alterations. Notice of the proposed Material Alterations was given on the 11<sup>th</sup> March 2022 in accordance with the requirements of Section 12(7) of the Planning and Development Act 2000 (as amended).

The proposed Material Alterations to the Draft Limerick Development Plan 2022 – 2028 and accompanying Environmental Reports were placed on public display and submissions invited on the Material Alterations only from 12<sup>th</sup> of March 2022 to 11<sup>th</sup> of April 2022. The level of engagement was high with 39 no. valid submissions received. A further 4 no. late submissions were received after the closing date.

#### 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 and includes a list of the submissions received;
- Part B summarises the submissions received from the Office of the Planning Regulator and the Southern Regional Assembly, followed by submissions by members of the public and sets out the Chief Executive's response and recommendations on the issues raised;
- Appendix A includes a list of the late submissions and Appendix B includes a copy of the newspaper advertisement;
- Appendix C includes the proposed minor amendments to the Material Alterations arising from the Chief Executive's Recommendations in this report;
- Appendix D includes associated maps.

## 1.2 Legislative Background for the Chief Executive's Report

Under Section 12(8) of the Planning and Development Act 2000 (as amended), the Chief Executive is required to prepare a report on any submissions and observations received in relation to the Material Alterations 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;
- 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 3 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 Material Alterations to 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 associated recommendations. 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 Material Alterations and this Chief Executive's Report within a period of 6 weeks under Section 12(9) of the Planning and Development Act 2000 (as amended). Members may then make the Plan by resolution, with or without the proposed alterations, or with further modifications to the proposed alterations as they consider appropriate. A further modification to a Material Alteration:

- May be made where it is minor in nature and therefore not likely to have significant effects on the environment, or adversely affect the integrity of a European Site, and;
- Shall not be made where it relates to an increase in the area of land zoned for any purpose, or an addition to, or deletion from the Record of Protected Structures.

In accordance with Section 12(11) of the Planning and Development Act 2000 (as amended), in making the Development Plan, the members are restricted to considering the proper planning and sustainable development of the area to which the Development Plan relates, the statutory obligations of any Local Authority in the area and any relevant policies or objectives for the time being of the Government or any Minister of the Government.



The ‘Adopted Plan’ comes into effect six weeks from the day that it is made.



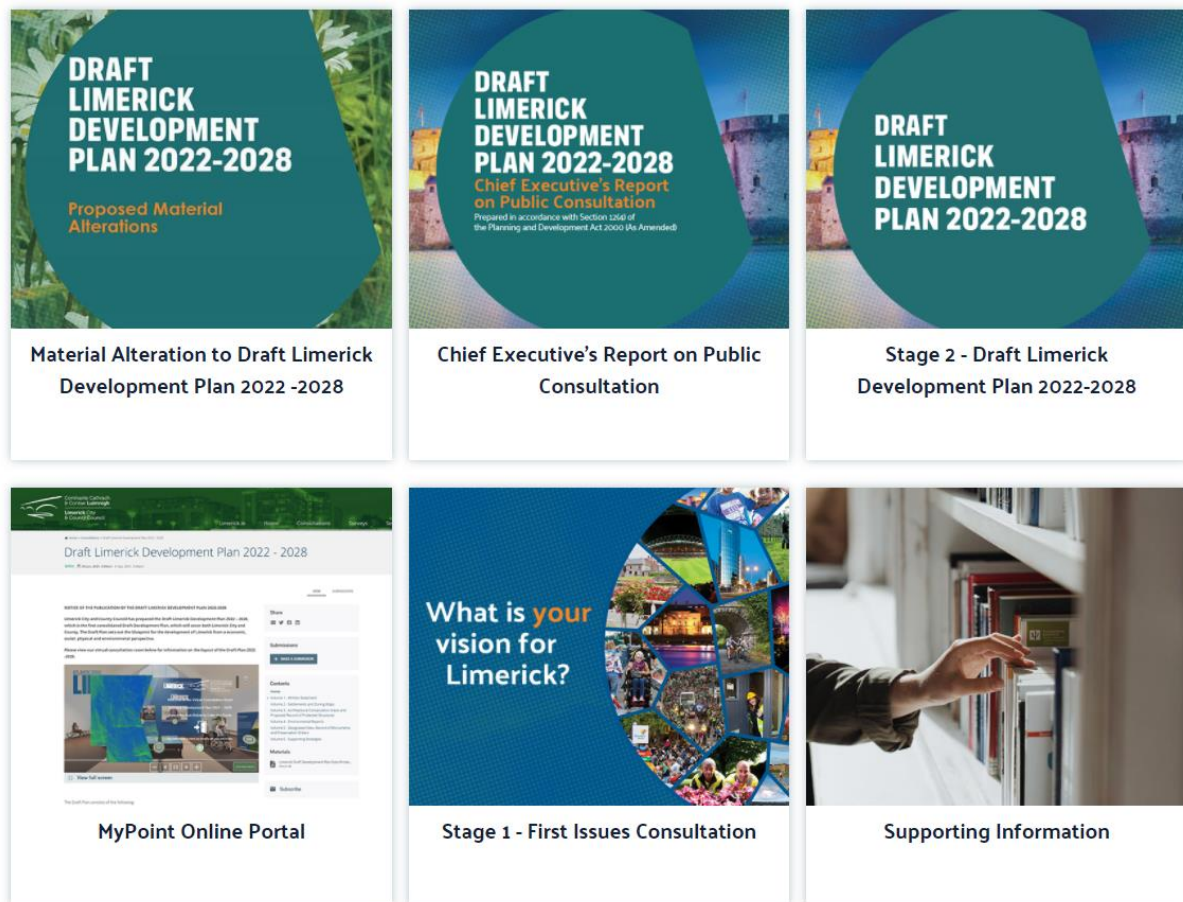
**Figure 1:** Development Plan Process

## 1.4 Material Alterations Consultation

The Material Alterations made by the Elected Members were in public display for a period of 4 weeks between 12<sup>th</sup> of March 2022 and 11<sup>th</sup> April 2022, in accordance with Section 12(7) of the Planning and Development Act 2000 (as amended). The public display invited submissions or observations on the proposed Material Alterations only. This Chief Executive’s Report sets out any submissions or observations received on the proposed Material Alterations.

### 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 712 hits on the website during the public consultation period.



**Figure 2: Webpage**

### 1.5 Overview of Submissions Received

In total, there were 43 submissions received during the Material Alterations public consultation, which comprised 39 no. valid submissions and 4 no. late submissions. Of the 39 no. valid submissions:

- 11 (28%) were online submissions submitted via the online consultation portal;
- 1 (3%) was submitted by post;
- 27 (69%) were submitted by email.

A list of the valid submissions received is set out in the following table:

Chief Executive's Report No.	Ref. Number	Name/ Group	Theme
1	LCC-C101-30	Office of Planning Regulator (OPR)	National Planning Policy
2	LCC-C101-34	Southern Regional Assembly (SRA)	Regional Planning Policy
3	LCC-C101-2	Gerry McCormack	Theme 1 City and Environs



<b>4</b>	LCC-C101-5	Liam O'Connell	Theme 1 City and Environs
<b>5</b>	LCC-C101-7	Yvonne O'Connell	Theme 1 City and Environs
<b>6</b>	LCC-C101-8	Martin Flynn	Theme 1 City and Environs
<b>7</b>	LCC-C101-9	Michelle McCarthy	Theme 1 City and Environs
<b>8</b>	LCC-C101-10	Catheriona Hughes	Theme 1 City and Environs
<b>9</b>	LCC-C101-20	Dan and Mary Sheehan	Theme 1 City and Environs
<b>10</b>	LCC-C101-23	Barry McDonnell	Theme 1 City and Environs
<b>11</b>	LCC-C101-31	Frank Larkin	Theme 1 City and Environs
<b>12</b>	LCC-C101-37	John and Mary Mortell	Theme 1 City and Environs
<b>13</b>	LCC-C101-3	Tom Phillips and Associates on behalf of Voyage Property Limited	Theme 1 City and Environs
<b>14</b>	LCC-C101-17	Staff and Parents' Association of The Model School	Theme 1 City and Environs
<b>15</b>	LCC-C101-21	Joe Murphy	Theme 1 City and Environs
<b>16</b>	LCC-C101-28	John Spain Associates on behalf of Clancourt	Theme 1 City and Environs
<b>17</b>	LCC-C101-13	Town & Country Resources Limited on behalf of Little Company of Mary	Theme 1 City and Environs
<b>18</b>	LCC-C101-14	Town & Country Resources Limited on behalf of Milford Care Centre	Theme 1 City and Environs
<b>19</b>	LCC-C101-33	John O'Dwyer	Theme 1 City and Environs
<b>20</b>	LCC-C101-36	Tom Phillips and Associates on behalf of Snowvale Ltd.	Theme 1 City and Environs
<b>21</b>	LCC-C101-18	Limerick Chamber	Theme 1 City and Environs
<b>22</b>	LCC-C101-26	Town & Country Resources Limited on behalf of Kirkland Investments Ltd.	Theme 1 City and Environs
<b>23</b>	LCC-C101-29	Gas Networks Ireland	Theme 1 City and Environs

<b>24</b>	LCC-C101-19	Pat Mitchell, Accutron Ltd.	Theme 2 Record of Protected Structures
<b>25</b>	LCC-C101-11	Coakley O’Neill Town Planning on behalf of Dairygold Agri Business Limited	Theme 3 Population and General Settlement Issues
<b>26</b>	LCC-C101-38	Tom O’Brien, Patrickswell Senior Hurling Players	Theme 3 Population and General Settlement Issues
<b>27</b>	LCC-C101-12	Avison Young on behalf of Tesco Ireland Limited	Theme 4 Retail
<b>28</b>	LCC-C101-27	Sheehan Planning on behalf of Irish Life Assurance PLC	Theme 4 Retail
<b>29</b>	LCC-C101-39	Irish Creamery Milk Suppliers Association (ICMSA)	Theme 5 Rural Settlement and Rural Housing
<b>30</b>	LCC-C101-32	Department of Education	Theme 6 Community and Education
<b>31</b>	LCC-C101-4	Dublin Aviation Authority (DAA)	Theme 7 Infrastructure
<b>32</b>	LCC-C101-15	Irish Water	Theme 7 Infrastructure
<b>33</b>	LCC-C101-24	Department of the Environment, Climate and Communications	Theme 7 Infrastructure
<b>34</b>	LCC-C101-25	Electricity Supply Board (ESB)	Theme 7 Infrastructure
<b>35</b>	LCC-C101-35	Wind Energy Ireland	Theme 7 Infrastructure
<b>36</b>	LCC-C101-6	Transport Infrastructure Ireland (TII)	Theme 8 Transport
<b>37</b>	LCC-C101-22	National Transport Authority (NTA)	Theme 8 Transport
<b>38</b>	LCC-C101-1	Environmental Protection Agency (EPA)	Theme 9 Environment
<b>39</b>	LCC-C101-16	Office of Public Works (OPW)	Theme 10 Climate and Flooding

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

### National Planning Policy

1	<b>Ref. and Name/ Group:</b> LCC-C101-30 Office of Planning Regulator (OPR)
<b>Submission/ Observation Summary</b>	
<b>Chief Executive’s Response</b>	
<p><b>Overview:</b></p> <p>The OPR recognises that the Plan is generally in compliance with National and Regional planning policy. The Office acknowledges the extensive work in responding to the issues raised. The approach to the Limerick Shannon Metropolitan Area sets a future vision and more focused and structured approach, while the Core Strategy and settlement hierarchy more clearly align with national and regional policy. Although a minor modification is suggested for the core strategy map.</p> <p>Regarding the decision not to comply with Recommendation 7 – Land use zoning and Local Areas Plans, and Recommendation 13 – Retail and Regeneration, the Office accepts the reasons given.</p> <p>Regarding the decision not to comply with Recommendation 4 – Future Growth of Patrickswell, Recommendation 5 - Core Strategy and Zoning for Residential Use (part (ii) concerning residential densities with regard to Newcastle West), and Recommendation 10 – Rural Housing Policy, the Office notes the reasons given. These matters are addressed further below.</p>	<p><b>Overview:</b></p> <p>The content of the submission received is noted. The individual issues raised are addressed in the responses below.</p>

The Office has significant concerns arising from proposed material amendments to zoning objectives, which are inconsistent with guidelines issued under Section 28, and/or with national and regional policy, and which fail to set out an overall strategy for proper planning and sustainable development. In particular, the zoning of land in flood plains for vulnerable development. The guidelines allow for some development of land at risk of flooding in exceptional circumstances, subject to a Justification Test by the Local Authority. It is of significant concern that these amendments have been introduced by Elected Members in cases where the land has failed the Justification Test in the Strategic Flood Risk Assessment.

Development on land at risk of flooding not only affects who lives there, but can increase flooding elsewhere, by decreasing flood storage. This is increasingly prevalent as a consequence of climate change. It is critical that the Development Plan does not plan for unsuitable development in areas vulnerable to flooding.

The Office sets out serious concerns with regard to a number of material amendments in relation to zoning objectives which conflict with national and regional policy for compact growth, sequential development, rural planning and national roads.

<p><b>1. Limerick-Shannon Metropolitan Area:</b></p> <p><b>(i)</b> The new Chapter 3 Spatial Strategy is well-structured, appropriate in content and detail, and addresses all of the issues in Recommendation 1(i)-(iii) raised by the Office.</p> <p><b>(ii)</b> Regarding the decision not to comply with part (iv) of the recommendation, which related to phasing of lands, the Office notes and generally accepts the reasons put forward in the Section 12(5)(aa) Notice.</p> <p><b>2. Core Strategy and Settlement Strategy:</b></p> <p><b>2.1 Housing and Population Targets:</b></p> <p><b>(i)</b> The Office welcomes MA No. 5 made to the Core Strategy, in response to Recommendation 2 and the amendment of the Core Strategy Map (map 2.1) illustrating the settlement hierarchy and spatial details, and inclusion of the Metropolitan Area Core Strategy Map (map 2.2) to more clearly show the metropolitan area extending into county Clare.</p> <p>The Office has carried out an assessment of the extent of land zoned for residential development, including 'Additional Provision'. Material amendments to rezone certain lands specified below for residential use, located in peripheral and non-sequential locations are not consistent with compact growth and/or are located in flood zones, are not required to meet the demand for housing set out in the Core Strategy. The OPR recommends removal of a number of sites identified under Recommendation 1 and 4 (dealt with further below) and considers that by excluding these material amendments,</p>	<p><b>1. Limerick-Shannon Metropolitan Area:</b></p> <p><b>(i)</b> The content of the submission received is noted. It is recommended that the Plan be made with the proposed Material Alteration No. 6 (Chapter 3 Spatial Strategy) as displayed.</p> <p><b>(ii)</b> The content of the submission received is noted.</p> <p><b>2. Core Strategy and Settlement Strategy:</b></p> <p><b>2.1 Housing and Population Targets:</b></p> <p><b>(i)</b> The content of the submission received is noted, in particular the OPR assessment of the capacity of lands to meet the housing demand of the Core Strategy, further to their recommendations in relation to the zoning of lands. This will be addressed in the response to OPR recommendations No.s 1 and 4 further below.</p>
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<p>the extent of zoned land will be substantively consistent with that required by the Core Strategy.</p> <p><b>2.2 Settlement Hierarchy and distribution of growth:</b>  <b>(i)</b> The Office welcomes MA No.5 redesignating Kilmallock as a level 3 town, in response to Recommendation 3.</p> <p><b>(ii)</b> Population growth in the Core Strategy for Patrickswell in response to Recommendation 4 still exceeds the provision of NPO 9 of the NPF and the objective NPO 18, to moderate growth to a level proportionate to the scale of the settlement and services, amenities and infrastructure available. The Office notes the reasons given by the Elected Members for not complying with Recommendation 4, as set out in the Section 12(5)(aa) notice. However, the concerns and reasoning remain and the Office notes that Recommendation 4 has not been complied with.</p> <p><b>3. Sustainable Development and Regeneration:</b>  <b>3.1 Compact Growth, Regeneration and Sequential Development:</b>  <b>(i)</b> The Office is satisfied that MA No.5 address parts (i) and (ii) of Recommendation 6 (compact growth) in respect of Limerick City and Environs. Details do not appear to have been included for compact growth for settlements, however</p>	<p><b>2.2 Settlement Hierarchy and distribution of growth:</b>  <b>(i)</b> The content of the submission received is noted.</p> <p><b>(ii)</b> With respect to Patrickswell, it is acknowledged that the OPR's Recommendation No. 4 to the Draft Plan was not complied with. In the Chief Executive's Report on submissions received to the Draft Plan, the Planning Authority indicated that they 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 within the Metropolitan Area, that 36% growth is considered appropriate. It is recommended that the proposed Material Alteration as set out in the Chief Executive's Report dated 26<sup>th</sup> November 2021 is made, providing for 36% growth.</p> <p><b>3. Sustainable Development and Regeneration:</b>  <b>3.1 Compact Growth, Regeneration and Sequential Development:</b>  <b>(i)</b> The content of the submission received is noted and no further amendments are recommended.</p>
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<p>the Office acknowledges that the Settlement Capacity Audits identify infill/brownfield lands. This is generally acceptable.</p> <p><b>(ii)</b> In preparing future Local Area Plans for larger settlements, including Newcastle West, the Office would encourage identification of lands that will contribute to compact growth, by way of appropriate maps.</p> <p><b>(iii)</b> The Office welcomes Policy CGR P2 – Monitoring of Brownfield/ Infill Sites in Chapter 3 and the expansion of Chapter 13 Implementation and Monitoring (MA No. 117) to reflect the Core Strategy monitoring indicators, addressing part (iii) of Recommendation 6. Chapter 13 does not provide for monitoring of brownfield/ infill sites or compact growth and is inconsistent with Policy CGR P2. This might be resolved through a minor modification of MA No. 117 to expand the indicators to be considered in monitoring to ensure consistency with Policy CGR P2.</p> <p><b>(iv)</b> The draft Plan does not specifically identify Settlement Consolidation Sites, defined in the draft Guidelines (s.6.4.2) as development sites of relatively strategic scale and importance located within the existing built-up area of towns &gt;10,000. In addition, many other sites will also contribute to the delivery of compact growth.</p> <p><b>(v)</b> The draft Plan made more than sufficient provision for zoning of residential and mixed-residential uses to implement the Core Strategy. Lands were appropriately located to regenerate and revitalise the City and Environs and to limit</p>	<p><b>(ii)</b> Maps identifying lands which will contribute to compact growth will be included in the Local Area Plan for Newcastle West.</p> <p><b>(iii)</b> A minor modification is recommended to the Core Strategy Indicators as set out under Chapter 13, to include the monitoring of Brownfield/Infill Sites in accordance with Policy CGR P2 - Monitoring of Brownfield/ Infill Sites as follows: <u>Establish a database of and monitor planning applications on brownfield and infill sites.</u></p> <p><b>(iv)</b> Consolidation Sites have been identified in the Settlement Capacity Audit for Limerick City and Environs, including Mungret and Annacotty. In Limerick there are no towns in excess of &gt;10,000 population outside of the City and Environs. No further amendments are therefore recommended.</p> <p><b>(v)</b> See response to Recommendation No. 1 below.</p>
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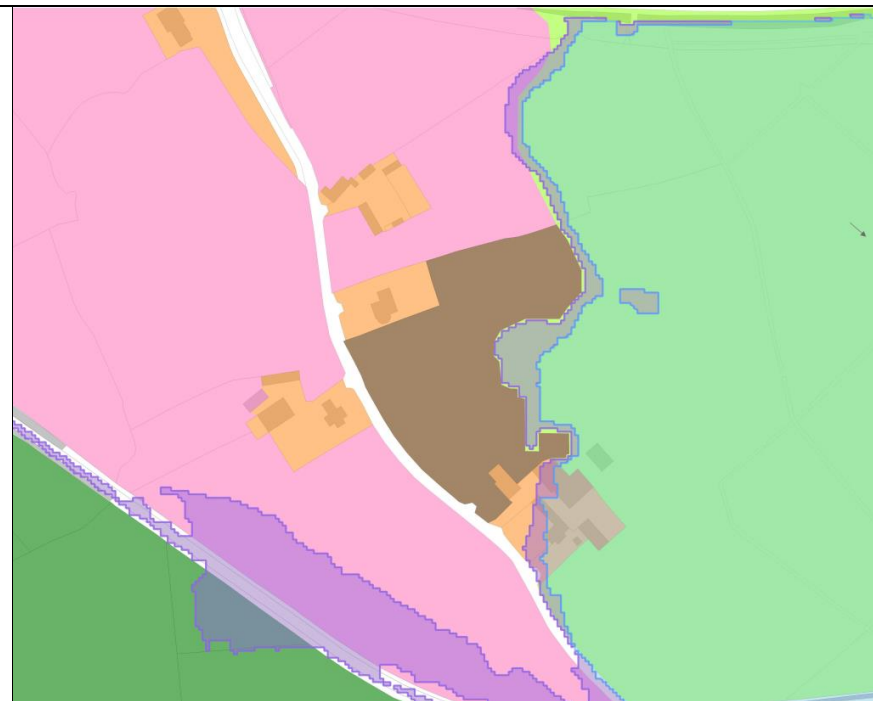
	<p>low-density sprawl and car-based traffic. The Office has, therefore, concerns regarding the following zoning peripheral to Limerick City and suburbs, some isolated relative to existing development and not representing sequential zoning:</p> <ul style="list-style-type: none"> <li>• MA No.135 - 4.2ha. from Enterprise and Employment to New Residential at Mungret.</li> <li>• MA No.143 - 2.4ha. from Agriculture to New Residential at South of Condell Road, Clonmacken.</li> <li>• MA No.151 - 2.9ha. from Agriculture to New Residential at Ballyclough, Castletroy.</li> <li>• MA No.152 - 1.2ha. from Enterprise and Employment to New Residential at Ballykeefe, Mungret.</li> </ul> <p>Due to their location, the proposed amendments are inconsistent with implementation of NPO 3 and RSO 10 and the achievement of compact growth under NSO 1 and RSO 1 under the NPF and RSES. The lands are not sequentially located to provide for compact growth, utilisation of existing infrastructure and regeneration and contrary to Section 4.19 of the Development Plans, Guidelines for Planning Authorities (2007) and Section 6.2.3 of the draft Guidelines, including SPPR DPG 7.</p> <p>The zoning will also militate against implementation of sustainable settlement and transport strategies necessary to address climate change under Section 10(2)(n) of the Act.</p>	
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<p><b>Recommendation 1: Compact growth and residential zonings:</b></p> <p>Having regard to the national and regional policy objectives for compact growth NPO 3 and RPO 10 under the NPF and RSES, to the requirements to implement sequential zonings under the Development Plans, Guidelines for Planning Authorities (2007) and Development Plans, Guidelines for Planning Authorities - Draft for Consultation (August 2021), including SPPR DPG 7, to the provisions of the Core Strategies Guidance Notes (November 2010), and to the implementation of objectives to promote sustainable settlement and transport strategies under Section 10(2)(n) of the Act, the Planning Authority is required to make the Plan without:</p> <ul style="list-style-type: none"> <li>• MA No.135 - 4.2ha. from Enterprise and Employment to New Residential at Mungret.</li> <li>• MA No.143 - 2.4ha. from Agriculture to New Residential at South of Condell Road, Clonmacken.</li> <li>• MA No.151 - 2.9ha. from Agriculture to New Residential at Ballyclough, Castletroy.</li> <li>• MA No.152 - 1.2ha. from Enterprise and Employment to New Residential at Ballykeefe, Mungret.</li> </ul>	<p><b>Recommendation 1: Compact growth and residential zonings:</b></p> <p>With respect to the OPR's recommendation to make the Plan without 4 no. sites, the Planning Authority notes the following:</p> <ul style="list-style-type: none"> <li>• MA No.135 - 4.2ha. from Enterprise and Employment to New Residential at Mungret: This site is not considered peripheral given its location within the core of Mungret village. The Planning Authority considers that the Plan should be made with MA No. 135 as displayed.</li> <li>• MA No.143 - 2.4ha. from Agriculture to New Residential at South of Condell Road, Clonmacken: This site is dealt with under Recommendation No. 4 (flooding) further below.</li> <li>• MA No.151 - 2.9ha. from Agriculture to New Residential at Ballyclough, Castletroy: This site is not considered peripheral given its proximity to Annacotty village. The Planning Authority considers that the Plan should be made with MA No. 151 as displayed.</li> <li>• MA No.152 - 1.2ha. from Enterprise and Employment to New Residential at Ballykeefe, Mungret: This site is not considered peripheral given its location adjoining existing residential development and the proximity to the built-up area of Dooradoyle. The Planning Authority considers that the Plan should be made with MA No. 152 as displayed, subject to minor modification to remove the area (0.11ha.) subject to flood risk allowing for 1.168ha. of New Residential as per the image below:</li> </ul>
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### 3.2 Newcastle West:

(i) The residential density assumption and target in the Core Strategy table for Newcastle West Key Town has been significantly reduced from 35 units per hectare to 22 units per hectare for 80% of units under MA No. 5. The Core Strategy also continues the application of a very low density of 10 units per hectare for 20% of units for the settlement.

Newcastle West with 7,000 people performs an important role in the economy and services. It is designated a Key Town in the RSES, in recognition of this role and to focus future



### 3.2 Newcastle West:

(i) The content of the submission received is noted. See response under MA Observation No. 1 below.

	<p>growth towards the town. Achieving a reasonable density is important to achieve compact growth and facilitate investment in infrastructure. Developing at such low densities will mean future residents will be located further from shops, schools and services, resulting in increased car dependency and eroding the benefits of a 10-minute town. The density for Newcastle West under MA No. 5 is not consistent with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009). The proposed density risks unsustainable sprawl and is inconsistent with the provisions under the RSES for Key Towns. The proposed density undermines objectives under Section 10(2)(n) of the Act for promoting sustainable settlement and transport strategies to address climate change, with significant limitations on the ability to prepare a Local Area Plan and/or Local Transport Plan consistent with national and regional policy for compact growth and sustainable development.</p> <p><b>MA Observation 1 – Core Strategy Density: Newcastle West:</b> Having regard to National Policy Objective 3 for compact growth and the recommended residential densities for large towns, small towns and villages in the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (2009), the Planning Authority is requested to make the Plan without the reduction in density to 22 units per hectare for 80% of units for the Key Town of Newcastle West in the proposed amendments of the Core Strategy under MA No. 5 and revert to the draft Plan.</p>	<p><b>MA Observation 1 – Core Strategy Density: Newcastle West:</b> In order to facilitate Newcastle West’s role as a Key Town in the Southern Region, achieve objectives for compact growth, the 10-minute town concept, town centre first and active travel and to address climate change, and comply with the Section 28 Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (2009), it is recommended that the Plan is made without MA No. 5 with respect to density in Newcastle West and the Plan be reverted to the standards set out in the draft Plan requiring 35 units per hectare for 80% of units.</p>
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<p><b>3.3 Level 4 and Level 5 Settlements:</b> MA No. 6 of Objective CGR O15 and Objective CGR O17 allow for sewerage treatment for serviced sites to generally be by means of individual treatment systems, where there is limited or no treatment capacity, subject to all systems constructed to allow connection to public sewers when capacity becomes available.</p> <p>The Office acknowledges this is an interim solution, but would caution that it will need to be carefully managed to ensure ground and surface waters are protected in compliance with S.I. No. 9/2010 - European Communities Environmental Objectives (Groundwater) Regulations 2010 and the S.I. No. 272/2009 - European Communities Environmental Objectives (Surface Waters) Regulations 2009, respectively, in accordance with the River Basin Management Plan, having regard to Section 10(2) of the Act.</p> <p><b>4. Housing Strategy and relevant policies:</b> <b>4.1 Traveller accommodation:</b> The Office is generally satisfied that the proposed amendments respond to Recommendation 11. The Office welcomes MA No. 7 to Objective HO O17 Traveller Accommodation and MA No. 139 to the zoning map to identify Traveller Accommodation. It would be useful to distinguish between proposed and existing locations. The Planning Authority should consider making a minor modification in this respect, having regard to the Traveller Accommodation Programme.</p>	<p><b>3.3 Level 4 and Level 5 Settlements:</b> Material Alteration No. 7 to Chapter 4 Housing includes the following text in relation to Serviced Sites “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”. This has also been reflected in the Development Management standards of the Draft Plan. No further amendments are recommended.</p> <p><b>4. Housing Strategy and relevant policies:</b> <b>4.1 Traveller accommodation:</b> The Planning Authority notes that there are no additional proposed locations identified under the current Traveller Accommodation Programme. The Material Alteration zoning maps identify all existing locations in accordance with the current programme and therefore further amendments are not considered necessary.</p>
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<p><b>5. Rural Housing and Regeneration:</b>  <b>5.1 Rural housing policy:</b>  The Office acknowledges the significant work undertaken by the Executive to revise Map 3.1 Rural Housing Map in response to Recommendation 10. This included a review of data on population growth and decline and POWSCAR data to determine commuting, consistent with Section 28 Sustainable Rural Housing Guidelines for Planning Authorities (2005), to determine a fair and equitable rural housing policy as an objective, transparent evidence-based approach. However, no relevant amendments have been proposed in response to Recommendation 10, contrary to the recommendations of the Chief Executive's report. The Office notes the reasons given for not complying, as set out in the Section 12(5)(aa) Notice.</p> <p>The Office reiterates that the identification of areas under urban pressure on the Rural Housing Map does not fully reflect the influence of larger urban areas (e.g. Newcastle West and Abbeyfeale) and/or the influence of the N21 and N20 routes and along the Cork County border with Charleville. In relation to Newcastle West, the settlement strategy is not consistent with the Key Town designation and the objectives to support regeneration and revitalisation through development within the town.</p> <p>The concerns of the Office and reasoning set out in Recommendation No. 10 remain relevant, and the Office concurs with the Section 12(5)(aa) notice issued by the</p>	<p><b>5. Rural Housing and Regeneration:</b>  <b>5.1 Rural housing policy:</b>  At the special Council meeting on 18<sup>th</sup> of February 2022, the Elected Members set out the reasons for not accepting the OPR's Recommendation No. 10 to the Draft Plan in relation to the rural housing policy. The reasons demonstrated that the policy complies with the methodology set out in the NPF for determining the City region commuter catchment. No further amendment to Material Alteration No. 5 in relation to the Rural Housing Strategy Map is recommended.</p>
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<p>Planning Authority that Recommendation No. 10 has not been complied with.</p> <p><b>6. Economic Development and Employment:</b>  <b>6.1 Employment Zoned Land:</b>  <b>(i)</b> No robust justification for the extent and location of employment zoned land in the county generally, has been provided, in response to Recommendation No. 12. The Section 12(5)(a) notice does not provide reasons not to comply. A clearer approach to employment zoned lands could have been provided in terms of setting out existing provision, projected demands and suitability of potential lands including servicing and consistency with national roads policy and the ‘Guiding principles to identify locations for strategic employment development’ under Section 4.7 of the RSES.  In relation to the four specific employment zonings referenced in Recommendation No. 12, the Office welcomes and generally accepts the response of the Chief Executive.</p> <p><b>(ii)</b> MA No. 109 proposes to insert a Data Centre land use zoning objective ‘to accommodate the provision of a Data Centre on lands identified at Rosbrien and other appropriately zoned lands’ for the purpose of a ‘data centre campus’. No amendment is proposed to the zoning matrix.</p> <p><b>(iii)</b> The Office acknowledges that the proposed amendment reflects the Government Statement on The Role of Data Centres in Ireland’s Enterprise Strategy (2018). However,</p>	<p><b>6. Economic Development and Employment:</b>  <b>6.1 Employment Zoned Land:</b>  <b>(i)</b> The content of the submission received is noted.</p> <p><b>(ii)</b> The Data Centre zoning has not been included in the Zoning Matrix, however the objective and purpose clearly set out under MA No. 109, that the zoning is for a Data Centre Campus only. However, in the interests of clarity, an additional minor amendment is recommended to state that general Enterprise and Employment uses will not be permitted in the Data Centre zone.</p> <p><b>(iii)</b> See response under Recommendation No. 2 below.</p>
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	<p>under the Climate Action Plan 2021 this strategy will be reviewed to ensure that the sector will be aligned with sectoral emission ceilings and support renewable energy targets. It would be appropriate to include a minor modification committing to the variation of development plan policy to align with the future revised strategy.</p> <p>MA No. 149 proposes to zone 33ha. for a Data Centre at Ballysimon House. This isolated site is located outside of the defined settlement boundary, in a rural location, inconsistent with the achievement of NSO 1 and RSO 1 for compact growth and objectives for sustainable settlement and transport strategies under Section 10(2)(n) of the Act.</p> <p>The proposed zoning is inconsistent with the provision of an overall strategy for proper planning and sustainable development, as facilitating such development will create pressure for further developments in this location south of the M7 and N24. Zoning without a clear evidence-based assessment in accordance with Section 2.7 of the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012), is inconsistent with the guidelines.</p> <p>The zoning conflicts with a range of national and regional policy, the Office is not satisfied that there is a credible rationale underpinning the zoning in accordance with Section 6.2.5 of the draft Guidelines.</p>	
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<p><b>MA Recommendation 2 – Data Centre (MA No. 149):</b> Having regard to NSO 1 and RSO 1 to achieve compact growth under the NPF and the RSES, the Development Plan Guidelines for Planning Authorities - Draft for Consultation (August 2021), the requirements under Section 10(2)(n) of the Act, and to the provisions of the Spatial Planning and National Roads Guidelines for Planning Authorities (2012), including Section 2.7, the Planning Authority is required to make the Plan without proposed amendment:</p> <ul style="list-style-type: none"> <li>• MA No. 149 to include the zoning of an area of 33ha. for Data Centre at Ballysimon House, Commons Road, Ballysimon.</li> </ul> <p><b>6.2 Rural Economy and Tourism:</b> <b>(i)</b> MA No. 38 (Objective ECON O40 Location of Tourism Accommodation) omits the provision that holiday home developments should be concentrated within or adjoining existing towns, villages and settlements where they can best</p>	<p><b>MA Recommendation 2 – Data Centre (MA No. 149):</b> Having regard to the content of the submission received, the National Planning Framework and Regional and Spatial Economic Strategy objectives to secure compact and sustainable growth, Section 28 Guidelines Spatial Planning and National Roads Guidelines for Planning Authorities, and the traffic and road related issues raised by the NTA and TII in their submissions, the Planning Authority acknowledge the issues with respect to the zoning of the lands at Ballysimon for a Data Centre.</p> <p>The Planning Authority acknowledge that development beyond the City and Environs boundary would not be sequential with the city first approach, exacerbating dependence on private based motorised transport and contributing to unsustainable patterns of development and traffic congestion. Development of these lands would therefore be contrary to compact growth objectives, the Climate Action Plan objectives and the Section 28 Guidelines.</p> <p>On the basis of the above, it is recommended that the Plan is made without the lands identified under Recommendation 2 of the OPR submission as follows:</p> <ul style="list-style-type: none"> <li>• MA No. 149 to include the zoning of an area of 33ha. for Data Centre at Ballysimon House, Commons Road, Ballysimon.</li> </ul> <p><b>6.2 Rural Economy and Tourism:</b> <b>(i)</b> The content of the submission received is noted. See response to MA Recommendation No. 3 below.</p>
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	<p>support the provision of services and minimise the impact on the open landscape.</p> <p>The proposed amendment is inconsistent with the Sustainable Rural Housing Guidelines for Planning Authorities (2005), which “emphasise the importance of clustering such tourism driven activity, as far as possible, in well designed and appropriately scaled developments in or adjoining small towns and villages”. The revised policy is likely to generate pressure for holiday homes in rural areas, losing important economic benefits to rural towns and villages, creating unnecessary pressure on the rural environment and a car-dependant pattern of development.</p> <p>The proposed amendment conflicts with the policy approach outlined in Section 4.8.4 Tourism Facilities and Accommodation, which generally directs such development to settlements, and development management Section 11.9.4 Visitor Accommodation and Holiday Homes, which provides that new single holiday homes in the countryside will not be permitted and will be directed to settlements.</p> <p><b>MA Recommendation 3 - Holiday home development:</b> Having regard to the Sustainable Rural Housing Guidelines for Planning Authorities (2005), and the provisions for holiday home development under the draft Plan in Section 4.8.4 Tourism Facilities and Accommodation and Section 11.9.4 Visitor Accommodation and Holiday Homes, the Planning Authority is required to make the Plan without proposed amendment MA No. 38.</p>	<p><b>MA Recommendation 3 - Holiday home development:</b> The proposed material alteration to Objective ECON O40 Location of Tourism Accommodation, in the first instance seeks to develop tourist accommodation in, or adjoining settlements. Only in limited circumstances, where there is a demonstrated need will tourist accommodation be permitted in the rural area. Therefore, the Planning Authority does not consider it necessary to remove MA No. 38.</p>
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<p><b>7. Sustainable Transport and Accessibility:</b> The Office welcomes Chapter 7 Sustainable Mobility and Transport, in responding to Recommendation 14(i). The Office notes, however, that the proposed amendments do not appear to include provisions for monitoring the implementation of the sustainable transport strategy to determine the effectiveness of the policy and to inform future changes. It would be feasible to include additional, appropriately detailed monitoring proposals in Chapter 13 Implementation and Monitoring by way of a minor modification. The Planning Authority should consult with the relevant prescribed authorities, including the NTA, TII and the SRA to inform any modifications.</p> <p><b>8. Climate Action and Renewable Energy:</b> <b>8.1 Renewable Energy:</b> The Office welcomes the response to Recommendation No. 16 including targets for renewable energy and removal of the 100m separation distance to wind turbines.</p> <p><b>9. Flood Risk Management:</b> <b>(i)</b> The revised Strategic Flood Risk Assessment (SFRA) for the city and county, revised flood map for Limerick City and Environs, including Mungret and Annacotty, and the Justification Tests under MA No. 210, in response to Recommendation No. 17 are acknowledged.</p>	<p><b>7. Sustainable Transport and Accessibility:</b> A minor modification is recommended to the Monitoring Indicators as set out under Chapter 13 (Monitoring and Implementation) to include monitoring indicators for implementation of the transport strategy as follows:  <u>-Progress with the delivery of enabling transport infrastructure projects identified</u>  <u>-Change in transport modal share for travel to work, school and college</u>  <u>-Progress with improvements in bus infrastructure serving the City and County</u>  <u>-No. of new bus stops/ rail stations opened</u>  <u>-Improvements to the cycle network</u>  <u>-Provision of new park and ride facilities</u>  <u>-Progress with improvements to the road network.</u></p> <p><b>8. Climate Action and Renewable Energy:</b> <b>8.1 Renewable Energy:</b> The content of the submission received is noted.</p> <p><b>9. Flood Risk Management:</b> <b>(i)</b> The content of the submission received is noted.</p>
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<p><b>(ii)</b> The Planning Authority has however, zoned extensive lands within Flood Zones A and B for vulnerable and/or highly vulnerable uses despite the lands having failed the Justification Test in the authority's own SFRA. This is inconsistent with The Planning System and Flood Risk Management, Guidelines for Planning Authorities (2009), as amended, which provides that if a land use zoning cannot be justified, the zoning should be avoided or alternatively, should be substituted for a land use zoning appropriate to the level of flood risk. It is also inconsistent with NPO 57 to ensure flood risk management informs place-making by avoiding inappropriate development in areas at risk of flooding in accordance with the guidelines.</p> <p>The decision will therefore place people and property at unnecessary risk from future flood events, including potentially outside of those sites. The material amendments concerned are identified under MA Recommendation No. 4(i) below.</p> <p><b>(iii)</b> The Chief Executive's recommendation to amend CAF O21, Identified Flood Risk to provide for mitigation specified in the SFRA "E) Ensure that vulnerable uses, including that of a residential nature, shall not be permitted at ground floor level on the District Centre zoned lands at Jetland/ Ennis Road/ Ennis Road Retail Park" has not been included in MA No. 70.</p> <p><b>(iv)</b> The SFRA states that further development within existing residential areas situated within Flood Zones A and B should</p>	<p><b>(ii)</b> The Elected Members at their special Council meeting on 18th of February 2022 made a number of material amendments to zone lands at risk of flooding. The decision to zone these lands was based on Justification Tests submitted by the Elected Members proposing the amendment. These Justification Tests were included in Appendix II of the Strategic Flood Risk Assessment that were placed on public display as part of the Material Alteration documents. See response under MA Recommendation No. 4 (i) below.</p> <p><b>(iii)</b> See response under MA Recommendation No. 4 (ii) below.</p> <p><b>(iv)</b> This concern was also raised by the OPW (see submission 39 below). Justification Tests have been prepared for each of the listed settlements and will form part of the final SFRA.</p>
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	<p>be restricted to minor development. However, this is not supported by appropriate policy objectives in the draft Plan as required by Recommendation No. 17 and no reasons have been included.</p> <p>The area concerned is very extensive and includes zoned lands in the city and county:</p> <ul style="list-style-type: none"> <li>• Castletroy - highly vulnerable Existing Residential zoned in Flood Zones A and B.</li> <li>• Ballingarry - highly vulnerable Existing Residential and Town Centre in Flood Zones A and B.</li> <li>• Bruff - highly vulnerable Existing Residential in Flood Zones A and B.</li> <li>• Bruree - highly vulnerable Existing Residential in Flood Zones A and B.</li> <li>• Doon - highly vulnerable Existing Residential and Town Centre, Education and Community Facilities and less vulnerable Enterprise and Employment in Flood Zones A and B.</li> <li>• Dromcolliher - highly vulnerable Existing Residential and Town Centre, Education and Community Facilities and Utilities in Flood Zones A and B.</li> <li>• Foynes - highly vulnerable Existing Residential and New Residential, Town Centre, Education and Community Facilities and Utilities in Flood Zones A and B.</li> <li>• Glin - highly vulnerable Existing Residential and less vulnerable Enterprise and Employment in Flood Zones A and B.</li> </ul>	<p>See also response under MA Recommendation No. 4 (iii) below.</p>
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	<ul style="list-style-type: none"> <li>• Hospital - highly vulnerable Existing Residential, Utilities and Education and Community Facilities in Flood Zones A and B.</li> <li>• Kilfinane - highly vulnerable Existing Residential and Education and Community Facilities in Flood Zones A and B.</li> <li>• Pallagreen - highly vulnerable Existing Residential and less vulnerable Enterprise and Employment in Flood Zones A and B.</li> <li>• Pallaskenry - highly vulnerable Existing Residential, New Residential and Education and Community Facilities in Flood Zones A and B.</li> </ul> <p>This approach is inconsistent with the requirements of the guidelines and may place people and property at unnecessary risk from future flood events. The Planning Authority should consider what minor modifications can be included in making the plan, such as, perhaps, repeating relevant text from the SFRA and the relevant policy objectives consistent with same.</p> <p><b>MA Recommendation 4 – Flood risk management:</b> Having regard to NPO 57 of the NPF and to provisions of The Planning System and Flood Risk Management, Guidelines for Planning Authorities (2009), as amended, the Planning Authority is required to:</p> <p><b>(i)</b> Make the plan without the following proposed material amendments:</p> <ul style="list-style-type: none"> <li>• MA No. 142 Ballykeefe from Agriculture to less vulnerable Enterprise and Employment in Flood Zone A.</li> </ul>	<p><b>MA Recommendation 4 – Flood risk management:</b> <b>(i)</b> Having regard to the submissions received by the OPR and OPW, it is recommended to make the Plan without the following proposed Material Alterations:</p> <ul style="list-style-type: none"> <li>• MA No. 142 Ballykeefe from Agriculture to less vulnerable Enterprise and Employment in Flood Zone A.</li> <li>• MA No. 143 Condell Road in Clonmacken from Agriculture to highly vulnerable New Residential in Flood Zones A and B.</li> </ul>
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	<ul style="list-style-type: none"> <li>• MA No. 143 Condell Road in Clonmacken from Agriculture to highly vulnerable New Residential in Flood Zones A and B.</li> <li>• MA No. 145 Pa Healy Road from Community and Educational to Mixed Use facilitating highly vulnerable development in Flood Zones A and B.</li> <li>• MA No. 146 Pa Healy Road from less vulnerable Enterprise and Employment to Mixed Use which allows highly vulnerable development in Flood Zones A and B.</li> <li>• MA No. 147 former Green Park Racecourse from less vulnerable Enterprise and Employment to highly vulnerable New Residential in Flood Zones A and B.</li> <li>• MA No. 148 lands adjacent to the Crescent Shopping Centre in Dooradoyle from water compatible Semi Natural Open Space to less vulnerable Enterprise and Employment in Flood Zones A and B.</li> <li>• MA No. 150 lands in Caherdavin from Agriculture to District Centre facilitating highly vulnerable development in Flood Zone A.</li> <li>• MA No. 151 lands in Castletroy from Agriculture to highly vulnerable New Residential overlapping with Flood Zones A and B.</li> <li>• MA No.153 lands at Ballykeefe, Mungret, from Agriculture to less vulnerable Enterprise and Employment in Flood Zone A.</li> </ul>	<ul style="list-style-type: none"> <li>• MA No. 145 Pa Healy Road from Community and Educational to Mixed Use facilitating vulnerable development in Flood Zones A and B.</li> <li>• MA No. 146 Pa Healy Road from less vulnerable Enterprise and Employment to Mixed Use which allows highly vulnerable development in Flood Zones A and B.</li> <li>• MA No. 147 former Green Park Racecourse from less vulnerable Enterprise and Employment to highly vulnerable New Residential in Flood Zones A and B.</li> <li>• MA No. 148 lands adjacent to the Crescent Shopping Centre in Dooradoyle from water compatible Semi Natural Open Space to less vulnerable Enterprise and Employment in Flood Zones A and B.</li> <li>• MA No. 150 lands in Caherdavin from Agriculture to District Centre facilitating highly vulnerable development in Flood Zone A.</li> <li>• MA No.153 lands at Ballykeefe, Mungret, from Agriculture to less vulnerable Enterprise and Employment in Flood Zone A.</li> </ul> <p>In relation to the recommendation to make the Plan without MA No. 151, re-zoning of lands in Castletroy from Agriculture to New Residential on lands which are identified at risk of flooding in Flood Zones A and B, it is recommended to remove the area (0.216ha.) within the Flood Zones allowing for 2.734ha. of New Residential as per the image below:</p>
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<p><b>(ii)</b> Make the plan with minor modification to CAF O21 Identified Flood Risk to implement the flood mitigation measures included under the Justification Test to ensure that vulnerable uses, including that of a residential nature, shall not be permitted at ground floor level on the District Centre zoned lands at Jetland/ Ennis Road/ Ennis Road Retail Park, at Caherdavin/Moyross.</p> <p><b>(iii)</b> Make the Plan with such minor modification as necessary to restrict development, within existing residential / highly vulnerable / vulnerable development areas situated within Flood Zones A and B, to minor development consistent with the approach set out in The Planning System and Flood Risk Management, Guidelines for Planning Authorities (2009).</p>	 <p><b>(ii)</b> The proposed amendment was included in the Material Alterations to the SFRA. However, in the interest of clarity, it is recommended that this amendment also be included in Objective CAF O21 Identified Flood Risk in the final Plan.</p> <p><b>(iii)</b> The restriction to minor development with respect to existing residential areas within Flood Zones A and B throughout the City and County has been included in the SFRA. It is not considered feasible or appropriate to incorporate the referred restrictions / measures to mitigate identified flood risk outlined in the SFRA into the draft Plan.</p>
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	<p>However, in the interest of clarity it is recommended to include minor amendments as follows:</p> <p>Policy CAF P5 Managing Flood Risk - 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 <u>and the Strategic Flood Risk Assessment (SFRA)</u>. Where a development/land use is proposed that is inappropriate within the Flood Zone, <u>but has passed the Plan Making Justification Test</u>, then the 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). <u>This will need to demonstrate inclusion of measures to mitigate flood and climate change risk, and flood risks, including those recommended under Part 3 (Specific Flood Risk Assessment) of the site-specific Plan Making Justification Tests detailed in the SFRA.</u> In Flood Zone C, the developer should satisfy themselves that the probability of flooding is appropriate to the development being proposed and should consider <u>other sources of flooding, residual risks and</u> the implications of climate change.</p> <p>Objective CAF O20 Flood Risk Assessments - It is an objective of the Council to require a Site-specific Flood Risk Assessment (FRA) for all planning applications <u>in Flood Zones A and B and consider all sources of flooding in areas at risk of flooding</u> (for example coastal/tidal,</p>
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	<p>fluvial, pluvial or groundwater), where deemed necessary. The detail of these Site-Specific FRAs (or commensurate assessments of flood risk for minor developments) will depend on the level of risk and scale of development. <u>The FRA will be prepared taking into account the requirements laid out in the SFRA, and in particular in the Plan Making Justification Tests as appropriate to the particular development site.</u> A detailed Site-Specific FRA should quantify the risks, the effects of selected mitigation and the management of any residual risks. The assessments shall consider and provide information on the implications of climate change with regard to flood risk in relevant locations.</p>
<b>Chief Executive's Recommendations</b>	
<p><b>1. Limerick-Shannon Metropolitan Area:</b>  <b>(i)</b> It is recommended that the Plan be made <b>with</b> the proposed Material Alteration No. 6 (Chapter 3 Spatial Strategy) as displayed.  <b>(ii)</b> None</p> <p><b>2. Core Strategy and Settlement Strategy:</b>  <b>2.1 Housing and Population Targets:</b>  <b>(i)</b> None</p> <p><b>2.2 Settlement Hierarchy and distribution of growth:</b>  <b>(i)</b> None  <b>(ii)</b> It is recommended that the Plan be made <b>with</b> the proposed Material Alteration No. 5 (Chapter 2 Core Strategy) as displayed, <b>subject to minor modification</b> to the Core Strategy as follows:  -Population growth for Patrickswell shall be 36%.</p> <p><b>3. Sustainable Development and Regeneration:</b>  <b>3.1 Compact Growth, Regeneration and Sequential Development:</b></p>	

(i) None

(ii) None

(iii) It is recommended that the Plan be made **with** the proposed Material Alteration No. 117 (Chapter 13 Implementation and Monitoring) as displayed, **subject to minor modification** to include the monitoring of Brownfield/ Infill sites in accordance with Policy CGR P2 – Monitoring of Brownfield/ Infill Sites as follows: [Establish a database of and monitor planning applications on brownfield and infill sites.](#)

(iv) None

(v) None

**Recommendation 1: Compact growth and residential zonings:** It is recommended that the Plan be made **with** the proposed Material Alterations No. 135 (Mungret), 151 (Ballyclough – outside flood zone) and 152 (Ballykeefe – outside flood zone) as displayed.

### **3.2 Newcastle West:**

(i) None

**MA Observation 1 – Core Strategy Density: Newcastle West:** It is recommended that the Plan be made **with** the proposed Material Alteration No. 5 (Chapter 2 Core Strategy) as displayed, **subject to minor modification** as follows:

-Density in Newcastle West shall be 35 units per hectare for 80% of units.

**3.3 Level 4 and Level 5 Settlements:** It is recommended that the Plan be made **with** the proposed Material Alteration No. 7 (Chapter 4 Housing) as displayed.

### **4. Housing Strategy and relevant policies:**

#### **4.1 Traveller accommodation:**

It is recommended that the Plan be made **with** the proposed Material Alteration No. 139 (Traveller Accommodation) as displayed.

### **5. Rural Housing and Regeneration:**

#### **5.1 Rural housing policy:**

It is recommended that the Plan be made **with** the proposed Material Alteration No. 5 (Rural Housing Strategy Map) as displayed.

### **6. Economic Development and Employment:**

### **6.1 Employment Zoned Land:**

**(i)** None

**(ii)** It is recommended that the Plan be made **with** the proposed Material Alteration No. 109 (Data Centre objective and purpose) as displayed, **subject to minor modification** as follows:

-Data Centre Purpose: Add the following text: General Enterprise and Employment uses will not be permitted in the Data Centre zone.

**(iii)** None

### **MA Recommendation 2 – Data Centre (MA No. 149):**

It is recommended that the Plan be made **without** the proposed Material Alteration No. 149 (Ballysimon House Data Centre zoning), as displayed.

### **6.2 Rural Economy and Tourism:**

**(i)** None

### **MA Recommendation 3 - Holiday home development:**

It is recommended that the Plan be made **with** the proposed Material Alteration No. 38 (Objective ECON O40 Location of Tourism Accommodation), as displayed.

### **7. Sustainable Transport and Accessibility:**

It is recommended that the Plan be made **with** the proposed Material Alteration No. 117 (Chapter 13 Implementation and Monitoring) as displayed, **subject to minor modification** to include monitoring indicators for implementation of the transport strategy as follows:

-Progress with the delivery of enabling transport infrastructure projects identified

-Change in transport modal share for travel to work, school and college

-Progress with improvements in bus infrastructure serving the City and County

-No. of new bus stops/ rail stations opened

-Improvements to the cycle network

-Provision of new park and ride facilities

-Progress with improvements to the road network.

### **8. Climate Action and Renewable Energy:**



**8.1 Renewable Energy:**

None

**9. Flood Risk Management:**

**(i) – (iv)** None

**MA Recommendation 4 – Flood risk management:**

**(i)** It is recommended that the Plan be made **without** the proposed Material Alteration No. 142 (Ballykeefe), 143 (Condell Road), 145 (Pa Healy Road), 146 (Pa Healy Road), 147 (Greenpark), 148 (Crescent), 150 (Jetland Caherdavin), 153 (Ballykeefe) as displayed.

Amend zoning map for the City and Environs to remove New Residential zoning subject to flood risk at Ballyclough MA No. 151.

**(ii)** It is recommended that the Plan be made **with** the proposed Material Alteration No. 70 (CAF O21 Identified Flood Risk) as displayed, **subject to minor modifications** to include the following text: (x) Implement the flood mitigation measures included under the Justification Test including to ensure that vulnerable uses, including that of a residential nature, shall not be permitted at ground floor level on the District Centre zoned lands at Jetland/ Ennis Road/ Ennis Road Retail Park, at Caherdavin/Moyross.

**(iii)** It is recommended that the Plan be made **with** the proposed Material Alterations, subject to minor modification as follows:

-Policy CAF P5 Managing Flood Risk - 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 and the Strategic Flood Risk Assessment (SFRA). Where a development/land use is proposed that is inappropriate within the Flood Zone, but that has passed the Plan Making Justification Test, then the 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). This will need to demonstrate inclusion of measures to mitigate flood and climate change risk, and flood risks, including those recommended under Part 3 (Specific Flood Risk Assessment) of the site-specific Plan Making Justification Tests detailed in the SFRA. In Flood Zone C, the developer should satisfy themselves that the probability of flooding is appropriate to the development being proposed and should consider other sources of flooding, residual risks and the implications of climate change.

	<p>-Objective CAF O20 Flood Risk Assessments - It is an objective of the Council to require a Site-Specific Flood Risk Assessment (FRA) for all planning applications <u>in Flood Zones A and B and consider all sources of flooding</u> <del>in areas at risk of flooding</del> (for example coastal/tidal, fluvial, pluvial or groundwater), where deemed necessary. The detail of these Site-Specific FRAs (or commensurate assessments of flood risk for minor developments) will depend on the level of risk and scale of development. <u>The FRA will be prepared taking into account the requirements laid out in the SFRA, and in particular in the Plan Making Justification Tests as appropriate to the particular development site.</u> A detailed Site-Specific FRA should quantify the risks, the effects of selected mitigation and the management of any residual risks. The assessments shall consider and provide information on the implications of climate change with regard to flood risk in relevant locations.</p>
	<p><b>SEA/ AA Response</b></p>
	<p>Minor alterations, including removing lands at risk of flooding has no impact on SEA/ AA</p>

## Regional Planning Policy

2	<b>Ref. and Name/ Group:</b> LCC-C101-34 Southern Regional Assembly (SRA)
<b>Submission/ Observation Summary</b>	
<b>Chief Executive's Response</b>	
<p><b>1. Chapter 2 - Core Strategy:</b></p> <p><b>(i)</b> Proposed MA No. 5 assists in addressing Recommendation No. 1 in the SRA's submission to the Draft Plan. The Core Strategy table can be further aligned with Section 5 of the LSMASP, through the inclusion of a population category for the 'Remainder Metropolitan Area (Limerick)' as per Table 1 of the LSMASP.</p> <p><b>(ii)</b> The terminology used in Tables 2.2, 2.4, 2.5 and 2.6 has not been amended consistently with the new Core Strategy table. The need for consistency in terminology based on the NPF, RSES and Limerick-Shannon Metropolitan Area was raised in Recommendation No. 1 (d). The Core Strategy table also includes terminology not consistent with these. References to the 'Limerick Metropolitan Area' and 'Limerick City and Environs' should be changed to 'Limerick-Shannon Metropolitan Area' and 'Limerick City and Suburbs' in all Material Alterations.</p> <p><b>(iii)</b> The 2028 population projection for Limerick City and Suburbs is higher than the pro-rata LSMASP projections, but close to the 2031 projection. This is reasonable as the NPF and RSES supports ambitious growth targets of at least 50%</p>	<p><b>1. Chapter 2 - Core Strategy:</b></p> <p><b>(i)</b> The Core Strategy table will be updated to include a total population growth figure for the remainder of Limerick Metropolitan Area.</p> <p><b>(ii)</b> Terminology will be updated as suggested to ensure consistency.</p> <p><b>(iii)</b> The content of the submission received is noted.</p>

<p>to 2040 and the reallocation of growth to Limerick City and Suburbs is not inhibited in the LSMASP.</p> <p><b>(iv)</b> Information gaps in the new Core Strategy table, e.g. figures for Limerick City and Suburbs under ‘population growth as % of 2016 base’ should be addressed.</p> <p><b>2. Chapter 3 - Spatial Strategy:</b></p> <p><b>(i)</b> Proposed MA No. 6 assists in addressing Recommendations No.s 1 and 2. Inconsistent terminology with the NPF, RSES and MASP arises throughout and should be addressed.</p> <p><b>(ii)</b> MA No. 6 notes that a Local Area Plan will provide a detailed approach to development of Newcastle West as a Key Town. However, Newcastle West should have a strong and distinct expression in the Draft Plan that builds on the RSES policy.</p> <p><b>(iii)</b> MA No.s 16, 17 and 53 are welcomed.</p> <p><b>3. Chapter 5 – A Strong Economy:</b></p> <p><b>(i)</b> MA No. 8 sets out the vision of the RSES Economic Strategy and assists in addressing Recommendation No. 5.</p> <p><b>(ii)</b> MA No. 9 sets out a policy supporting increased employment through the existing enterprise ecosystem and smart specialisation.</p>	<p><b>(iv)</b> The percentage growth figure has been provided for the overall City and Environs, including Mungret and Annacotty.</p> <p><b>2. Chapter 3 - Spatial Strategy:</b></p> <p><b>(i)</b> The content of the submission received is noted. The terminology will be updated as suggested to ensure consistency.</p> <p><b>(ii)</b> The objectives set out under RPO 22 for Newcastle West in the RSES will be inserted into CGR O11 – Level 2 Key Town Newcastle West.</p> <p><b>(iii)</b> The content of the submission received is noted.</p> <p><b>3. Chapter 5 – A Strong Economy:</b></p> <p><b>(i) - (v)</b> The content of the submission received is noted. It is recommended that the Plan be made with proposed Material Alteration No.s 8, 9, 16, 21 and 22 as displayed.</p>
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<p><b>(iii)</b> MA No. 16 sets out support for the Atlantic Economic Corridor and assists in addressing Recommendation No. 6.</p> <p><b>(iv)</b> MA No. 21 supports Limerick as a Learning City and County and working with relevant stakeholders, this assists in addressing Recommendation No. 13 (a).</p> <p><b>(v)</b> MA No. 22 supports the collaborative work undertaken by the Mid-West Regional Enterprise Plan and the Mid-West Regional Skills Forum in employment generation and the knowledge-based economy, this assists in addressing Recommendation No. 13 (a).</p> <p><b>4. Chapter 6 – Environment, Heritage, Landscape and Green Infrastructure:</b></p> <p><b>(i)</b> MA No. 46 seeks to advance the use of an ecosystem services approach and valuation as a decision-making tool, subject to appropriate ecological assessment, this assists in addressing Recommendation No. 12.</p> <p><b>(ii)</b> MA No. 49 includes a new section and objective on Ecosystem Services, this assists in addressing Recommendation No. 12.</p> <p><b>5. Chapter 7 – Sustainable Mobility and Transport:</b></p> <p>MA No. 53 includes amendments to Objective TR O5, this assists in addressing Recommendation No. 10. Targets for mode share with baseline figures assists in addressing Recommendation No. 9(b).</p>	<p><b>4. Chapter 6 – Environment, Heritage, Landscape and Green Infrastructure:</b></p> <p><b>(i) - (ii)</b> The content of the submission received is noted. It is recommended that the Plan be made with proposed Material Alteration No.s 46 and 49 as displayed.</p> <p><b>5. Chapter 7 – Sustainable Mobility and Transport:</b></p> <p>The content of the submission received is noted. It is recommended that the Plan be made with proposed Material Alteration No. 10 as displayed.</p>
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<p>to correlate and connect the information. The Planning Authority is asked to address this issue.</p> <p>(ii) The inclusion of the built-up footprint i.e. the Census boundary of Limerick City and Suburbs, would assist in addressing Recommendation No. 3(a).</p> <p><b>10. Section 12(5)(aa) Notice – Response:</b></p> <p>(i) The Planning Authority has provided notice of its decision not to comply with Recommendation No. 1(a) in relation to developing a shared section on the LSMASP. LSMASP Policy Objective 1 states it is an objective to promote the Limerick-Shannon Metropolitan Area as a cohesive Metropolitan Area and a purpose of the MASP was to address the ‘multiplicity of plans addressing the individual and specific requirements of local authorities makes co-ordination of strategic development challenging’. The SRA have issued the same request to the Draft Clare County Development Plan 2023-2029. The Plan should give a greater emphasis to the shared ambition and purpose of the MASP. A key priority is the planning and sustainable development of Limerick City and Suburbs. It is in two functional areas but shares services such as schools and infrastructure. In this regard, it is considered reasonable to co-ordinate the objectives of both Development Plans.</p> <p>(ii) The Planning Authority has also provided notice of its decision not to comply with Recommendation 4(b) in relation to the identification of areas adjacent to Newcastle West as</p>	<p>SCA tables correlate and connect with the site numbers on the SCA maps. Having regard to the detailed information and extensive number of sites involved, it is difficult to simplify the presentation of the information.</p> <p>(ii) Clarification will be provided on Map 2.2 Metropolitan Area Core Strategy Map.</p> <p><b>10. Section 12(5)(aa) Notice – Response:</b></p> <p>(i) Material Alteration No. 6 included Section 3.2.3 A Collaborative Approach in Chapter 3 Spatial Strategy. This new section recognises the need for a continued collaborative approach with Clare County Council to implement the objectives of the Limerick Shannon MASP area.</p> <p>(ii) See response to submission No. 1 OPR item 5.1 Rural housing policy.</p>
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	structurally weak in the Rural Housing Map. The Plan should provide greater clarity on the criteria used for the Rural Housing Map, particularly in relation to the area surrounding Newcastle West.	
<b>Chief Executive's Recommendations</b>		
	<p><b>1. Chapter 2 – Core Strategy:</b></p> <p><b>(i)</b> It is recommended that the Plan be made <b>with</b> the proposed Material Alteration No. 5 (Chapter 2 Core Strategy) as displayed, <b>subject to minor modification</b> as follows:</p> <p>-Update Core Strategy to include a total population growth figure for the remainder of Limerick Metropolitan Area.</p> <p><b>(ii)</b> It is recommended that the Plan be made <b>with</b> the proposed Material Alterations as displayed, <b>subject to minor modification</b> amending references as follows: Replacing references to <del>Limerick Metropolitan Area</del> with <u>Limerick-Shannon Metropolitan Area</u> and references to <del>Limerick City and Environs</del> with <u>Limerick City and Suburbs</u> throughout the Draft Development Plan.</p> <p><b>(iii) – (iv)</b> None</p> <p><b>2. Chapter 3 - Spatial Strategy:</b></p> <p><b>(i)</b> It is recommended that the Plan be made <b>with</b> the proposed Material Alterations as displayed, <b>subject to minor modification</b> amending references as follows: Replacing references to <del>Limerick Metropolitan Area</del> with <u>Limerick-Shannon Metropolitan Area</u> and references to <del>Limerick City and Environs</del> with <u>Limerick City and Suburbs</u> throughout the Draft Development Plan.</p> <p><b>(ii)</b> It is recommended that the Plan be <b>made</b> with the proposed Material Alteration No. 6 as displayed, <b>subject to minor modification</b> to include the objectives set out under RPO 22 for Newcastle West into CGR O11 – Level 2 Key Town Newcastle West.</p> <p><b>(iii)</b> None</p> <p><b>3. Chapter 5 – A Strong Economy:</b></p> <p><b>(i)</b> It is recommended that the Plan be made <b>with</b> proposed Material Alteration No. 8 as displayed.</p> <p><b>(ii)</b> It is recommended that the Plan be made <b>with</b> proposed Material Alteration No. 9 as displayed.</p> <p><b>(iii)</b> It is recommended that the Plan be made <b>with</b> proposed Material Alteration No. 16 as displayed.</p> <p><b>(iv)</b> It is recommended that the Plan be made <b>with</b> proposed Material Alteration No. 21 as displayed.</p>	



	<p>(v) It is recommended that the Plan be made <b>with</b> proposed Material Alteration No. 22 as displayed.</p> <p><b>4. Chapter 6 – Environment, Heritage, Landscape and Green Infrastructure:</b></p> <p>(i) It is recommended that the Plan be made <b>with</b> proposed Material Alteration No. 46 as displayed.</p> <p>(ii) It is recommended that the Plan be made <b>with</b> proposed Material Alteration No. 49 as displayed.</p> <p><b>5. Chapter 7 – Sustainable Mobility and Transport:</b></p> <p>It is recommended that the Plan be made <b>with</b> proposed Material Alteration No. 10 as displayed.</p> <p><b>6. Chapter 8 – Infrastructure:</b></p> <p>(i) It is recommended that the Plan be made <b>with</b> proposed Material Alteration No. 54 as displayed.</p> <p>(ii) It is recommended that the Plan be made <b>with</b> proposed Material Alteration No. 55 as displayed.</p> <p><b>7. Chapter 9 – Climate Action, Flood Risk and Transition to Low Carbon Economy:</b></p> <p>None</p> <p><b>8. Chapter 10 - Sustainable Communities and Social Infrastructure:</b></p> <p>It is recommended that the Plan be made <b>with</b> proposed Material Alteration No. 78 as displayed.</p> <p><b>9. Settlement Capacity Audit, Zoning, Flood and Transport Maps:</b></p> <p>(i) None</p> <p>(ii) It is recommended that the Plan be made <b>with</b> proposed Material Alteration No. 5 (Chapter 2 Core Strategy), <b>subject to minor modification</b> clarifying the Census boundary of Limerick City and Suburbs on Map 2.2 Metropolitan Area Core Strategy Map.</p> <p><b>10. Section 12(5)(aa) Notice – Response:</b></p> <p>(i) None</p> <p>(ii) None</p>
	<b>SEA/ AA Response</b>
	Minor alterations have no impact on SEA/ AA

## Theme 1 City and Environs

3	Ref. and Name/ Group:	LCC-C101-2 Gerry McCormack
	Submission/ Observation Summary	Chief Executive's Response
	<p><b>1. Material Alteration No. 150 – Change of zoning of 1.6ha. from Agriculture to District Centre at the Jetland District Centre Caherdavin</b></p> <p>The observer requests the Council to reject the proposed amendment on the lands above, based on the following:</p> <ul style="list-style-type: none"> <li>-The site is located in Flood Zone A;</li> <li>-Rear gardens of the adjoining estates of Ashbrook Gardens, Ashbrook Crescent and Bracken Crescent suffer water logging in winter and in summer following prolonged rainfall;</li> <li>-Residents are restricted in getting house insurance as some insurers refuse cover;</li> <li>-Any development on the site would exacerbate potential flooding due to foundation piling and extensive infill to create hard paving for roadways and carparking, causing an increase in water table levels;</li> <li>-The OPW has agreed the flood defences are not up to the required standard. Future climate change effects can be catastrophic;</li> <li>-The site is not brownfield and has never been developed, but occasionally used for storage of equipment and machinery;</li> </ul>	<p><b>1. Material Alteration No. 150 – Change of zoning of 1.6ha. from Agriculture to District Centre at the Jetland District Centre Caherdavin</b></p> <p>The OPR submission to the Material Alterations includes Recommendation No. 4 – Flood risk management which states 'having regard to NPO 57 of the NPF, and to provisions of The Planning System and Flood Risk Management, Guidelines for Planning Authorities (2009), as amended, the Planning Authority is required to make the plan without the following proposed material amendments: MA No. 150 – lands in Caherdavin from Agriculture to District Centre which allows for highly vulnerable development in Flood Zone A'.</p> <p>On the basis of the location of the lands within Flood Zone A and the submissions received by the OPR and OPW, it is recommended that the Plan be made without the proposed Material Alteration No. 150 as displayed.</p>

	-The site is at the lowest point of a valley between Clonmacken and the North Circular Road, running south to north between Clondell Road and the Jetland and future flooding seems likely.	
	<b>Chief Executive's Recommendations</b>	
	1. It is recommended that the Plan be made <b>without</b> the proposed Material Alteration No. 150 as displayed.	
	<b>SEA/ AA Response</b>	
	Removing land at risk of flood – No impact on SEA/ AA	

4	<b>Ref. and Name/ Group:</b>	LCC-C101-5 Liam O'Connell
	<b>Submission/ Observation Summary</b>	<b>Chief Executive's Response</b>
	<p><b>1. Material Alteration No. 150 – Change of zoning of 1.6ha. from Agriculture to District Centre at the Jetland District Centre Caherdavin</b></p> <p>-A planning application for a Health Centre has been refused. The site is on a flood plain;          -Ashbrook Gardens, Ashbrook Crescent and Bracken Gardens are at high risk of flooding, this is heightened if the flood plain bordering the houses is interfered with, causing further displacement of water, or a reduction of soakage;          -An amendment proposes the re-zoning of the proposed health centre site to District Centre;</p>	<p><b>1. Material Alteration No. 150 – Change of zoning of 1.6ha. from Agriculture to District Centre at the Jetland District Centre Caherdavin</b></p> <p>See response to Submission No. 3 above.</p>

	<ul style="list-style-type: none"> <li>-The amendment is flawed, containing a number of inaccuracies. Councillors voting were not in possession of the true facts and the amendment should be withdrawn;</li> <li>-Permission for the health centre has since been refused, failing the Justification Test, re-zoning does not make sense;</li> <li>-The site is not brownfield, a narrow strip is owned by Jetland and an area has to be crossed to access the remainder, which has been used for agricultural purposes only;</li> <li>-It is not true that no alternative site exists, land is available in Coonagh, Ferndale and Moyross, served by public transport, on higher ground with no flood risk;</li> <li>-There is a stated need for development of the flood defences, which are legacy structures not fit for purpose;</li> <li>-The budget for defences is available but delayed in the planning process due to objections;</li> <li>-The substandard defences will not be improved anytime soon;</li> <li>-A development on a flood plain should never be considered, or considered only after defences are improved;</li> <li>-The proposed amendment included a comprehensive Site-Specific Flood Risk Assessment and Justification Test. However, the Council concluded that the proposed development failed the Justification Test;</li> <li>-The proposed development sits on the lowest area of the flood plain, where most of the water will flow, pylons to support the plinth and surface car parking etc. will result in displacement of water;</li> <li>-Interference with the water retention and soakage properties could be catastrophic, with this soakpit being the last form of defence against homes being flooded;</li> </ul>	
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	-Rezone this site in a manner that will prevent development that will affect water retention and soakage properties of the land.	
<b>Chief Executive's Recommendations</b>		
1. It is recommended that the Plan be made <b>without</b> the proposed Material Alteration No. 150 as displayed.		
<b>SEA/ AA Response</b>		
Removing land at risk of flood – No impact on SEA/ AA		

5	Ref. and Name/ Group:	LCC-C101-7 Yvonne O’Connell
	Submission/ Observation Summary	Chief Executive’s Response
	1. Material Alteration No. 150 – Change of zoning of 1.6ha. from Agriculture to District Centre at the Jetland District Centre Caherdavin	1. Material Alteration No. 150 – Change of zoning of 1.6ha. from Agriculture to District Centre at the Jetland District Centre Caherdavin
	-A planning application for a Health Centre at the Jetland was lodged with the Council and is on a flood plain; -Ashbrook Gardens, Ashbrook Crescent and Bracken Gardens are at high risk of flooding. This risk is heightened if the flood plain is interfered with, causing further displacement of water, or reduction in soakage properties of the lands; -The flood plain should be zoned as Agriculture or Amenity given the serious concerns regarding flood risk if developed.	See response to Submission No. 3 above.
	Chief Executive’s Recommendations	
1. It is recommended that the Plan be made <b>without</b> the proposed Material Alteration No. 150 as displayed.		
SEA/ AA Response		

	Removing land at risk of flood – No impact on SEA/ AA
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6	Ref. and Name/ Group: LCC-C101-8 Martin Flynn	
	<b>Submission/ Observation Summary</b>	<b>Chief Executive's Response</b>
	<b>1. Material Alteration No. 150 – Change of zoning of 1.6ha. from Agriculture to District Centre at the Jetland District Centre Caherdavin</b>  -A planning application for a Health Centre at the Jetland was lodged with the Council and is on a flood plain; -Ashbrook Gardens, Ashbrook Crescent and Bracken Gardens are at high risk of flooding. This risk is heightened if the flood plain is interfered with, causing further displacement of water, or reduction in soakage properties of the land; -The flood plain should be zoned as Agriculture or Amenity given the serious concerns regarding flood risk if developed.	<b>1. Material Alteration No. 150 – Change of zoning of 1.6ha. from Agriculture to District Centre at the Jetland District Centre Caherdavin</b>  See response to Submission No. 3 above.
	<b>Chief Executive's Recommendations</b>	
	1. It is recommended that the Plan be made <b>without</b> the proposed Material Alteration No. 150 as displayed.	
	<b>SEA/ AA Response</b>	
	Removing land at risk of flood – No impact on SEA/ AA	

7	Ref. and Name/ Group: LCC-C101-9 Michelle McCarthy	
	<b>Submission/ Observation Summary</b>	<b>Chief Executive's Response</b>
	<b>1. Material Alteration No. 150 – Change of zoning of 1.6ha. from Agriculture to District Centre at the Jetland District Centre Caherdavin</b>  -A planning application for a Health Centre at the Jetland was lodged with the Council and is on a flood plain; -Ashbrook Gardens, Ashbrook Crescent and Bracken Gardens are at high risk of flooding. This risk is heightened if the flood plain is interfered with, causing further displacement of water, or reduction in soakage properties of the land; -The flood plain should be zoned as Agriculture or Amenity given the serious concerns regarding flood risk if developed.	<b>1. Material Alteration No. 150 – Change of zoning of 1.6ha. from Agriculture to District Centre at the Jetland District Centre Caherdavin</b>  See response to Submission No. 3 above.
	<b>Chief Executive's Recommendations</b>	
	1. It is recommended that the Plan be made <b>without</b> the proposed Material Alteration No. 150 as displayed.	
	<b>SEA/ AA Response</b>	
	Removing land at risk of flood – No impact on SEA/ AA	

8	Ref. and Name/ Group:	LCC-C101-10 Catheriona Hughes
	Submission/ Observation Summary	Chief Executive's Response
	<p><b>1. Material Alteration No. 150 – Change of zoning of 1.6ha. from Agriculture to District Centre at the Jetland District Centre Caherdavin</b></p> <p>-A planning application for a Health Centre at the Jetland was lodged with the Council and is on a flood plain;          -Ashbrook Gardens, Ashbrook Crescent and Bracken Gardens are at high risk of flooding. This risk is heightened if the flood plain is interfered with causing further displacement of water, or a reduction in soakage;          -The observer's garden is regularly flooded with water lodged when raining;          -The observer is excluded from flood cover on her Home Insurance Policy, this causes worry and the health centre proposal will cause continuous worry and anxiety;          -Without consultation with the most vulnerable party, an amendment was adopted by the Council to rezone the flood plain to District Centre to comprise the Health Centre;          -The site is at the lowest area of the flood plain, where most water will flow. The building will require an array of large pylons to support the plinth, car parking etc., resulting in the displacement of water;          -Interfering with water retention and soakage properties could be catastrophic, this soakpit is the last form of defence against homes being flooded;</p>	<p><b>1. Material Alteration No. 150 – Change of zoning of 1.6ha. from Agriculture to District Centre at the Jetland District Centre Caherdavin</b></p> <p>See response to Submission No. 3 above.</p>



	-The observer requests the re-zoning of the land to prevent development that will affect water retention and soakage properties.	
Chief Executive’s Recommendations		
1. It is recommended that the Plan be made <b>without</b> the proposed Material Alteration No. 150 as displayed.		
SEA/ AA Response		
Removing land at risk of flood – No impact on SEA/ AA		

9	<b>Ref. and Name/ Group:</b>	LCC-C101-20 Dan and Mary Sheehan
	<b>Submission/ Observation Summary</b>	<b>Chief Executive's Response</b>
	<p><b>1. Material Alteration No. 150 – Change of zoning of 1.6ha. from Agriculture to District Centre at the Jetland District Centre Caherdavin</b></p> <p>-A planning application for a Health Centre on a flood plain has been refused by the Council;          -Ashbrook Gardens, Ashbrook Crescent and Bracken Gardens are at high risk of flooding, from heavy rain and a breach of the Shannon estuary flood defences. House owners cannot get flood insurance. This risk is heightened if the flood plain is interfered with, causing further displacement of water or a reduction of soakage;          -An amendment proposes the re-zoning of the proposed health centre site to District Centre;          -The amendment is flawed, containing a number of inaccuracies;</p>	<p><b>1. Material Alteration No. 150 – Change of zoning of 1.6ha. from Agriculture to District Centre at the Jetland District Centre Caherdavin</b></p> <p>See response to Submission No. 3 above.</p>

	<ul style="list-style-type: none"> <li>-Permission for the health centre has been refused, failing the Justification Test, re-zoning does not make sense;</li> <li>-The site is not brownfield, a narrow strip is owned by Jetland and an area has to be crossed to access the remainder which has been used for agricultural purposes only;</li> <li>-Alternative land is available in Coonagh, Ferndale and Moyross, served by public transport, on higher ground with no flood risk;</li> <li>-The flood defences are legacy structures not fit for modern day purpose;</li> <li>-The observers regularly see extensive waterlogging of the site after heavy rainfall. Neighbouring gardens are waterlogged permanently in winter and regularly in summer. Land drainage was required to make the observers' garden useable but does not work when the stream overflows in winter. A very serious flooding incident resulted in water almost entering the houses;</li> <li>-In 2019 due to a breach of the embankment, Na Piersaigh GAA Club grounds, Coonagh Airfield, 5 houses in Coonagh and over 60 acres of farmland were all severely damaged. Ashbrook Gardens, Ashbrook Crescent, Bracken Gardens and Na Piersaigh GAA Club are all at the same elevation of between 7 and 10ft.;</li> <li>-Due to climate change, flood levels and frequency are increasing. Sea levels are rising and increasingly intense rainfall and storm events are compounding water levels. The risk is difficult to predict;</li> <li>-The budget for defences is available but delayed in the planning process;</li> </ul>	
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	<ul style="list-style-type: none"> <li>-The substandard defences will not be improved soon;</li> <li>-Development on a flood plain should never be considered, or considered only after defences are improved;</li> <li>-A Strategic Flood Risk Assessment was submitted as part of the planning application process. The Council concluded that the proposed development on site failed the Justification Test;</li> <li>-The site sits on the lowest area of the flood plain, where most of the water will flow, the proposed building with pylons to support the plinth and surface car parking etc. will result in displacement of water;</li> <li>-Interference with the water retention and soakage properties could be catastrophic, with this soakpit being the last form of defence against homes being flooded;</li> <li>-The zoning of this land should be reverted to prevent development that will affect water retention and soakage properties of the land.</li> </ul>	
<b>Chief Executive's Recommendations</b>		
1. It is recommended that the Plan be made <b>without</b> the proposed Material Alteration No. 150 as displayed.		
<b>SEA/ AA Response</b>		
Removing land at risk of flood – No impact on SEA/ AA		

10	Ref. and Name/ Group:	LCC-C101-23 Barry McDonnell	
	Submission/ Observation Summary		Chief Executive's Response
	1. Material Alteration No. 150 – Change of zoning of 1.6ha. from Agriculture to District Centre at the Jetland District Centre Caherdavin  -A planning application for a Health Centre at the Jetland was lodged with the Council and is on a flood plain; -Ashbrook Gardens, Ashbrook Crescent and Bracken Gardens are at high risk of flooding. This risk is heightened if the flood plain is interfered with, causing further displacement of water, or reduction in soakage; -The flood plain should be zoned as Agriculture or Amenity given the serious concerns regarding flood risk if development is to occur on site.		1. Material Alteration No. 150 – Change of zoning of 1.6ha. from Agriculture to District Centre at the Jetland District Centre Caherdavin  See response to Submission No. 3 above.
	Chief Executive's Recommendations		
	1. It is recommended that the Plan be made <b>without</b> the proposed Material Alteration No. 150 as displayed.		
	SEA/ AA Response		
	Removing land at risk of flood – No impact on SEA/ AA		

11	Ref. and Name/ Group:	LCC-C101-31 Frank Larkin
	Submission/ Observation Summary	Chief Executive's Response
	<p><b>1. Material Alteration No. 150 – Change of zoning of 1.6ha. from Agriculture to District Centre at the Jetland District Centre Caherdavin</b></p> <p>-An application for a Primary Health Care Centre was submitted to the Council on the site and was refused due to flooding;</p> <p>-Previous zoning of the lands for Residential, without any building activity is a relic of the Celtic Tiger era planning excess;</p> <p>-The 2018 CFRAM Study means the Local Authority can no longer ignore the risks of building on flood zones;</p> <p>-In formulating the Draft Plan, the Council rightly zoned the land Agriculture given the highest category Flood Zone A. Nothing has changed to justify a change from Agriculture;</p> <p>-The proposer states that an FRA found the site at low risk of flooding. The SFRA found the site is at risk of flooding and would not pass a Justification Test. The observer canoed over the site following a major river bank reach in 1961;</p> <p>-The site is not brownfield, it is greenfield and has never been developed or used, except for materials and machinery storage;</p> <p>-A Primary Health Care Centre would be welcomed on the north side, but there is no justification for building on a flood plain. There are many sites where development could take place without the risk of flooding;</p>	<p><b>1. Material Alteration No. 150 – Change of zoning of 1.6ha. from Agriculture to District Centre at the Jetland District Centre Caherdavin</b></p> <p>See response to Submission No. 3 above.</p>

	-It is disappointing after all the public consultation that the Councillors have approved this alteration without the public having sight of them until they are passed.	
	<b>Chief Executive's Recommendations</b>	
	1. It is recommended that the Plan be made <b>without</b> the proposed Material Alteration No. 150 as displayed.	
	<b>SEA/ AA Response</b>	
	Removing land at risk of flood – No impact on SEA/ AA	

12	<b>Ref. and Name/ Group:</b>	LCC-C101-37 John and Mary Mortell
	<b>Submission/ Observation Summary</b>	<b>Chief Executive's Response</b>
	<p><b>1. Material Alteration No. 150 – Change of zoning of 1.6ha. from Agriculture to District Centre at the Jetland District Centre Caherdavin</b></p> <p>-Planning application 21/1741 was refused for a Health Centre and a motion to amend the Draft Plan was passed by the Elected Members without any consultation with or consideration of concerned observations to the planning application;</p> <p>-The Caherdavin site is infill and not brownfield;</p> <p>-The Clonmacken site is greenfield and subject to flooding and water lodging, very poor soakage with a high-water table and a history of overflowing into Ashbrook lowlands. Any rezoning or construction has the potential to disturb</p>	<p><b>1. Material Alteration No. 150 – Change of zoning of 1.6ha. from Agriculture to District Centre at the Jetland District Centre Caherdavin</b></p> <p>See response to Submission No. 3 above.</p>

	<p>water storage channels and soakage with disastrous impact on adjoining housing;</p> <p>-In February 2022 some very heavy rainfall caused the Westfields wetlands/marsh SAC water levels to rise by 500mm for 2 days, overflowing onto walkways;</p> <p>-The land is protected by legacy flood defences which are very challenged and have crumbled and overflowed with river water flowing across the Condell Road;</p> <p>-Construction work on this land should not take place until major river defences and surface/storm water management takes place as per the Chief Executive's Report.</p>	
	<b>Chief Executive's Recommendations</b>	
	1. It is recommended that the Plan be made <b>without</b> the proposed Material Alteration No. 150 as displayed.	
	<b>SEA/ AA Response</b>	
	Removing land at risk of flood – No impact on SEA/ AA	

<b>13</b>	<b>Ref. and Name/ Group:</b>	LCC-C101-3 Tom Phillips and Associates on behalf of Voyage Property Limited
	<b>Submission/ Observation Summary</b>	<b>Chief Executive's Response</b>
	<p><b>1. Material Alteration No. 147 – Proposed change of zoning of 14.71ha. from Enterprise and Employment and Open Space and Recreation to New Residential at Greenpark</b></p> <p>Change of zoning from Enterprise and Employment and Open Space to New Residential, equating to 19.55ha. with a residential yield of 802 no. units.</p>	<p><b>1. Material Alteration No. 147 – Proposed change of zoning of 14.71ha. from Enterprise and Employment and Open Space and Recreation to New Residential at Greenpark</b></p> <p>The OPR submission to the Material Alterations includes Recommendation 4 – Flood risk management which states</p>

<p>The observer welcomes this proposed Material Alteration, which reflects the location close to the City Centre in accordance with national, regional and local policy to promote compact growth. The Greenpark lands will help deliver the growth targets to 2040 of 50% within the existing built footprint as set out in the NPF, is serviced and can be developed in the short term. A mixed-use model will contribute to economic growth, in proximity to social infrastructure, open space, public transport, employment centres, University Hospital Limerick, third level institutions and the City Centre.</p> <p>The observer states that the New Residential zoning complies with national and regional planning policy including the NPF, RSES, MASP, Development Plan Guidelines, Sustainable Residential Development in Urban Areas Guidelines, Sustainable Urban Housing: Design Standards for New Apartments Guidelines, the Planning System and Flood Risk Management Guidelines, Housing for All and Rebuilding Ireland. Local level policies and objectives also support redevelopment of Greenpark for a mix of uses.</p> <p><b>- Planning System and Flood Risk Management Guidelines for Planning Authorities, 2009:</b></p> <p>The observer disagrees with the Justification Test Conclusion. If a site satisfies the Development Plan Justification Test, then it is suitable for development and under the guidelines no uses (vulnerable or less vulnerable) are precluded. The lands pass the Justification Test and are</p>	<p>‘having regard to NPO 57 of the NPF, and to provisions of The Planning System and Flood Risk Management, Guidelines for Planning Authorities (2009), as amended, the Planning Authority is required to make the plan without the following proposed material amendments: MA No. 147 – Change of zoning of 14.71ha. from Enterprise and Employment and Open Space and Recreation to New Residential’.</p> <p>On the basis of the location of the lands within Flood Zones A and B and the submissions received by the OPR and OPW, it is recommended that the Plan be made without the proposed Material Alteration No. 147 as displayed.</p> <p>Although there is only a pass / fail of the Justification Test set out in the Planning System and Flood Risk Management Guidelines, within Part 3</p>
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<p>more suitable for residential than enterprise and employment. The flood risk can be managed and the residual risk will not cause unacceptable adverse impacts elsewhere.</p> <p><b>- Justification Test and Regional Planning Guidance:</b>  The Justification Test seeks to ground the Enterprise and Employment zoning by reference to the Dock Road in the RSES and MASP, which does not include Greenpark. The Dock Road refers to Limerick's Docklands as identified in the Limerick Docklands Framework Strategy. Justification Tests have been applied separately to the Dock Road and Greenpark. The Justification Test for Greenpark notes that the lands meet all relevant criteria to facilitate compact growth. However, the Justification Test concludes that the site is suitable for Enterprise and Employment only, contrary to the observer's Justification Test which concludes that the site is suitable for Residential.</p> <p>The Greenpark lands have not been identified as a key employment and enterprise location under the RSES and MASP relating to the Dock Road. The rationale for proposing to maintain the Enterprise and Employment zoning of the Greenpark lands is not grounded in regional policy.</p> <p><b>Service Status:</b>  Under the Settlement Capacity Audit, the Greenpark lands have been altered to Tier 2 status. The service provision has not altered and is assumed due to the necessity for flood alleviation works, prior to development. Greenpark is not</p>	<p>there is scope to review the level of flood risk and impact this may have on the various vulnerabilities of development. Mitigation measures may then recognise a suitable vulnerability of development.</p>
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	dependent on the completion of flood alleviation works. Future development will necessitate integration of flood risk mitigation measures in line with a Site-Specific Flood Risk Assessment. Reference to Tier 2 should be considered in this context.	<b>Service Status:</b> The Settlement Capacity Audit has included a consistent assessment of all potential development sites across Limerick City and Environs, including Mungret and Annacotty in accordance with the Draft Development Plan Guidelines for Planning Authorities (2021). Where a site has been identified as being at flood risk it will require additional investment by reason of the preparation of a Site-Specific Flood Risk Assessment, the provision of raised finished floor levels, flood mitigation measures etc. in the event of a grant of planning permission, then these sites have been identified as Tier 2 Serviceable. Given that lands will require additional investment over and above the normal servicing requirements of a development, the inclusion of the lands as Tier 2, consistent with any other lands identified as being of flood risk is considered reasonable.
	<b>Chief Executive's Recommendations</b>	
	1. It is recommended that the Plan be made <b>without</b> the proposed Material Alteration No. 147 as displayed.	
	<b>SEA/ AA Response</b>	
	Removing land at risk of flood – No impact on SEA/ AA	

14	<b>Ref. and Name/ Group:</b>	LCC-C101-17 Staff and Parents' Association of the Model School
	<b>Submission/ Observation Summary</b>	<b>Chief Executive's Response</b>
	1. Material Alteration No. 141 - Change the Zoning of 0.3ha. from New Residential to Community and Education at the Model School	1. Material Alteration No. 141 - Change the Zoning of 0.3ha. from New Residential to Community and Education at the Model School

	<p>The Model School has 610 pupils. The rezoning for Educational and Community purposes is very welcome and fully supported. The school needs more space for recreation to enhance education and meet the need for recreation and exercise. The zoning protects the land for a soft play area and is vital to protect the City Centre as an attractive location.</p>	<p>The content of the submission received is noted. The Planning Authority acknowledges the need to future proof the expansion of existing schools and provide for new schools, particularly in Limerick City, in tandem with the substantial population growth envisaged. The proposed zoning would facilitate the future proofing of the existing Model School and the provision of supporting amenities. On this basis, it is recommended that the Plan be made with the proposed Material Alteration No. 141 as displayed.</p>
	<b>Chief Executive's Recommendations</b>	
	1. It is recommended that the Plan be made <b>with</b> the proposed Material Alteration No. 141 as displayed.	
	<b>SEA/ AA Response</b>	
	N/A	

15	<b>Ref. and Name/ Group:</b>	LCC-C101-21 Joe Murphy
	<b>Submission/ Observation Summary</b>	<b>Chief Executive's Response</b>
	<p><b>1. Material Alteration No. 143 - Change the Zoning of 2.4ha. from Agriculture to New Residential at South of Condell Road, Clonmacken</b></p> <p>The observer is concerned that the amendment to the zoning map is inaccurate. The observer requests that the zoning line be amended to comply with the SHD (Strategic Housing Development) application, reducing the quantum of zoned land at this location from 4.64ha. to 4ha.</p>	<p><b>1. Material Alteration No. 143 - Change the Zoning of 2.4ha. from Agriculture to New Residential at South of Condell Road, Clonmacken</b></p> <p>The Planning Authority acknowledges that the area displayed as part of proposed Material Alteration No. 143 was at variance with that proposed. The area sought for rezoning is 4ha. representing a reduction of 0.64ha. from that set out in the proposed Material Alterations.</p> <p>Notwithstanding the above, the OPR's submission outlines concerns regarding zoning peripheral to Limerick City and suburbs, isolated</p>

		<p>relative to existing development and not representing sequential development. In this respect, OPR Recommendation No. 1: Compact growth and residential zonings states ‘Having regard to the national and regional policy objectives for compact growth NPO 3 and RPO 10 under the NPF and RSES, to the requirements to implement sequential zonings under the Development Plans, Guidelines for Planning Authorities (2007) and Development Plans, Guidelines for Planning Authorities - Draft for Consultation (August 2021), including SPPR DPG 7, to the provisions of the Core Strategies Guidance Notes (November 2010), and to the implementation of objectives to promote sustainable settlement and transport strategies under Section 10(2)(n) of the Act, the Planning Authority is required to make the Plan without MA No.143 - 2.4ha from Agriculture to New Residential at South of Condell Road, Clonmacken’.</p> <p>The OPR submission includes Recommendation No. 4 – Flood risk management which states ‘having regard to NPO 57 of the NPF, and to provisions of The Planning System and Flood Risk Management, Guidelines for Planning Authorities (2009), as amended, the Planning Authority is required to make the plan without MA No. 143 - Condell Road in Clonmacken from Agriculture to highly vulnerable New Residential in Flood Zones A and B’.</p> <p>On the basis of the submissions received by the OPR and OPW, it is recommended that the Plan be made without the proposed Material Alteration No. 143 as displayed.</p>
	<b>Chief Executive’s Recommendations</b>	
	<p><b>1.</b> It is recommended that the Plan be made <b>without</b> the proposed Material Alteration No. 143 as displayed.</p>	

	<b>SEA/ AA Response</b>
	Removing land at risk of flood – No impact on SEA/ AA

16	<b>Ref. and Name/ Group:</b>	LCC-C101-28 John Spain Associates on behalf of Clancourt	
	<b>Submission/ Observation Summary</b>	<b>Chief Executive's Response</b>	
	<p><b>1. MA No. 13 - Insert a new Objective ECON OXX Dooradoyle Urban Quarter in Section 4.6.4 District Centres and MA No. 148 Change the Zoning of 30ha. from Semi Natural Open Space to Enterprise and Employment at The Crescent, Dooradoyle</b></p> <p>The observer generally welcomes and supports the Material Alterations, in particular MA No. 13 ECON OXX Dooradoyle Urban Quarter and MA No. 148 change of zoning of 30ha. from Semi Natural Open Space to Enterprise and Employment.</p> <p>Policy CS P6 – LSMATS is also welcomed. Integrated land use and transport planning supports delivery of development along public transport corridors. Existing and proposed public transport would further justify the delivery of employment uses on these strategically located lands.</p> <p>To attract inward investment, it is critical that sufficient employment lands are provided as supported by a letter from the IDA. The lack of office space available is highlighted in the Cushman and Wakefield Q1 2022 Office Report for the Limerick Market. The requirement for</p>	<p><b>1. MA No. 13 - Insert a new Objective ECON OXX Dooradoyle Urban Quarter in Section 4.6.4 District Centres and MA No. 148 Change the Zoning of 30ha. from Semi Natural Open Space to Enterprise and Employment at The Crescent, Dooradoyle</b></p> <p>The OPR submission includes Recommendation No. 4 – Flood risk management which states ‘having regard to NPO 57 of the NPF, and to provisions of The Planning System and Flood Risk Management, Guidelines for Planning Authorities (2009), as amended, the Planning Authority is required to make the plan without MA No. 148 lands adjacent to the Crescent Shopping Centre in Dooradoyle from water compatible Semi Natural Open Space to less vulnerable Enterprise and Employment in Flood Zones A and B’.</p> <p>On the basis of the location of the lands within Flood Zones A and B, and the submissions received by the OPR and OPW, it is recommended that the Plan be made without the proposed Material Alterations No. 13 and 148 as displayed.</p>	

	<p>sufficient lands for employment uses supports the inclusion of the lands for Enterprise and Employment. The serviceability of the lands highlights the suitability of the lands for development.</p> <p>The inclusion of the CSO boundary on relevant maps identifying the built-up area to which growth is targeted under the RSES is welcomed.</p> <p><b>2. Strategic Flood Risk Assessment:</b> The SFRA does not appropriately assess the lands against the criteria of the Plan Making Justification Test. Justification Tests have been submitted with the motion to change the zoning. The suitability of the land for development appears to be predetermined based on flood risk, rather than first determining the appropriate land use zoning in accordance with the Flood Risk Guidelines.</p> <p>The submission disputes and comments on the Justification Test as follows:</p> <ul style="list-style-type: none"> <li>i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement:</li> </ul> <p>The lands are essential to facilitate expansion of the urban settlement and are entirely suitable given their infill nature and location adjoining a District Centre, services, amenities and public transport. There is a requirement for employment lands and a lack of office space. The rationale for Greenpark consolidating the built-up area also applies.</p>	<p><b>2. Strategic Flood Risk Assessment:</b> It is acknowledged that the FRA submitted with the motion was included in an Appendix to the SFRA as part of the Material Alteration display documents.</p> <p>However, the Planning Authority had already carried out a Justification Test as part of the Chief Executive's Report, which considered the core principle of the Planning Guidelines to apply the sequential approach to development, which is firstly based on the avoidance of flood risk by locating development preferentially within Flood Zone C. Only where development in Flood Zones A or B cannot be avoided, or substituted, can the Justification Test be applied. The currently undeveloped parts of the Crescent site are within Flood Zone A and therefore, in following the sequential approach should be avoided. The Justification Test, as included in the SFRA, demonstrates that the site is not essential for the expansion of the urban settlement of Limerick, within which the Crescent lies as there are other sites available at a lower risk of flooding.</p> <p>As set out above, it is acknowledged that the FRA submitted with the motion does propose a means of mitigating flood risk, but this has</p>
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	<p>ii) Comprises significant previously developed and/or under-utilised lands: The lands are undeveloped and comprise an underutilised land bank in an infill location and should be targeted for development.</p> <p>iii) Is within or adjoining the core of an established or designated urban settlement: The infill lands adjoin a designated District Centre providing a range of services close to residential areas and served by bus routes and complies with the definition for core of an urban settlement in the Guidelines.</p> <p>iv) Will be essential in achieving compact or sustainable urban growth: The lands are sequentially favourable, comprising an infill site between two developed areas and should be developed to achieve compact growth. Leaving the lands undeveloped represents a missed opportunity to achieve sustainable compact growth.</p> <p>v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement: The lands are equally if not better suited for enterprise and employment than Greenpark, given the transport infrastructure and facilities. There is less residual risk than the lands at Greenpark.</p>	<p>bypassed the first steps of the sequential approach and is therefore not in accordance with the Planning System and Flood Risk management, Guidelines for Planning Authorities (2009).</p> <p>The Planning Authority has prepared plan making Justification Tests with oversight of all sites available and utilising a consistent approach to assessment. Justification Tests are prepared on a specific site-by-site basis and are not comparable between individual sites. These lands comprise a flood plain which are likely to become an integral part of the OPW Flood Relief Scheme for Limerick.</p>
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	<p>vi) A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere:</p> <p>The SFRA assessment is inaccurate as to the content of the FRA included by the observer and did not identify a high degree of breach. This scenario was extremely remote and easily mitigated. The FRA is more detailed and up to date than the CFRAMS. The flood relief scheme cannot be used as justification for delaying the consideration of strategic sites and the guidelines do not provide for prematurity. The FRA demonstrates the flood risk can be adequately managed and the use of the lands will not cause unacceptable adverse impacts elsewhere. These lands can facilitate the early delivery of a scheme which protects a larger area and infrastructure.</p> <p>vii) Conclusion and Recommendation:</p> <p>Having regard to the responses above and the detailed information in the accompanying Justification Tests, the lands pass the Justification Test and are suitable and appropriate for Enterprise and Employment zoning. It is recommended that the Material Alteration to change the zoning is approved and the SFRA updated to reflect the above commentary.</p>	
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Appropriate safeguards are incorporated into the Dooradoyle Urban Quarter objective to ensure that flood risk would not be significantly increased elsewhere, would not impede delivery of the flood relief scheme and will facilitate it. In reviewing the SFRA, references to breach analysis and evacuation plans are made. The MA No. 13 text may be slightly augmented as follows: ECON OXX Dooradoyle Urban Quarter (d) Ensure any application on lands at risk of flooding is 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. This FRA shall also include a detailed Emergency Response Plan and a Breach Modelling Assessment using a methodology to be agreed in advance with LCCC.

### **3. Strategic Environmental Assessment:**

The SEA identifies potential significant effects on the environment. The commentary in relation to the proposed Enterprise and Employment zoning is noted. The SEA process does not preclude potential significant environmental effects, however mitigation and monitoring may be put forward, but none is proposed. The safeguards under MA No. 13 in relation to flood risk mitigation measures should be acknowledged in the SEA. The SEA requires clear justification for proceeding with alterations which are likely to have significant environmental effects, or which conflict with policy. The justification for zoning is set out in the Justification Test accompanying the motion.

**4. Sequential Assessment:**

The submission sets out how the consolidation of Limerick and economic growth, in accordance with stated national and regional policy can be achieved through development of the infill and well served site.

**5. ARUP Report:**

-Residual Risk: The residual risk has been evaluated in the Site-Specific FRA submitted previously. The SFRA has not adequately assessed residual risk and has not provided any evidence base. The existing embankments provide a high degree of protection. The consequence of breach downstream is very low given the protection of the high level of the N18 and R526 and ground to the west. The risk of breach is remote and not sufficient to not zone the land.

-Prematurity pending flood relief scheme: There is no provision to not zone lands on the grounds of prematurity in the Guidelines. To ensure development does not hinder the delivery of a flood relief scheme, an appropriate objective as per the Material Alterations can be included. The primary risk of flooding is tidal and the optimal viable solution is to upgrade the existing embankment on its current alignment. Development will allow this section of embankment to be upgraded sooner, protecting the sustainable transport corridor along Rosbrien Road.

-Climate Change: Flood levels downstream of the R526 will increase in proportion to sea level rise and upstream at the

	<p>subject lands will be significantly less. The lands are less sensitive to sea level rise and the requirement for higher flood defence levels upstream will also be less.</p> <p>-Justification Test: The strategic planning part of the Justification Test has been passed for Greenpark and should be passed for Clancourt. There is no rationale to adopt an alternative approach to both sites with respect to the availability of alternative lands. The flood risk at Clancourt is lower and therefore more favourable than at Greenpark. Given the recognition that some enterprise and employment lands are needed in flood risk areas, it is prudent to next consider areas of lowest residual risk that benefit from protection. Given that Greenpark is appropriate for Residential, then Clancourt should be zoned Enterprise to ensure sufficient lands are available.</p> <p>-Flood Risk objectives: Text of MA No. 13 should be amended to include an Emergency Response Plan and require a breach modelling exercise.</p> <p><b>6. IDA Letter:</b></p> <p>To ensure a robust value proposition for clients and 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 its established activities and attract new investments. Fundamental to achieving this will be the availability of sufficient zoned, serviced and accessible land in strategic locations.</p>	
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	<b>7. Cushman and Wakefield Office Report Q1 2022:</b> There is a shortage of modern Grade A office accommodation in the market with the majority of the available stock comprising older legacy space in need of refurbishment.	
	<b>Chief Executive's Recommendations</b>	
	<b>1 – 7.</b> It is recommended that the Plan be made <b>without</b> the proposed Material Alterations No.s 13 and 148 as displayed.	
	<b>SEA/ AA Response</b> Removing land at risk of flood – No impact on SEA/ AA	

17	Ref. and Name/ Group:	LCC-C101-13 Town & Country Resources Limited on behalf of Little Company of Mary
	Submission/ Observation Summary	Chief Executive's Response
	<b>1. Material Alteration No. 113 - Amend the Nursing Home/ Residential Care or Institution/ Retirement Village Land Use Zoning Matrix, insert new footnote and definition</b>  The observer supports the principle of the combined amendments to the Land Use Matrix and Footnote and requests an additional amendment to the Footnote as follows:  Footnote No. 6 - Nursing Home/ Residential Care or Institution/ Retirement Village are uses which are Generally Not Permitted in the Education and Community	<b>1. Material Alteration No. 113 - Amend the Nursing Home/ Residential Care or Institution/ Retirement Village Land Use Zoning Matrix, insert new footnote and definition</b>  The content of the submission received is noted. The proposed request to amend the footnote is considered reasonable given the existing uses of the lands at Milford for Little Company of Mary. The minor amendment would enable the support of the existing uses and ensure the protection of the Education and Community Infrastructure lands at Milford for appropriate uses.

	<p>Infrastructure zone, except at Milford Care Centre and Little Company of Mary Milford, where Nursing Homes/ <a href="#">Residential Care or Institution/ Retirement Village</a> are Open for Consideration.</p> <p>This amendment is requested having regard to the residential function of the lands at Milford for Little Company of Mary, with 3 separate Convent facilities.</p>	
	<b>Chief Executive's Recommendations</b>	
	<p><b>1.</b> It is recommended that the Plan be made <b>with</b> the proposed Material Alteration No. 113 as displayed, <b>subject to minor modification</b> as follows:</p> <p>Footnote No. 6 - Nursing Home/ Residential Care or Institution/ 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/ <a href="#">Residential Care or Institution/ Retirement Village</a> are Open for Consideration.</p>	
	<b>SEA/ AA Response</b>	
	Minor modification – No impact on SEA/ AA	

18	Ref. and Name/ Group:	LCC-C101-14 Town & Country Resources on behalf of Milford Care Centre
	Submission/ Observation Summary	Chief Executive's Response
	<p><b>1. Material Alteration No. 113 - Amend the Nursing Home/ Residential Care or Institution/ Retirement Village Land Use Zoning Matrix, insert new footnote and definition</b></p> <p>The observer supports the principle of the combined amendments to the Land Use Matrix and Footnote and</p>	<p><b>1. Material Alteration No. 113 - Amend the Nursing Home/ Residential Care or Institution/ Retirement Village Land Use Zoning Matrix, insert new footnote and definition</b></p> <p>The content of the submission received is noted. The proposed request to amend the footnote is considered reasonable given the existing uses of the lands at Milford. The minor amendment would enable the</p>

	<p>requests an additional amendment to the Footnote as follows:</p> <p>Footnote No. 6- Nursing Home/ Residential Care or Institution/ 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/ <a href="#">Residential Care or Institution/ Retirement Village</a> are Open for Consideration.</p> <p>This amendment is requested given the wide range of services at Milford Campus, including a Specialist Palliative Care Hospice In-patient Unit and Community Services Base, a Residential Nursing Home, a Day Care Centre, Administration Building and an Education/ Research Centre. The amendment would reflect the full nature and extent of essential services provided and enables further consolidation and expansion should proposals emerge in the future.</p>	<p>support of the existing uses and ensure the protection of the Education and Community Infrastructure lands at Milford for appropriate uses.</p>
<b>Chief Executive's Recommendations</b>		
	<p><b>1.</b> It is recommended that the Plan be made <b>with</b> the proposed Material Alteration No. 113 as displayed, <b>subject to minor modification</b> as follows:</p> <p>Footnote No. 6 - Nursing Home/ Residential Care or Institution/ 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/ <a href="#">Residential Care or Institution/ Retirement Village</a> are Open for Consideration.</p>	
	<b>SEA/ AA Response</b>	

	Minor modification – No impact on SEA/ AA
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19	<b>Ref. and Name/ Group:</b>	LCC-C101-33 John O'Dwyer
	<b>Submission/ Observation Summary</b>	<b>Chief Executive's Response</b>
	<p><b>1. Material Alteration No. 20 – Include an additional area of 7.348ha. for Enterprise and Employment at Annacotty Business Park</b></p> <p>The observer is disappointed that the Local Authority is considering the extension of Annacotty Business Park. The observer fully supports the economic development of Limerick, including the reuse of the former Ferinka site. However, as residents they have become increasingly concerned about the level of traffic generated by the Business Park.</p> <p>The observer tries to use sustainable transport modes where possible, including the Dublin Road (R445). However, the R506 causes most concern, being dominated by vehicle traffic including large HGVs and has become increasingly busier. The potential for serious injury and loss of life in a collision with an HGV is significant. Increasing industrial activity where the road network is already at capacity and increasing the unsafe environment for cycling and walking is a further deterrent to active transport.</p> <p>The extension to Annacotty Business Park does not integrate land use and transport when it exacerbates a car</p>	<p><b>1. Material Alteration No. 20 – Include an additional area of 7.348ha. for Enterprise and Employment at Annacotty Business Park</b></p> <p>The content of the submission received is noted.</p> <p>At a special Council meeting on the 18<sup>th</sup> of February 2022, issues in relation to the existing road network, capacity, footpaths and lack of public transport were highlighted as concerns with respect to a proposed extension to the Annacotty Business Park of 40.15ha. Having regard to these concerns a decision was made to extend the Annacotty Business Park boundary to encompass an additional area of 7.348ha. to safeguard the expansion of the business Park, to allow existing businesses to expand and to facilitate and promote enterprise and employment due to the following reasons:</p> <ul style="list-style-type: none"> <li>• Annacotty Business Park is fully let, including all buildings and lands.</li> <li>• Limerick and the South Region of Ireland are expected to grow in enterprise and employment.</li> <li>• Annacotty Business Park is in a strategic and sustainable location for enterprise development.</li> <li>• Annacotty Business Park provides the only enterprise and employment lands in the local area that caters for smaller businesses.</li> </ul>

	<p>dominant environment, contrary to Policy CS P6 – 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.</p> <p>Policy CSP P2 refers to Compact Growth. Prioritising employment within and contiguous to the City and town footprints is at odds with the reasoning for extension of the Business Park. There is no sustainable transport, contrary to the commitments for a low carbon society. The Development Plan’s focus is on increasing employment in the City and towns, decreasing the distance to travel between home and work. The observer is surprised and disappointed that it is considered acceptable to extend the Business Park, when it is in direct contradiction to its policy.</p>	<ul style="list-style-type: none"> <li>It is a Council objective to facilitate the sustainable development of Annacotty Business Park. The expansion would facilitate that in principle, but for the Council’s assurance, each application would be required to prove on a case-by-case basis that its “scale, phasing and character [was] compatible with surrounding land uses and capacity of the road network”.</li> </ul> <p>It is further noted that no issues in relation to this proposed Material Alteration have been raised, including in relation to traffic, in the submissions received by the OPR, NTA or TII. On this basis, it is recommended to make the Plan with Material Alteration No. 20 as displayed.</p>
<b>Chief Executive’s Recommendations</b>		
1. It is recommended that the Plan be made <b>with</b> the proposed Material Alteration No. 20 as displayed.		
<b>SEA/ AA Response</b>		
No impact		



20	Ref. and Name/ Group:	LCC-C101-36 Tom Phillips and Associates on behalf of Snowvale Ltd.	
	Submission/ Observation Summary		Chief Executive's Response
	<p><b>1. Material Alteration No. 20 – Include an additional area of 7.348ha. for Enterprise and Employment at Annacotty Business Park</b></p> <p>The observation welcomes the expansion of Annacotty Business Park boundary by 7.3ha. to 49.7ha. However, a minor addition of 0.83ha. is sought to facilitate access as the proposed additional lands are considered landlocked. The strip of land is traversed by power lines but would facilitate a two-way access route outside the power line exclusion zone. The additional lands would be for infrastructural/access purposes only.</p> <p>Annacotty Business Park is a “key employment location” in the RSES. Expansion of the boundary is supported as:</p> <ol style="list-style-type: none"> <li>1. The Business Park is fully let;</li> <li>2. Limerick and the South Region is expected to grow in enterprise and employment;</li> <li>3. A strategic and sustainable location for enterprise development;</li> <li>4. Provides the only lands in the area that caters for smaller businesses;</li> <li>5. ABP previously expressed difficulty in principle with the inclusion of un-zoned land.</li> </ol> <p>It is an objective to facilitate the sustainable development of Annacotty Business Park. Each application would be</p>		<p><b>1. Material Alteration No. 20 – Include an additional area of 7.348ha. for Enterprise and Employment at Annacotty Business Park</b></p> <p>The content of the submission received is noted.</p> <p>The Elected Members at the special Council meeting on 18<sup>th</sup> of February 2022 decided to extend the Annacotty Business Park boundary to encompass an additional area of 7.348ha. to safeguard the expansion of the business Park, to allow existing businesses to expand and to facilitate and promote enterprise and employment.</p> <p>On this basis, the Planning Authority considers that the additional area of the Business Park allows for expansion of existing businesses in the first instance. Therefore, it is considered that access could be provided through the existing facilities and road network serving the park.</p>

	<p>required to demonstrate on a case-by-case basis that its “scale, phasing and character [was] compatible with surrounding land uses and capacity of the road network”.</p> <p>To facilitate the proposed extension, the Council should extend the boundary by 0.83ha.. The minor alteration would allow access to the additional lands, which do not border the R506 regional road, but the existing Annacotty Business Park to the south, making them landlocked and would not readily facilitate expansion.</p> <p>Permission was granted in 2009 for 32 No. industrial buildings, however this was refused by ABP on the grounds of the un-zoned lands and since addressed infrastructural reasons. Permission has been secured with access across un-zoned lands but that is not ideal.</p>	
<b>Chief Executive’s Recommendations</b>		
1. It is recommended that the Plan be made <b>with</b> the proposed Material Alteration No. 20 as displayed		
<b>SEA/ AA Response</b>		
No impact		

21	Ref. and Name/ Group:	LCC-C101-18 Limerick Chamber
	Submission/ Observation Summary	Chief Executive's Response
	<p><b>1. Chapter 1: Introduction, Vision and Strategic Overview:</b></p> <p><b>(i)</b> Strategic Objective No. 1 should include language mandating and encouraging densification and compact sustainable development in the City Centre/ central business district. This could be reflected in the Limerick Brand by promoting Limerick City as an energetic compact City Centre, adhering to the NPF and revitalising the City Centre.</p> <p><b>(ii)</b> Strategic Objective No. 3 should include a focus on financial stability through affordable housing.</p> <p><b>2. Chapter 2: Core Strategy:</b></p> <p><b>(i)</b> Household projections do not include the social housing waiting list set out in the Housing Agency's Summary of Social Housing Assessments report. This will reinforce reliance on HAP and RAS, increase competition on the private rental market, enhancing pressure on supply, demand and prices.</p>	<p><b>A number of issues raised in the submission do not relate to Material Alterations. Notwithstanding, a summary response is provided below.</b></p> <p><b>1. Chapter 1: Introduction, Vision and Strategic Overview:</b></p> <p><b>(i)</b> There are a number of policies and objectives mandating densification and compact growth of the City Centre.</p> <p><b>(ii)</b> Strategic Objective No. 3 is inclusive of all types of residential development.</p> <p><b>2. Chapter 2: Core Strategy:</b></p> <p><b>(i)</b> The Core Strategy sets 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 housing supply targets have been prepared in accordance with the Housing Supply Target Methodology Guidelines for Planning Authorities (2020). These targets are cognisant of the requirement for social housing as reflected in the Housing Strategy, Housing Need Demand Assessment and DoHPLG Social Housing Strategy 2020. The Draft Development Plan Guidelines (2021) does not set out a separate requirement for social housing in the preparation of the Core Strategy. However, in order to maximise the potential for the provision of Part V social and affordable</p>

	<p>dwelling in Limerick in accordance with the most up to date legislation, it is considered reasonable to update Objective HO O13 - Provision of Social and Affordable Housing with the following text:</p> <p><del>A) Promote the provision of social and affordable housing, in accordance with the Council's Draft Housing Strategy, Housing Need Demand Assessment and Government policy as outlined in the DHLGH Housing for All – a New Housing Plan for Ireland 2021 Social Housing Strategy 2020 and to ensure that 10% of</del> <u>Require</u> <del>lands zoned for residential use, or for a mixture of residential and other uses, 20% of lands in residential or mixed use schemes greater than</del> <u>and any land which is not zoned for residential use, or for a mixture of residential and other uses, 4 units where</u> <del>in respect of which permission for the development of 4 or more houses is granted, to comply with</del> <u>be reserved for social and affordable housing in accordance with the Urban Regeneration and Housing Act 2015</u> the Affordable Housing Act 2021 and Part V of the Planning and Development Act 2000 (as amended) and any subsequent amendments thereof. <del>to the legal requirement to deliver this housing during the lifetime of the Draft Plan. This requirement shall comprise 10% social housing and 10% affordable housing (including affordable purchase and/or Cost Rental), subject to local factors, including demand for and viability of affordable housing on individual sites.</del> The Council reserves the right to determine the appropriateness of 'Part V' Cost Rental and/or affordable purchase delivery on individual sites on a case-by-case basis.</p> <p><del>B) All new social and affordable housing schemes shall promote a social and tenure mix.</del></p>
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<p><b>(ii)</b> Table 2.2 Population (2028), estimated (2022) and future (2028) growth and Table 2.5 Projected population and household growth per settlement hierarchy should be broken down into key areas. The growth target for Limerick City Centre is not distinct from the suburbs of Mungret and/or Annacotty. Table 2.9 Core Strategy, includes the disaggregation of Mungret and Annacotty, but the CSO definition of the City is too broad and takes in suburban areas such as Rhebogue and Raheen. The Council should provide an accurate boundary map for the City Centre. These figures should be disaggregated to outline population growth, housing and land in the City Centre. Inhabitants per dwelling should be included. Limerick City Centre should be a standalone hierarchy 1 target.</p> <p><b>(iii)</b> The ESRI Regional Demographics and Structural Housing Demand at a County Level used for household projections does not include pent up demand and hidden homelessness of adult children living in family homes, risking underestimating housing demand. This should be analysed for the City Centre and included in housing targets. The use of the ESRI scenario which takes account of NPF required growth is recommended.</p> <p><b>(iv)</b> Limerick City Centre should be priority in the Settlement Hierarchy with other suburban locations following. As per Determining the Quantum of Zoned Land</p>	<p><del>C) Support the provision of affordable housing through affordable purchase, cost rental and new build incremental schemes.</del></p> <p><b>(ii)</b> The Core Strategy has been prepared in accordance with the Planning and Development Act 2000 (as amended) and Core Strategy Guidelines issued by the Department of Environment, Heritage and Local Government. Also, the population projections are set out in accordance with the settlement hierarchy provided in the National Planning Framework, Regional Spatial and Economic Strategy and Limerick-Shannon Metropolitan Area Spatial Plan. Any deviation in the hierarchy as suggested would render the Plan inconsistent with the provisions of the higher tier plans, contrary to the requirements of the Planning and Development Act 2000 (as amended) and OPR.</p> <p><b>(iii)</b> The Core Strategy is in line with the ESRI figures, 'Regional Demographics and Structural Housing Demand at a County Level', that were issued by the Department and the Housing Supply Target Methodology Guidelines for Planning Authorities (2020). The Planning Authority had no discretion to amend these figures.</p> <p><b>(iv)</b> The Core Strategy and settlement hierarchy is consistent with the national and regional policy of the NPF, RSES and MASP. There are a</p>
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<p>Required to Accommodate Proposed Growth, the City Centre should be prioritised ahead of Mungret and Annacotty.</p> <p><b>(v)</b> Table 2.6 Density Assumptions per Settlement Hierarchy should aim to deliver more dense and compact housing in villages and towns. More people are returning to these areas and will need to be accommodated, including single people and smaller families.</p> <p><b>(vi)</b> Figure 2.2 Density Zones includes parts of the Dock Road for 45+ dwellings per hectare and adjacent areas at 35+ dwellings per hectare. This is inappropriate for such central and strategic areas of the city and should be revised upwards to 100+. The difference between the 100+ and 45+ should be mitigated in the area surrounding the City Centre.</p> <p><b>(vii)</b> Policy CS P2 – Compact Growth is welcomed but text enforcing the City Centre as the main priority for development is encouraged.</p> <p><b>3. Chapter 3: Spatial Strategy:</b>  <b>(i)</b> The observer welcomes the text on the NPF and strategy for the City Centre and the Southern Region’s three cities working together.</p>	<p>number of policies and objectives to prioritise the sustainable intensification and consolidation of Limerick City in the Plan.</p> <p><b>(v)</b> The proposed densities are set out in accordance with the Section 28 Sustainable Urban Housing, Design Standards for new Apartments – Guidelines for Planning Authorities, 2020, Urban Development and Building Height Guidelines, 2018 and Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities, 2009. With the exception of a Material Alteration to the proposed density in Newcastle West, the OPR has not raised any issue in relation to this item.</p> <p><b>(vi)</b> The density zones within the City and Environs have been set out in accordance with the definition for Central and/or Accessible Urban Locations as per the Section 28 Guidelines “Design Standards for New Apartments – Guidelines for Planning Authorities”, 2020. These guidelines require density standards to align with proximity to public transport services.</p> <p><b>(vii)</b> Policy CS P2 – Compact Growth is a policy relevant to all settlements and prioritising development within and contiguous to the settlement. The policy already specifically references Limerick City.</p> <p><b>3. Chapter 3: Spatial Strategy:</b>  <b>(i)</b> The content of the submission received is noted.</p>
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<p><b>(ii)</b> Policy CGR P1 is welcomed, focusing on compact and consolidated growth, however the priority should remain the City Centre. To include Annacotty and Mungret in population and zoning projections, hinders the ability to monitor and progress the City Centre alone.</p> <p><b>(iii)</b> Inclusion of towns and villages in Objective CGR O1 is welcomed, but this should focus on decreasing urban sprawl from the City Centre as well.</p> <p><b>(iv)</b> Inclusion of the Whole of Government National Disability Inclusion Strategy is welcomed in Objective CGR O2.</p> <p><b>(v)</b> Objective CGR O3 targets 50% of new homes in the built-up footprint and suburbs. The inability to separate the City Centre from the suburbs is a concern. Along with housing growth there is a significant opportunity to revitalise the City Centre through increased residency, boosting the economy of the Mid-West region, increasing indigenous businesses and foreign businesses while achieving compact growth. Measurements need to be set for monitoring progress. Objective CGR O3(e) seeking masterplans would benefit from a required timeline for starting and completion. Zoning along the Dock Road and in proximity to Mary Immaculate College could sustain a large population increase, particularly student accommodation.</p>	<p><b>(ii)</b> The Core Strategy and settlement hierarchy is consistent with the national and regional policy of the NPF, RSES and MASP. There are a number of policies and objectives to prioritise the sustainable intensification and consolidation of Limerick City in the Plan.</p> <p><b>(iii)</b> The focus of this policy is to prevent ribbon development.</p> <p><b>(iv)</b> The content of the submission received is noted.</p> <p><b>(v)</b> The Settlement Capacity Audit for Limerick City and Environs, including Mungret and Annacotty identifies the sites for potential residential development and associated residential yield within the City Centre. Chapter 13 Monitoring and Implementation commits to monitoring the implementation of the Plan.</p>
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<p><b>(vi)</b> Policy CGR P2 monitoring brownfield and infill sites would benefit from an online portal with updates on a quarterly basis with a timeline for delivery.</p> <p><b>(vii)</b> Objective CGR O4 active land management would benefit from a definition of a strategic site and the updating of a database on a quarterly basis.</p> <p><b>(viii)</b> Inclusion of Council owned lands in Objective CGR O5 is welcomed, this could be expanded with vacant sites, strategic brownfield, infill and derelict sites on the database/ online portal.</p> <p><b>(ix)</b> Table 3.4.1 Strengths, Constraints, Opportunities and Threats (SCOT) should be modified as follows:</p> <ul style="list-style-type: none"> <li>• World class infrastructure should be moved to Constraints and renamed Infrastructure. Lack of housing supply (threat), lack of investment in public transport and lack of centrally located high density developments (constraints) are not cohesive with world class infrastructure.</li> <li>• Housing (threats) should include affordable housing and housing for smaller families and single people.</li> <li>• Brain drain of graduates should be included (threat).</li> <li>• High quality lifestyle does not fit with infrastructure gaps and should be removed or clarified.</li> <li>• Highest disposable income outside Dublin should be included (strengths).</li> </ul>	<p><b>(vi)</b> The content of the submission received is noted. The suggestion of the establishment of an online portal is welcomed, however, this is outside of the remit of the Development Plan.</p> <p><b>(vii)</b> Sites are identified in the Settlement Capacity Audit for Limerick City and Environs including Mungret and Annacotty. Objective CGR O4 Active Land Management commits to monitoring on an annual basis.</p> <p><b>(viii)</b> The content of the submission received is noted. The suggestion of the establishment of an online portal is welcomed, however, this is outside of the remit of the Development Plan.</p> <p><b>(ix)</b> The Planning Authority notes the following:</p> <ul style="list-style-type: none"> <li>• World class infrastructure includes assets such as the Limerick Tunnel, Shannon Foynes Port, University of Limerick, University Hospital Limerick etc. These are appropriately identified as strengths in the SCOT.</li> <li>• The reference to housing as a threat relates to all types and tenures of housing supply.</li> <li>• Opportunities for employment and the availability of amenities and leisure facilities enable a high-quality lifestyle in Limerick.</li> <li>• High disposable income contributes to and forms a part of a high-quality lifestyle.</li> <li>• The loss of vitality and vibrancy of some streets have been identified as constraints, while investment in transport, culture and the night time economy have been identified as opportunities.</li> </ul> <p>On the basis of the above, no further amendments to the SCOT are recommended.</p>
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	<ul style="list-style-type: none"> <li>• Large concentration of state-owned lands should be included (opportunities).</li> <li>• Decreased footfall, lack of an all-day economy and inappropriate levels of public and private investment in the City Centre should be included (threats).</li> </ul> <p><b>(x)</b> 3.4.2.1 Developing a Spatial Strategy should disaggregate population growth of the City Centre from the environs including Mungret and Annacotty. Developing the Mungret Framework with c.1,950 housing units may harm the City Centre and potential mitigation measures put forward.</p> <p><b>(xi)</b> Infrastructure is required to mitigate potential flood risk so areas can be unlocked and consolidated for housing, to fully utilise land and decrease urban sprawl.</p> <p><b>(xii)</b> Regarding Limerick 2030 and the LDA facilitating developments, text should be included that puts development prioritisation on the City Centre.</p> <p><b>(xiii)</b> Map 3.2 Limerick Opportunities and Destinations has a lack of housing projects and strategic sites for housing in the City Centre. To pursue City Centre revitalisation, focus must be prioritised within the City Central Business District.</p> <p><b>(xiv)</b> Map 3.3 City Spatial Opportunities - The phasing of Cleaves Riverside Quarter and Colbert Quarter should be reflected on the map with a timeline for delivery.</p>	<p><b>(x)</b> See response to Item 2(ii) above.</p> <p><b>(xi)</b> A Flood Relief Scheme for Limerick City is currently being developed in conjunction with the OPW.</p> <p><b>(xii)</b> Both Limerick 2030 and the LDA play an important role in much needed development including housing. It is not considered appropriate to restrict this to the City Centre.</p> <p><b>(xiii)</b> Map 3.2 Limerick Opportunities and Destinations illustrates the opportunities for development throughout Limerick City and Environs, including Mungret and Annacotty and does not focus on the City Centre.</p> <p><b>(xiv)</b> Map 3.3 City Spatial Opportunities includes indicative timelines in relation to development of sites including Cleaves and Colbert.</p>
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<p><b>(xv)</b> Objectives for Cleeves Riverside Quarter are welcomed and should be fast tracked with resources to deliver a masterplan, showing investors Limerick is revitalising. World Class Waterfront updates will be important to highlight regeneration. Should the SDZ application for a University Town in South Clare be successful, it could significantly impact the UL City Campus.</p> <p><b>(xvi)</b> Objective CGR O10 is welcomed but should include text around engaging in strategic partnerships for delivery given the private sector's access to finance and delivery capabilities.</p> <p><b>(xvii)</b> Section 3.4.3.4 Limerick 2030, the last paragraph should not be removed. It is vital that there is focus on brownfield sites and tackling vacancy and dereliction.</p> <p><b>(xviii)</b> Section 3.4.3.9 Arthur's Quay, the importance of the park as a public realm and meeting space needs to be protected and footprint expanded.</p>	<p><b>(xv)</b> The content of the submission received is noted.</p> <p><b>(xvi)</b> All funding referenced in Objective CGR O10 Revitalisation supports engagement with relevant strategic partners.</p> <p><b>(xvii)</b> This text is proposed to be removed as it does not relate solely to the work of Limerick 2030 and relates to text elsewhere in the Plan. For example, Section 2.4 Core Strategy Statement aims to prioritise the development of brownfield sites and reduce vacancy in Limerick City, increase average densities and help revitalisation. While Section 3.2.1 states 'strategic initiatives, which will achieve the compact growth targets on brownfield and infill sites, are sought, including site assembly for revitalisation and the promotion of brownfield lands over greenfield developments in all urban areas'. On the basis of the above, it is considered that the text represents duplication and should not be included.</p> <p><b>(xviii)</b> Section 3.4.3.9 Arthur's Quay sets out a requirement for the preparation of a framework plan which will consider issues in relation to the park.</p>
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<p><b>(xix)</b> Opera Square, Limerick Laneways, World Class Waterfront, Cleeves Riverside Quarter, UL City Campus, Arthur's Quay and Ellen Street, should include timelines and delivery dates.</p> <p><b>(xx)</b> Clarification is required regarding the difference between a masterplan and framework in relation to Mungret.</p> <p><b>(xxi)</b> Objective MF O1 is of concern given the potential population and business detracting from the City Centre due to proximity to the Crescent Shopping Centre. It would be more appropriate to focus efforts on Cleeves Riverside Quarter. Text promoting active and public transport linking Mungret to the City Centre are recommended.</p> <p><b>(xxii)</b> Collaboration of the Council and LDA is welcomed, however the Plan should include all lands to be inherited by the LDA under the site transfer portion of Housing for All. Objective CSQ O1b should include a timeline and phasing for each district of the Colbert Quarter plan.</p> <p><b>(xxiii)</b> Map 3.9 City and Environs, Mungret and Annacotty Consolidation and Opportunity Sites lacks sites along the Dock Road and adjacent lands which could provide a considerable number of homes. Housing opportunities near the City Centre should be established.</p> <p><b>(xxiv)</b> Plans for Thomond Park are welcomed.</p>	<p><b>(xix)</b> Map 3.3 City Spatial Opportunities sets out indicative timelines for development of strategic sites.</p> <p><b>(xx)</b> Objective MF O1 Mungret Framework sets out the framework to which any development in Mungret shall have regard.</p> <p><b>(xxi)</b> The plan promotes active and public transport linkages from all areas to the City Centre. It should be noted that the development of Mungret is supported in the NPF.</p> <p><b>(xxii)</b> Objective CSQ O1b Colbert Quarter supports the implementation of the Colbert Quarter Spatial Framework. This framework includes potential phasing and timelines for development.</p> <p><b>(xxiii)</b> Lands at risk of flooding were not considered suitable for vulnerable uses such as residential.</p> <p><b>(xxiv)</b> The content of the submission received is noted.</p>
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<p><b>(xxv)</b> Social, economic and physical infrastructure plans for regeneration areas are welcomed.</p> <p><b>(xxvi)</b> The observer supports MA No. 147 change of zoning of 14.71ha. from Enterprise and Employment and Open Space and Recreation to New Residential at Greenpark, given the housing crisis and potential delivery of 900 homes close to the City Centre.</p> <p><b>(xxvii)</b> Lands at Courtbrack adjacent to Alandale and Dock Road (3 sites of 2.8ha.) should be zoned for residential use.</p> <p><b>(xxviii)</b> Policy CGR P2 should include text regarding the reporting schedule of monitoring brownfield/ infill sites, data to be collected and dissemination service to the public.</p> <p><b>4. Chapter 4: Housing:</b></p> <p><b>(i)</b> The National Disability Authority's UD ++ standard should be a standard requirement.</p> <p><b>(ii)</b> The retrofitting of social housing and home loan is welcomed. Value for money for social housing reuse should be encouraged and text included. The cohort of private</p>	<p><b>(xxv)</b> The content of the submission received is noted.</p> <p><b>(xxvi)</b> See response to OPR submission No. 1 item MA Recommendation No. 4 – Flood risk management.</p> <p><b>(xxvii)</b> This issue does not relate to a proposed Material Alteration. However, lands at risk of flooding were not considered suitable for vulnerable uses such as residential.</p> <p><b>(xxviii)</b> Following adoption of the Plan, the Planning Authority will establish a programme to monitor implementation of the objectives of the Plan.</p> <p><b>4. Chapter 4: Housing:</b></p> <p><b>(i)</b> The standards of the draft Plan have been prepared with cognisance to the National Housing Strategy for Disabled People 2022-2027. It is considered reasonable to clarify the National Disability Authority's standards as set out in the Plan as follows: MA. No. 7 All new residential schemes shall <u>be designed having regard</u> <del>ensure that a minimum of 15% of dwellings are designed</del> to the National Disability Authority's <del>UD ++</del> standards<u>.</u></p> <p><b>(ii)</b> The content of the submission received is noted. However, this is outside of the remit of the Development Plan.</p>
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<p>households falling outside the social housing bracket with not enough income for retrofitting or home loan should be catered for. The Council should liaise with the relevant authorities to put in place the correct initiatives to support this cohort.</p> <p><b>(iii)</b> The Council should identify land in appropriate City Centre locations and facilitate purpose-built student accommodation.</p> <p><b>(iv)</b> A distinction between residential and urban density should be noted, with urban density prioritised and referring to improving and increasing the residential density of the City Centre. Residential density is too broad and allows increased densification of suburban developments contributing to urban sprawl and less focus on the City Centre.</p> <p><b>(v)</b> There is a shortage of 1 bed apartment units. Rental analysis has shown only 7 No. 1 bed units for rent over a 6-week period, causing massive competition and prices at €1,526 per month. Shared housing is not attractive for professionals. The increase in supply may alleviate increases in rental prices. Appropriate homes must be planned and delivered in the City Centre. The Plan should set targets for apartments relative to other housing types.</p> <p><b>(vii)</b> Significant potential to attract students to the City Centre due to the UL City Campus and improved accessibility. The third level institutes strengthen the case</p>	<p><b>(iii)</b> The Plan includes appropriate policies and objectives to support the provision of student accommodation on appropriately zoned lands as identified.</p> <p><b>(iv)</b> The Plan clearly sets out density requirements in line with Section 28 Ministerial Guidelines.</p> <p><b>(v)</b> This is not a Material Alteration, however it is considered that the Housing Need Demand Assessment and Housing Strategy has addressed this issue.</p> <p><b>(vii)</b> The content of the submission received is noted.</p>
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	<p>that student accommodation has the potential to be advantageous in terms of revitalising the City Centre.</p> <p><b>5. Chapter 5: A Strong Economy:</b></p> <p><b>(i)</b> The focus on City Centre retail is welcomed. It is not appropriate to remove text which aims to assess potential retail impact on the City from retail warehousing in MA No. 15. Revitalising the retail sector in the City Centre is crucial for successful regeneration. Noting the challenges for the City, with retail being in decline for a decade due to a lack of footfall and private investment is important.</p> <p><b>(ii)</b> MARA and marine planning for offshore wind must be a priority.</p> <p><b>(iii)</b> Objective for Circular Economy is crucial for businesses.</p> <p><b>(iv)</b> It is important that innovative strategies for tourism are adopted to attract visitors. Capitalising on the historical and cultural importance, promoting digital innovation and the World Class Waterfront will promote Limerick.</p> <p><b>6. Chapter 7: Sustainable Mobility and Transport:</b></p> <p><b>(i)</b> Public and active travel infrastructure must be put in place. A considerable number of journeys are within short distances of workplaces. Further investigation of the reasons for car use for these short journeys is required. Table 7.3 Target Mode Share should include what percentage these current mode shares have.</p>	<p><b>5. Chapter 5: A Strong Economy:</b></p> <p><b>(i)</b> MA No. 15 included an amendment for the purposes of clarification with respect to the limited capacity of retail warehousing in the City and Environs.</p> <p><b>(ii)</b> The content of the submission received is noted.</p> <p><b>(iii)</b> The content of the submission received is noted.</p> <p><b>(iv)</b> The content of the submission received is noted.</p> <p><b>6. Chapter 7: Sustainable Mobility and Transport:</b></p> <p><b>(i)</b> Table 7.2 Baseline Mode Share sets out the baseline mode share.</p>
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<p><b>(ii)</b> Text should be included to support active and public transport routes on any potential road infrastructure (LNDR). The Council should analyse the mechanisms for land value capture in conjunction with the LNDR. Any monetary gain should be reinvested back into active and private transport to support compact growth and form linkages with other strategic areas.</p> <p><b>(iii)</b> The Plan should support the expansion of data collection points for congestion and other traffic monitoring purposes.</p> <p><b>(iv)</b> Policy TR P7 Sustainable Travel and Transport is welcomed.</p> <p><b>(v)</b> Objective for Park and Ride/ Stride points is supported. These locations must be strategically located to cover the maximum catchment area to be an option for commuters and reduce last mile trips.</p> <p><b>(vii)</b> The inclusion of suburban areas in Limerick City's projections for modal shift will inaccurately represent performance due to the inability to disaggregate City Centre data.</p> <p><b>(viii)</b> Objective TR O46 – Limerick City Centre Traffic Management Plan should be informed by the Place-making Plan. Private cars will not be at the forefront of transportation options in future. Place-making and public</p>	<p><b>(ii)</b> The plan includes a number of objectives in relation to promotion of sustainable forms of transport use.</p> <p><b>(iii)</b> The plan commits to monitoring implementation of the Plan including modal shift.</p> <p><b>(iv)</b> The content of the submission received is noted.</p> <p><b>(v)</b> The content of the submission received is noted.</p> <p><b>(vii)</b> The monitoring of data will include an assessment of the best available information at an appropriate level for measurement.</p> <p><b>(viii)</b> The content of the submission received is noted and agreed.</p>
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<p>amenity should be prioritised to accommodate population growth and active travel.</p> <p><b>7. Chapter 9: Climate Action, Flood Risk and Transition to Low Carbon Economy:</b> Significant land banks within Flood Zones A and B could be unlocked if the correct measures are put in place. The Council should collaborate with landowners to unlock these lands for housing and other uses, encourage compact growth and prevent urban sprawl.</p> <p><b>8. Chapter 11: Development Management Standards:</b> The Building Height Table requires a user-friendly update given the multiple pages. Height limits should be included in the Spatial Strategy.</p> <p><b>9. Chapter 13: Implementation and Monitoring:</b> <b>(i)</b> An online portal for monitoring progress of the Plan is recommended. Table 13.1 Core Strategy Monitoring Indicators are cohesive to quarterly updating, increasing transparency around the goals and targets.</p> <p><b>(ii)</b> Text is recommended in Section B1 Plan Objectives Monitoring to facilitate a progress report being prepared and delivered by the Directly Elected Mayor, with progress reports every two years and not just after the first two years.</p> <p><b>(iii)</b> The portal could include other economic and spatial indicators in consultation with the public and other</p>	<p><b>7. Chapter 9: Climate Action, Flood Risk and Transition to Low Carbon Economy:</b> Lands at risk of flooding are not considered suitable for vulnerable uses such as residential.</p> <p><b>8. Chapter 11: Development Management Standards:</b> The Section 28 Ministerial Guidelines recommends avoidance of prescriptive height limits. The Building Height Strategy has been prepared in accordance with these guidelines.</p> <p><b>9. Chapter 13: Implementation and Monitoring:</b> <b>(i)</b> The provision of an online portal is outside of the remit of the Development Plan.</p> <p><b>(ii)</b> The Planning and Development Act sets out the requirement for a progress report two years after the adoption of the Plan.</p> <p><b>(iii)</b> Noted. However, the provision of an online portal is outside of the remit of the Development Plan.</p>
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	stakeholders to examine what items should be monitored and reported.	
	<p><b>Chief Executive's Recommendations</b></p> <p>1. None</p> <p>2(i) None</p> <p>(ii) It is recommended that the Plan be made <b>with</b> Material Alteration No. 7 (Chapter 4 Housing), <b>subject to minor modification</b> to Objective HO O13 - Provision of Social and Affordable Housing as follows:</p> <p><del>A) Promote the provision of social and affordable housing, in accordance with the Council's Draft Housing Strategy, Housing Need Demand Assessment and Government policy as outlined in the DHLGH Housing for All – a New Housing Plan for Ireland 2021 Social Housing Strategy 2020 and to ensure that 10% of</del> <u>Require</u> <del>lands zoned for residential use, or for a mixture of residential and other uses, 20% of lands in residential or mixed-use schemes greater than</del> <u>and any land which is not zoned for residential use, or for a mixture of residential and other uses, 4 units where</u> <u>in respect of which</u> <del>permission for the development of 4 or more houses is granted, to comply with</del> <u>be reserved for social and affordable housing in accordance with the Urban Regeneration and Housing Act 2015</u> the Affordable Housing Act 2021 and Part V of the Planning and Development Act 2000 (as amended) and any subsequent amendments thereof. <del>to the legal requirement to deliver this housing during the lifetime of the Draft Plan. This requirement shall comprise 10% social housing and 10% affordable housing (including affordable purchase and/or Cost Rental), subject to local factors, including demand for and viability of affordable housing on individual sites.</del> The Council reserves the right to determine the appropriateness of 'Part V' Cost Rental and/or affordable purchase delivery on individual sites on a case-by-case basis.</p> <p><del>B) All new social and affordable housing schemes shall promote a social and tenure mix.</del></p> <p><del>C) Support the provision of affordable housing through affordable purchase, cost rental and new build incremental schemes.</del></p> <p>(iii) – (xxvii) None</p> <p>3. None</p> <p>4. (i) It is recommended to make the Plan <b>with</b> MA. No. 7 as displayed, <b>subject to minor amendment</b> to text in Section 4.2.3 Housing Mix as follows: All new residential schemes shall <u>be designed having regard</u> <del>ensure that a minimum of 15% of dwellings are designed</del> <del>to</del> the National Disability Authority's <del>UD++</del> <u>standards</u>.</p> <p>5- 9. None</p>	

	<b>SEA/ AA Response</b>
	N/A

<b>22</b>	<b>Ref. and Name/ Group:</b>	LCC-C101-26 Town & Country Resources Ltd. On behalf of Kirkland Investments Ltd.	
	<b>Submission/ Observation Summary</b>		<b>Chief Executive's Response</b>
	<b>1. Material Alterations No. 154 – 157 Transport Map:</b>		<b>1. Material Alterations No. 154 – 157 Transport Map:</b>
	<p>The Transport Map illustrates an Indicative Link Road traversing south-west/north-east and an Indicative Cycleway/ Walkway traversing across the Towlerton Opportunity lands, between Groody Link Road and Bloodmill Road. The necessary infrastructure has been constructed to a design speed of 50km/h with 2m footpaths and cycle lanes on both sides. It is requested that the Transport Map is amended to omit these objectives and updated to include the line of the constructed infrastructure.</p>		<p>The content of the submission received is noted. The Transport Map will include a minor modification reflecting the constructed infrastructure between Groody Link Road and Bloodmill Road.</p>
	<b>Chief Executive's Recommendations</b>		
	<p><b>1.</b> It is recommended that the Plan be made <b>with</b> the proposed Material Alterations No. 154 - 157 as displayed, <b>subject to minor modification</b> updating the Transport Map to reflect the constructed infrastructure between Groody Link Road and Bloodmill Road.</p>		
	<b>SEA/ AA Response</b>		
	Minor modification – No impact on SEA/ AA.		

23	Ref. and Name/ Group:	LCC-C101-29 Gas Networks Ireland	
	Submission/ Observation Summary		Chief Executive's Response
	<p><b>1. Building Height Strategy - Docklands Character Area:</b></p> <p>The observer raises concerns with regard to the wording of the Building Height Strategy in relation to the Docklands Character Area (and associated Tall Building Recommended Height section on page 194 of the Building Height Strategy). The wording may not be interpreted as providing an opportunity to increase height within the entire Docklands Character Area, while creating an expectation that development outside the Docks and Character Area will be limited to local context height +2 storeys. This would impact development in the Docklands area, including the former Gasworks Site, where it could be interpreted as providing only a 4-storey building. The wording creates an expectation of a single approach for an entire site and does not align with Section 3.4.2.5 which provides for clusters of varying height. The amendments to Objective CGR O3 are noted, where a Masterplan will not be required for all sites and therefore the Development Plan is appropriate to provide guidance.</p> <p>The following revision is proposed: The Docklands Character Area encompasses lands on both sides of the Dock Road, with the opportunity to increase height in the <del>area existing docks</del>. Where the site adjoins existing residential areas, e.g. along St. Alphonsus Street, <del>generally</del></p>		<p><b>1. Building Height Strategy - Docklands Character Area:</b></p> <p>The submission does not relate to a Material Alteration and modifications to the Building Height Strategy cannot be made at this stage. Notwithstanding, the content of the submission received is noted. The submission relates to specific wording in the Building Height Strategy for Limerick City. Page 191 – 196 sets out the strategy for the Docklands Character Area. However, the Building Height Strategy is not intended to be as prescriptive as interpreted and flexibility in the height of proposed buildings will be considered on a case-by-case basis.</p>

	local context height +2 storeys <u>in the immediate vicinity of the existing housing</u> is likely to be acceptable <u>rising to 7+ storeys elsewhere</u> . Development should be subject to a Masterplan, <u>where required under Objective CGR 03</u> .	
	<b>Chief Executive's Recommendations</b>	
	1. None	
	<b>SEA/ AA Response</b>	
	N/A	

## Theme 2 Record of Protected Structures

24	Ref. and Name/ Group:	LCC-C101-19 Pat Mitchell, Accutron Ltd.	
	Submission/ Observation Summary		Chief Executive’s Response
	1. Material Alteration No. 190 - Delete RPS No. 581 Millough House, Milltown, Pallaskenry from the Draft Record of Protected Structures		1. Material Alteration No. 190 - Delete RPS No. 581 Millough House, Milltown, Pallaskenry from the Draft Record of Protected Structures
	The observer wishes to confirm their support for this Material Alteration.		The content of the submission received is noted. The Chief Executive’s Report to the Draft Plan recommended deletion of No. 581 from the RPS. It is recommended that the Plan be made with the proposed Material Alteration as displayed.
	Chief Executive’s Recommendations		
	1. It is recommended that the Plan be made <b>with</b> the proposed Material Alteration No. 190 as displayed.		
	SEA/ AA Response		
N/A			

## Theme 3 Population and General Settlement Issues

25	Ref. and Name/ Group:	LCC-C101-11 Coakley O'Neill Town Planning on behalf of Dairygold Agri Business Limited
	Submission/ Observation Summary	Chief Executive's Response
	<p><b>1. Zoning in Cappamore:</b></p> <p>-The observer owns the former Co-Op and Creamery, Moore Street, Cappamore measuring 0.43ha.</p> <p>-MA No. 161, 162, 163 and 164 – Amend Cappamore Zoning Map. In the context of these MAs, the observer seeks a modification to the zoning matrix for Enterprise and Employment to include residential as permitted in principle, particularly in relation to underutilised, brownfield, centrally located sites.</p> <p>-The observation sets out the policies of the NPF, Sustainable Residential Development Guidelines 2009, Action Plan for Rural Development 2017, RSES, Limerick County Development Plan 2010 – 2016 and Cappamore LAP 2011 – 2017 to support new housing in and regeneration of towns, creating sustainable communities and development of settlements. The Draft Plan identified opportunities for development of residential units within the village, supported by Objective SS O11.</p> <p>-The site is centrally located adjacent to established residential uses and amenities. The LAP zones the site</p>	<p><b>1. Zoning in Cappamore:</b></p> <p>The content of the submission received is noted. The submission relates to the zoning of land for Enterprise and Employment in Cappamore and the associated Zoning Matrix. However, the Zoning Matrix with respect to the Enterprise and Employment zone was adopted by Elected Members at their Council meeting on 18<sup>th</sup> of February 2022. In this regard, the submission does not relate to a Material Alteration and modifications to the Enterprise and Employment land use zoning matrix cannot be recommended in accordance with the Planning and Development Act 2000 (as amended).</p>

	<p>Mixed Use allowing residential development. In the context of national, regional and local planning policy, residential use should be permitted in principle. Planning applications and rezoning demonstrate the demand for housing. Policy aims to achieve sustainable development by targeting population growth within existing built-up areas to combat sprawl. This more centrally located brownfield serviced site in a primarily residential area, adjoining the village's amenities and within walking distance of services is more suitable for residential.</p>	
	<b>Chief Executive's Recommendations</b>	
	1. None	
	<b>SEA/ AA Response</b>	
	N/A	

26	<b>Ref. and Name/ Group:</b>	LCC-C101-38 Tom O'Brien, Patrickswell Senior Hurling Players
	<b>Submission/ Observation Summary</b>	<b>Chief Executive's Response</b>
	<p><b>1. MA No. 5 - Core Strategy Patrickswell:</b></p> <p>-The limits on development proposed by the OPR contradicts that of the Planning Authority and is far removed from what is needed in reality;          -Stagnancy for young people is palpable. Families are needed to prompt badly needed economic and social activity;</p>	<p><b>1. MA No. 5 - Core Strategy Patrickswell:</b></p> <p>The content of the submission received is noted. See response to OPR submission item 2.2(ii) Settlement Hierarchy and distribution of growth.</p>

	<ul style="list-style-type: none"> <li>-The GAA club is struggling massively with underage numbers spiralling continuously downwards, meaning it is difficult to field teams and sustain the club, with the highest number of Senior Hurling Championships in Limerick;</li> <li>-The downward population drift is felt hugely and the capping of development by the OPR, aligned to stringent development management policy, means the club is at a tipping point for sustainability;</li> <li>-Due to the proximity to the City, Patrickswell has minuscule social and economic activities in the village core and without the hurling club there is little else;</li> <li>-To cap the increase in population makes little sense given that the infrastructure can absorb this increase;</li> <li>-Patrickswell has an elderly population and are at saturation point with social housing;</li> <li>-The relentless hard volunteering work to keep the club afloat is made eminently more difficult with a cap on population;</li> <li>-The GAA club is all that people have in Patrickswell;</li> <li>-The observer appeals for the population cap to be reconsidered and the original cap to be observed, given its practicality and capability to bring new life into the village.</li> </ul>	
	<p><b>Chief Executive's Recommendations</b></p> <p>1. It is recommended that the Plan be made <b>with</b> the proposed Material Alteration No. 5 (Chapter 2 Core Strategy) as displayed, <b>subject to minor modification</b> to the Core Strategy as follows:</p> <ul style="list-style-type: none"> <li>-Population growth for Patrickswell shall be 36%</li> </ul>	



	<b>SEA/ AA Response</b>
	Minor modification – No impact on SEA/ AA.

## Theme 4 Retail

27	Ref. and Name/ Group:	LCC-C101-12 Avison Young on behalf of Tesco Ireland Limited	
	Submission/ Observation Summary	Chief Executive's Response	
	<p><b>1. Material Alteration No. 12 - Amend Section 4.6.4 District Centres to comply with the Draft Limerick Shannon Metropolitan Area and County Limerick Retail Strategy, in terms of the designation of the District Centres - Remove Coonagh Cross Shopping Centre from Section 4.6.4 District Centres and zone Local Centre</b></p> <p>Tesco Ireland acknowledges the importance of convenience retail facilities in Limerick and requested policies and land use facilities to protect retail functions. Tesco requested at Draft Stage that the Land Use Zoning Map be amended to reflect the zoning of Coonagh Cross Shopping Centre as a District Centre. The Limerick City Development 2010 – 2016 (as extended) zones the Coonagh Cross Shopping Centre as 5A Mixed Use in which the permitted uses are in line with the District Centre zoning. Under the Local Centre objective, Retail Convenience and Comparison of greater than 1,800m<sup>2</sup> are not permitted. Due to the existing floorspace, the superstore could be considered a non-conforming use. This has the potential to stagnate sustainable growth of the store in line with changing customer needs and could impact long term viability. A more appropriate zoning objective will provide certainty and investment, improving the service, offer and</p>	<p><b>1. Material Alteration No. 12 - Amend Section 4.6.4 District Centres to comply with the Draft Limerick Shannon Metropolitan Area and County Limerick Retail Strategy, in terms of the designation of the District Centres - Remove Coonagh Cross Shopping Centre from Section 4.6.4 District Centres and zone Local Centre</b></p> <p>The content of the submission received is noted. Coonagh Shopping Centre is a Local Centre as designated in the Retail Strategy for the Limerick Shannon Metropolitan Area and County Limerick. The zoning map has been amended to identify the lands at Coonagh Shopping Centre as a Local Centre accordingly. It is noted that the Coonagh Shopping Centre was also identified as a Local Centre in the Mid-West Retail Strategy 2010 – 2016.</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 does not therefore prevent the continuation or improvement 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 Local Centre does not therefore preclude the continued use or improvement of the development in accordance with any planning permission granted.</p>	

	experience for customers. Restrictions can negatively impact supporting infrastructure to serve the growing population. It is requested to amend the zoning objective from Local Centre to District Centre.	
	<b>Chief Executive's Recommendations</b>	
	1. It is recommended that the Plan be made <b>with</b> the proposed Material Alteration No. 12 as displayed.	
	<b>SEA/ AA Response</b>	
	N/A	

28	<b>Ref. and Name/ Group:</b>	LCC-C101-27 Sheehan Planning on behalf of Irish Life Assurance PLC
	<b>Submission/ Observation Summary</b>	<b>Chief Executive's Response</b>
	<b>1. Material Alteration No. 15 - Amend Section 4.6.7 Retail Warehousing</b>  <p>The Retail Strategy indicates that there is limited capacity for additional retail warehousing in the City and Environs. In this context it is regrettable that the Draft Plan proposes to rezone a successful mixed-use shopping park at Childers Road to Retail Warehousing, particularly given the overprovision of that use in the immediate area.</p>	<b>1. Material Alteration No. 15 - Amend Section 4.6.7 Retail Warehousing</b>  <p>The content of the submission received is noted. The Retail Strategy for the Limerick Shannon Metropolitan Area and County Limerick indicates that there is limited capacity for additional retail warehousing in the City and Environs and 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 in accordance with the objectives of the National Planning Framework and Regional Spatial and Economic Strategy for the Southern Region.</p>

	<b>Chief Executive's Recommendations</b>
	1. It is recommended that the Plan be made <b>with</b> the proposed Material Alteration No. 15 as displayed.
	<b>SEA/ AA Response</b>
	N/A

## Theme 5 Rural Settlement and Rural Housing

29	Ref. and Name/ Group:	LCC-C101-39 Irish Creamery Milk Suppliers Association (ICMSA)
	Submission/ Observation Summary	Chief Executive's Response
	<p><b>1. Housing and Services:</b> 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><b>2. Climate Change:</b> 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><b>1. Housing and Services:</b> The content of the submission received is noted. It is also noted that the submission is substantially similar to that submitted to the Draft Plan.</p> <p>See response to OPR submission item 5.1 Rural housing policy.</p> <p><b>2. Climate Change:</b> Planning exemptions exist for the installation of solar panels in accordance with the Planning and Development Regulations 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>

<p>solar panels on farm sheds from requiring planning permission.</p> <p><b>3. Flooding and River Maintenance:</b> 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><b>4. Sustainability Goals:</b> 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><b>5. Economy and Employment:</b> 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 employer. It is essential that farmers are exempt from the standard development charges on any investments on farms that contribute positively to the environment.</p>	<p><b>3. Flooding and River Maintenance:</b> River maintenance is a separate issue to Planning Legislation and is governed by the Arterial Drainage Acts. The OPW is the lead Authority in this regard and accordingly is outside the remit of the Development Plan.</p> <p><b>4. Sustainability Goals:</b> 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><b>5. Economy and Employment:</b> 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 Development Contribution Scheme 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) includes Anaerobic Digesters.</p>
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<p><b>6. Retail Strategy:</b> 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><b>7. Infrastructure:</b> 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><b>8. Transport and Mobility:</b> 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><b>6. Retail Strategy:</b> 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 5 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"> <li>• Regional Spatial and Economic Strategy for the Southern Region;</li> <li>• Retail Strategy for Limerick Shannon Metropolitan Area and County Limerick;</li> <li>• The 2012 Retail Planning Guidelines for Planning Authorities (RPGs) and Retail Design Manual.</li> </ul> <p>The issue of rates is outside of the remit of the Development Plan.</p> <p><b>7. Infrastructure:</b> The content of the submission received is 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> <p><b>8. Transport and Mobility:</b> The content of the submission received is noted. The 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</p>
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	<p><b>9. Heritage:</b> 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>Areas and Policy TR P11 Rural Transport for all ages and abilities living in rural areas.</p> <p><b>9. Heritage:</b> 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>
	<b>Chief Executive's Recommendations</b>	
	1. None	
	<b>SEA/ AA Response</b>	
	N/A	



## Theme 6 Community and Education

30	Ref. and Name/ Group:	LCC-C101-32 Department of Education
	Submission/ Observation Summary	Chief Executive's Response
	<p><b>1. General:</b> The Department of Education has replaced the Department of Education and Skills.</p> <p>The Material Alterations do not impact on the projected school place requirements of the Department. The projected school requirements outlined in September 2021 are re-confirmed.</p> <p><b>2. MA No. 50 - Relocate Table 5.1 Urban Character Areas:</b> The Department of Further, Higher Education, Research, Innovation and Science (DFHERIS) would be more appropriate to comment on the amendment relating to Community/ Education zoned lands adjoining LIT.</p> <p><b>3. MA No. 79 - Amend Objective SCSi O9 Educational Facilities:</b> This is appreciated and will position the existing school network to meet changing requirements of communities as Limerick develops.</p> <p><b>4. MA No. 127 - Change the zoning of 0.126ha. from Existing Residential and Education and Community to</b></p>	<p><b>1. General:</b> Any references to the Department of Education and Skills will be updated to Department of Education throughout the Plan.</p> <p>The content of the submission received is noted, in particular that the Material Alterations do not impact on projected school place demand.</p> <p><b>2. MA No. 50 - Relocate Table 5.1 Urban Character Areas:</b> The content of the submission received is noted. The Council will continue to liaise with prescribed bodies in relation to educational facilities. It is recommended that the Plan be made with the proposed Material Alteration No. 50 as displayed.</p> <p><b>3. MA No. 79 - Amend Objective SCSi O9 Educational Facilities:</b> The content of the submission received is noted. It is recommended that the Plan be made with the proposed Material Alteration No. 79 as displayed.</p> <p><b>4. MA No. 127 - Change the zoning of 0.126ha. from Existing Residential and Education and Community to New Residential at</b></p>

<p><b>New Residential at Monaleen, Castletroy and 128 - Change the zoning of 0.15ha. from New Residential to Education and Community Facilities at Monaleen, Castletroy:</b> The proposed land swap is noted and would not materially impact the future proofing of additional development at Monaleen National School.</p> <p><b>5. MA No. 129 - Change the zoning of 2.3ha. outside of any flood zone from Education and Community Facilities to New Residential at Diocesan Lands, Corbally:</b> There are adequate lands zoned to cater for the future expansion of both school campuses, however there may be future requirements to establish another school in this general area given its position within the MASP. The population increases on the Clare side will put further pressure on schools, particularly at post-primary level.</p> <p><b>6. MA No. 133 - Change the zoning of 0.75ha. from Open Space to Education and Community at College Park:</b> The Dept. supports this amendment to facilitate expansion of Ardscoil Mhuire.</p> <p><b>7. MA No. 141 - Change the Zoning of 0.3ha. from New Residential to Community and Education at the Model School:</b> The Dept. supports this amendment to zone additional land beside the Model School.</p>	<p><b>Monaleen, Castletroy and 128 - Change the zoning of 0.15ha. from New Residential to Education and Community Facilities at Monaleen, Castletroy:</b> The content of the submission received is noted. It is recommended that the Plan be made with the proposed Material Alteration No. 127 as displayed.</p> <p><b>5. MA No. 129 - Change the zoning of 2.3ha. outside of any flood zone from Education and Community Facilities to New Residential at Diocesan Lands, Corbally:</b> The area of Community and Education Facilities surrounding the existing school at St. Munchins including playing pitches comprises 15.797ha. The rezoning of 2.3ha. for residential use will enable retention of sufficient lands for the future proofing of the existing school and the provision of a new school campus if required. On this basis, it is recommended to make the Plan with MA No. 129.</p> <p><b>6. MA No. 133 - Change the zoning of 0.75ha. from Open Space to Education and Community at College Park:</b> The content of the submission received is noted. It is recommended that the Plan be made with the proposed Material Alteration No. 133 as displayed.</p> <p><b>7. MA No. 141 - Change the Zoning of 0.3ha. from New Residential to Community and Education at the Model School:</b> The content of the submission received is noted. It is recommended that the Plan be made with the proposed Material Alteration No. 141 as displayed.</p>
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	<p><b>8. MA No. 145 - Change the Zoning of 1.7ha. from Community and Education to Mixed Use at Pa Healy Road:</b> The Dept. requests that this amendment is refused. The Education and Community zoning should be retained. Adjoining the site of the new Gaelcholaiste Luimnigh with an enrolment of 661 students, a new 750 student building has commenced construction. It is the only co-educational all-Irish speaking second level school in Limerick. Given the projected population increase, the Dept. consider it would be prudent to future proof this school.</p> <p><b>9. MA No. 165 - Amend Doon Zoning Map as follows - Change the Zoning of 1.762ha. from New Residential to Community and Education:</b> The Dept. welcomes this amendment that lands zoned Community/ Education conform to the OPW's flood zone mapping.</p>	<p><b>8. MA No. 145 - Change the Zoning of 1.7ha. from Community and Education to Mixed Use at Pa Healy Road:</b> The draft Development Plan proposes substantial population growth that will need to be supported in tandem with sustainable community infrastructure.</p> <p>The OPR submission to the Material Alterations includes Recommendation No. 4 – Flood risk management which states 'having regard to NPO 57 of the NPF, and to provisions of The Planning System and Flood Risk Management, Guidelines for Planning Authorities (2009), as amended, the Planning Authority is required to make the plan without the following proposed material amendments: MA No. 145 Pa Healy Road from Community and Educational to Mixed Use which allows highly vulnerable development in Flood Zones A and B'. It is noted that the OPW submission also raises concerns in relation to these lands.</p> <p>On the basis of the above, it is recommended that the Plan be made without the proposed Material Alteration as displayed.</p> <p><b>9. MA No. 165 - Amend Doon Zoning Map as follows - Change the Zoning of 1.762ha. from New Residential to Community and Education:</b> The content of the submission received is noted. It is recommended that the Plan be made with the proposed Material Alteration No. 165 as displayed.</p>
<b>Chief Executive's Recommendations</b>		
<p><b>1.</b> It is recommended to make the Plan <b>with</b> minor modifications replacing any references to the Department of Education and Skills with Department of Education throughout.</p>		

2. It is recommended that the Plan be made **with** the proposed Material Alteration No. 50 as displayed.
3. It is recommended that the Plan be made **with** the proposed Material Alteration No. 79 as displayed.
4. It is recommended that the Plan be made **with** the proposed Material Alteration No. 127 as displayed.
5. It is recommended that the Plan be made **with** the proposed Material Alteration No. 129 as displayed.
6. It is recommended that the Plan be made **with** the proposed Material Alteration No. 133 as displayed.
7. It is recommended that the Plan be made **with** the proposed Material Alteration No. 141 as displayed.
8. It is recommended that the Plan be made **without** the proposed Material Alteration No. 145 as displayed
9. It is recommended that the Plan be made **with** the proposed Material Alteration No. 165 as displayed.

#### **SEA/ AA Response**

Minor modifications – No impact on SEA/ AA

## Theme 7 Infrastructure

31	Ref. and Name/ Group: LCC-C101-4 Dublin Aviation Authority (DAA)	
	Submission/ Observation Summary	
	The DAA has no comment other than to recommend consultation with the IAA and IAA-ANSP.	
	Chief Executive's Response	
	The content of the submission received is noted. The Local Authority will continue to consult with the Irish Aviation Authority as necessary.	
	Chief Executive's Recommendations	
	None	
	SEA/ AA Response	
	N/A	

32	Ref. and Name/ Group:		LCC-C101-15 Irish Water														
	Submission/ Observation Summary			Chief Executive's Response													
	<p><b>1. Water Services Capacity:</b> Following revision of the Core Strategy, Irish Water has updated the analysis of their ability to meet the population targets and updated the Water Services Summary Table outlining Water Supply and Waste Water capacity throughout Limerick. The Tables outline constraints and deficiencies throughout Limerick for water and wastewater as set out below:</p> <table><tr><td>Settlement</td><td>2016 CSO Pop.</td><td>2028 Pop. Target</td><td>WRZ</td><td>IW Water Availability Comment</td><td>IW WWTP Comment</td></tr><tr><td></td><td></td><td></td><td></td><td></td><td></td></tr></table>			Settlement	2016 CSO Pop.	2028 Pop. Target	WRZ	IW Water Availability Comment	IW WWTP Comment							<p><b>1. Water Services Capacity:</b> The content of the water and wastewater capacity tables submitted are noted. The Council are aware of the various capacity, deficiency and constraint issues in the water services infrastructure.</p> <p>The Council are committed to ongoing engagement with Irish Water for the delivery and improvement of water services infrastructure throughout Limerick.</p>	
Settlement	2016 CSO Pop.	2028 Pop. Target	WRZ	IW Water Availability Comment	IW WWTP Comment												

	Limerick Metropolitan City and Environs, including Mungret and Annacotty	92,878	127,452	Limerick City	Adequate capacity available to cater for projected growth however, WTP upgrade may be required in the medium term.	Bunlicky: Adequate spare capacity available. WWTP upgrade project to provide additional spare capacity at design stage. Castletroy: Limited spare capacity, project underway to increase capacity to 77,500.
	Castleconnell	2,107	2,697	Limerick City	As above.	Castletroy: Limited spare capacity, project underway to increase capacity to 77,500, due for completion 2025, which will cater for growth.
	Caherconlish	1,476	1,815	Limerick City	Adequate capacity to cater for growth. Interconnection with Limerick City PWS planned and will be completed within the lifetime of the Plan. See also Limerick City and Environs.	Potential spare capacity. WWTP currently not compliant with WWDL ELVs but is capable of achieving UWW standards.
	Patrickswell	847	1,271	Limerick City	As above.	Bunlicky WWTP: Adequate capacity available to cater for growth. See also Limerick City and Environs. Significant number of houses not

						connected and not included in existing or projected load estimates.	
	Clarina	294	591	Limerick City	As above.	Limerick City agglomeration. Adequate capacity available.	
	Murroe	1,377	1,694	Murroe	Adequate capacity available. Supply may be constrained in drought. Leakage reduction and/ or interim upgrades may be required. NWRP preferred solution to supply from Limerick City PWS.	No spare capacity. Upgrade being progressed under IWSS Programme at design stage, timeline for completion not confirmed. This will improve treatment performance but will not provide spare capacity.	
	Montpellier	150	173	O'Briens Bridge PWS	Very limited capacity.	Existing septic tank serves 15 No. houses and has capacity for the current connections. Not designed or sized to provide for the greater Brookhaven/ Montpellier area. NCAP pilot project on hold until flooding issues resolved.	
	Pallasgreen	568	727	Oola/ Pallasgreen	Works planned to address constraints in Doon/ Oola/ Pallasgreen WRZs. Works	Potential spare capacity. WWTP currently not compliant but capable of achieving UWW standards. Houses not connected, in the region	

					will be completed within the lifetime of the Plan and will cater for growth.	of 150PE and not included in existing or projected load estimates.	
	Rathkeale	1,441	1,844	Rathkeale	Two projects underway: 1. Rising main upgrades; 2. Groundwater investigations to augment supply. Ongoing works will ensure adequate capacity to cater for projected growth.	Adequate capacity to cater for projected growth.	
	Bruree	580	740	Rockhill and Bruree	Adequate capacity to cater for projected growth. Leakage reduction and/or interim upgrades may be required.	Adequate capacity to cater for projected growth.	
	Askeaton	1,137	1,455	Shannon Estuary Water Supply	Very limited capacity, insufficient to cater for growth. Proposed solution to connect to	No spare capacity. Capital funding for upgrade of Askeaton WWTP not within the Investment Plan period 2020-2024, however IW intend to complete	



				Limerick City and Environs PWS being progressed.	detailed designs within this period.	
	Pallaskenry	651	836	Shannon Estuary Water Supply	As above.	Adequate capacity to cater for projected growth. Serviced sites should take account of the WWTP and the potential for extensions/intensification of use.
	Foynes	520	666	Shannon Estuary Water Supply	As above.	No capacity available. Project to provide new WWTP at detailed design stage, to be completed within lifetime of the Plan. With the proposed works, sufficient spare capacity will be available. There is no provision for existing unconnected industrial loads.
	Newcastle West	6,619	8,607	South West Regional	Very limited capacity, insufficient to cater for growth. Groundwater investigations and trunk main upgrades being progressed and expected to be completed within lifetime of the Plan. With these works, there	WWTP upgrade project is at concept design stage to provide sufficient spare capacity to cater for the targeted growth within the lifetime of the Plan, subject to funding and other approvals.

					will be adequate capacity to cater for growth. Supply may be constrained during drought. Long term solution is to connect to Limerick PWS.		
	Dromcollagher	518	663	South West Regional	As above.	No spare capacity at present. WWTP upgrade project at concept design stage.	
	Abbeyfeale	2,023	2,589	Abbeyfeale Water Supply	Limited capacity. Works will be completed within the lifetime of the Plan to cater for growth.	Some spare capacity available (approx. 370p.e.) but insufficient to cater for projected growth. Abbeyfeale WWTP upgrade not included in 2020-2024 Investment Plan.	
	Adare	1,129	1,455	Adare	Preferred approach to secure supply for Adare is to rationalise Adare to Clareville. A project is underway and expected to be delivered within the lifetime of the Plan. With these works, there will be	Potential spare capacity. WWTP currently not compliant but capable of achieving UWW standards. WWTP upgrade project at concept design stage will provide sufficient spare capacity to cater for growth, within the lifetime of the Plan, subject to funding and other approvals.	

					adequate capacity to cater for growth.		
	Ballingarry	521	667	Ballingarry	Some constraints, however works will be completed within the lifetime of the Plan which will cater for growth.	Potential spare capacity. WWTP not compliant but capable of achieving UWW standards.	
	Bruff	803	1,043	Bruff Water Supply	Adequate capacity to cater for growth. Leakage reduction and/or interim upgrades may be required.	Adequate capacity to cater for projected growth.	
	Cappamore	620	794	Cappamore Foilee Water Supply	Adequate capacity to cater for growth. Supply may be constrained in drought. Leakage reduction and/or interim upgrades may be required. NWRP preferred solution to connect to Limerick PWS.	Potential spare capacity. WWTP not compliant but capable of achieving UWW standards.	

	Croom	1,159	1,484	Croom PWS	Capacity not available, project underway to connect to Limerick City and Environs PWS and will cater for growth.	Approx. 300 PE capacity available, with additional applications being processed. Treatment capacity may be exceeded if growth is achieved. Upgrade at design stage, will not provide spare capacity.
	Doon	516	660	Doon Water Supply	Works planned to address constraints in Doon/ Oola/ Pallasgreen WRZs to be completed within the lifetime of the Plan and will cater for growth. Long-term plan to connect to Limerick City PWS.	Potential spare capacity. WWTP currently not compliant but is capable of achieving UWW standards.
	Kilmallock	1,668	2,135	Glenosheen/ Jamestown/ Kilmallock	Adequate capacity to cater for growth. Leakage reduction and/ or interim upgrades may be required.	Adequate capacity to cater for growth.
	Glin	576	737	Glin Water Supply	Adequate capacity to cater for growth. Leakage	No spare capacity. Project to provide new WWTP at detailed design stage to be completed within

				reduction and/or interim upgrades (augmenting borehole supply) may be required. Groundwater investigations ongoing.	lifetime of the Plan, subject to planning approvals. With proposed works, sufficient spare capacity will be available to cater for growth.
Kilfinnane	789	1,010	Kilfinnane-Ardpatrick Water Supply	Rationalisation to Jamestown underway. WTP upgrade may be required. These upgrades will ensure sufficient capacity to cater for growth.	Potential spare capacity. WWTP not compliant but is capable of achieving UWW standards.
Hospital	653	836	Knocklong/Hospital	Adequate capacity to cater for growth.	No spare capacity. Works to be progressed in the short term will improve treatment performance but not capacity. WWTP upgrade via STVGP will provide capacity for growth, within lifetime of Plan.
<p><b>2. SuDS:</b> Irish Water welcomes the proposal to promote SuDS and Nature based SuDS. Further objectives are recommended to promote the implementation of NbSuDS in areas contributing to combined drainage systems, where streetscape enhancement programmes or resurfacing programmes are planned.</p>					
<p><b>2. SuDS:</b> The recommendation is noted and addressed under item No. 10 below.</p>					

<p><b>3. MA No. 3:</b> Amend Section 1.3 Strategic Objectives No. 7 as follows: Protect, enhance and ensure the sustainable use of <b>Limerick's</b> key infrastructure <u>through the provision of support to utility providers, of the following</u>, including water supplies and wastewater treatment facilities, energy supply including renewables, broadband and transportation. 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.</p> <p><b>4. Objective MK O1 – St. Mary's Park and King's Island:</b> Amend as follows: (b) Environmentally improve the existing street network of St. Mary's Park to provide a safe, attractive, accessible and well-designed network of streets in tandem with <u>supporting Irish Water in</u> the upgrade to the existing water network <u>if required</u> and refurbishment works to existing houses.</p> <p><b>5. Objective CGR O16 – Local Area Plans in Level 4 Settlements:</b> Amend as follows: These settlements have some essential infrastructure (i.e. <b>Council Irish Water's</b> water and or sewage facilities) and a range of community infrastructure that provide for convenience and daily needs of the local population and surrounding area.</p> <p><b>6. Section 4.3 Serviced Sites in Towns and Villages:</b> Amend to include the following: <u>Irish Water supports growth and development in rural areas</u></p>	<p><b>3. MA No. 3:</b> The proposed amendment is noted and considered minor. It is recommended that the Plan be made with the proposed Material Alteration No. 3 as displayed, subject to minor modification as follows: Protect, enhance and ensure the sustainable use of <b>Limerick's</b> key infrastructure <u>through the provision of support to utility providers</u> including water supplies and wastewater treatment facilities, energy supply including renewables, broadband and transportation. 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.</p> <p><b>4. Objective MK O1 – St. Mary's Park and King's Island:</b> The proposed amendment is noted and considered minor. It is recommended that the Plan be made with the proposed Material Alteration as displayed, subject to minor modification as per the submission.</p> <p><b>5. Objective CGR O16 – Local Area Plans in Level 4 Settlements:</b> The proposed amendment is noted and considered minor. It is recommended that the Plan be made with the proposed Material Alteration as displayed, subject to minor modification as per the submission.</p> <p><b>6. Section 4.3 Serviced Sites in Towns and Villages:</b> The proposed amendment is noted. However, this proposed</p>
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<p><u>through the promotion of investment in Local Authority identified areas for prioritized growth. This is completed under the Small Towns and Villages Growth Programme. Population ambitions should be focused in settlements where Irish Water have announced funding to support such growth initiatives and other settlements with available water services capacity. The Local Authority will continue to support Irish Water in the delivery of this programme.</u></p> <p><b>7. Section 7.9.1 National Road Network:</b> Objective TR O39 National Roads - There are a number of water and wastewater projects planned over the coming years, which may require additional access points, or generate increased traffic from existing accesses to national roads to which speed limits greater than 60km/h apply. These projects are necessary to meet strategic growth and environmental objectives in national, regional and local planning. Policy provision should be made for these projects as per Section 2.6. Exceptional circumstances of the Spatial Planning and National Roads Guidelines.</p> <p><b>8. MA No. 57:</b> Amend Objective IN O5 Water Services as follows: Ensure that development proposals connecting to the public water and/or wastewater networks <u>now or in the future</u> comply with Irish Water Standards Details and Codes of Practice 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. Where relevant, ensure developments comply with the EPA Code of Practice for Domestic Waste Water Treatment Systems 2021.</p> <p><b>9. MA No. 59:</b> Amend Section 7.5.2 Public Waste Water Treatment as follows: Irish Water's <u>current</u> <del>2019</del> wastewater treatment capacity register</p>	<p>amendment conflicts with Objective HO O19 - Serviced Sites in Towns and Villages without adequate Water Services Infrastructure, where limited growth is allowed. It should be noted that this objective requires connection to Irish Water facilities when available.</p> <p><b>7. Section 7.9.1 National Road Network:</b> The objective allows for exceptional circumstances and each planning application will be assessed on a case-by-case basis in consultation with TII and in accordance with national policy. In this regard, it is not considered necessary to amend this objective.</p> <p><b>8. MA No. 57:</b> The proposed amendment is noted and would provide clarification. It is recommended that the Plan be made with the proposed Material Alteration as displayed, subject to minor modification as per the submission.</p> <p><b>9. MA No. 59:</b> The proposed amendment is noted and provides an update. It is recommended that the Plan be made with the proposed Material Alteration as</p>
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<p>for County Limerick <u>dated March 2022</u>, states that there is capacity available in 41 No. of the 53 No. Waste water treatment plants (WWTPs).</p> <p><b>10. MA No. 61:</b> Amend Objective IN O10 Surface Water and SuDS to include the following: To prohibit the discharge of additional surface water to combined (foul and surface water) sewers in order to maximize the capacity of existing collection systems for foul water. <u>In areas where streetscape enhancement or resurfacing is planned, seek to introduce NbSUDS to cater for rainfall run-off at source in order to maximize the capacity of existing collection systems for foul water.</u></p> <p><b>11. MA No. 175:</b> Murroe Objective: Irish Water welcomes the inclusion of this objective and recommends a similar objective for Askeaton which also has capacity constraints.</p> <p><b>12. MA No. 176:</b> Pallaskenry: A project is being planned to connect the Shannon Estuary Water Resource Zone (WRZ) to Limerick City WRZ which will address water supply capacity constraints in Pallaskenry. This project will be delivered within the lifetime of the Development Plan, subject to approvals.</p>	<p>displayed, subject to minor modification as per the submission.</p> <p><b>10. MA No. 61:</b> The proposed amendment is noted and would provide mitigation for climate change. It is recommended that the Plan be made with the proposed Material Alteration as displayed, subject to minor modification as per the submission.</p> <p><b>11. MA No. 175:</b> Objective IN O8 Public Waste Water requires that adequate and appropriate wastewater infrastructure is available to cater for existing and proposed development. It is considered that this objective addresses the concerns raised in relation to Askeaton.</p> <p><b>12. MA No. 176:</b> The content of the submission received is noted. In the interest of clarity, it is recommended that the Plan be made with a minor modification to the proposed Material Alteration No. 176 as follows: In terms of sewerage the existing plant has adequate capacity, to cater for the projected growth in the lifetime of the plan. Water is supplied from the Foynes/Shannon Estuary Water Treatment Plant. Spare capacity exists in the separated surface water network and discharges to the lake at the rear of Cluan Mhuire Estate. <u>There is very limited capacity available in the</u></p>
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<p><b>13. MA No. 88:</b> Amend Section 11.3.5 Roads, Footpaths, Water Services and Landscaping as follows: Each house shall have its own independent foul and surface water sewer connections to the main foul and surface water sewers. <u>There shall be no increase in hydraulic flow downstream in the foul or combined drainage networks, from the proposed development as a result of surface water generated on the development site.</u></p> <p><b>14. Development in un-serviced areas e.g. MA No. 92, Section 11.4.3 Serviced Sites, MA No.s 183, 184 and 185:</b> Consider inclusion of the following text: As per Section 5.3 of the Draft Water Services Guidelines for Planning Authorities, '<u>Alternative solutions such as private wells or waste water treatment plants should not generally be considered by Planning Authorities. Irish Water will not retrospectively take over responsibility for developer provided treatment facilities or associated networks, unless agreed in advance</u>'. The opportunity may arise for the development to</p>	<p><u>Shannon Estuary Water Resource Zone (WRZ), this is insufficient to cater for projected growth across the WRZ. A proposed solution is to connect to the Limerick City Public Water Scheme (PWS), however this is not included in 2020-2024 current Investment Plan. A project is being planned to connect the Shannon Estuary Water Resource Zone (WRZ) to Limerick City WRZ which will address water supply capacity constraints in Pallaskenry. This project will be delivered within the lifetime of the Development Plan, subject to approvals.</u></p> <p><b>13. MA No. 88:</b> The proposed amendment is noted and would provide clarification. It is recommended that the Plan be made with the proposed Material Alteration as displayed, subject to minor modification as per the following: <u>There shall generally be no increase in hydraulic flow downstream in the foul or combined drainage networks, from the proposed development as a result of surface water generated on the development site.</u></p> <p><b>14. Development in un-serviced areas e.g. MA No. 92, Section 11.4.3 Serviced Sites, MA No.s 183, 184 and 185:</b> The proposed amendment is noted. However, this proposed amendment conflicts with Objective HO O19 - Serviced Sites in Towns and Villages without adequate Water Services Infrastructure, where limited growth is allowed.</p>
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<p>connect into the network in the future however, the developer provided treatment facility would not be taken over.</p> <p><b>15. Settlement Capacity Audit:</b> Residential sites 12, 144, 145, 148, 150 and 151 and Enterprise sites 2, 3, 4, 5, 37, 45 are not currently serviced. Developers will have regard to the Irish Water Connections charging policy in respect of these sites where they may be asked to pay for the extension of infrastructure, or contribute towards the costs.</p> <p><b>16. MAs amending Zoning:</b> Short network extensions may be required to service some sites. Depending on the extent of development, localised network upgrades may be required, particularly in areas served by 150mm diameter sewers or watermain of less than 80mm. Third party agreement may be required. Where network reinforcements such as upgrades or extensions are required, these shall be developer driven unless there are committed IW projects in place. All connections are assessed through the Connections and Developer Service process. Where assets are within a site, these must be protected or diverted and a diversion agreement required.</p> <p><b>17. Environmental Reports:</b> This observation should be taken into account in the Environmental Reports.</p>	<p><b>15. Settlement Capacity Audit:</b> The content of the submission received is noted.</p> <p><b>16. MAs amending Zoning:</b> The content of the submission received is noted.</p> <p><b>17. Environmental Reports:</b> The content of the Environmental Reports will be updated as necessary.</p>
<p><b>Chief Executive's Recommendations</b></p>	
<p><b>1. – 2. None</b></p> <p><b>3.</b> It is recommended that the Plan be made <b>with</b> the proposed Material Alteration No. 3 as displayed, <b>subject to minor modification</b> as follows: Protect, enhance and ensure the sustainable use of <del>Limerick's</del> key infrastructure <u>through the provision of support to utility providers</u> including water supplies and wastewater treatment facilities, energy supply including renewables, broadband and transportation. This</p>	

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.

**4.** It is recommended that the Plan be made **with** the proposed Material Alteration No. 6 as displayed, **subject to minor modification** as follows:

Objective MK O1 – St. Mary’s Park and King’s Island (b) Environmentally improve the existing street network of St. Mary’s Park to provide a safe, attractive, accessible and well-designed network of streets in tandem with supporting Irish Water in the upgrade to the existing water network if required and refurbishment works to existing houses.

**5.** It is recommended that the Plan be made **with** the proposed Material Alteration No. 6 as displayed, **subject to minor modification** as follows:

Objective CGR O16 – Local Area Plans in Level 4 Settlements - These settlements have some essential infrastructure (i.e. ~~Council~~Irish Water’s water and or sewage facilities) and a range of community infrastructure that provide for convenience and daily needs of the local population and surrounding area.

**6. – 7.** None

**8.** It is recommended that the Plan be made **with** the proposed Material Alteration No. 57 as displayed, **subject to minor modification** as follows:

Objective IN O5 Water Services - Ensure that development proposals connecting to the public water and/or wastewater networks now or in the future comply with Irish Water Standards Details and Codes of Practice 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. Where relevant, ensure developments comply with the EPA Code of Practice for Domestic Waste Water Treatment Systems 2021.

**9.** It is recommended that the Plan be made **with** the proposed Material Alteration No. 59 as displayed, **subject to minor modification** as follows:

Section 7.5.2 Public Waste Water Treatment - Irish Water’s ~~current~~ 2019 wastewater treatment capacity register for County Limerick dated March 2022, states that there is capacity available in 41 No. of the 53 No. Waste water treatment plants (WWTPs).

**10.** It is recommended that the Plan be made **with** the proposed Material Alteration No. 61 as displayed, **subject to minor modification** as follows:

Objective IN O10 Surface Water and SuDS - To prohibit the discharge of additional surface water to combined (foul and surface water) sewers in order to maximize the capacity of existing collection systems for foul water. In areas where streetscape enhancement or resurfacing is planned, seek to introduce NbSUDS to cater for rainfall run-off at source in order to maximize the capacity of existing collection systems for foul water.

**11.** None

**12.** It is recommended that the Plan be made **with** the proposed Material Alteration No. 176 as displayed, **subject to minor modification** as follows:

In terms of sewerage the existing plant has adequate capacity, to cater for the projected growth in the lifetime of the plan. Water is supplied from the Foynes/Shannon Estuary Water Treatment Plant. Spare capacity exists in the separated surface water network and discharges to the lake at the rear of Cluan Mhuire Estate. There is very limited capacity available in the Shannon Estuary Water Resource Zone (WRZ), this is insufficient to cater for projected growth across the WRZ. ~~A proposed solution is to connect to the Limerick City Public Water Scheme (PWS), however this is not included in 2020-2024 current Investment Plan.~~ A project is being planned to connect the Shannon Estuary Water Resource Zone (WRZ) to Limerick City WRZ which will address water supply capacity constraints in Pallaskenry. This project will be delivered within the lifetime of the Development Plan, subject to approvals.

**13.** It is recommended that the Plan be made **with** the proposed Material Alteration No. 88 as displayed, **subject to minor modification** as follows:

Section 11.3.5 Roads, Footpaths, Water Services and Landscaping - Each house shall have its own independent foul and surface water sewer connections to the main foul and surface water sewers. There shall generally be no increase in hydraulic flow downstream in the foul or combined drainage networks, from the proposed development as a result of surface water generated on the development site.

**14. – 17.** None

	<b>SEA/ AA Response</b>
	Minor modifications – No impact on SEA/ AA

33	<b>Ref. and Name/ Group:</b>	LCC-C101-24 Department of the Environment, Climate and Communications
	<b>Submission/ Observation Summary</b>	<b>Chief Executive's Response</b>
	<p><b>1. Climate Action:</b> The Dept. generally supports the range of proposed alterations relating to climate action, change, resilience, adaptation and mitigation, re-use of buildings and promotion of new technologies.</p> <p><b>2. Energy and Gas Infrastructure:</b> The Dept. notes MA No.s 62 amend Objective IN O11 Energy and Gas Network and 76 amend Section 8.5.10 Combined Heat and Power. The improvement of energy infrastructure is a critical component for energy security and this should be considered in the context of MA No. 62. Improving any State infrastructure requires adequate consultation between all stakeholders. MA No. 76 is consistent with the Government's Security of Electricity Supply Policy Statement (2021) and is supported.</p> <p><b>3. Onshore Renewable Energy:</b> (i) The Dept. welcomes the inclusion of targets for renewables under MA No. 73. The Council is requested to consider the increased ambition of the Climate Action Plan 2021 of up to 80% renewable energy by 2030 (as opposed</p>	<p><b>1. Climate Action:</b> The content of the submission received is noted.</p> <p><b>2. Energy and Gas Infrastructure:</b> The objective IN O11 Energy and Gas Networks already provides policy support to improve energy infrastructure. No further amendments are recommended.</p> <p><b>3. Onshore Renewable Energy:</b> (i) The content of the submission received is noted. See response to Submission No. 35 below.</p>

<p>to 70% previously). Local Authorities should consider their maximum potential contribution to the State's requirements and targets, determined by available land, energy generation potential and environmental designations. Targets should be seen as minimums and the Council is requested to clarify its methodology for the targets.</p> <p><b>(ii)</b> MA No. 98 amend Section 11.7.2.1 Wind Energy is supported and it is important that the final Plan includes this amendment in order to allow for a further iteration of the Wind Energy Design Guidelines to be finalised.</p> <p><b>(iii)</b> MA No. 77 amend Policy SCS1 P2 Location of Community Facilities is supported. It is important that due consideration is given to the potential for new developments to contribute to the realisation of the Council's renewable energy ambitions.</p> <p><b>(iv)</b> MA No. 74 amend Section 8.4.3 Solar Energy is noted and welcomed. The Council is encouraged to engage with the Renewable Energy Division of the Dept. in the formulation of any future, more detailed, plans for renewable energy.</p> <p><b>4. Offshore Energy:</b> MA No.s 40 new section Marine Spatial Planning and 41 amend Objective ECON O45 Offshore Renewable Energy are noted and supported. However, the Maritime Area Planning Act 2021 has passed and text should be updated.</p>	<p><b>(ii)</b> The content of the submission received is noted. It is recommended that the Plan be made with proposed Material Alteration No. 98 as displayed.</p> <p><b>(iii)</b> The content of the submission received is noted. It is recommended that the Plan be made with proposed Material Alteration No. 77 as displayed.</p> <p><b>(iv)</b> The content of the submission received is noted. The Council is committed to engaging with the Department in the formulation of any future renewable energy plans. It is recommended that the Plan be made with proposed Material Alteration No. 74 as displayed.</p> <p><b>4. Offshore Energy:</b> The content of the submission received is noted. It is recommended that the Plan be made with proposed Material Alteration No. 40 as displayed, subject to minor modification updating references in the Plan to the Maritime Area Planning Act 2021.</p>
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	<p>The roll out of offshore energy under the revised Offshore Renewable Energy Development Plan requires supportive land side policy frameworks.</p> <p><b>5. Circular Economy:</b> MA No.s 3, 32, 33, 63 and 64 in relation to the Circular Economy are noted and supported.</p> <p><b>6. Geological Survey Ireland:</b> MA No. 44 Objective EH O9 Geological Sites, MA. No. 27 Objective ECON O32 Mineral Extraction and MA No. 26 GSI maps are commended.</p>	<p><b>5. Circular Economy:</b> The content of the submission received is noted. It is recommended that the Plan be made with proposed Material Alteration No.s 3, 32, 33, 64 and 64 as displayed.</p> <p><b>6. Geological Survey Ireland:</b> The content of the submission received is noted. It is recommended that the Plan be made with proposed Material Alteration No.s 44, 27 and 26 as displayed.</p>
<b>Chief Executive's Recommendations</b>		
	<p><b>1. – 2.</b> None</p> <p><b>3. (i)</b> None</p> <p><b>(ii)</b> It is recommended that the Plan be made <b>with</b> proposed Material Alteration No. 98 as displayed.</p> <p><b>(iii)</b> It is recommended that the Plan be made <b>with</b> proposed Material Alteration No. 77 as displayed.</p> <p><b>(iv)</b> It is recommended that the Plan be made <b>with</b> proposed Material Alteration No. 74 as displayed.</p> <p><b>4.</b> It is recommended that the Plan be made <b>with</b> proposed Material Alteration No. 40 as displayed, <b>subject to minor modification</b> updating references in the Plan to the Maritime Area Planning Act 2021.</p> <p><b>5.</b> It is recommended that the Plan be made <b>with</b> proposed Material Alteration No.s 3, 32, 33, 64 and 64 as displayed.</p> <p><b>6.</b> It is recommended that the Plan be made <b>with</b> proposed Material Alteration No.s 44, 27 and 26 as displayed.</p>	

	<b>SEA/ AA Response</b>
	Minor modifications – No impact on SEA/ AA

34	<b>Ref. and Name/ Group:</b>	LCC-C101-25 Electricity Supply Board (ESB)
	<b>Submission/ Observation Summary</b>	<b>Chief Executive's Response</b>
	<p><b>1. MA No. 67 - Include reference to the Climate Action Act and Low Carbon Development Amendment Act (2021) and amend Section 8.2.1 International, National and Regional Policy:</b></p> <p>The Climate Action Plan 2021, prepared following the enactment of the Climate Act 2021, commits Ireland to a target of net zero emissions no later than 2050 and a reduction of 51% by 2030. 80% of electricity will be generated by a mix of 5GW offshore and 8GW onshore wind and 1.5-2.5GW solar PV. Energy storage systems and land-side developments and an enhanced electricity transmission and distribution grid are essential. ESB will develop an additional 4GW of onshore and offshore wind and solar PV renewable assets. By 2030 63% of electricity will come from renewables and will be a net zero producer by 2040. ESB is committed to transforming generation portfolios, replacing old, inefficient plant with a mixture of renewables and high efficiency gas capacity. ESB is developing assets such as battery storage and flexible gas fired units that respond to system demands, which is key to facilitating large-scale renewables in the future.</p>	<p><b>1. MA No. 67 - Include reference to the Climate Action Act and Low Carbon Development Amendment Act (2021) and amend Section 8.2.1 International, National and Regional Policy:</b></p> <p>The content of the submission received is noted.</p>



<p><b>2. MA No. 40 - Insert a new section Marine Spatial Planning in Section 4 Marine Economy, Insert new Objective ECON OXX National and Regional Marine Planning and No. 41 - Amend Objective ECON O45 Offshore Renewable Energy:</b> These alterations are welcomed promoting Offshore Renewable Energy projects.</p> <p><b>3. MA No. 62 - Amend Objective IN O11 Energy and Gas Network:</b> Inclusion of Part (g) to Objective IN O11 Energy and Gas Network is noted and the requirement to consider the strategic function of the national road network when delivering infrastructure. The provision of a secure and reliable electricity transmission infrastructure and grid is essential. Limerick has a very strong grid and substation network and this will be instrumental in supporting development of renewable energy.</p> <p><b>4. MA No. 73 - Insert Renewable Energy Targets:</b> The Renewable Energy Targets table is welcomed. The targets identify the quantum of renewable energy to be developed to contribute to delivery of national targets.</p> <p><b>5. MA No. 74 - Amend Section 8.4.3 Solar Energy:</b> The inclusion of text to support utility scale solar projects is supported. Solar will play a significant role in reducing emissions and provide environmental benefits, complimentary to economic growth. Limerick ranks highly in terms of solar resource.</p> <p><b>6. MA No. 75 - Insert a new Objective CAF OXX Life Extension and Repowering of Wind Farms in Section 8.5.4 Wind Energy:</b></p>	<p><b>2. MA No. 40 - Insert a new section Marine Spatial Planning in Section 4 Marine Economy, Insert new Objective ECON OXX National and Regional Marine Planning and No. 41 - Amend Objective ECON O45 Offshore Renewable Energy:</b> The content of the submission received is noted. It is recommended that the Plan be made with proposed Material Alteration No. 41 as displayed.</p> <p><b>3. MA No. 62 - Amend Objective IN O11 Energy and Gas Network:</b> The content of the submission received is noted. It is recommended that the Plan be made with proposed Material Alteration No. 62 as displayed.</p> <p><b>4. MA No. 73 - Insert Renewable Energy Targets:</b> The content of the submission received is noted. See response to Submission No. 35 below.</p> <p><b>5. MA No. 74 - Amend Section 8.4.3 Solar Energy:</b> The content of the submission received is noted. It is recommended that the Plan be made with proposed Material Alteration No. 74 as displayed.</p> <p><b>6. MA No. 75 - Insert a new Objective CAF OXX Life Extension and Repowering of Wind Farms in Section 8.5.4 Wind Energy:</b></p>
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<p>The Plan led approach in line with national policies is welcomed. The inclusion of Objective CAF OXX Life Extension and Repowering of Wind Farms is also welcomed.</p> <p><b>7. MA No. 76 - Amend Section 8.5.10 Combined Heat and Power:</b> Inclusion of text in relation to the gas network is welcomed.</p> <p><b>8. MA No. 103 - Amend Section 11.8.6 EV Charging Points:</b> The promotion of electric vehicle charge points is welcomed. Given the increase in registration of EVs and the EU Energy Performance of Buildings Directive call for an increase to 20% of parking spaces with charging infrastructure and associated standards, the opportunity exists to ensure availability is expanded. The standards set out in SI No. 393/2021 European Union (Energy Performance of Buildings) Regulations 2021 should be fully implemented as follows:</p> <table><tr><th>Development Category</th><th>EV Charging Points</th></tr><tr><td>Residential multi-unit developments both new buildings and buildings undergoing major renovations (with private car spaces including visitor car parking spaces)</td><td>A minimum of 1 EV Charge point space per five car parking spaces (ducting for every parking space shall be provided)</td></tr><tr><td>New dwellings with in-curtilage car parking</td><td>Installation of appropriate infrastructure to enable</td></tr></table>	Development Category	EV Charging Points	Residential multi-unit developments both new buildings and buildings undergoing major renovations (with private car spaces including visitor car parking spaces)	A minimum of 1 EV Charge point space per five car parking spaces (ducting for every parking space shall be provided)	New dwellings with in-curtilage car parking	Installation of appropriate infrastructure to enable	<p>The content of the submission received is noted. It is recommended that the Plan be made with proposed Material Alteration No. 75 as displayed.</p> <p><b>7. MA No. 76 - Amend Section 8.5.10 Combined Heat and Power:</b> The content of the submission received is noted. It is recommended that the Plan be made with proposed Material Alteration No. 76 as displayed.</p> <p><b>8. MA No. 103 - Amend Section 11.8.6 EV Charging Points:</b> In order to ensure compliance with the standards set out in SI No. 393/2021 European Union (Energy Performance of Buildings) Regulations 2021, the standards set out in the submission are recommended to be included in Section 11.8.6 EV Charging Points of the Plan. These amendments are considered minor. It is recommended that the Plan be made with proposed Material Alteration No. 103, subject to minor modification as per the submission.</p>
Development Category	EV Charging Points						
Residential multi-unit developments both new buildings and buildings undergoing major renovations (with private car spaces including visitor car parking spaces)	A minimum of 1 EV Charge point space per five car parking spaces (ducting for every parking space shall be provided)						
New dwellings with in-curtilage car parking	Installation of appropriate infrastructure to enable						

		installation of recharging point for EVs	
	Non-residential developments (with private car parking spaces including visitor car parking spaces with more than 10 spaces e.g. office developments)	Provide at least 1 recharging point, and a minimum of 1 space per 5 car parking spaces should be equipped with one fully functional EV Charging Point	
	Developments with publicly accessible spaces (e.g. supermarket car park, cinema etc.)	Provide at least 1 recharging point, and a minimum of 1 space per 5 car parking spaces should be equipped with one fully functional EV Charging Point	
Chief Executive’s Recommendations			
1. It is recommended that the Plan be made <b>with</b> proposed Material Alteration No. 67 as displayed.			
2. It is recommended that the Plan be made <b>with</b> proposed Material Alteration No. 41 as displayed.			
3. It is recommended that the Plan be made <b>with</b> proposed Material Alteration No. 62 as displayed.			
4. None			
5. It is recommended that the Plan be made <b>with</b> proposed Material Alteration No. 74 as displayed.			
6. It is recommended that the Plan be made <b>with</b> proposed Material Alteration No. 75 as displayed.			
7. It is recommended that the Plan be made <b>with</b> proposed Material Alteration No. 76 as displayed.			

8. It is recommended that the Plan be made **with** proposed Material Alteration No. 103, **subject to minor modification** to include the following:

<u>Development Category</u>	<u>EV Charging Points</u>
<u>Residential multi-unit developments both new buildings and buildings undergoing major renovations (with private car spaces including visitor car parking spaces)</u>	<u>A minimum of 1 EV Charge point space per five car parking spaces (ducting for every parking space shall be provided)</u>
<u>New dwellings with in-curtilage car parking</u>	<u>Installation of appropriate infrastructure to enable installation of recharging point for EVs</u>
<u>Non-residential developments (with private car parking spaces including visitor car parking spaces with more than 10 spaces e.g. office developments)</u>	<u>Provide at least 1 recharging point, and a minimum of 1 space per 5 car parking spaces should be equipped with one fully functional EV Charging Point</u>
<u>Developments with publicly accessible spaces (e.g. supermarket car park, cinema etc.)</u>	<u>Provide at least 1 recharging point, and a minimum of 1 space per 5 car parking spaces should be equipped with one fully functional EV Charging Point</u>

**SEA/ AA Response**

Minor modifications – No impact on SEA/ AA

35	<b>Ref. and Name/ Group:</b>	LCC-C101-35 Wind Energy Ireland
	<b>Submission/ Observation Summary</b>	<b>Chief Executive's Response</b>
	<b>1. Introduction:</b> The criticality of onshore wind in Ireland's energy mix is apparent when the trajectories in the Clean Energy Package Governance Regulation (2018) are considered, this requires a National Energy and Climate Plan setting out how each member state will contribute to decarbonisation.	<b>1. Introduction:</b> The content of the submission received is noted. In particular, the increase in Ireland's renewable electricity target to 80% by 2030 following publication of the Climate Action Plan 2021 and National Development Plan 2021 – 2030. It is recommended that references in

Following the 2021 Climate Action Plan, the National Development Plan 2021 – 2030 increases Ireland’s renewable electricity target to 80% by 2030 from the previous 70% target. The NDP earmarks a target of 5GW offshore and 8GW onshore wind by 2030. The increase to 80% should serve as a key indicator for onshore wind development.

**2. MA No. 73 - Insert Renewable Energy Targets:**

The proposed increase to 65% capacity of onshore wind is welcomed, but it is unclear how this figure was derived, relates to the overall national targets or will be reached.

Concerns are raised that repowering is at the centre of achieving renewable targets. The Chief Executive’s Report quotes a IWEA report (2019), which states that repowering old wind farms has the potential to increase total installed capacity by 65%. With a typical operational design age of 20-25 years, an analysis of the age of the current wind farms would be required to make capacity projections. This is not an adequate analysis of how the Plan will contribute to national renewable energy targets, which have increased to 80%.

The reduction of Areas Open for Consideration to the east of Foynes, north of Askeaton and west of Pallaskenry on the wind energy map results in an overall decrease in areas for potential wind energy.

the Plan to the Climate Action Plan and associated targets be updated accordingly.

**2. MA No. 73 - Insert Renewable Energy Targets:**

Achievement of the 80% target is possible but will rely on contributions from technologies other than wind. With three SPA designations and an SAC designation, there are significant constraints for wind energy in Limerick. One of the SPAs covers the Shannon Estuary, while the other two cover the uplands in the west, south west and east of the county, which may otherwise be considered suitable for wind energy. The Galtee and Ballyhoura SAC sites also cover the eastern and southern upland areas of the county. To compensate allocations for other forms of renewable energy are proposed as follows:

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

Limerick suffers considerable constraints in terms of ecological designations. All wind farm planning permissions, except one, were

	<p>WEI request that the Council review the approach to designating renewable energy targets to align with national objectives and ensure that enough land is designated as Preferred Areas or Open for Consideration for wind farms.</p>	<p>granted before the designation of SPAs in 2008, with the most favourable sites already utilised. Concentrating on repowering to deliver wind energy targets is therefore important. The 65% repowering figure was identified in <i>More Power to You</i> (IWA 2019), which also recognised the significant constraints that ecological designations can pose, which given the wide distribution of designated sites in upland Limerick is the case. In both the Ballyhoura and Galtee SACs, sensitive upland peat sites would be vulnerable to development, while wind energy close to the estuary would pose risk to bird species for which the River Shannon and Fergus SPAs were designated. The selection of a 65% target based on repowering of existing sites is feasible given the need to protect designated sites, while facilitating wind energy development. An analysis of the age of wind farms was carried out with dates of connection to the national grid forming the basis.</p> <p>The Planning Authority notes that there have not been significant changes in the areas designated for wind energy in the draft Plan. Given the environmental designations, areas have been identified with a realistic chance of delivering working permissions. One area has been repositioned back from the estuary where ecological designations exist and which would have implications for wind energy. An area open for consideration has been created further inland to the south to compensate, away from both SPA and SAC designations, which were a barrier to obtaining planning permission in the area east of Foynes. Scenic and tourism considerations with proximity to the estuary also played a role in this regard.</p> <p>Realising the 80% target will be achieved through a combination of repowering in the case of wind, further development of solar and AD,</p>
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		and other technologies. Following adoption of the Plan a new monitoring programme will be established which will include the achievement of energy targets.
	<b>Chief Executive's Recommendations</b>	
	1. It is recommended to make the Plan <b>with</b> minor modifications replacing any references to the <del>Climate Action Plan 2019</del> with <u>Climate Action Plan 2021</u> and associated renewable energy targets <del>70%</del> <u>80%</u> .	
	<b>SEA/ AA Response</b>	
	Minor modification – No impact on SEA/ AA	

## Theme 8 Transport

36	Ref. and Name/ Group:	LCC-C101-6 Transport Infrastructure Ireland (TII)
	Submission/ Observation Summary	Chief Executive's Response
	<p><b>1. Material Alteration No. 6:</b>  <b>(i) Map 3.6 Tall Buildings at City Level:</b>  This map identifies a Gateway Building in the vicinity of M7 Junction 30. LSMATS identifies the importance of ensuring localised junction congestion does not impact on the strategic function of the M7/N18 national road. Section 2.7 of DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities requires care in the zoning of locations at, or close to junctions on the national road network, where such development could generate significant additional traffic, compromising the capacity and efficiency of the national road/ associated junctions and possibly leading to the premature and unacceptable reduction in the level of service.</p> <p><b>-Recommendation:</b>  Development proposals in the vicinity of national road junctions, including those in the City Environs, will require particular care and robust assessment to ensure development proceeds complementary to safeguarding the strategic function of the national road network in accordance with Government objectives.</p>	<p><b>1. Material Alteration No. 6:</b>  <b>(i) Map 3.6 Tall Buildings at City Level:</b>  The concerns raised in relation to development of Gateway Buildings at or close to junctions are noted. See response to Recommendation below.</p> <p><b>-Recommendation:</b>  The safeguarding of the strategic function of the national road network is protected through a number of policies and objectives of the Draft Plan.</p>



<p><b>(ii) Section 3.5 Level 2: Key Towns:</b> A Local Area Plan (LAP) for Newcastle West will be reviewed and the Council have committed to preparing a Local Transport Plan (LTP).</p> <p><b>-Recommendation:</b> TII would welcome consultation on the review of the LAP and LTP. Preparation of the LTP should be informed by the TII/NTA Area Based Transport Assessment (ABTA) Guidance. The findings and recommendations of the LTP should inform the LAP review to ensure coordination of land use and transport planning.</p> <p><b>2. Material Alteration No. 53:</b> <b>(i) Section 7.5 Sustainable Mobility:</b> TII notes Objective TR O2 – Design Manual for Urban Roads and Streets. Complementary TII Publication ‘The Treatment of Transition Zones to Towns and Villages on National Roads’, describes the requirements implemented on National Roads on the approaches to towns and villages, including traffic calming measures and pedestrian crossings.</p> <p><b>-Recommendation:</b> Update Objective TR O2 to reference TII Publication Standards DN-GEO-03084 ‘The Treatment of Transition Zones to Towns and Villages on National Roads’ in association with reference to DMURS, in the interests of providing clarification that the complementary national road standard will be applied, in the interests of road user safety, on national roads.</p>	<p><b>(ii) Section 3.5 Level 2: Key Towns:</b> The content of the submission received is noted. See response to Recommendation below.</p> <p><b>-Recommendation:</b> The Local Authority is committed to consultation with the public, TII and other statutory authorities during the forthcoming preparation of the Newcastle West Local Area Plan and Local Transport Plan.</p> <p><b>2. Material Alteration No. 53:</b> <b>(i) Section 7.5 Sustainable Mobility:</b> The content of the submission received is noted. See response to Recommendation below.</p> <p><b>-Recommendation:</b> Objective TR O2 will be updated with a minor amendment to include reference to TII Publication Standards DN-GEO-03084 ‘The Treatment of Transition Zones to Towns and Villages on National Roads’ in association with reference to DMURS, to clarify that the complementary national road standard will be applied, in the interests of road safety. It is recommended that the Plan be made with proposed Material Alteration No. 53 as displayed, subject to minor modification to include reference to</p>
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		TII Publication Standards DN-GEO-03084 'The Treatment of Transition Zones to Towns and Villages on National Roads'.
	<p><b>(ii) Section 7.8 Strategic Roads Infrastructure:</b> TII notes text in Section 7.8 and Objective TR O36 in relation to the Limerick Northern Distributor Road (LNDR). This is not a national road scheme.</p> <p><b>-Recommendation:</b> Any additional crossings of the River Shannon should evaluate the consequences of the special requirements of the tolling scheme (N18 Limerick Tunnel PPP Scheme) and the financial implications for the Exchequer.</p> <p><b>(iii) Section 7.9.1 National Road Network:</b> <b>(i)</b> TII notes the proposed alteration to Objective TR O39 – National Roads. The proposed alteration conflicts with the provisions of the Section 28 "Spatial Planning and National Roads Guidelines for Planning Authorities" (DoECLG, 2012).  <b>(ii)</b> Objective TR O35(a) defers critical policy and safety considerations regarding access to national roads to development management, this is inappropriate and contrary to the Guidelines. 'Exceptional circumstances' require an evidence-based plan led approach.  <b>(iii)</b> TII welcomes the amendment to Objective TR O35(d).</p> <p><b>-Recommendation:</b> Consider the following wording "Prevent <u>except in exceptional circumstances and subject to a plan-led</u></p>	<p><b>(ii) Section 7.8 Strategic Roads Infrastructure:</b> The content of the submission received is noted. See response to Recommendation below.</p> <p><b>-Recommendation:</b> Any additional river crossings will be considered in the detailed design of any road scheme.</p> <p><b>(iii) Section 7.9.1 National Road Network:</b> <b>(i)</b> The content of the submission received is noted. See response to Recommendation below.  <b>(ii)</b> The content of the submission received is noted.  <b>(iii)</b> The content of the submission received is noted.</p> <p><b>-Recommendation:</b> The recommended wording is noted. As a standard practice, the Planning Authority consults with TII in relation to</p>

<p>evidence-based approach, in consultation with Transport Infrastructure Ireland, and incorporated into the Development Plan in accordance with <del>as outlined in the</del> <u>Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ (DoECLG, 2012)</u>, inappropriate development on lands adjacent to the existing national road network, which would adversely affect the safety, current and future capacity and function of national roads and having regard to reservation corridors, to cater for possible future upgrades of the national roads and junctions”.</p> <p><b>3. Material Alteration No.s 109, 140 and 149:</b></p> <p><b>(i)</b> MA No. 109 proposes to introduce a Data Centre zoning objective.</p> <p><b>(ii)</b> MA No. 140 proposes 18.88ha. for a Data Centre at Rosbrien, in the vicinity of M7/M20 Junction 30. This requires clarification as to whether the lands are specifically restricted to a Data Centre.</p> <p><b>(iii)</b> MA No. 149 proposes 33ha. for a Data Centre at Ballysimon House, in the vicinity of M7/N24 Ballysimon Junction and N24, remote from the City and Environs contrary to compact growth. No access proposals or evidence-based land use or transport analysis is provided. Safeguarding the strategic function of the national road network is critical. Compromising the strategic function of</p>	<p>applications that would impact on the national road network. A minor amendment to Material Alteration No. 53 - Objective TR O39 National Roads is recommended as follows: ‘Prevent except in exceptional circumstances <u>and subject to a plan-led evidence-based approach, in consultation with Transport Infrastructure Ireland, in accordance with</u> <del>as outlined in</del> 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 junctions’.</p> <p><b>3. Material Alteration No.s 109, 140 and 149:</b></p> <p><b>(i)</b> The content of the submission received is noted.</p> <p><b>(ii)</b> See response under Recommendation item (iii) below.</p> <p><b>(iii)</b> With respect to the proposed zoning of lands at Ballysimon for a Data Centre the issues in relation to compact growth and traffic congestion are noted. In addition, the OPR submission includes MA Recommendation No. 2 – Data Centre in relation to MA No. 149, requires the Plan to be made without MA No. 149 the zoning of 33ha. for a Data Centre at Ballysimon, having regard to NSO 1 and RSO 1 to achieve compact growth under the NPF and the RSES, to the Development Plans, Guidelines for Planning Authorities - Draft for Consultation (August</p>
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<p>the national road network has the potential to inhibit growth, impact economic performance and reduce accessibility.</p> <p><b>(iv)</b> Section 2.7 of the Spatial Planning and National Roads Guidelines for Planning Authorities require care in the assessment and management of development proposals in the Development Plan, relating to the zoning of locations at, or close to, junctions on the national road network, where such development could generate significant additional traffic, compromising the capacity and efficiency of the national road/ associated junctions and possibly leading to premature and unacceptable reductions in the level of service. TII is not aware of a supporting evidence base.</p> <p>Draft LSMATS recognises localised congestion on the junctions along the M7/N18 Limerick City Bypass, in particular Mackey (Newport) Roundabout, Ballysimon Interchange and Dock Road Interchange. Ensuring localised junction congestion does not impact on the strategic function of the M7/N18 road is important.</p> <p><b>-Recommendation:</b> TII recommends consideration of the following requirements: <b>(i)</b> Development in the vicinity of national road junctions, including those in the City Environs, will require particular</p>	<p>2021), to the requirements under Section 10(2)(n) of the Act, and to the provisions of the Spatial Planning and National Roads Guidelines for Planning Authorities (2012), including Section 2.7.</p> <p>On the basis of the issues raised in the TII and OPR submissions, it is recommended that the Plan be made without Material Alteration No. 149 as displayed.</p> <p><b>(iv)</b> The content of the submission received is noted. Compliance with the Section 28 Ministerial Guidelines Spatial Planning and National Roads Guidelines for Planning Authorities will be managed through the Development Management function of the Planning Authority.</p> <p><b>-Recommendation:</b> <b>(i)</b> The Planning Authority considers that this item is already addressed under Policy TR P12 - Safeguard the Capacity of National Roads.</p>
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<p>care and robust assessment to ensure development proceeds complementary to safeguarding the strategic function of the national road network in accordance with Government objectives;</p> <p><b>(ii)</b> The development of an evidence base in accordance with the requirements of Section 2.7 of the Section 28 “Spatial Planning and National Roads Guidelines for Planning Authorities” (DoECLG, 2012) is required in advance of any decision to incorporate the subject lands;</p> <p><b>(iii)</b> Clarification that only Data Centre related development will be accommodated on the lands identified is required.</p> <p><b>4. Material Alteration No.s 142 and No. 153:</b>  MA No. 142 proposes to change the zoning of four plots (21.8ha.) from Agriculture to Enterprise and Employment at Ballykeeffe and MA No. 153 proposes to change the zoning of 14ha. from Agriculture to Enterprise and Employment at Ballykeeffe. Both in the vicinity of N18/N69 Junction 2 Dock Road. TII submitted observations which remain during the review of the Southern Environs Local Area Plan 2021 – 2027.</p> <p>LSMATS recognises localised congestion on junctions along the M7/N18 Limerick City Bypass, noting, Mackey (Newport) Roundabout, Ballysimon and Dock Road Interchanges. Ensuring localised junction congestion does not impact on the strategic function of the M7/N18 road is important.</p>	<p><b>(ii)</b> Any planning application for a Data Centre at Ballysimon House will require a robust traffic and transport assessment prior to any decision.</p> <p><b>(iii)</b> The Data Centre zoning has not been included in the Zoning Matrix, however the objective and purpose clearly set out that the zoning is for a Data Centre Campus only under MA No. 109. In the interests of clarity, an additional minor amendment is recommended to state that general Enterprise and Employment uses will not be permitted on the Data Centre zone.</p> <p><b>4. Material Alteration No.s 142 and No. 153:</b>  The OPR submission to the Material Alterations includes Recommendation No. 4 – Flood risk management which states ‘having regard to NPO 57 of the NPF, and to provisions of The Planning System and Flood Risk Management, Guidelines for Planning Authorities (2009), as amended, the Planning Authority is required to make the plan without the following proposed material amendments: MA No. 142 and 153’.</p>
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<p>The significant extent of Enterprise and Employment zoning in the vicinity of the Dock Road Junction conflicts with the Agriculture zoning of the LAP. TII has consistently expressed concern that proposals to zone additional lands have been advanced in the absence of quantified impact on the national road network. Zoning to the line/ boundary of the national road network and junctions is inconsistent with objectives for any future enhancements. TII is not aware that an evidence base has been developed to demonstrate that the zoning accords with official policy.</p> <p><b>-Recommendation:</b></p> <p>TII is not aware that the policies and zoning designations in relation to the zoning proposals in the vicinity of the Dock Road Junction have been subject to an evidenced based approach in accordance with the requirements of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities. The proposed amendments appear to conflict with the zoning strategy in the recently adopted Local Area Plan. Accordingly, TII recommends a review of proposed zoning amendments in the vicinity of the Dock Road Junction to ensure the development of an appropriate evidence base demonstrating compliance with the provisions of the Guidelines.</p> <p><b>5. Material Alteration No. 167:</b></p> <p>TII notes the proposed amendment to the Marine Related Industry zoning objective in Foynes, which adjoins the N69, national road, at a location outside where a 50 – 60kph speed</p>	<p><b>-Recommendation:</b></p> <p>On the basis of the location of the lands within Flood Zone A and the submissions received by the OPR and OPW, it is recommended that the Plan be made without the proposed Material Alterations No.s 142 and 153 as displayed.</p> <p><b>5. Material Alteration No. 167:</b></p> <p>The content of the submission received is noted.</p>
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	<p>limit applies. TII requested that access to the lands, to accord with the provisions of official policy, should be outlined.</p> <p><b>-Recommendation:</b> The Marine Related Industry zoning objective in the Foynes Settlement Plan adjoins 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.</p>	<p><b>-Recommendation:</b> Material Alteration No. 167 included Foynes Objective FO O1 Capacity of National Roads, which states 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’. On this basis it is considered that the issues raised have been addressed and no further amendment is recommended.</p>
<b>Chief Executive’s Recommendations</b>		
	<p><b>1. Material Alteration No. 6:</b> <b>(i) Map 3.6 Tall Buildings at City Level:</b> None <b>Recommendation:</b> It is recommended that the Plan be made <b>with</b> proposed Material Alteration No. 6 as displayed.</p> <p><b>(ii) Section 3.5 Level 2: Key Towns:</b> None <b>Recommendation:</b> None</p> <p><b>2. Material Alteration No. 53:</b> <b>(i) Section 7.5 Sustainable Mobility:</b> None <b>Recommendation:</b> It is recommended that the Plan be made <b>with</b> proposed Material Alteration No. 53 as displayed, <b>subject to minor modification</b> to include reference to TII Publication Standards DN-GEO-03084 “The Treatment of Transition Zones to Towns and Villages on National Roads”.</p> <p><b>(ii) Section 7.8 Strategic Roads Infrastructure:</b> None <b>Recommendation:</b> None</p>	

**(iii)Section 7.9.1 National Road Network:**

**(i) – (iii)** None

**Recommendation:** It is recommended that the Plan be made **with** Material Alteration No. 53 as displayed, **subject to minor modification** as follows: Objective TR O39 National Roads - Prevent except in exceptional circumstances and subject to a plan-led evidence-based approach, in consultation with Transport Infrastructure Ireland, in accordance with ~~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 junctions.

**3. Material Alteration No.s 109, 140 and 149:**

**(i) – (ii)** None

**(iii)** It is recommended that the Plan be made **without** Material Alteration No. 149 as displayed.

**(iv)** None

**Recommendation:**

**(i)** None

**(ii)** None

**(iii)** It is recommended that the Plan be made **with** the proposed Material Alteration No. 109 (Data Centre objective and purpose) as displayed, **subject to minor modification** as follows:

-Data Centre Purpose: Add the following text: General Enterprise and Employment uses will not be permitted in the Data Centre zone.

**4. Material Alteration No.s 142 and No. 153:**

**Recommendation:** It is recommended that the Plan be made **without** the proposed Material Alterations No.s 142 and 153 as displayed.

**5. Material Alteration No. 167:**

It is recommended that the Plan be made **with** proposed Material Alteration No. 167 as displayed.

**SEA/ AA Response**

Minor modifications – No impact on SEA/ AA



37	Ref. and Name/ Group:	LCC-C101-22 National Transport Authority (NTA)
	Submission/ Observation Summary	Chief Executive's Response
	<p><b>1. Overview:</b> The NTA welcomes the Material Alterations. The Plan provides a firm basis for the viable development of the Limerick-Shannon Metropolitan Area (LSMA) and sustainable transport system, closely integrated with land use planning policy.</p> <p><b>-Recommendation:</b> The NTA recommends that the Material Alterations which provide for the integration of the LSMATS into the Plan are approved, as a means of ensuring the LSMA can be developed in a sustainable manner.</p> <p><b>2. Table 2.6 Density Assumptions per Settlement Hierarchy:</b> The NTA notes with concern the proposal to reduce the density in Newcastle West to 22 units per hectare. This is not favoured for walking and cycling to school or retail, as it would lead to an inefficient use of land and increase in the distances required to travel.</p> <p><b>-Recommendation:</b> The NTA recommends that this alteration is rejected on the basis that it would lead to a low-density urban form which would promote car use for local trips.</p>	<p><b>1. Overview:</b> The content of the submission received is noted.</p> <p><b>-Recommendation:</b> The Material Alterations integrating the LSMATS into the Plan are recommended to be included in the final Development Plan.</p> <p><b>2. Table 2.6 Density Assumptions per Settlement Hierarchy:</b> The content of the submission received is noted. See response to OPR submission No. 1 Item 3.2 Newcastle West.</p> <p><b>-Recommendation:</b> See response to OPR submission No. 1 MA Observation 1 – Core Strategy Density: Newcastle West.</p>

<p><b>3. Material Alterations No.s 109, 140 and 149 Data Centres:</b></p> <p>Zoning at Rosbrien and Ballysimon for Data Centres is required to be undertaken in a manner consistent with the DoECLG's Spatial Planning and National Roads Guidelines for Planning Authorities and should consider the principles and measures of LSMATS.</p> <p><b>-Recommendation:</b></p> <p>The NTA recommends that the Data Centre Land Use Zoning Objective and Purpose is amended as follows: To accommodate the provision of a Data Centre according to the following principles:</p> <ul style="list-style-type: none"> <li>(a) That the development is consistent with the DoECLG's Spatial Planning and National Roads Guidelines for Planning Authorities;</li> <li>(b) That car parking is provided at a rate below the maximum permitted;</li> <li>(c) That a public transport service plan is agreed with the NTA; and</li> <li>(d) That the operations of the development will be monitored.</li> </ul> <p>A reference to sustainable transport should be included in the purpose.</p> <p><b>4. MA No.s 142 and 153 – Additional Enterprise and Employment Zoning at N69 Dock Road/ N18 Junction:</b></p>	<p><b>3. Material Alterations No.s 109, 140 and 149 Data Centres:</b></p> <p>The content of the submission received is noted. See response to Item 3 Material Alteration No.s 109, 140 and 149 in Submission No. 36 TII above.</p> <p><b>-Recommendation:</b></p> <p>The Planning Authority considers that the principles recommended are addressed in other policies and objectives in the Draft Plan. In relation to the request to provide car parking below the maximum rate, it is noted that table DM8(a) already sets maximum car parking standards. On this basis, it is not recommended to include the principles as requested.</p> <p><b>4. MA No.s 142 and 153 – Additional Enterprise and Employment Zoning at N69 Dock Road/ N18 Junction:</b></p>
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<p>The NTA notes that significant additional lands have been proposed to be rezoned in the vicinity of the N69/N18 junction. These lands were not zoned in the 2021 Southern Environs LAP and there now appears to be a conflict.</p> <p><b>-Recommendation:</b>  <b>(i)</b> The NTA is concerned that these alterations comprise an incremental approach to the reinstatement of zonings made at draft stage of the Southern Environs LAP and reiterate previous comments:  While the removal of these zonings would be optimal in terms of consistency with the LSMATS, RSES and MASP, their maintenance may be considered acceptable, subject to the following conditions on their future development being incorporated into the final Plan:  -The development of these sites would be governed by a single Masterplan agreed between the landowners, Limerick City and County Council, Transport Infrastructure Ireland and the NTA;  -Car parking will be provided at a rate below that provided for in the County Development Plan and provided on an area wide basis rather than according to the requirements of individual developments;  -Cycle parking will be provided in all developments to cater for 20% of all trips to be made by this mode;  -All developments will include end-of-trip cycling facilities for employees such as showers and lockers;  -All new roads would incorporate segregated cycle tracks designed in accordance with the National Cycle Manual;</p>	<p>The content of the submission received is noted. See response under Recommendation below.</p> <p><b>-Recommendation:</b>  <b>(i)</b> See response to Item No. 4 Material Alteration No.s 142 and No. 153 in Submission No. 36 TII above.</p>
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<p>-All new roads will seek, in the first instance, to provide for filtered permeability, in order to avoid creating additional capacity for car traffic; and</p> <p>-The Masterplan, and all subsequent development proposals would include Mobility Management Plans, with clear targets and commitments to implementing measures to promote sustainable transport.</p> <p><b>(ii)</b> The NTA reiterates their statement on the Enterprise and Employment zoning from the draft stage as follows: 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><b>(iii)</b> Clarity around the relationship between the LAP and Development Plan should be provided.</p>	<p><b>(ii)</b> 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><b>(iii)</b> Pending the adoption of the Limerick Development Plan 2022 – 2028, the area of the Southern Environs will come under the remit of the Development Plan. The Planning Authority will then revoke the Southern Environs Local Area Plan 2021 – 2027 in accordance with Section 18(5) of the Planning and Development Act 2000 (as amended)</p>
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	<p><b>5. Limerick Northern Distributor Road:</b> The NTA notes and welcomes the amendments related to the LNDR regarding development management along the route.</p> <p><b>-Recommendation:</b> The NTA recommends that the amendments to the LNDR section are approved in the making of the final Development Plan.</p>	<p>which states that ‘a planning authority may at any time amend or revoke a local area plan’.</p> <p><b>5. Limerick Northern Distributor Road:</b> The content of the submission received is noted.</p> <p><b>-Recommendation:</b> The Material Alterations relating to the LNDR and Development Management along the route are recommended to be included in the final Plan.</p>
<b>Chief Executive’s Recommendations</b>		
	<p><b>1. Overview:</b> It is recommended that the Plan be made <b>with</b> proposed Material Alterations as displayed.</p> <p><b>2. Table 2.6 Density Assumptions per Settlement Hierarchy:</b> It is recommended that the Plan be made <b>with</b> the proposed Material Alteration No. 5 (Chapter 2 Core Strategy) as displayed, <b>subject to minor modification</b> as follows: -Density in Newcastle West shall be 35 units per hectare for 80% of units.</p> <p><b>3. Material Alterations No.s 109, 140 and 149 Data Centres:</b> It is recommended that the Plan be made <b>without</b> proposed Material Alteration No. 149 as displayed.</p> <p><b>4. MA No.s 142 and 153 – Additional Enterprise and Employment Zoning at N69 Dock Road/ N18 Junction:</b> (i) It is recommended that the Plan be made <b>without</b> the proposed Material Alteration No.s 142 and 153 as displayed. (ii) None (iii) None</p>	

	<b>5. Limerick Northern Distributor Road:</b> It is recommended that the Plan be made <b>with</b> the proposed Material Alterations in relation to the LNDR and Development Management.
	<b>SEA/ AA Response</b>
	Minor amendments – No impact on SEA/ AA

## Theme 9 Environment

38	Ref. and Name/ Group: LCC-C101-1 Environmental Protection Agency (EPA)	
	<b>Submission/ Observation Summary</b>	<b>Chief Executive's Response</b>
	<p><b>1. Introduction:</b> The EPA is a statutory environmental authority, focusing on promoting full and transparent integration of the findings of the Environmental Assessment into the Plan and advocating that key environmental challenges are addressed. A self-service approach is provided via the guidance document "SEA of Local Authority Land Use Plans – EPA Recommendations and Resources".</p>	<p><b>1. Introduction:</b> Noted. The Local Authority uses this resource in the preparation of the Environmental Report and will use it in the preparation of the SEA statement.</p>
	<p><b>2. Sustainable Development:</b> The Council should ensure that the Plan is consistent with proper planning and sustainable development. Adequate and appropriate service infrastructure should be in place, or required, to service proposed development.</p> <p>The Council should consider the need to align with national commitments on climate change and incorporate recommendations in sectoral, regional and local climate adaptation plans.</p> <p>The Council should ensure the Plan is consistent with key relevant higher-level plans and programmes.</p>	<p><b>2. Sustainable Development:</b> Noted. This is part of the Plan approach to development as required by both the NPF and RSES. It will inform subordinate plans such as LAPs, which are informed by the Development Plan.</p> <p>The plan outlines a commitment to work with other agencies and to take into account existing and forthcoming legislation and guidance on climate action.</p> <p>The Plan has been informed throughout by reference to Environmental Protection Objective (EPO) HTP 1 ensuring consistency with higher tier plans.</p>

<p><b>3. Specific Comments:</b> Table 6 Key Environmental Issues Associated with the Material Alterations in the SEA is acknowledged. The environmental issues/ concerns highlighted in relation to flood risk vulnerability, removal of structures from the RPS and inclusion of individual treatment systems for specific developments is noted. Where the SEA has identified any alterations as having potential for likely significant environmental effects, or which conflict with national environmental or planning policy, clear justification should be given for proceeding with those alterations. Prior to its adoption, the Plan should also consider and integrate the recommendations of the SEA.</p> <p><b>4. Future Modifications:</b> Where further changes are proposed, these should be screened for likely significant effects in accordance with SEA Regulations and the method of assessment applied in the environmental assessment.</p> <p><b>5. SEA Statement:</b> On adoption of the Plan, an SEA Statement should be prepared summarising: -How environmental considerations have been integrated; -How the Environmental Report, submissions, observations and consultations have been taken into account; -The reasons for choosing the Plan adopted in light of other reasonable alternatives dealt with; -The measures decided upon to monitor the significant environmental effects of implementation of the Plan.</p>	<p><b>3. Specific Comments:</b> Noted. Where conflict might occur with national level policy this will be highlighted and justification provided.</p> <p>As part of the SEA Statement, the recommendations of the SEA process which have been integrated into the plan will be outlined.</p> <p><b>4. Future Modifications:</b> Noted. This will be carried out as part of the SEA and plan-making process.</p> <p><b>5. SEA Statement:</b> Noted. This will be carried out as standard practice as per the 2022 SEA guidelines for Regional Assemblies and Planning Authorities (Chapter 7) and will take into account all of the points raised.</p>
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	<b>Chief Executive's Recommendations</b>	
	The Environmental Report will be finalised in accordance with the legislation.	
	<b>SEA/ AA Response</b>	
	<b>N/A</b>	

## Theme 10 Climate and Flooding

39	<b>Ref. and Name/ Group:</b> LCC-C101-16 Office of Public Works (OPW)
<b>Submission/ Observation Summary</b>	
<p><b>1. Welcomed amendments:</b>  The OPW welcomes Material Alterations No.s 209 (SFRA), 61 (prohibits surface water discharge to combined sewers), 89 (green roofs), 71 and 72 (prevent proposals impeding flood relief measures), 210, 211 and 212 (flood maps) and 70 (mitigation measures).</p> <p><b>2. Policy Objectives:</b>  The SFRA notes that ‘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 was supported by an objective.</p> <p><b>3. Justification Tests:</b>  Several Material Alterations have resulted in land use zonings which would allow inappropriate development in Flood Zones A and B, despite failing to pass the Plan Making Justification Test. Examples include:</p> <ul style="list-style-type: none"> <li>• MA No. 142 rezones lands at Ballykeefe from Agriculture to less vulnerable Enterprise and Employment in Flood Zone A</li> <li>• MA No. 143 rezones lands at Clonmacken from Agriculture to highly vulnerable New Residential in Flood Zones A and B</li> </ul>	<p><b>Chief Executive’s Response</b></p> <p><b>1. Welcomed amendments:</b>  The contents of the submission received is noted.</p> <p><b>2. Policy Objectives:</b>  The content of the submission received is noted. See response to MA Recommendation No. 4 – Flood risk management (iii) in the OPR submission No. 1.</p> <p><b>3. Justification Tests:</b>  The content of the submission received is noted. See response to MA Recommendation No. 4 – Flood risk management (i) in the OPR submission No. 1.</p>

	<ul style="list-style-type: none"> <li>• MA No. 145 rezones lands at Pa Healy Road from Community and Educational to Mixed Use which allows highly vulnerable usage in Flood Zones A and B</li> <li>• MA No. 146 rezones lands at Pa Healy Road from less vulnerable Enterprise and Employment to Mixed Use which allows highly vulnerable usage in Flood Zones A and B</li> <li>• MA No. 147 rezones lands at Greenpark from less vulnerable Enterprise and Employment to highly vulnerable New Residential in Flood Zones A and B</li> <li>• MA No. 148 rezones lands adjacent to the Crescent Shopping Centre in Dooradoyle from water compatible Semi Natural Open Space to less vulnerable Enterprise and Employment in Flood Zones A and B</li> <li>• MA No. 150 rezones lands in Caherdavin from Agriculture to District Centre which allows for highly vulnerable usage in Flood Zone A</li> <li>• MA No. 151 rezones lands in Castletroy from Agriculture to highly vulnerable New Residential which has an overlap with Flood Zones A and B</li> <li>• MA No. 153 rezones lands in Ballykeefe from Agriculture to less vulnerable Enterprise and Employment in Flood Zones A and B.</li> </ul> <p>This is not consistent with the approach to flood risk management as set out in the Guidelines. If zoning cannot be justified, the zoning should be avoided or alternatively, substituted for a land use zoning appropriate to the level of flood risk.</p>	
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	<p>Several Material Alterations as set out below have resulted in land use zonings within Flood Zones A and B, which would be inappropriate unless a Plan Making Justification Test completed by the Local Authority can be satisfied, but for which none have been included. For sites where only a small proportion is at risk of flooding, an objective might be attached requiring the sequential approach to site planning to ensure no encroachment onto, or loss of the flood plain, or that only water compatible development such as open space would be permitted, following a detailed FRA. This is of relevance to the following:</p> <p><b>(i)</b> Limerick City Centre and Surroundings: MA No. 129 rezones lands at Corbally from Education and Community Facilities to highly vulnerable New Residential. These lands contain a small overlap with Flood Zones A and B.</p> <p><b>(ii)</b> Limerick Southern Environs: MA No. 152 rezones lands at Ballykeefe from less vulnerable Enterprise and Employment to highly vulnerable New Residential. These lands contain a small overlap with Flood Zones A and B.</p> <p><b>(iii)</b> Caherdavin/Moyross: MAs to the SFRA propose that objective “CAF O21, Identified Flood Risk” be amended to include the following: <u>“E) Ensure that vulnerable uses, including that of a residential nature, shall not be permitted at ground floor level on the District Centre zoned lands at Jetland/ Ennis Road/ Ennis Road Retail Park.”</u> This should be included in MA No. 70.</p>	<p>On lands where the Justification Test for Plan Making has been passed and where a small proportion of the land is at risk of flooding, the sequential approach to development will be applied, and development will be limited to Minor Development (Section 5.28 of the Planning System and Flood Risk Management). There will be a presumption against the granting of permission for highly or less vulnerable development which encroaches onto or results in the loss of the flood plain. Water compatible development only will be considered in such areas at risk of flooding. See response to MA Recommendation No. 4 – Flood risk management (iii) in the OPR submission No. 1.</p> <p><b>(i)</b> Only lands outside of the flood zones A and B are zoned for development.</p> <p><b>(ii)</b> Only lands outside of the flood zones A and B shall be developed. Zoning maps shall be updated to reflect this.</p> <p><b>(iii)</b> The content of the submission received is noted. These existing developed lands have been Justified in Appendix B of the SFRA. See response to MA Recommendation No. 4 – Flood risk management (ii) in the OPR submission No. 1.</p>
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	<p><b>(iv)</b> Castletroy: There are areas of highly vulnerable Existing Residential which have been zoned in Flood Zones A and B.</p> <p><b>(v)</b> Ballingarry: Areas of highly vulnerable Existing Residential and Town Centre zoning in Flood Zones A and B.</p> <p><b>(vi)</b> Bruff: Areas of highly vulnerable Existing Residential zoned in Flood Zones A and B.</p> <p><b>(vii)</b> Bruree: Areas of highly vulnerable Existing Residential zoned in Flood Zones A and B.</p> <p><b>(viii)</b> Cappamore: The zoning of lands as Village Centre, Education and Community Facilities, New Residential and Enterprise and Employment has been justified on the basis that any further development within Flood Zones A and B “should be restricted to infill sites and extensions as per Section 5.28 of the Flood Risk Management Guidelines for Planning Authorities”. This should be supported by an objective in the Plan.</p>	<p><b>(iv)</b> The content of the submission received is noted. A Justification Test has been prepared and will form part of the final SFRA. See response to MA Recommendation No. 4 – Flood risk management (iii) in the OPR submission No. 1.</p> <p><b>(v)</b> The content of the submission received is noted. A Justification Test has been prepared and will form part of the final SFRA. See response to MA Recommendation No. 4 – Flood risk management (iii) in the OPR submission No. 1.</p> <p><b>(vi)</b> The content of the submission received is noted. A Justification Test has been prepared and will form part of the final SFRA. See response to MA Recommendation No. 4 – Flood risk management (iii) in the OPR submission No. 1.</p> <p><b>(vii)</b> The content of the submission received is noted. A Justification Test has been prepared and will form part of the final SFRA. See response to MA Recommendation No. 4 – Flood risk management (iii) in the OPR submission No. 1.</p> <p><b>(viii)</b> The content of the submission received is noted. A Justification Test has been prepared and will form part of the final SFRA. See response to MA Recommendation No. 4 – Flood risk management (iii) in the OPR submission No. 1.</p>
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	<p><b>(ix)</b> Doon: Areas of highly vulnerable Existing Residential and Town Centre, Education and Community Facilities which can allow highly vulnerable development, and less vulnerable Enterprise and Employment zoning in Flood Zones A and B.</p> <p><b>(x)</b> Dromcolliher: Areas of highly vulnerable Existing Residential and Town Centre, Education and Community Facilities and Utilities zoned in Flood Zones A and B.</p> <p><b>(xi)</b> Foynes: Areas of highly vulnerable Existing Residential and New Residential, Town Centre, Education and Community Facilities and Utilities which can allow highly vulnerable development, and less vulnerable Enterprise and Employment zoned in Flood Zones A and B.</p> <p><b>(xii)</b> Glin: Areas of highly vulnerable Existing Residential and less vulnerable Enterprise and Employment zoned in Flood Zones A and B.</p> <p><b>(xiii)</b> Hospital: Areas of highly vulnerable Existing Residential, Utilities and Education and Community Facilities which can allow highly vulnerable development zoned in Flood Zones A and B.</p> <p><b>(xiv)</b> Kilfinane: Areas of highly vulnerable Existing Residential and Education and Community Facilities which can allow highly vulnerable development zoned in Flood Zones A and B.</p>	<p><b>(ix)</b> The content of the submission received is noted. A Justification Test has been prepared and will form part of the final SFRA. See response to MA Recommendation No. 4 – Flood risk management (iii) in the OPR submission No. 1.</p> <p><b>(x)</b> The content of the submission received is noted. A Justification Test has been prepared and will form part of the final SFRA. See response to MA Recommendation No. 4 – Flood risk management (iii) in the OPR submission No. 1.</p> <p><b>(xi)</b> The content of the submission received is noted. A Justification Test has been prepared and will form part of the final SFRA. See response to MA Recommendation No. 4 – Flood risk management (iii) in the OPR submission No. 1.</p> <p><b>(xii)</b> The content of the submission received is noted. A Justification Test has been prepared and will form part of the final SFRA. See response to MA Recommendation No. 4 – Flood risk management (iii) in the OPR submission No. 1.</p> <p><b>(xiii)</b> The content of the submission received is noted. A Justification Test has been prepared and will form part of the final SFRA. See response to MA Recommendation No. 4 – Flood risk management (iii) in the OPR submission No. 1.</p> <p><b>(xiv)</b> The content of the submission received is noted. A Justification Test has been prepared and will form part of the final SFRA. See response to MA Recommendation No. 4 – Flood risk management (iii) in the OPR submission No. 1.</p>
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<p>(xv) Pallasgreen: Areas of highly vulnerable Existing Residential and less vulnerable Enterprise and Employment zoned in Flood Zones A and B.</p> <p>(xvi) Pallaskenry: Areas of highly vulnerable Existing Residential, New Residential and Education and Community Facilities which can allow highly vulnerable development zoned in Flood Zones A and B.</p>	<p>(xv) The content of the submission received is noted. A Justification Test has been prepared and will form part of the final SFRA. See response to MA Recommendation No. 4 – Flood risk management (iii) in the OPR submission No. 1.</p> <p>(xvi) The content of the submission received is noted. A Justification Test has been prepared and will form part of the final SFRA. See response to MA Recommendation No. 4 – Flood risk management (iii) in the OPR submission No. 1.</p>
<b>Chief Executive's Recommendations</b>	
<p>1. None</p> <p>2. It is recommended that the Plan be made <b>with</b> the proposed Material Alterations, subject to minor modification as follows:</p> <p>-Policy CAF P5 Managing Flood Risk - 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 <u>and the Strategic Flood Risk Assessment (SFRA)</u>. Where a development/land use is proposed that is inappropriate within the Flood Zone, <u>but that has passed the Plan Making Justification Test</u>, then the 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). <u>This will need to demonstrate inclusion of measures to mitigate flood and climate change risk, and flood risks, including those recommended under Part 3 (Specific Flood Risk Assessment) of the Site-Specific Plan Making Justification Tests detailed in the SFRA.</u> In Flood Zone C, the developer should satisfy themselves that the probability of flooding is appropriate to the development being proposed and should consider <u>other sources of flooding, residual risks and</u> the implications of climate change.</p>	

	<p>-Objective CAF O20 Flood Risk Assessments - It is an objective of the Council to require a Site-Specific Flood Risk Assessment (FRA) for all planning applications <u>in Flood Zones A and B and consider all sources of flooding</u> <del>in areas at risk of flooding</del> (for example coastal/tidal, fluvial, pluvial or groundwater), where deemed necessary. The detail of these Site-Specific FRAs (or commensurate assessments of flood risk for minor developments) will depend on the level of risk and scale of development. <u>The FRA will be prepared taking into account the requirements laid out in the SFRA, and in particular in the Plan Making Justification Tests as appropriate to the particular development site.</u> A detailed Site-Specific FRA should quantify the risks, the effects of selected mitigation and the management of any residual risks. The assessments shall consider and provide information on the implications of climate change with regard to flood risk in relevant locations.</p> <p><b>3.</b> It is recommended that the Plan be made <b>without</b> the proposed Material Alteration No. 142 (Ballykeefe), 143 (Condell Road), 145 (Pa Healy Road), 146 (Pa Healy Road), 147 (Greenpark), 148 (Crescent), 150 (Jetland Caherdavin), 153 (Ballykeefe) as displayed.</p> <p><b>(i)</b> None</p> <p><b>(ii)</b> It is recommended that the Plan be made with a further amendment to Material Alteration No. 152, to remove a small area of land in Flood Zones A and B. Zoning maps shall be updated to reflect this.</p> <p><b>(iii)</b> It is recommended that the Plan be made <b>with</b> the proposed Material Alteration No. 70 (CAF O21 Identified Flood Risk) as displayed, <b>subject to minor modifications</b> to include the following text: <u>(x) Implement the flood mitigation measures included under the Justification Test including to ensure that vulnerable uses, including that of a residential nature, shall not be permitted at ground floor level on the District Centre zoned lands at Jetland/ Ennis Road/ Ennis Road Retail Park, at Caherdavin/Moyross.</u></p> <p><b>(iv) - (xvi)</b> Recommendation as per 2 above.</p> <p><b>SEA/ AA Response</b></p> <p>Minor alterations and removal of lands at risk of flooding – No impacts on SEA/ AA</p>
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## Appendix A: List of Late Submissions Received

No.	Name/ Representative/ Group
1	Sienna O'Dwyer
2	IDA
3	Department of Housing, Local Government and Heritage
4	John O'Mahony, Syncreon Technology



## PUBLIC NOTICE

### OUTDOOR RECREATION INFRASTRUCTURE SCHEME 2022

The Minister for Rural & Community Development, Heather Humphreys TD, recently announced funding of €15 million under the Outdoor Recreation Infrastructure Scheme for 2022, which will provide funding for outdoor recreation projects, placing a particular focus on developing adventure tourism in rural Ireland. This funding supports the growing activity tourism sector as prioritised in "Our Rural Future" Ireland's Rural Development Policy 2021-2025.

The Scheme is funded by the Department of Rural and Community Development in partnership with Fáilte Ireland.

Expressions of Interest are being sought for project proposals under **Measure 1** of this scheme.

Measure 1 provides funding for **Small Scale Repair/Development/Promotion and Marketing with a maximum grant up to €30,000.**

Full details of the Scheme and the Measure 1 Expression of Interest form are available to download at [www.limerick.ie](http://www.limerick.ie).

Please contact the Urban and Rural Community Development Department on 061-557117 or 061-557531 or by email to [oris@limerick.ie](mailto:oris@limerick.ie) with any queries in relation to the ORIS 2022 Scheme.

**Completed Measure 1 Expression of Interest forms must be submitted no later than 12 noon on Friday 25th March 2022.**

### PLANNING AND DEVELOPMENT ACT 2000 (AMENDED)

#### PLANNING AND DEVELOPMENT REGULATIONS 2001 (AMENDED) NOTICE OF PROPOSED MATERIAL ALTERATIONS TO THE DRAFT LIMERICK DEVELOPMENT PLAN 2022 – 2028

Notice is hereby given, that the Members of Limerick City and County Council, having considered the Draft Limerick Development Plan 2022 – 2028 and the Chief Executive's Report in respect of the submissions received, resolved at a Special Council Meeting on Friday 18th February 2022, in accordance with Section 12(6) and 12(7) of the Planning and Development Act 2000 (as amended) that the Draft Plan be amended. The proposed amendments constitute Material Alterations to the Draft Limerick Development Plan 2022 – 2028.

The likely significant effects on the environment of implementing the proposed Material Alterations have been assessed and in accordance with Section 12(7) of the Planning and Development Act 2000 (as amended), the SEA and AA determinations, the SEA Environmental Report (which includes information on the likely significant effects on the environment of implementing relevant alterations) and the Natura Impact Report, with a copy of the proposed Material Alterations to the Draft Plan, will be available for public inspection from **Saturday 12th March 2022 – Monday 11th April 2022 inclusive**, at the following locations:

- Online at [www.limerick.ie/limerick-development-plan](http://www.limerick.ie/limerick-development-plan)
- Limerick City and County Council Corporate Headquarters, Merchants Quay, Limerick – during normal office opening hours;
- Limerick City and County Council, County Hall, Dooradoyle, Limerick – during normal office opening hours;
- Limerick City and County Council Municipal District Offices in Newcastle West, Kilmallock and Rathkeale – during normal office opening hours;
- Limerick City and County Council Libraries, throughout Limerick – during normal library opening hours, for the specific library.

The proposed Material Alterations together with associated Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) Determinations and Reports, may also be viewed via the Council's public consultation portal <https://mypoint.limerick.ie>. For a full history of the plan making process to date, please refer to [www.limerick.ie/limerick-development-plan](http://www.limerick.ie/limerick-development-plan)

#### Submissions/ Observations:

Limerick City and County Council hereby invites any interested parties to make a submission/ observation on the Material Alterations and supporting environmental reports and determinations **ONLY**, via the following mediums, between the 12th March 2022 and the 11th April 2022 inclusive:

- Online at <https://mypoint.limerick.ie>
- Email to [devplan@limerick.ie](mailto:devplan@limerick.ie) or
- In writing to Forward Planning, Economic Development and Enterprise Directorate, Limerick City and County Council, Merchants Quay, Limerick.

In respect of making a submission or observation please note the following:

- Submissions/observations should include your name and address and, where relevant, details of any organisation, community group or company etc., which you represent;
- Please be advised that, in accordance with the requirements of the Planning and Development Act, 2000 (as amended), all submissions/observations received will be published online and will also form part of the statutory Chief Executive's Report to be submitted to the full Council. You should ensure that no vexatious, defamatory 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;
- Submissions or observations with respect to the proposed Material Alterations, the associated SEA Environmental Report and the AA Natura Impact Report, and associated determinations, may be **made no later than close of business on Monday 11th April 2022.**
- Late submissions will not be accepted.

Please make your submission by one medium only, i.e. hard copy, email or website. Written submissions or observations with respect to the proposed Material Alterations and/or associated Environmental Reports to the Draft Limerick Plan that are made to the Planning Authority **by close of business on Monday April 11th 2022** will be taken into consideration before the making of the Plan.

Vincent Murray  
A/Director of Services – Economic Development and Enterprise Directorate  
12th March 2022

## Appendix C: Proposed Minor Amendments

The following sets out the proposed further Minor Alterations to the Material Alterations of the written statement and volumes of the Draft Limerick Development Plan 2022 - 2028. Each further minor amendment includes a reference number corresponding to the chapter/volume in which the text is located. The text in black is the text in the Draft Plan, the text to be omitted is ~~struck through in red~~ and text to be inserted is underlined in green.

**Note:** Where sections, policies, objectives, tables, figures or maps are proposed to be included or altered, the numbers of those in the Draft Plan may need to be revised prior to final adoption of the Plan.

No.	<u>Volume 1 Written Statement</u>	Section/ Policy/ Objective etc.	Submission No.s/ Elected Member Amendment No.
1	Minor modification to proposed Material Alteration No. 3 as displayed as follows: Protect, enhance and ensure the sustainable use of <del>Limerick's</del> key infrastructure <u>through the provision of support to utility providers</u> including water supplies and wastewater treatment facilities, energy supply including renewables, broadband and transportation. 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.	1.3 Strategic Objectives	32
2	Minor modification of proposed Material Alteration No. 5 (Chapter 2 Core Strategy) clarifying the Census boundary of Limerick City and Suburbs on Map 2.2 Metropolitan Area Core Strategy Map	2.8 Core Strategy Maps  Map 2.2 Metropolitan	2

No.	<u>Volume 1 Written Statement</u>	Section/ Policy/ Objective etc.	Submission No.s/ Elected Member Amendment No.
		Area Core Strategy Map	
3	Minor modification to proposed Material Alteration No. 5 (Chapter 2 Core Strategy) as follows: -Update Core Strategy to include a total population growth figure for the remainder of Limerick Metropolitan Area.	2.9 Core Strategy Table  Table 2.7	2
4	Minor modification of proposed Material Alteration No. 5 (Chapter 2 Core Strategy) as follows: -Density in Newcastle West shall be 35 units per hectare for 80% of units.	2.9 Core Strategy Table  Table 2.7	1, 37
5	Minor modification of proposed Material Alteration No. 5 (Chapter 2 Core Strategy) as follows:  -Population growth for Patrickswell shall be 36%	2.9 Core Strategy Table  Table 2.7	1
6	Minor modification to proposed Material Alteration No. 6 as follows: Objective MK O1 – St. Mary’s Park and King’s Island (b) Environmentally improve the existing street network of St. Mary’s Park to provide a safe, attractive, accessible and well-designed network of streets in tandem with <a href="#">supporting Irish Water in</a> the upgrade to the existing water network <a href="#">if required</a> and refurbishment works to existing houses.	3.4.6.6 St. Mary’s Park and King’s Island  Objective MK O1 St. Mary’s Park and King’s Island	32
7	Minor modification to proposed Material Alteration No. 6 as follows: Objective CGR O16 – Local Area Plans in Level 4 Settlements - These settlements have some essential infrastructure (i.e. <del>Council</del> <a href="#">Irish Water’s</a> water and or sewage facilities) and a range of	3.7 Level 4: Large Villages	32

No.	<u>Volume 1 Written Statement</u>	Section/ Policy/ Objective etc.	Submission No.s/ Elected Member Amendment No.
	community infrastructure that provide for convenience and daily needs of the local population and surrounding area.	Objective CGR O16 Local Area Plans	
8	<p>Minor modification of proposed Material Alteration No. 6 to include the objectives set out under RPO 22 for Newcastle West into CGR O11 – Level 2 Key Town Newcastle West as follows:</p> <p>It is an objective of the Council to:</p> <p>(a) Promote Newcastle West as a key service centre and to promote the sustainable growth of the town-to become a self-sufficient settlement and act as a service centre for its inhabitants and rural hinterland. At least 30% of all new homes shall be located within the existing built-up footprint of the settlement, in order to deliver compact growth and reduce unsustainable urban sprawl.</p> <p><u>(b) Support and promote the role of Newcastle West as a strategically located urban centre of significant influence in a sub-regional context. In particular, it is an objective to promote the opportunity for inter-regional collaborations across county boundaries with Abbeyfeale, Listowel and Rathkeale and locations identified in the Strategic Integrated Framework Plan for the Shannon Estuary, which offer collective strengths and potential for project partnerships to drive sustainable economic growth in the West Limerick/ North Kerry area;</u></p> <p><u>(c) Support the initiatives of the Atlantic Economic Corridor to realise the full potential of the Newcastle West enterprise assets to support job creation, improve competitiveness, attract investment and create future economic growth;</u></p> <p><u>(d) Support the delivery of the infrastructural requirements identified for Newcastle West subject to the outcome of the planning process and environmental assessments;</u></p>	<p>3.5 Level 2: Key Town</p> <p>Objective CGR O11 Level 2 – Key Town Newcastle West</p>	2

No.	Volume 1 Written Statement	Section/ Policy/ Objective etc.	Submission No.s/ Elected Member Amendment No.
	<p><u>(e) Support and promote the tourism potential of Newcastle West's historical heritage to facilitate the expansion of the existing tourism offer and to develop connectivity to and synergies with Newcastle West and the Great Southern Greenway;</u></p> <p><u>(f) Support the identification of opportunities for investment in incubation and innovation infrastructure for ICT and related companies and capitalise on Newcastle West's ability to accommodate remote working, enterprise start-ups and up scaling companies.</u></p>		
9	<p>Minor modification to proposed Material Alteration No. 7 as displayed, <b>subject to minor amendment</b> to text in Section 4.2.3 Housing Mix as follows: All new residential schemes shall <u>be designed having regard</u> <del>ensure that a minimum of 15% of dwellings are designed to</del> the National Disability Authority's <del>UD ++</del> standards.</p>	4.2.3 Housing Mix	21
10	<p>Minor modification of proposed Material Alteration No. 7 to amend Objective HO O13 - Provision of Social and Affordable Housing as follows:</p> <p><del>A) Promote the provision of social and affordable housing, in accordance with the Council's Draft Housing Strategy, Housing Need Demand Assessment and Government policy as outlined in the DHLGH Housing for All – a New Housing Plan for Ireland 2021 Social Housing Strategy 2020 and to ensure that 10% of</del> <u>Require</u> lands zoned for residential use, or for a mixture of residential and other uses, <del>20% of lands in residential or mixed-use schemes greater than</del> <u>and any land which is not zoned for residential use, or for a mixture of residential and other uses, 4 units where in respect of which</u> permission for the development of <u>4 or more</u> houses is granted, <u>to comply with</u> <del>be reserved for social and affordable housing in accordance with the Urban Regeneration and Housing Act 2015</del> the Affordable Housing Act 2021 and Part V of the Planning and Development Act 2000 (as amended) and any subsequent amendments thereof. <del>to the legal requirement to deliver this housing during the lifetime of the Draft Plan. This requirement shall comprise 10% social housing and 10% affordable housing</del></p>	4.2.15 Social Housing  Objective HO O13 Provision of Social and Affordable Housing	21

No.	<u>Volume 1 Written Statement</u>	Section/ Policy/ Objective etc.	Submission No.s/ Elected Member Amendment No.
	<p><del>(including affordable purchase and/or Cost Rental), subject to local factors, including demand for and viability of affordable housing on individual sites.</del> The Council reserves the right to determine the appropriateness of 'Part V' Cost Rental and/or affordable purchase delivery on individual sites on a case-by-case basis.</p> <p><del>B) All new social and affordable housing schemes shall promote a social and tenure mix.</del></p> <p><del>C) Support the provision of affordable housing through affordable purchase, cost rental and new build incremental schemes.</del></p>		
11	<p>Minor modification of proposed Material Alteration No. 98 as displayed, subject to minor modification updating references to the <u>Maritime Area Planning Act 2021</u> <del>Maritime Planning Bill 2021</del></p>	<p>Section 4 Marine Economy</p> <p>New Section</p>	33
12	<p>Minor modification to proposed Material Alteration No. 53 to include reference to TII Publication Standards DN-GEO-03084 "The Treatment of Transition Zones to Towns and Villages on National Roads".</p>	<p>Chapter 7 Sustainable Mobility and Transport</p>	36
13	<p>Minor modification to Material Alteration No. 53 as follows: Objective TR O39 National Roads - Prevent except in exceptional circumstances <u>and subject to a plan-led evidence-based approach, in consultation with Transport Infrastructure Ireland, in accordance with</u> <del>as outlined in</del> the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012), <del>inappropriate</del> development on lands adjacent to the existing national road network, which would adversely affect the safety, current and future</p>	<p>7.9.1 National Road Network</p> <p>Objective TR O39 National Roads</p>	36

No.	<u>Volume 1 Written Statement</u>	Section/ Policy/ Objective etc.	Submission No.s/ Elected Member Amendment No.
	capacity and function of national roads and having regard to reservation corridors, to cater for possible future upgrades of the national roads and junctions.		
14	Minor modification to proposed Material Alteration No. 57 as follows: Objective IN O5 Water Services - Ensure that development proposals connecting to the public water and/or wastewater networks <u>now or in the future</u> comply with Irish Water Standards Details and Codes of Practice 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. Where relevant, ensure developments comply with the EPA Code of Practice for Domestic Waste Water Treatment Systems 2021.	7.5.1 Services Act 2013  IN O5 Water Services	32
15	Minor modification to proposed Material Alteration No. 59 as follows: Section 7.5.3 Public Waste Water Treatment - Irish Water's <u>current 2019</u> wastewater treatment capacity register for County Limerick <u>dated March 2022</u> , states that there is capacity available in 41 No. of the 53 No. Waste water treatment plants (WWTPs).	7.5.3 Public Waste Water Treatment	32
16	Minor modification to proposed Material Alteration No. 61 as follows: Objective IN O10 Surface Water and SuDS - To prohibit the discharge of additional surface water to combined (foul and surface water) sewers in order to maximize the capacity of existing collection systems for foul water. <u>In areas where street scape enhancement or resurfacing is planned, seek to introduce NbSUDS to cater for rainfall run-off at source in order to maximize the capacity of existing collection systems for foul water.</u>	7.5.5 Storm Water and Surface Water  IN O10 Surface Water and SuDS	32
17	Minor modification of proposed Material Alteration No. 70 (CAF O21 Identified Flood Risk) to include the following text: <u>(x) Implement the flood mitigation measures included under the Justification Test including to ensure that vulnerable uses, including that of a residential</u>	8.3 Flooding, Flood Risk Management and	1



No.	<u>Volume 1 Written Statement</u>	Section/ Policy/ Objective etc.	Submission No.s/ Elected Member Amendment No.
	<u>nature, shall not be permitted at ground floor level on the District Centre zoned lands at Jetland/ Ennis Road/ Ennis Road Retail Park, at Caherdavin/Moyross.</u>	Water Management  CAF O21 Identified Flood Risk	
18	Minor modification of proposed Draft Plan Policy CAF P5 Managing Flood Risk as follows: Policy CAF P5 Managing Flood Risk - 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 <u>and the Strategic Flood Risk Assessment (SFRA)</u> . Where a development/land use is proposed that is inappropriate within the Flood Zone, <u>but that has passed the Plan Making Justification Test</u> , then the 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). <u>This will need to demonstrate inclusion of measures to mitigate flood and climate change risk, <del>and flood risks</del>, including those recommended under Part 3 (Specific Flood Risk Assessment) of the Site-Specific Plan Making Justification Tests detailed in the SFRA.</u> In Flood Zone C, the developer should satisfy themselves that the probability of flooding is appropriate to the development being proposed and should consider <u>other sources of flooding, residual risks and</u> the implications of climate change.	8.3 Flooding, Flood Risk Management and Water Management  CAF P5 Managing Flood Risk	1, 39

No.	<u>Volume 1 Written Statement</u>	Section/ Policy/ Objective etc.	Submission No.s/ Elected Member Amendment No.
19	<p>Minor modification of proposed Draft Plan Objective CAF O20 Flood Risk Assessments as follows:</p> <p>Objective CAF O20 Flood Risk Assessments - It is an objective of the Council to require a Site-Specific Flood Risk Assessment (FRA) for all planning applications <u>in Flood Zones A and B and consider all sources of flooding</u> <del>in areas at risk of flooding</del> (for example coastal/tidal, fluvial, pluvial or groundwater), where deemed necessary. The detail of these Site-Specific FRAs (or commensurate assessments of flood risk for minor developments) will depend on the level of risk and scale of development. <u>The FRA will be prepared taking into account the requirements laid out in the SFRA, and in particular in the Plan Making Justification Tests as appropriate to the particular development site.</u> A detailed Site-Specific FRA should quantify the risks, the effects of selected mitigation and the management of any residual risks. The assessments shall consider and provide information on the implications of climate change with regard to flood risk in relevant locations.</p>	<p>8.3 Flooding, Flood Risk Management and Water Management</p> <p>Objective CAF O20 Flood Risk Assessments</p>	1, 39
20	<p>Minor modifications replacing any references to the <del>Climate Action Plan 2019</del> with <u>Climate Action Plan 2021</u> and associated renewable energy targets <del>70%</del> <u>80%</u>.</p>	8.5 Renewable Energy	35
21	<p>Minor modification to proposed Material Alteration No. 88 as follows:</p> <p>Section 11.3.5 Roads, Footpaths, Water Services and Landscaping - Each house shall have its own independent foul and surface water sewer connections to the main foul and surface water sewers. <u>There shall generally be no increase in hydraulic flow downstream in the foul or combined drainage networks, from the proposed development as a result of surface water generated on the development site.</u></p>	11.3.5 Roads, Footpaths, Water Services and Landscaping	32

No.	Volume 1 Written Statement	Section/ Policy/ Objective etc.	Submission No.s/ Elected Member Amendment No.										
22	Minor modification to proposed Material Alteration No. 103, to include the following:	11.8.6 EV Charging Points	25										
	<table><tr><th>Development Category</th><th>EV Charging Points</th></tr><tr><td><u>Residential multi-unit developments both new buildings and buildings undergoing major renovations (with private car spaces including visitor car parking spaces)</u></td><td><u>A minimum of 1 EV Charge point space per five car parking spaces (ducting for every parking space shall be provided)</u></td></tr><tr><td><u>New dwellings with in-curtilage car parking</u></td><td><u>Installation of appropriate infrastructure to enable installation of recharging point for EVs</u></td></tr><tr><td><u>Non-residential developments (with private car parking spaces including visitor car parking spaces with more than 10 spaces e.g. office developments)</u></td><td><u>Provide at least 1 recharging point, and a minimum of 1 space per 5 car parking spaces should be equipped with one fully functional EV Charging Point</u></td></tr><tr><td><u>Developments with publicly accessible spaces (e.g. supermarket car park, cinema etc.)</u></td><td><u>Provide at least 1 recharging point, and a minimum of 1 space per 5 car parking spaces should be equipped with one fully functional EV Charging Point</u></td></tr></table>			Development Category	EV Charging Points	<u>Residential multi-unit developments both new buildings and buildings undergoing major renovations (with private car spaces including visitor car parking spaces)</u>	<u>A minimum of 1 EV Charge point space per five car parking spaces (ducting for every parking space shall be provided)</u>	<u>New dwellings with in-curtilage car parking</u>	<u>Installation of appropriate infrastructure to enable installation of recharging point for EVs</u>	<u>Non-residential developments (with private car parking spaces including visitor car parking spaces with more than 10 spaces e.g. office developments)</u>	<u>Provide at least 1 recharging point, and a minimum of 1 space per 5 car parking spaces should be equipped with one fully functional EV Charging Point</u>	<u>Developments with publicly accessible spaces (e.g. supermarket car park, cinema etc.)</u>	<u>Provide at least 1 recharging point, and a minimum of 1 space per 5 car parking spaces should be equipped with one fully functional EV Charging Point</u>
	Development Category			EV Charging Points									
	<u>Residential multi-unit developments both new buildings and buildings undergoing major renovations (with private car spaces including visitor car parking spaces)</u>			<u>A minimum of 1 EV Charge point space per five car parking spaces (ducting for every parking space shall be provided)</u>									
	<u>New dwellings with in-curtilage car parking</u>			<u>Installation of appropriate infrastructure to enable installation of recharging point for EVs</u>									
	<u>Non-residential developments (with private car parking spaces including visitor car parking spaces with more than 10 spaces e.g. office developments)</u>			<u>Provide at least 1 recharging point, and a minimum of 1 space per 5 car parking spaces should be equipped with one fully functional EV Charging Point</u>									
<u>Developments with publicly accessible spaces (e.g. supermarket car park, cinema etc.)</u>	<u>Provide at least 1 recharging point, and a minimum of 1 space per 5 car parking spaces should be equipped with one fully functional EV Charging Point</u>												
23	Minor modification of proposed Material Alteration No. 109 (Data Centre objective and purpose) as follows: -Data Centre Purpose: Add the following text: <u>General Enterprise and Employment uses will not be permitted in the Data Centre zone.</u>	12.3 Land Use Zoning Objectives	1, 36										
24	Minor modification to proposed Material Alteration No. 113 as follows: Footnote No. 6 - Nursing Home/ Residential Care or Institution/ Retirement Village are uses which are Generally Not Permitted in the Education and Community Infrastructure zone,	12.3 Land Use Zoning Objectives	17, 18										

No.	<u>Volume 1 Written Statement</u>	Section/ Policy/ Objective etc.	Submission No.s/ Elected Member Amendment No.
	except at Milford Care Centre and Little Company of Mary Milford, where Nursing Homes/ <a href="#">Residential Care or Institution/ Retirement Village</a> are Open for Consideration.		
25	Minor modification of proposed Material Alteration No. 117 (Chapter 13 Implementation and Monitoring) to include monitoring of Brownfield/ Infill sites in accordance with Policy CGR P2 – Monitoring of Brownfield/ Infill Sites as follows: <a href="#">Establish a database of and monitor planning applications on brownfield and infill sites.</a>	Chapter 13 Implementation and Monitoring	1
26	Minor modification of proposed Material Alteration No. 117 (Chapter 13 Implementation and Monitoring) to include the monitoring indicators of implementation of the transport strategy as follows: <a href="#">-Progress with the delivery of enabling transport infrastructure projects identified</a> <a href="#">-Change in transport modal share for travel to work, school and college</a> <a href="#">-Progress with improvements in bus infrastructure serving the City and County</a> <a href="#">-No. of new bus stops/ rail stations opened</a> <a href="#">-Improvements to the cycle network</a> <a href="#">-Provision of new park and ride facilities</a> <a href="#">-Progress with improvements to the road network</a>	Chapter 13 Implementation and Monitoring	1
27	Make the Plan without the proposed Material Alteration No. 142 (Ballykeefe), 143 (Condell Road), 145 (Pa Healy Road), 146 (Pa Healy Road), 147 (Greenpark), 148 (Crescent), 150 (Jetland Caherdavin), 153 (Ballykeefe) as displayed.	City and Environs Zoning Map	1
28	Make the Plan without the proposed Material Alteration No. 149 (Ballysimon House Data Centre zoning), as displayed.	City and Environs Zoning Map	1

No.	<u>Volume 1 Written Statement</u>	Section/ Policy/ Objective etc.	Submission No.s/ Elected Member Amendment No.
29	Make the Plan with a further amendment to Material Alteration No.s 151 (Ballyclough) and 152 (Ballykeefe), to remove a small area of land in Flood Zones A and B.	City and Environs Zoning Map	1, 39
30	Minor modification to proposed Material Alterations No. 154 - 157 to update the Transport Map to reflect the constructed infrastructure between Groody Link Road and Bloodmill Road.	City and Environs Transport Map	22
31	Minor modification to proposed Material Alteration No. 176 as follows: In terms of sewerage the existing plant has adequate capacity, to cater for the projected growth in the lifetime of the plan. Water is supplied from the Foynes/Shannon Estuary Water Treatment Plant. Spare capacity exists in the separated surface water network and discharges to the lake at the rear of Cluan Mhuire Estate. <u>There is very limited capacity available in the Shannon Estuary Water Resource Zone (WRZ), this is insufficient to cater for projected growth across the WRZ. A proposed solution is to connect to the Limerick City Public Water Scheme (PWS), however this is not included in 2020-2024 current Investment Plan. A project is being planned to connect the Shannon Estuary Water Resource Zone (WRZ) to Limerick City WRZ which will address water supply capacity constraints in Pallaskenry. This project will be delivered within the lifetime of the Development Plan, subject to approvals.</u>	Volume 2 Level 4  Pallaskenry  Infrastructure	32
32	Minor modification of proposed Material Alterations to replace references to <del>Limerick Metropolitan Area</del> with <u>Limerick-Shannon Metropolitan Area</u> and references to <del>Limerick City and Environs</del> with <u>Limerick City and Suburbs</u> throughout the Draft Development Plan.	All Volumes	2
33	Minor modifications to replace any references to the Department of Education and Skills with Department of Education throughout the Development Plan.	All Volumes	30

# Core Strategy

**Table 2.7:** Settlement hierarchy, population and household growth up to end of Draft Plan period Q2 2028 plus zoned land provision

Level	Settlements	Census 2016 population	Population totals 2028	Population growth as % of 2016 base	Additional house-holds forecasted 2022-28	Target residential density ranges (UPH) <sup>[1]</sup>	Zoned land Required (hectares)	Existing zoned land available (hectares)	Infill or brownfield as % of total zoned lands <sup>[2]</sup>	Shortfall (-) or excess (+) of zoned land (hectares)
Limerick - Shannon Metropolitan Area (in Limerick)	Limerick City and Suburbs (in Limerick) Environs Census definition	89,671	<u>123,242</u> <del>123,124</del>		<u>11,054</u> <del>10,991</del>	35 to 100+	<u>259.25</u> <del>257.77</del>	<u>348.42</u> <del>367.36</del>	<u>84%</u> <del>64%</del>	<u>89.17</u> <del>109.59</del>
	Annacotty	2,930	3,641		235	45+	5.22	<u>8.38</u> <del>8.59</del>	<u>80%</u> <del>66%</del>	<u>3.16</u> <del>3.37</del>
	Mungret	277	687		153	35+	4.37	4.38	<u>100%</u> <del>0%</del>	0.01
	City and Suburbs Environs including (in Limerick), Mungret and Annacotty aggregate	92,878	<u>127,570</u> <del>127,452</del>	37%	<u>11,442</u> <del>11,379</del>		<u>268.84</u> <del>267.36</del>	<u>361.18</u> <del>380.34</del>	<u>84%</u>	<u>92.34</u> <del>112.98</del> ha (Capacity for <u>12,580</u> <del>13,346</del> units on zoned lands)
	Castleconnell	2,107	2,697	28%	205	10 or 22+	11.59	24.89		13.30
	Patrickswell	847	<u>1,153</u> <del>1,271</del>	<u>36%</u> <del>50%</del>	<u>95</u> <del>157</del>	10 or 22+	<u>5.36</u> <del>8.91</del>	37.93		<u>32.57</u> <del>29.02</del>
	Clarina	294	591	101% <sup>[3]</sup>	20					
	Montpelier	150	172	15%	7					
	Rural Metro Area	8,676	9,237	6%	104					
	Remainder of Metro Area	<u>12,074</u>	<u>13,850</u>	<u>16%</u>	<u>431</u>		<u>16.95</u>	<u>62.82</u>		<u>45.87</u>
	Limerick Shannon Metropolitan	104,952	141,420	35%	11,873		<u>285.78</u> <del>287.86</del>	<u>424.00</u> <del>443.16</del>		<u>138.22</u> <del>155.3</del>

	n Area (in Limerick) Total Metro Area									
Key town	Newcastle West	6,619	8,607	30%	706	10 or 35+ <del>10 or 22+</del>	30.26 <del>39.80</del>	139.02		108.76 <del>99.22</del>
Level 3 towns	Abbeyfeale	2,023	2,589	28%	211	10 or 22+	11.89	45.50		33.61
	Kilmallock	1,668	2,135	28%	162	10 or 22+	9.14	19.61		10.47
	Rathkeale	1,441	1,844	28%	147	10 or 22+	8.30	38.12		29.82
	Caherconlish	1,476	1,815	23%	125	10 or 22+	7.02	9.94		2.92
Level 3 towns	Aggregate	6,608	8,383	27%	645		36.35	113.17		76.82
Level 4 Settlements	Adare	1,129	1,455	29%	122	10 or 22+	6.88	58.35		51.48
	Askeaton	1,137	1,455	28%	119	10 or 22+	6.72	23.54		16.82
	Ballingarry	521	667	28%	55	10 or 22+	3.08	5.89	29.71%	2.81
	Bruff	803	1,043	30%	83	10 or 22+	4.68	5.52	12.30%	0.84
	Bruree	580	740	28%	39	10 or 22+	2.21	2.13	65.49%	See Footnote <sup>[4]</sup>
	Cappamore	620	794	28%	65	10 or 22+	3.66	3.32	17.62%	See Footnote iv
	Croom	1,159	1,484	28%	104	10 or 22+	5.84	12.45		6.61
	Doon	516	660	28%	52	10 or 22+	2.91	2.73	100.00%	See Footnote iv
	Dromcolliher	518	663	28%	54	10 or 22+	3.06	2.43	65.06%	See Footnote iv
	Foynes	520	666	28%	55	10 or 22+	3.07	3.49	0.00%	0.42
	Glin	576	737	28%	59	10 or 22+	3.33	3.10	38.71%	See Footnote iv
	Hospital	653	836	28%	64	10 or 22+	3.59	3.32	100.00%	See Footnote iv
	Kilfinane	789	1,010	28%	81	10 or 22+	4.59	3.81	100.00%	See Footnote iv
	Murroe	1,377	1,694	23%	117	10 or 22+	6.61	5.82	66.79%	See Footnote iv
	Pallasgreen	568	727	28%	60	10 or 22+	3.38	3.11	50.32%	See Footnote iv
	Pallaskenry	651	836	28%	63	10 or 22+	3.53	3.60	86.28%	0.07
Level 4	Aggregate	12,117	15,467	28%	1,191		67.15	142.61		75.46

Level 5	Small Villages	5,469	6,453	18%	313					
Level 6	Rural Clusters	1,613	1,855	15%	91					
Level 7	Open Countryside	57,521	61,936	8%	772					
City and County	Totals	194,899	244,121	25%	15,591		<u>419.54</u> <del>431.15</del>	<u>818.80</u> <del>837.96</del>		<u>399.26</u> <del>406.8</del>

<sup>[1]</sup> The average densities for all settlements outside of the City area are derived by combining serviced sites at 10 units per hectare to accommodate 20% of the requirements for housing in this form and the remainder as “Residential Development Areas”. The densities for “Residential Development Areas” are set at 22 units per hectare for all settlements outside of the City and Environs, except Newcastle West where the density shall be 35 units per hectare for 80% of units.

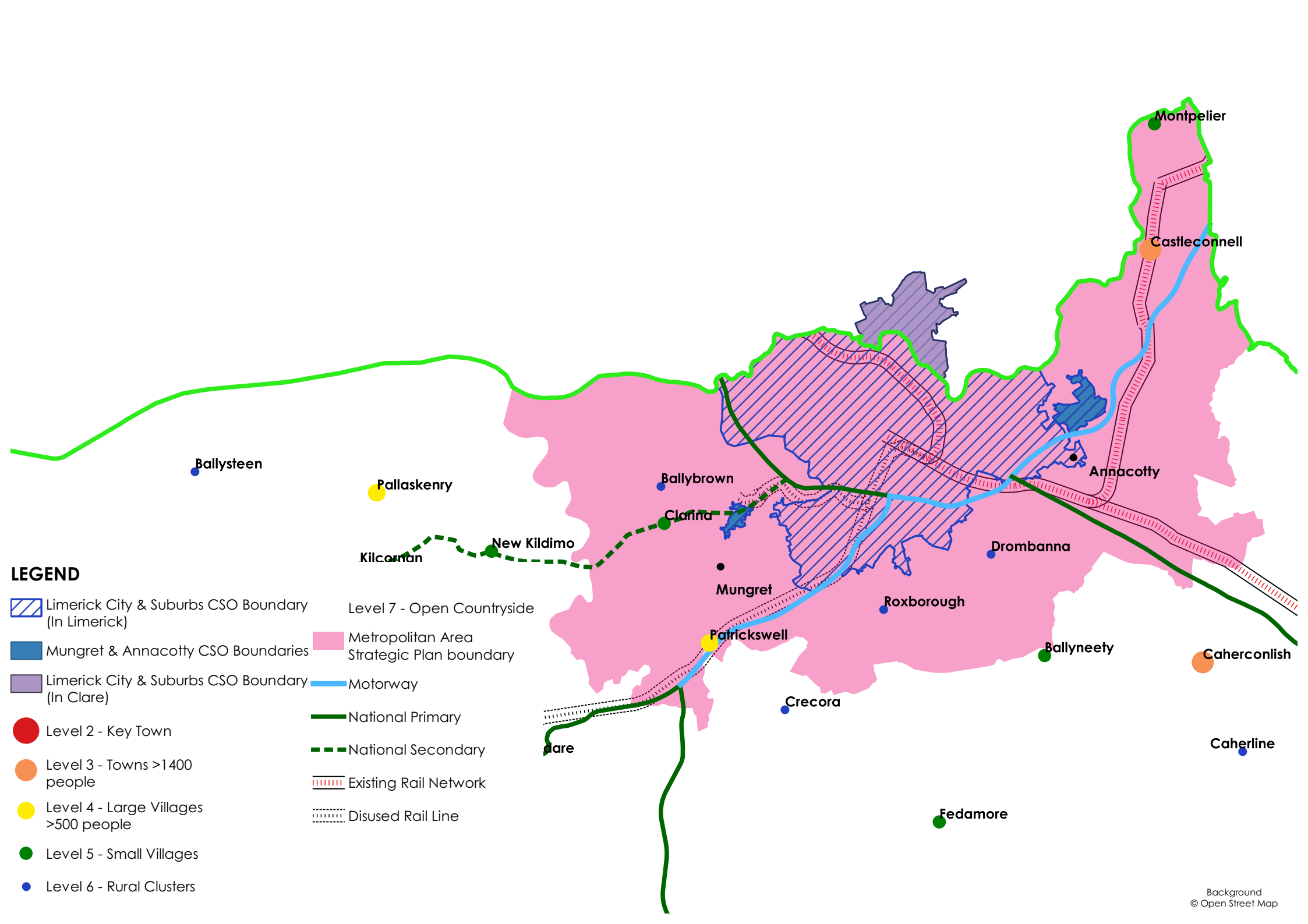
<sup>[2]</sup> The NPF requires that the proportion of new homes within the built up footprint should be at least 50% for the City and 30% for all other settlements. It should be noted that the zoning for new housing development in the settlements of Bruff, Cappamore and Foynes are immediately contiguous to the built up area.

<sup>[3]</sup> The growth allocation of Clarina between 2016 and 2028 is high, but this is largely accounted for by growth already taken place between 2016 and 2022. New population growth since 2016 is estimated at being 244, constituting 82% of the total projected growth up to 2028.

<sup>[4]</sup> A percentage of the population growth ranging from 5% to 15% is expected to be accommodated within the town or village center zoning. Where there are deficits between the quantum of zoned land required and that which is available, it is expected that the balance of demand will be met from within the town or village centers through renovations or infill development.









## Volume 2: Level 1 Limerick City and Environs Settlement Capacity Audit

**Table 1:** SCA Limerick City and Environs, Mungret and Annacotty lands identified for potential Residential, or a combination of Residential and other Mixed Use development:

Legend					
Serviced/ Yes	✓	Serviceable/ Investment required	!	Not required/ No	✗
Located within 1.5km walk	●	Located within 1.5-3km walk	●	Located over 3km+ walk	●
Short term – 5 year delivery	S	Medium term – 10 year delivery	M	Long Term – 20 year delivery	L

Site No.	Zoning	Area (ha.)	Assumed Residential Density per ha.	Estimated Residential Yield	Lighting	Footpaths	Public Transport	Road Access	Water	Foul	Surface Water	Flood Risk	Infill/ Brown-field	Proximity to Schools	Time Line/ Cost	Planning History/ Comments if applicable	Service Status/ Tier
1	New Residential	2.408 <del>4.811</del>	35+	84 <del>168</del>	✓	✓	●	✓	✓	✓	✓	✗	✗	●	Developer led	-Permission for 415 units expired -Vacant Site Register <del>-Site flood design/ mitigation works</del>	<u>1</u> <del>2</del>
2	New Residential	2.395	35+	84	✓	!	●	!	✓	✓	✓	✗	✗	●	Developer led	-Road widening required	2
3	New Residential	2.013	45+	91	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-Brownfield -Permission for 74 units (21/7025)	1
4	New Residential	1.712	45+	92*	✓	✓	●	✓	✓	✓	✓	✗	✗	●		-*Permission for 92 units (19/970) Commenced	1
5	New Residential	2.72	35+	94	✓	✓	●	✓	!	!	!	✗	✗	●	S €1m	-Additional services required	2
6	Local Centre <sup>3</sup>	0.651	35+	6	✓	✓	●	✓	!	!	!	✗	✗	●	S €1m	-Additional services required	2
7	New Residential	11.8	35+	413	✓	✓	●	✓	!	!	!	✗	✗	●	S €1m	-Additional services required	2
8	New Residential	2.772	35+	97	✓	✓	●	✓	!	!	!	✗	✗	●	S €1m	-Additional services required	2
9	Existing Residential	1.07	45+	48	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-Regeneration Area	1
10	Existing Residential	1.991	45+	90	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-Regeneration Area	1
11	Existing Residential	0.269	45+	12	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-Regeneration Area	1
12	Mixed Use	9.4	45+	108*	!	!	●	!	!	!	!	✗	✗	●	S €1m	-Regeneration Area -Additional services required -*Tender Awarded (108 units)	2

Site No.	Zoning	Area (ha.)	Assumed Residential Density per ha.	Estimated Residential Yield	Lighting	Footpaths	Public Transport	Road Access	Water	Foul	Surface Water	Flood Risk	Infill/ Brown-field	Proximity to Schools	Time Line/ Cost	Planning History/ Comments if applicable	Service Status/ Tier
13	Existing Residential	0.899	45+	40	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-Regeneration Area	1
14	Existing Residential	2.014	45+	91	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-Permission for 92 units (19/970) commenced	1
15	New Residential	3.003	45+	135	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-Regeneration Area	1
16	Existing Residential	0.436	45+	20	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-Regeneration Area	1
17	Existing Residential	0.136	45+	6	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-Regeneration Area	1
18	Existing Residential	1.216	45+	55	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-Part 8 for 50 units (15/8003)	1
19	Existing Residential	0.74	45+	33	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-Regeneration Area -Part 8 for 27 units (19/8003)	1
20	Mixed Use	0.641	45+	28	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-Regeneration Area	1
21	New Residential	0.172	45+	31*	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-*Permission for 31 units (19/710) -Brownfield	1
22	City Centre	3.919	100+	250**	✓	✓	●	✓	✓	✓	✓	✓	✓	●	Developer led	-MASP supported Clevees Riverside Campus -Brownfield Consolidation Site -**Potential for 250 units over lifetime of Plan -Site flood design/ mitigation works	2
23	New Residential	0.148	45+	7	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
24	New Residential	0.248	45+	11	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
25	Existing Residential	0.125	45+	6	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
26	New Residential	2.196	35+	77	✓	✓	●	!	✓	✓	✓	✗	✓	●	S €1.5m	-Mill Road requires upgrading – Part 8 permitted	2
27	New Residential	2.326	45+/35+	86	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
28	New Residential	0.586	45+/35+	25	✓	✓	●	!	✓	✓	✓	✗	✓	●	S €1.5m	-Mill Road requires upgrading – Part 8 permitted	2
29	New Residential	1.88	45+	85	✓	✓	●	!	✓	✓	✓	✗	✓	●	S €1.5m	-Mill Road requires upgrading – Part 8 permitted	2
30	New Residential	0.475	45+	21	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1

Site No.	Zoning	Area (ha.)	Assumed Residential Density per ha.	Estimated Residential Yield	Lighting	Footpaths	Public Transport	Road Access	Water	Foul	Surface Water	Flood Risk	Infill/ Brown-field	Proximity to Schools	Time Line/ Cost	Planning History/ Comments if applicable	Service Status/ Tier
31	New Residential	1.061	45+/35+	37	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
32	New Residential	4.27	45+/35+	178	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-Masterplan by developer recommended -Permission for 1 unit (21/1664)	1
33	New Residential	2.57	35+	90	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
34	New Residential	1.33	35+	47	✓	✓	●	✓	✓	✓	✓	✗	✗	●		-Masterplan by developer recommended	1
35	New Residential	0.454	45+	27*	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-*Part 8 for 27 units (19/8004)	1
36	City Centre	0.198	100+	20	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
37	City Centre	0.09	100+	9	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
38	City Centre	0.036	100+	4	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
39	City Centre	0.094	100+	9	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
40	City Centre	0.132	100+	13	✓	✓	●	✓	✓	✓	✓	✓	✓	●	Developer led	-Site flood mitigation/design required	2
41	City Centre	0.106	100+	11	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
42	City Centre	0.061	100+	12*	✓	✓	●	✓	✓	✓	✓	✓	✓	●	Developer led	-*Part 8 for 12 units (17/8012) -Brownfield -Site flood mitigation/ design required	2
43	New Residential	4.191	45+	188	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-Brownfield	1
44	New Residential	0.632	45+	28	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-Brownfield	1
45	New Residential	0.452	45+	20	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
46	New Residential	0.912	45+	41	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
47	New Residential	0.373	45+	17	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
48	New Residential	0.936	45+	42	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
49	New Residential	0.922	45+	41	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-Permission for 17 units (17/834)	1
50	New Residential	0.704	45+	31	✓	✓	●	✓	✓	✓	✓	✗	✗	●		-Permission for 4 units (20/827)	1

Site No.	Zoning	Area (ha.)	Assumed Residential Density per ha.	Estimated Residential Yield	Lighting	Footpaths	Public Transport	Road Access	Water	Foul	Surface Water	Flood Risk	Infill/ Brown-field	Proximity to Schools	Time Line/ Cost	Planning History/ Comments if applicable	Service Status/ Tier
51	Existing Residential	0.272	45+	12	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-Permission for 8 units (17/834)	1
52	New Residential	0.548	45+	25	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
53	New Residential	2.401	45+	108	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-New school within 1.5km to commence construction in 2021 -Brownfield	1
54	New Residential	1.435	45+	65	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
55	New Residential	1.435	35+	63*	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-*Permission for 63 units (20/1074)	1
56	New Residential	4.644	35+	132	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-Permission for 31 units (18/55)	1
57	New Residential	12.36	45+/35+	508	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
58	New Residential	4.146	45+	200*	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-*SHD application 200 units (307631)	1
59	New Residential	0.668	45+	30	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
60	New Residential	1.133	45+	51	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-Annacotty Settlement -Vacant Site Register	1
61	New Residential	2.467	45+	137	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-Annacotty Settlement -SHD Granted for 137 units (309999)	1
62	Existing Residential	1.582	45+	71	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-Annacotty Settlement -Permission for 48 units expired -Vacant Site Register	1
63	New Residential	0.467	45+	21	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-Annacotty Settlement -Brownfield	1
64	New Residential	13.36	45+/35+	502*	✓	✓	●	✓	✓	✓	✓	✗	✓	●	Developer led	-*Permission for 411 units (18/1105, 19/1236, 19/547, 20/256, 21/350), 89 units commenced (18/1104) -Vacant Site Register -Water Services to be provided by developer	1
65	New Residential	1.18	45+	53	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-Vacant Site Register	1
66	New Residential	0.191	35+	7	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1

Site No.	Zoning	Area (ha.)	Assumed Residential Density per ha.	Estimated Residential Yield	Lighting	Footpaths	Public Transport	Road Access	Water	Foul	Surface Water	Flood Risk	Infill/ Brown-field	Proximity to Schools	Time Line/ Cost	Planning History/ Comments if applicable	Service Status/ Tier
67	New Residential	2.056	35+	74	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-Permission for 15 units expired	1
68	New Residential	2.638	35+	92	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
69	New Residential	8.746	45+/ 35+	310	✓	✓	●	✓	✓	✓	✓	✗	✗	●	€5m	-Proposed distributor road	1
70	New Residential	8.56	45+/ 35+	375	✓	✓	●	✓	✓	✓	✓	✗	✗	●	M/ L	-Indicative Link Road in this area, not required for site access	1
71	New Residential	3.167	45+/ 35+	141	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
72	Mixed Use <sup>1</sup>	16.05	45+/ 35+	216	✓	✓	●	✓	✓	✓	✓	✗	✗	●		-Road and services installed by developer -New school within 1.5km to commence construction in 2021	1
73	Existing Residential	0.274	35+	9	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-Permission for 4 units (18/72)	1
74	New Residential	0.543	35+	19	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
75	New Residential	0.227	45+/ 35+	10	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
76	Mixed Use <sup>2</sup>	6.603	45+	245*	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-Brownfield	1
77	New Residential	0.727	45+	33	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
78	New Residential	0.919	45+	41	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
79	New Residential	2.384	45+	107	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-Permission for 55 units (21/580)	1
80	Existing Residential	0.077	45+	3	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-Brownfield	1
81	New Residential	0.156	45+	32*	✓	✓	●	✓	✓	✓	✓	✓	✓	●	Developer led	-Site flood mitigation/design required -Brownfield	2
82	City Centre	0.165	100+	17	✓	✓	●	✓	✓	✓	✓	✓	✓	●	Developer led	-Site flood mitigation/design required -Permission for 32 units (19/762) -Brownfield	2

<sup>1</sup> A maximum of 30% of this Mixed Use site area shall be considered for Residential use

<sup>2</sup> A maximum of 48% of this Mixed Use site area shall be considered for Residential use



Site No.	Zoning	Area (ha.)	Assumed Residential Density per ha.	Estimated Residential Yield	Lighting	Footpaths	Public Transport	Road Access	Water	Foul	Surface Water	Flood Risk	Infill/ Brown-field	Proximity to Schools	Time Line/ Cost	Planning History/ Comments if applicable	Service Status/ Tier
83	City Centre	0.124	100+	12	✓	✓	●	✓	✓	✓	✓	✓	✓	●	Developer led	-Site flood mitigation/ design required -Brownfield	2
84	City Centre	0.043	100+	20	✓	✓	●	✓	✓	✓	✓	✓	✓	●	Developer led	-Permission for 20 units (18/1210) -Site flood mitigation/ design required -Brownfield	2
85	City Centre	1.538	100+	13	✓	✓	●	✓	✓	✓	✓	✓	✓	●		-MASP supported Opera Site development commenced (17/8008) 13 units -Brownfield Consolidation Site	1
86	City Centre	0.676	100+	68	✓	✓	●	✓	✓	✓	✓	✓	✓	●	Developer led	-Site flood mitigation/design required -Brownfield Consolidation Site	2
87	City Centre	0.136	100+	14	✓	✓	●	✓	✓	✓	✓	✗	✓	●	Developer led	-Site flood mitigation/design required -Brownfield	2
88	City Centre	0.348	100+	35	✓	✓	●	✓	✓	✓	✓	✓	✓	●	Developer led	-Site flood mitigation/design required -Brownfield	2
89	City Centre	0.089	100+	9	✓	✓	●	✓	✓	✓	✓	✓	✓	●	Developer led	-Site flood mitigation/design required	2
90	City Centre	0.311	100+	42*	✓	✓	●	✓	✓	✓	✓	✓	✓	●		-*Permission for 42 units (19/1060) -Brownfield	2
91	City Centre	1.38	100+	138	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-Brownfield	1
92	City Centre	0.079	100+	8	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
93	City Centre	0.056	100+	6	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
94	City Centre	0.204	100+	24*	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-*Permission for 24 units (20/222)	1
95	City Centre	0.104	100+	10	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
96	City Centre	0.156	100+	16	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
97	City Centre	0.061	100+	6	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
98	City Centre	0.087	100+	9	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1

Site No.	Zoning	Area (ha.)	Assumed Residential Density per ha.	Estimated Residential Yield	Lighting	Footpaths	Public Transport	Road Access	Water	Foul	Surface Water	Flood Risk	Infill/ Brown-field	Proximity to Schools	Time Line/ Cost	Planning History/ Comments if applicable	Service Status/ Tier
99	City Centre	0.065	100+	7	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
100	City Centre	0.363	100+	36	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-Brownfield	1
101	City Centre	0.157	100+	16	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-Permission for 8 units (18/168) -Brownfield Consolidation Site	1
102	City Centre	0.129	100+	13	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
103	City Centre	0.086	100+	9	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
104	City Centre	0.074	100+	7	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
105	City Centre	0.21	100+	21	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
106	Existing Residential	0.14	45+	6	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-Tender awarded for Social Housing (36 units) -Brownfield	1
107	City Centre	68.48	100+	625**	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-LDA Colbert Station Quarter -**Potential capacity over lifetime of Plan -Permission for 11 units (18/8010) -Permission for 12 units (17/1103) -Brownfield Consolidation Site	1
108	New Residential	0.297	45+	13	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
109	New Residential	0.26	45+	12	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
110	New Residential	0.126	45+	6	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
111	New Residential	0.703	45+	32	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
112	New Residential	1.346	45+	61	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
113	Existing Residential	0.207	45+	9	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
114	Local Centre <sup>3</sup>	0.66097	35+	6	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1

<sup>3</sup> A maximum of 25% of this Local Centre site area shall be considered for Residential use

Site No.	Zoning	Area (ha.)	Assumed Residential Density per ha.	Estimated Residential Yield	Lighting	Footpaths	Public Transport	Road Access	Water	Foul	Surface Water	Flood Risk	Infill/ Brown-field	Proximity to Schools	Time Line/ Cost	Planning History/ Comments if applicable	Service Status/ Tier
115	Existing Residential	0.952	45+	43	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
116	Existing Residential	0.133	45+	6	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
117	Existing Residential	0.181	45+	8	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
118	Existing Residential	0.506	45+	23	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
119	Existing Residential	1.074	45+	48	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
120	Existing Residential	0.755	45+	34	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
121	Existing Residential	0.563	45+	25	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
122	Existing Residential	0.757	45+	34	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
123	New Residential	0.467	45+ /35+	21	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-Brownfield site	1
124	Existing Residential	0.139	45+	27	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-Part 8 for 27 units (17/8003)	1
125	Existing Residential	1.413	45+	64	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
126	Existing Residential	0.412	45+	19	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
127	Existing Residential	0.508	45+	23	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
128	New Residential	4.75	45+	214	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
129	New Residential	2.208	45+	99	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-Regeneration Area -Brownfield	1
130	Existing Residential	0.144	45+	6	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-Regeneration Area	1
131	New Residential	0.252	45+	11	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-Regeneration Area	1
132	Existing Residential	0.706	45+	31	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-SHD Application 100 units -Brownfield	1
133	New Residential	<del>4.841</del> <del>19.55</del>	45+/ 35+	<del>209</del> <del>802</del>	✓	✓	●	✓	✓	✓	✓	✓	✓	●		-Permission for 31 units (17/1190) -SHD application for 371 units (21/311588)	<del>1</del> <del>2</del>

Site No.	Zoning	Area (ha.)	Assumed Residential Density per ha.	Estimated Residential Yield	Lighting	Footpaths	Public Transport	Road Access	Water	Foul	Surface Water	Flood Risk	Infill/ Brown-field	Proximity to Schools	Time Line/ Cost	Planning History/ Comments if applicable	Service Status/ Tier
															Developer led	<del>-Site flood mitigation/design required</del>	
134	Existing Residential	0.607	45+/35+	23	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
135	Existing Residential	0.182	35+	6	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
136	New Residential	8.558	35+	300	✓	✓	●	✓	✓	✓	✓	✗	✗	●		-SHD Pre-Planning 322 units	1
137	New Residential	2.42	35+	85	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-Potential for connections through existing estate	1
138	New Residential	2.14	35+	75	✓	✓	●	✓	✓	✓	✓	✗	✗	●		-Permission Expired – 97 units	1
139	New Residential	0.285	35+	10	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-Brownfield	1
140	New Residential	3.138	35+	110	✓	✓	●	✓	✓	✓	✓	✗	✗	●		-Permission for 96 units (20/1115)	1
141	New Residential	0.516	35+	18	✓	✓	●	✓	✓	✓	✓	✗	✗	●			1
142	New Residential	4.12	35+	144	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-Permission Expired – 28 units	1
143	New Residential	4.38	35+	153	!	!	●	✓	✓	✓	✓	✗	✓	●	Developer led	-Lighting, footpath extensions and pedestrian crossing of N69 required -Road infrastructure upgrades including traffic calming required -Access to be provided via minor road only	2
144	New Residential	31.95	35+	1118	!	!	●	!	!	!	!	✗	✗	●	S €50	-MASP identified Mungret Masterplan -Mungret Link Road will provide all services -Part 8 granted 253 units (21/800)	2
145	New Residential	1.326	35+	52	!	!	●	!	!	!	!	✗	✗	●	S €50	-MASP identified Mungret Masterplan -Mungret Link Road will provide all services	2
146	New Residential	0.632	35+	22	✓	✓	●	✓	✓	✓	✓	✗	✗	●		-MASP identified Mungret Masterplan	1
147	Local Centre <sup>3</sup>	1.03	35+	9	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-MASP identified Mungret Masterplan	1

Site No.	Zoning	Area (ha.)	Assumed Residential Density per ha.	Estimated Residential Yield	Lighting	Footpaths	Public Transport	Road Access	Water	Foul	Surface Water	Flood Risk	Infill/ Brown-field	Proximity to Schools	Time Line/ Cost	Planning History/ Comments if applicable	Service Status/ Tier
148	New Residential	5.065	35+	253*	!	!	●	!	!	!	!	✗	✗	●	S €50	-MASP identified Mungret Masterplan -Permission for 253 units (21/800) -Link Road will provide all services	2
149	Existing Residential	0.939	35+	33	✓	✓	●	✓	✓	✓	✓	✗	✓	●		-MASP identified Mungret Masterplan	1
150	New Residential	2.519	35+	88	!	!	●	!	!	!	!	✗	✗	●		-MASP identified Mungret Masterplan -Phase 1 Link Road constructed	2
151	New Residential	13.45	45+/35+	586	!	!	●	!	!	!	!	✗	✗	●	S €50	-MASP identified Mungret Masterplan -Proposed Mungret Link Road	2
152	New Residential	4.12	45+/35+	145	✓	✓	●	✓	✓	✓	✓	✗	✗	●			1
153	New Residential	2.521	35+	88	✓	✓	●	✓	✓	✓	✓	✗	✗	●		-Permission for 65 units (20/1195) -MASP identified Mungret Masterplan	1
154	Existing Residential	0.743	45+	33	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
155	New Residential	0.34	45+	15	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
156	Existing Residential	0.584	45+	26	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
157	Local Centre <sup>3</sup>	0.576	45+	6	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
<del>158</del>	<del>Mixed Use<sup>4</sup></del>	<del>1.758</del>	<del>45+</del>	<del>55</del>	<del>✓</del>	<del>✓</del>	<del>●</del>	<del>✓</del>	<del>✓</del>	<del>✓</del>	<del>✓</del>	<del>✓</del>	<del>✓</del>	<del>●</del>	<del>Developer led</del>	<del>-Site flood mitigation/design required</del>	<del>2</del>
<del>159</del>	<del>Mixed Use<sup>4</sup></del>	<del>0.704</del>	<del>45+</del>	<del>22</del>	<del>✓</del>	<del>✓</del>	<del>●</del>	<del>✓</del>	<del>✓</del>	<del>✓</del>	<del>✓</del>	<del>✓</del>	<del>✓</del>	<del>●</del>	<del>Developer led</del>	<del>-Brownfield Site flood mitigation/design required</del>	<del>2</del>
<del>158</del> 160	New Residential	0.938	45+	42	✓	✓	●	✓	✓	✓	✓	✗	✓	●	Developer led	-110kv ESB cables and pylons on site	2
<del>159</del> 161	New Residential	<del>2.734</del> 2.95	45+ /35+	<del>97</del> 105	✓	✓	●	✓	✓	✓	✓	✗	✗	●	Developer led	-Noise mitigation/design required	2
<del>160</del> 162	New Residential	<del>1.168</del> 1.278	35+	<del>42</del> 45	!	!	●	✓	✓	✓	✓	✗	✗	●	Developer led	-Noise mitigation/design required	2

<sup>4</sup> A maximum of 70% of this Mixed Use site area shall be considered for Residential use



Draft Limerick  
Development Plan  
2022 -2028

Residential Settlement Capacity Audit  
Further Alterations

LEGEND

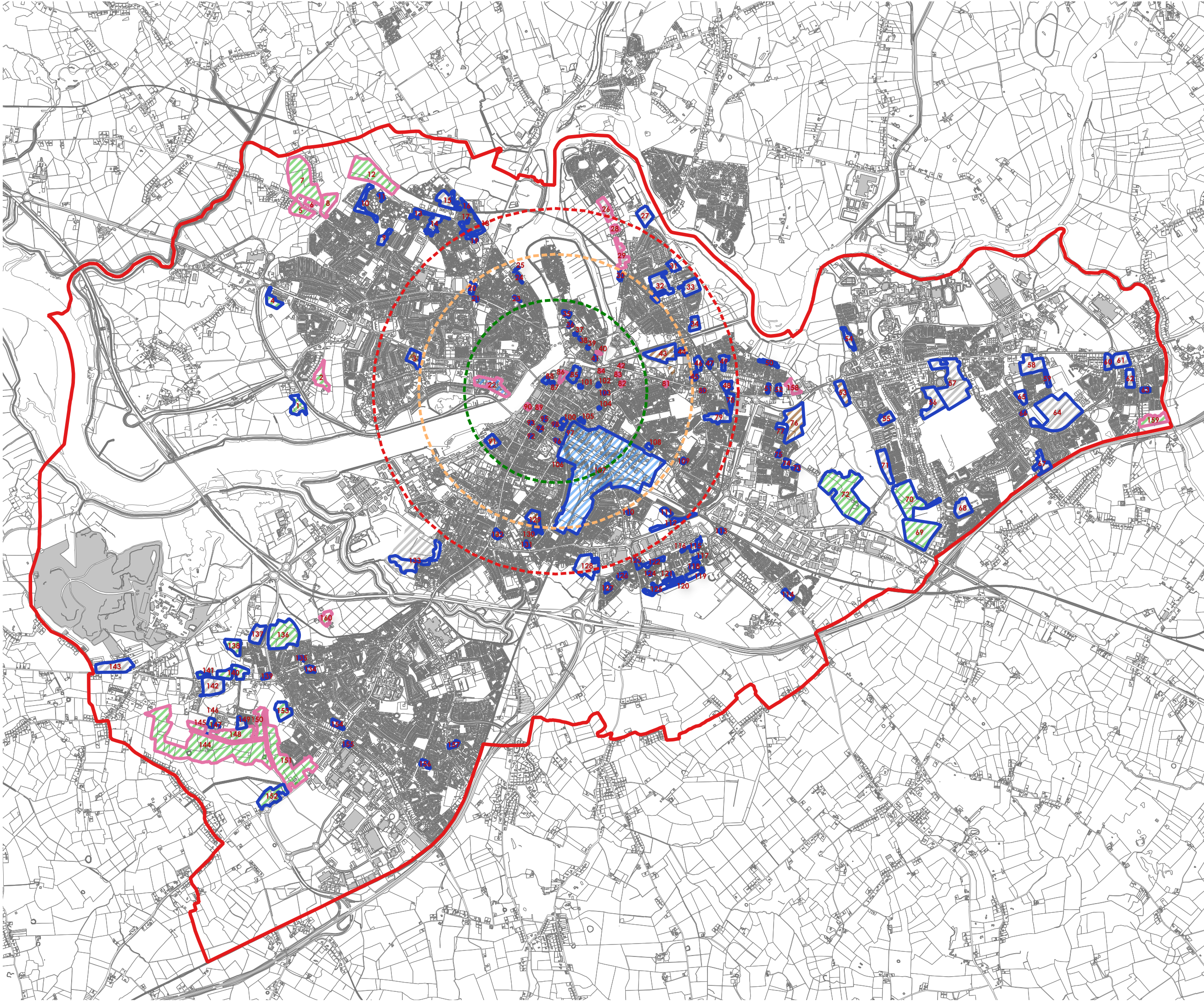
RSC Audit

- Tier 1  
Tier 2

- Brownfield  
Consolidation Site  
(Brownfield)  
Greenfield  
Infill

- 1KM  
1.5KM  
2KM

May '22 CDP-V2-04  
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**Table 2:** Limerick City and Environs, Mungret and Annacotty lands identified for potential Employment related development:

Legend																	
Serviced/ Yes	✓	Serviceable/ Investment required	!	Not required/ No	✗												
Located within 1.5km walk	●	Located within 1.5-3km walk	●	Located over 3km+ walk	●												
Short term – 5 year delivery	S	Medium term – 10 year delivery	M	Long Term – 20 year delivery	L												
Site No.	Zoning	Area (ha.)	Assumed Residential Density per ha.	Estimated Residential Yield	Lighting	Footpaths	Public Transport	Road Access	Water	Foul	Surface Water	Flood Risk	Infill/ Brown-field	Proximity to Schools	Time Line/ Cost	Planning History/ Comments if applicable	Service Status/ Tier
1	Enterprise & Employment	3.588	N/A	N/A	!	✓	●	✓	!	!	✓	✗	✗	●		-Brownfield	1
2	Enterprise & Employment	0.603	N/A	N/A	!	✓	●	✓	!	!	✓	✗	✗	●	S €1m	-Regeneration Area -MASP supported Northside Business Campus -Water main requires upgrading -Additional services required	2
3	Enterprise & Employment	10.8	N/A	N/A	!	!	●	!	!	!	!	✗	✗	●	S €1m	-Regeneration Area -MASP supported Northside Business Campus -Water main requires upgrading -Additional services required	2
4	Mixed Use	9.43	45+/35+	108*	!	!	●	!	!	!	!	✗	✗	●	S €1m	-Regeneration Area -MASP supported Northside Business Campus -Water main requires upgrading -Additional Services required -*Tender awarded for 108 units	2
5	Enterprise & Employment	12.79	N/A	N/A	!	!	●	!	!	!	!	✗	✗	●	S €1m	-Regeneration Area -MASP supported Northside Business Campus -Additional Services required	2
6	Mixed Use	2.150	N/A	N/A	✓	✓	●	✓	✓	✓	✓	✗	✗	●		-Regeneration Area	1
7	Mixed Use	0.641	N/A	29	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
8	Enterprise & Employment	2.787	N/A	N/A	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1



Site No.	Zoning	Area (ha.)	Assumed Residential Density per ha.	Estimated Residential Yield	Lighting	Footpaths	Public Transport	Road Access	Water	Foul	Surface Water	Flood Risk	Infill/ Brown-field	Proximity to Schools	Time Line/ Cost	Planning History/ Comments if applicable	Service Status/ Tier
9	High Tech/ Manuf.	6.603	N/A	N/A	✓	✓	●	✓	✓	✓	✓	✓	✓	●	Developer led	-Specific objective for SSFRA and mitigation works	2
10	High Tech/ Manuf.	8.296	N/A	N/A	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
11	Mixed Use	6.603	45+	142	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
12	Enterprise & Employ.	3.188	N/A	N/A	✓	✓	●	✓	✓	✓	✓	✗	✗	●			1
13	Enterprise & Employ.	16.05	N/A	N/A	✓	✓	●	✓	✓	✓	✓	✗	✗	●			1
14	Enterprise & Employ.	2.019	N/A	N/A	✓	✓	●	✓	✓	✓	✓	✓	✗	●		-Objective for Site Specific Flood Risk Assessment	2
15	Enterprise & Employ.	18.16	N/A	N/A	✓	✓	●	✓	✓	✓	✓	✗	✗	●			1
16	Enterprise & Employment	24.22	N/A	N/A	!	!	●	✓	✓	✓	✓	✗	✗	●	Developer led	-Extension of existing services required	2
17	Enterprise & Employ.	1.99	N/A	N/A	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
18	Enterprise & Employ.	0.789	N/A	N/A	✓	✓	●	✓	✓	✓	✓	✗	✗	●			1
19	Enterprise & Employ.	0.417	N/A	N/A	✓	✓	●	✓	✓	✓	✓	✗	✗	●			1
20	Enterprise & Employ.	1.306	N/A	N/A	✓	✓	●	✓	✓	✓	✓	✗	✓	●			1
21	Enterprise & Employ.	10.01	N/A	N/A	✓	✓	●	✓	✓	✓	✓	✓	✗	●		-Objective to plan site sequentially outside flood zone, to be used for ancillary open space	2
22	Data Centre	18.88	N/A	N/A	!	!	●	✓	✓	✓	✓	✓	✗	●	Developer led	-Objective for access and water compatible uses in the Flood Zone only -Extension of existing services required	2
23	Enterprise & Employ.	33.47 <del>20.47</del>	N/A	N/A	✓	✓	●	✓	✓	✓	✓	✓	✓	●		-Objective for Site Specific Flood Risk Assessment	2
24	Enterprise & Employ.	0.505	N/A	N/A	✓	✓	●	✓	✓	✓	✓	✓	✓	●		-Objective for Site Specific Flood Risk Assessment	2
25	Enterprise & Employ.	1.907	N/A	N/A	✓	✓	●	✓	✓	✓	✓	✓	✓	●		-Objective for Site Specific Flood Risk Assessment	2
26	Industry	5.229	N/A	N/A	✓	✓	●	✓	✓	✓	✓	✓	✓	●	S/M	-Primary bus route and cycle lanes proposed for Dock Road (LSMATs)	1

Site No.	Zoning	Area (ha.)	Assumed Residential Density per ha.	Estimated Residential Yield	Lighting	Footpaths	Public Transport	Road Access	Water	Foul	Surface Water	Flood Risk	Infill/ Brown-field	Proximity to Schools	Time Line/ Cost	Planning History/ Comments if applicable	Service Status/ Tier
															Developer led	-Site Specific Flood Risk Assessment required	
27	Industry	7.292	N/A	N/A	✓	✓	●	✓	✓	✓	✓	✓	✓	●	S/M Developer led	-Primary bus route and cycle lanes proposed for Dock Road (LSMATS) -Site Specific Flood Risk Assessment required	1
28	Enterprise & Employment	5.944	N/A	N/A	✓	✓	●	✓	✓	✓	✓	✓	✓	●	S €10m Developer led	-Primary bus route and cycle lanes proposed for Dock Road (LSMATS) -Site Specific Flood Risk Assessment required	1
29	Enterprise & Employment	4.34	N/A	N/A	✓	✓	●	✓	✓	✓	✓	✓	✓	●	S €10m Developer led	-Primary bus route and cycle lanes proposed for Dock Road (LSMATS) -Site Specific Flood Risk Assessment required	1
30	Enterprise & Employment	0.748	N/A	N/A	✓	✓	●	!	✓	✓	✓	✓	✓	●	S €10m Developer led	-Primary bus route and cycle lanes proposed for Dock Road (LSMATS) -Access available but Indicative Link Road -Site Specific Flood Risk Assessment required	2
31	Enterprise & Employ.	<u>2.033</u> <del>5.015</del>	N/A	N/A	✓	✓	●	!	✓	✓	✓	✓	✗	●	S €10m <del>Developer led</del>	-Primary bus route and cycle lanes proposed for Dock Road (LSMATS) -Access available but Indicative Link Road <del>-Site Specific Flood Risk Assessment required</del>	2
32	Enterprise & Employ.	<u>1.012</u> <del>6.496</del>	N/A	N/A	✓	✓	●	!	✓	✓	✓	✓	✗	●	S €10m <del>Developer led</del>	-Primary bus route and cycle lanes proposed for Dock Road (LSMATS) -Access available but Indicative Link Road <del>-Site Specific Flood Risk Assessment required</del>	2
33	Enterprise & Employ.	2.191	N/A	N/A	✓	!	●	✓	✓	✓	✓	✓	✗	●	<del>Developer led</del>	<del>-Site Specific Flood Risk Assessment required</del>	2
34	Enterprise & Employ.	<u>10.85</u> <del>12.41</del>	N/A	N/A	✓	!	●	!	✓	✓	✓	✓	✗	●	S €10m <del>Developer led</del>	-Primary bus route and cycle lanes proposed for Dock Road (LSMATS) -Indicative Link Road <del>-Site Specific Flood Risk Assessment required</del>	2
35	Enterprise & Employment	<u>4.445</u> <del>6.685</del>	N/A	N/A	✓	!	●	✓	✓	✓	✓	✓	✗	●	S €10m	-Primary bus route and cycle lanes proposed for Dock Road (LSMATS)	2

Site No.	Zoning	Area (ha.)	Assumed Residential Density per ha.	Estimated Residential Yield	Lighting	Footpaths	Public Transport	Road Access	Water	Foul	Surface Water	Flood Risk	Infill/ Brown-field	Proximity to Schools	Time Line/ Cost	Planning History/ Comments if applicable	Service Status/ Tier
															Developer led	<del>-Site Specific Flood Risk Assessment required</del>	
36	Industry	1.647	N/A	N/A	!	!	●	✓	✓	✓	✓	✗	✗	●	Developer led	-Lighting and footpath extensions required	2
37	High Tech/ Manuf.	46.68	N/A	N/A	!	!	●	✓	!	!	✓	✗	✗	●	Developer led	-Extension of existing services required -Framework Plan required Objective ECON O18	2
38	High Tech/ Manuf.	48.25	N/A	N/A	✓	✓	●	✓	✓	✓	✓	✓	✗	●	Developer led	-Ancillary uses / Attenuation areas in flood zone -Specific Objective for Flood Risk Assessment -Framework Plan required Objective ECON O18	2
39	High Tech/ Manuf.	9.54	N/A	N/A	✓	✓	●	✓	✓	✓	✓	✗	✗	●			1
40	High Tech/ Manuf.	33.12	N/A	N/A	✓	✓	●	✓	✓	✓	✓	✗	✗	●			1
41	Enterprise and Employment	7.562	N/A	N/A	↓	↓	●	↓	✓	✓	✓	✓	✓	●	Developer led	<del>-Site flood mitigation/design required -Extension of existing services required</del>	2
42	Enterprise and Employment	14.72	N/A	N/A	↓	↓	●	✓	✓	✓	✓	✓	✗	●	Developer led	<del>-Site flood mitigation/design required -Extension of existing services required</del>	2
43	Mixed Use <sup>5</sup>	1.758	45+	55	✓	✓	●	✓	✓	✓	✓	✓	✓	●	Developer led	<del>-Masterplan required -Site flood mitigation/design required</del>	2
41 44	Enterprise & Employment Mixed Use	0.704	45+	22	✓	✓	●	✓	✓	✓	✓	✓	✓	●	Developer led	-Brownfield -Site flood mitigation/design required	2
45	Data Centre	33.75	N/A	N/A	↓	↓	●	↓	↓	↓	↓	✗	✗	●	Developer led	<del>-Services required</del>	2

<sup>5</sup> A maximum of 70% of this Mixed Use site area shall be considered for Residential use



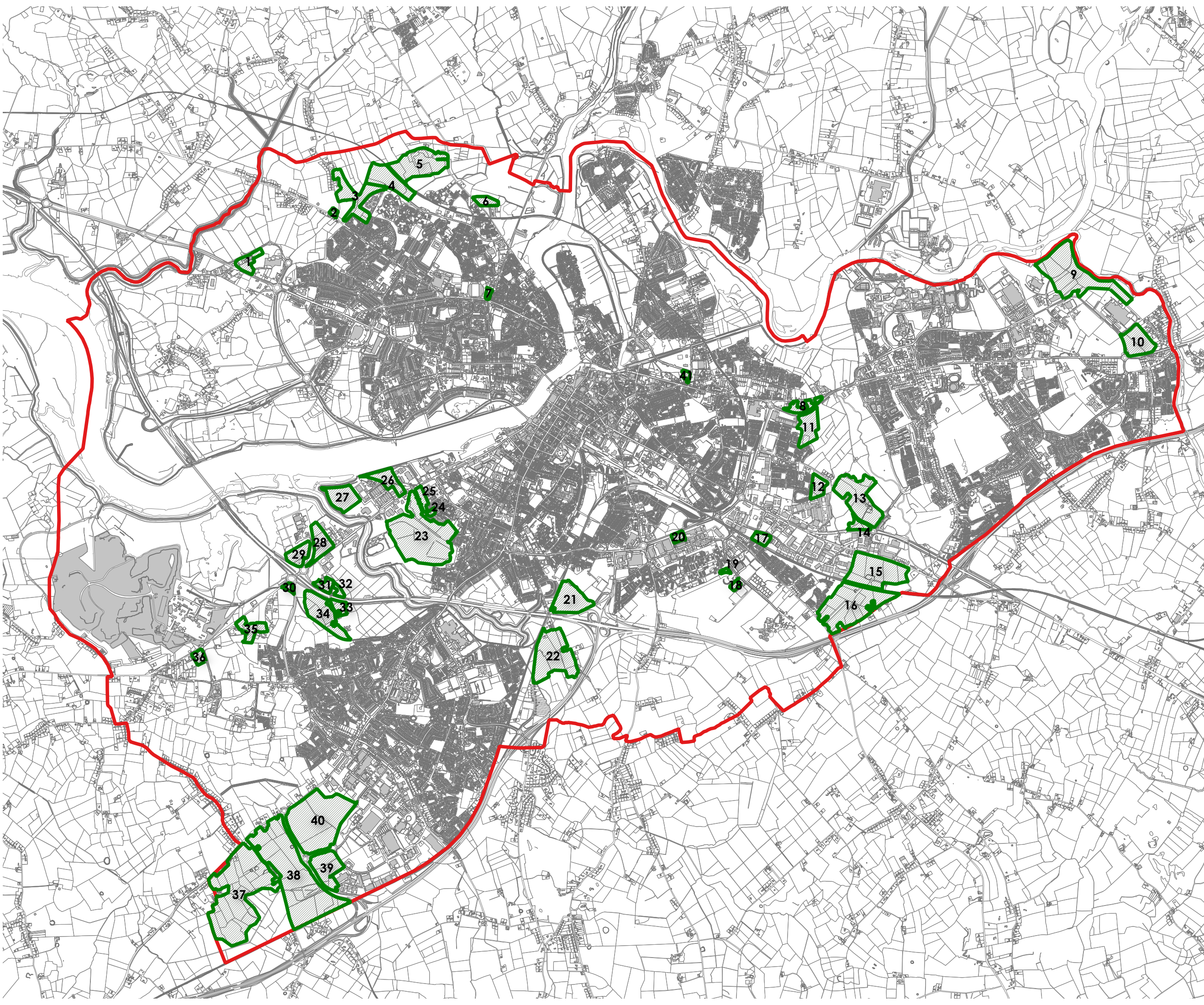
Draft Limerick  
Development Plan  
2022 -2028

Employment Settlement Capacity Audit  
Further Alterations

Legend

-  City & Environs  
Boundary
-  Employment Lands

DATE	May '22	DWG. No.	CDP-V2-05
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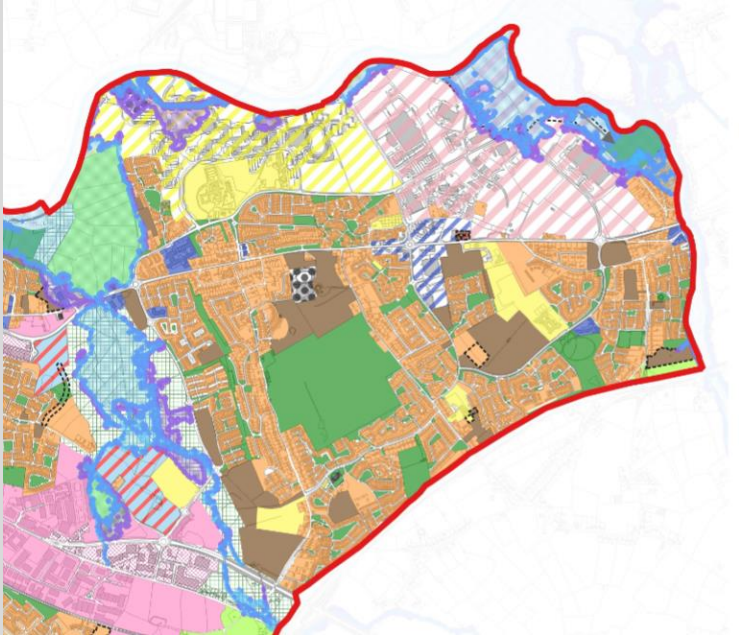




## Volume 4: Environmental Reports: Strategic Flood Risk Assessment

### Addendum: Appendix B Justification Tests

#### B.3 Castletroy

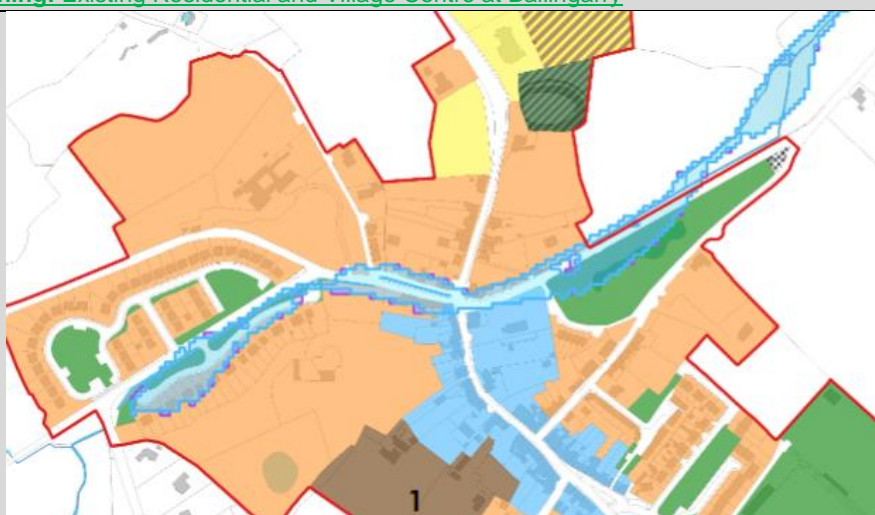
<b>Submission No.:</b> LCC-C101-16 OPW	
<b>Draft Plan Zoning:</b> Existing Residential at Castletroy	
	
<b>The urban settlement is targeted for growth under the National Planning Framework regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act 2000, as amended.</b>	<p>Limerick is targeted for growth under the National Planning Framework (NPF) and Regional Spatial and Economic Strategy (RSES) for the Southern Region.</p> <p>The NPF envisages Limerick as the principal focus within the Mid-West Region, with the potential to generate and be the focus of significant employment and housing growth.</p> <p>The RSES includes a Metropolitan Area Strategic Plan (MASP) for the Limerick Shannon area. The MASP supports the NPF's ambitious growth targets to enable Limerick City to grow by at least 50% to 2040 and to enhance its significant potential to become a city of scale.</p>
<b>The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the town and in particular:</b>	
<b>(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement</b>	The lands are proposed to be zoned Existing Residential reflecting their existing uses.
<b>(ii) Comprises significant previously developed and/or under-utilised lands</b>	These lands are already developed and currently occupied by existing dwellings.
<b>(iii) Is within or adjoining the core of an established or designated urban settlement</b>	The lands are within and adjoining the core of Castletroy.
<b>(iv) Will be essential in achieving compact or sustainable urban growth</b>	The lands are already in residential use.
<b>(v) 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</b>	The lands are currently developed.
<b>A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic</b>	Where there is Existing Residential development within Flood Zones A/B future development should be limited to minor development (Section 5.28

Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere.	of the Planning Guidelines) with no new, major development permitted within this area.
<b>Conclusion</b>	
The lands are currently occupied by Existing Residential uses and it is considered reasonable that the Plan continues to support the existing developments. However, it is proposed that any further development in Flood Zone A and B should be restricted to infill sites and extensions as per Section 5.28 of the Flood Risk Management Guidelines for Planning Authorities.	
<b>Recommendation</b>	
Retain the zoning objective.	

## B.4 County Limerick

Submission No.: LCC-C101-16 OPW

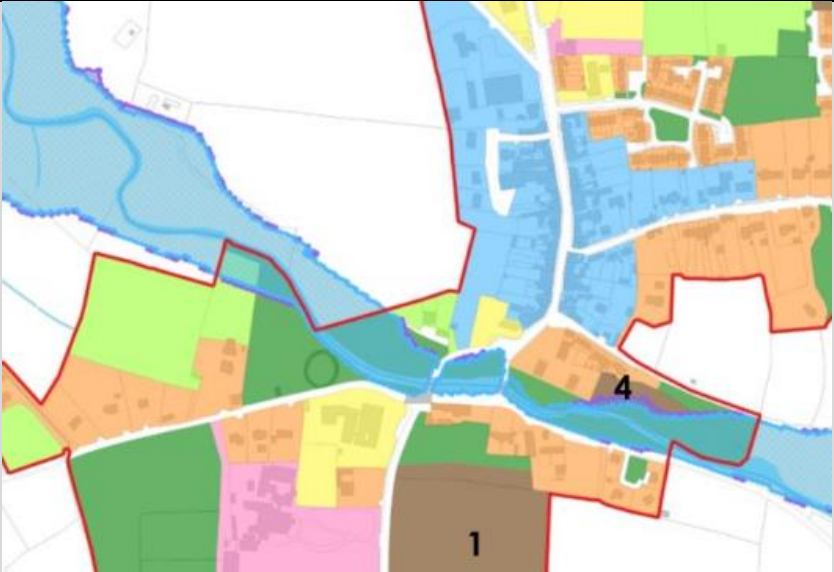
Draft Plan Zoning: Existing Residential and Village Centre at Ballingarry



<p>The urban settlement is targeted for growth under the National Planning Framework regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act 2000, as amended.</p>	<p>Limerick is targeted for growth under the National Planning Framework (NPF) and Regional Spatial and Economic Strategy (RSES) for the Southern Region.</p> <p>Ballingarry is a Level 4 Large Village in the Settlement Hierarchy of the Draft Limerick Development Plan 2022 – 2028. NPO 3c of the National Planning Framework sets out that at least 30% of all new homes that are targeted in settlements other than the five cities and their suburbs should occur within their existing built-up footprints.</p>
<p>The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the town and in particular:</p>	
<p>(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement</p>	<p>The lands are proposed to be zoned Existing Residential and Village Centre reflecting their existing uses. The lands are essential to facilitate regeneration and expansion of the centre of the settlement i.e. the Village Centre zone.</p>
<p>(ii) Comprises significant previously developed and/or under-utilised lands</p>	<p>These lands are already developed and currently occupied by existing uses as per their proposed zoning objectives.</p>
<p>(iii) Is within or adjoining the core of an established or designated urban settlement</p>	<p>The lands are within and adjoining the core of the Village Centre.</p>
<p>(iv) Will be essential in achieving compact or sustainable urban growth</p>	<p>The lands are essential to compact and sustainable growth of the settlement.</p>
<p>(v) 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</p>	<p>The lands are currently developed.</p>
<p>A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic</p>	<p>The extent of Flood Zone A/B across the Village Centre zoning is very limited and risks can be managed by following the sequential approach, guided by an appropriately detailed FRA.</p>



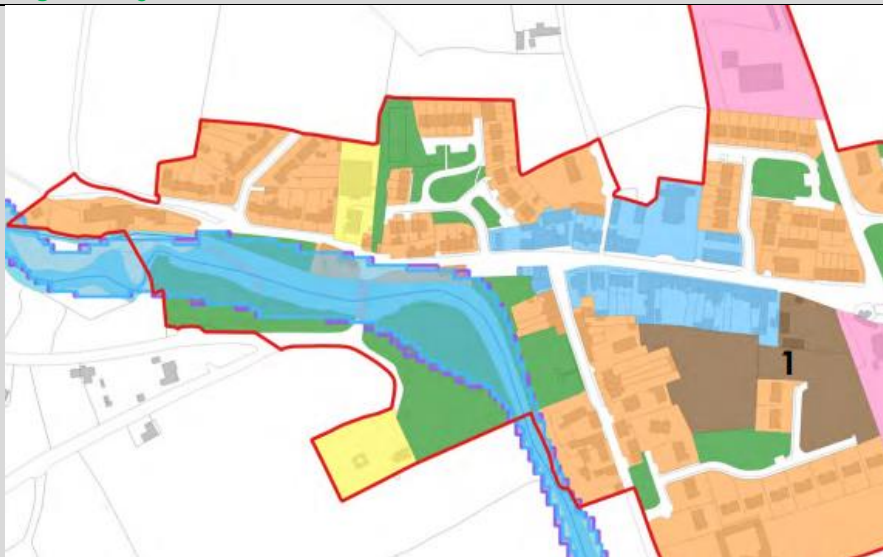
<u>Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere.</u>	Where there is Existing Residential development within Flood Zones A/B future development should be limited to minor development (Section 5.28 of the Planning Guidelines) with no new, major development permitted within this area.
<u>Conclusion</u>	
The lands are currently occupied by Existing Residential and Village Centre uses and it is considered reasonable that the Plan continues to support the existing developments. However, it is proposed that any further development in Flood Zones A and B should be restricted to infill sites and extensions as per Section 5.28 of the Flood Risk Management Guidelines for Planning Authorities.	
<u>Recommendation</u>	
Retain the zoning objectives.	

<u>Submission No.: LCC-C101-16 OPW</u>	
<u>Draft Plan Zoning: Existing Residential at Bruff</u>	
	
<u>The urban settlement is targeted for growth under the National Planning Framework regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act 2000, as amended.</u>	Limerick is targeted for growth under the National Planning Framework (NPF) and Regional Spatial and Economic Strategy (RSES) for the Southern Region. Bruff is a Level 4 Large Village in the Settlement Hierarchy of the Draft Limerick Development Plan 2022 – 2028. NPO 3c of the National Planning Framework sets out that at least 30% of all new homes that are targeted in settlements other than the five cities and their suburbs should occur within their existing built-up footprints.
<u>The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the town and in particular:</u>	
<u>(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement</u>	The lands are proposed to be zoned Existing Residential reflecting their existing uses. The lands are essential to facilitate expansion of the centre of the settlement.
<u>(ii) Comprises significant previously developed and/or under-utilised lands</u>	These lands are already developed and currently occupied by existing uses as per their proposed zoning objective.
<u>(iii) Is within or adjoining the core of an established or designated urban settlement</u>	The lands are within and adjoining the core of the settlement.

<u>(iv) Will be essential in achieving compact or sustainable urban growth</u>	The lands are essential to compact and sustainable growth of the settlement.
<u>(v) 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</u>	The lands are currently developed.
<u>A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere.</u>	Where there is Existing Residential development within Flood Zones A/B future development should be limited to minor development (Section 5.28 of the Planning Guidelines) with no new, major development permitted within this area.
<b><u>Conclusion</u></b>	
The lands are currently occupied by Existing Residential uses and it is considered reasonable that the Plan continues to support the existing developments. However, it is proposed that any further development in Flood Zones A and B should be restricted to infill sites and extensions as per Section 5.28 of the Flood Risk Management Guidelines for Planning Authorities.	
<b><u>Recommendation</u></b>	
Retain the zoning objective.	

**Submission No.:** LCC-C101-16 OPW

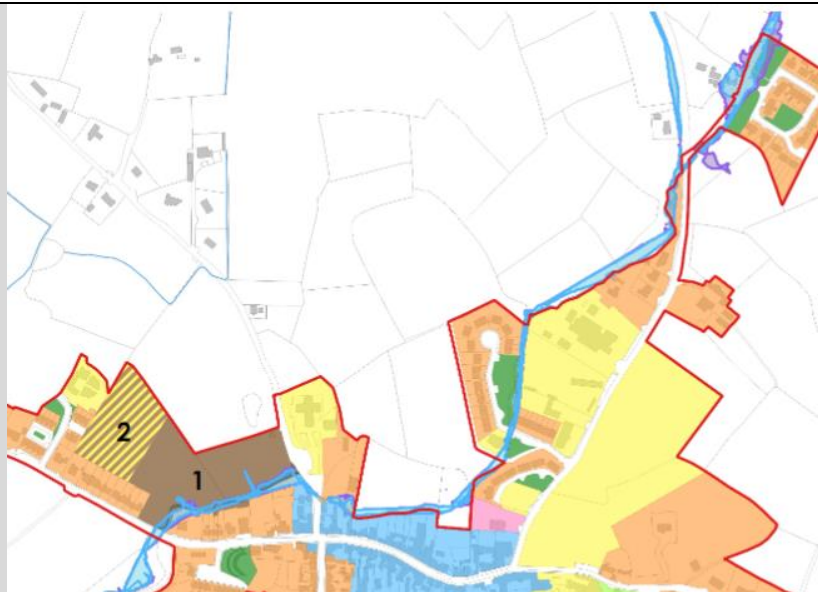
**Draft Plan Zoning:** Existing Residential at Bruree



<u>The urban settlement is targeted for growth under the National Planning Framework regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act 2000, as amended.</u>	<p>Limerick is targeted for growth under the National Planning Framework (NPF) and Regional Spatial and Economic Strategy (RSES) for the Southern Region.</p> <p>Bruree is a Level 4 Large Village in the Settlement Hierarchy of the Draft Limerick Development Plan 2022 – 2028. NPO 3c of the National Planning Framework sets out that at least 30% of all new homes that are targeted in settlements other than the five cities and their suburbs should occur within their existing built-up footprints.</p>
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<b>The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the town and in particular:</b>	
<b>(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement</b>	The lands are proposed to be zoned Existing Residential reflecting their existing uses. The lands are essential to facilitate regeneration and expansion of the centre of the settlement.
<b>(ii) Comprises significant previously developed and/or under-utilised lands</b>	These lands are already developed and currently occupied by existing uses as per their proposed zoning objective.
<b>(iii) Is within or adjoining the core of an established or designated urban settlement</b>	The lands are within and adjoining the core of the settlement.
<b>(iv) Will be essential in achieving compact or sustainable urban growth</b>	The lands are essential to compact and sustainable growth of the settlement.
<b>(v) 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</b>	The lands are currently developed.
<b>A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere.</b>	Where there is Existing Residential development within Flood Zones A/B future development should be limited to minor development (Section 5.28 of the Planning Guidelines) with no new, major development permitted within this area.
<b><u>Conclusion</u></b>	
The lands are currently occupied by Existing Residential uses and it is considered reasonable that the Plan continues to support the existing developments. However, it is proposed that any further development in Flood Zones A and B should be restricted to infill sites and extensions as per Section 5.28 of the Flood Risk Management Guidelines for Planning Authorities.	
<b><u>Recommendation</u></b>	
Retain the zoning objectives.	

<b>Submission No.:</b> LCC-C101-16 OPW
<b>Draft Plan Zoning:</b> Existing Residential, Village Centre, Education and Community Facilities and Enterprise and Employment at Doon

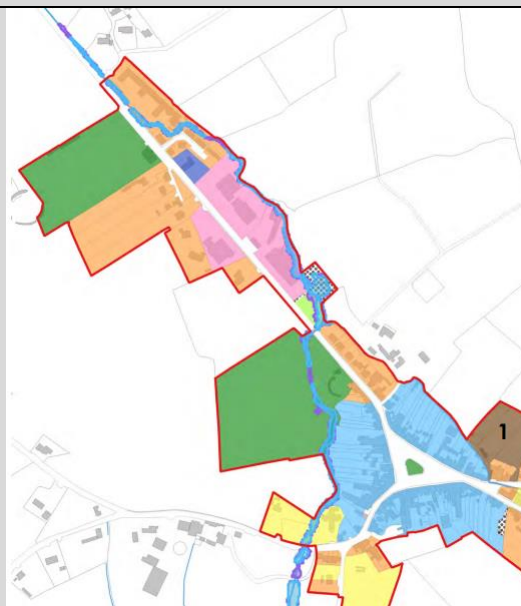


<u>The urban settlement is targeted for growth under the National Planning Framework regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act 2000, as amended.</u>	Limerick is targeted for growth under the National Planning Framework (NPF) and Regional Spatial and Economic Strategy (RSES) for the Southern Region. Doon is a Level 4 Large Village in the Settlement Hierarchy of the Draft Limerick Development Plan 2022 – 2028. NPO 3c of the National Planning Framework sets out that at least 30% of all new homes that are targeted in settlements other than the five cities and their suburbs should occur within their existing built-up footprints.
<u>The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the town and in particular:</u>	
<u>(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement</u>	The lands are proposed to be zoned Existing Residential, Village Centre, Education and Community Facilities and Enterprise and Employment, reflecting their existing uses. The lands are essential to facilitate regeneration and expansion of the centre of the settlement.
<u>(ii) Comprises significant previously developed and/or under-utilised lands</u>	These lands are already developed and currently occupied by existing uses as per their proposed zoning objectives.
<u>(iii) Is within or adjoining the core of an established or designated urban settlement</u>	The lands are within and adjoining the core of the settlement.
<u>(iv) Will be essential in achieving compact or sustainable urban growth</u>	The lands are essential to compact and sustainable growth of the settlement.
<u>(v) 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</u>	The lands are currently developed.
<u>A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not</u>	The extent of Flood Zone A/B across the Village Centre zoning is very limited and risks can be managed by following the sequential approach, guided by an appropriately detailed FRA. Where there is Existing Residential development within Flood Zones A/B future development should be limited to minor development (Section 5.28 of the Planning Guidelines) with no new, major development permitted within this area. The zoning objectives for Education and Community Facilities and Enterprise and Employment have been retained to reflect the current uses of the sites, but future development in Flood Zones A and B for highly vulnerable uses, in the flood zone area must be limited to minor

<u>cause unacceptable adverse impacts elsewhere.</u>	development (Section 5.28 of the Planning Guidelines), provided there is no intensification of use and consequent increase in flood risk.
<u>Conclusion</u>	
The lands are currently occupied by existing Village Centre, Education and Community, Existing Residential and Enterprise and Employment uses and it is considered reasonable that the Plan continues to support the existing developments. However, it is proposed that any further development in Flood Zones A and B should be restricted to infill sites and extensions as per Section 5.28 of the Flood Risk Management Guidelines for Planning Authorities.	
<u>Recommendation</u>	
Retain the zoning objectives.	

#### Submission No.: LCC-C101-16 OPW

Draft Plan Zoning: Existing Residential, Village Centre, Education and Community Facilities and Utilities at Dromcolliher



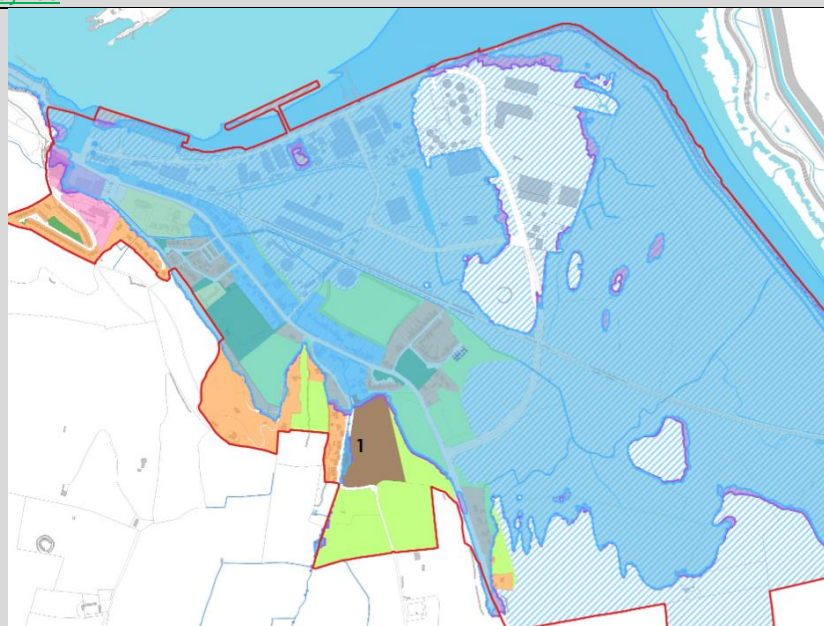
<u>The urban settlement is targeted for growth under the National Planning Framework regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act 2000, as amended.</u>	Limerick is targeted for growth under the National Planning Framework (NPF) and Regional Spatial and Economic Strategy (RSES) for the Southern Region. Dromcolliher is a Level 4 Large Village in the Settlement Hierarchy of the Draft Limerick Development Plan 2022 – 2028. NPO 3c of the National Planning Framework sets out that at least 30% of all new homes that are targeted in settlements other than the five cities and their suburbs should occur within their existing built-up footprints.
<u>The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the town and in particular:</u>	
<u>(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement</u>	The lands are proposed to be zoned Existing Residential, Village Centre, Education and Community Facilities and Utilities reflecting their existing uses. The lands are essential to facilitate regeneration and expansion of the centre of the settlement.
<u>(ii) Comprises significant previously developed and/or under-utilised lands</u>	These lands are already developed and currently occupied by existing uses as per their proposed zoning objectives.
<u>(iii) Is within or adjoining the core of an established or designated urban settlement</u>	The lands are within and adjoining the core of the settlement.
<u>(iv) Will be essential in achieving compact or sustainable urban growth</u>	The lands are essential to compact and sustainable growth of the settlement.



<u>(v) 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</u>	<u>The lands are currently developed.</u>
<u>A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere.</u>	<p>The extent of Flood Zone A/B across the Village Centre zoning is very limited and risks can be managed by following the sequential approach, guided by an appropriately detailed FRA.</p> <p>Where there is Existing Residential development within Flood Zones A/B future development should be limited to minor development (Section 5.28 of the Planning Guidelines) with no new, major development permitted within this area.</p> <p>The zoning objectives for Education and Community Facilities and Utilities have been retained to reflect the current uses of the sites, but future development in Flood Zones A and B for highly vulnerable uses, must be limited to minor development (Section 5.28 of the Planning Guidelines), provided there is no intensification of use and consequent increase in flood risk.</p>
<b><u>Conclusion</u></b>	
The lands are currently occupied by Existing Residential, Village Centre, Education and Community Facilities and Utility uses and it is considered reasonable that the Plan continues to support the existing developments. However, it is proposed that any further development in Flood Zones A and B should be restricted to infill sites and extensions as per Section 5.28 of the Flood Risk Management Guidelines for Planning Authorities.	
<b><u>Recommendation</u></b>	
Retain the zoning objectives.	

**Submission No.:** LCC-C101-16 OPW


**Draft Plan Zoning:** Existing Residential, New Residential, Village Centre, Education and Community Facilities and Utilities at Foynes



<u>The urban settlement is targeted for growth under the National Planning Framework regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the</u>	<p>Limerick is targeted for growth under the National Planning Framework (NPF) and Regional Spatial and Economic Strategy (RSES) for the Southern Region.</p> <p>Foynes is a Level 4 Large Village in the Settlement Hierarchy of the Draft Limerick Development Plan 2022 – 2028. NPO 3c of the National Planning Framework sets out that at least 30% of all new homes that are targeted in settlements other than the five cities and their suburbs should occur within their existing built-up footprints.</p>
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<b>Planning and Development Act 2000, as amended.</b>	
<b>The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the town and in particular:</b>	
<b>(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement</b>	The lands are proposed to be zoned Existing Residential, Village Centre, Education and Community Facilities and Utilities reflecting their existing uses. A small section of New Residential, the majority of which is within Flood Zone C is located adjoining the Village Centre zone. The lands are essential to facilitate regeneration and expansion of the centre of the settlement i.e. the Village Centre zone.
<b>(ii) Comprises significant previously developed and/or under-utilised lands</b>	These lands are already developed and currently occupied by existing uses as per their proposed zoning objectives.
<b>(iii) Is within or adjoining the core of an established or designated urban settlement</b>	The lands are within and adjoining the core of the Village Centre.
<b>(iv) Will be essential in achieving compact or sustainable urban growth</b>	The lands are essential to compact and sustainable growth of the settlement.
<b>(v) 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</b>	The lands are currently developed.
<b>A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere.</b>	Where there is Existing Residential and Village Centre development within Flood Zones A/B future development should be limited to minor development (Section 5.28 of the Planning Guidelines) with no new, major development permitted within this area. The zoning objective for Education and Community Facilities and Utilities has been retained to reflect the current uses of the sites, but future development in Flood Zones A and B for highly vulnerable uses, must be limited to minor development (Section 5.28 of the Planning Guidelines), provided there is no intensification of use and consequent increase in flood risk. In the area of New Residential, development should follow the sequential approach and avoid highly vulnerable development in Flood Zones A and B, or less vulnerable development in Flood Zone A.
<b>Conclusion</b>	
The lands are occupied by Existing Residential, Village Centre, Education and Community Facilities and Utilities and it is considered reasonable that the Plan continues to support the existing developments. However, it is proposed that any further development in Flood Zones A and B should be restricted to infill sites and extensions as per Section 5.28 of the Flood Risk Management Guidelines for Planning Authorities. Development in the New Residential zone should follow the sequential approach and avoid highly vulnerable development in Flood Zones A and B, or less vulnerable development in Flood Zone A.	
<b>Recommendation</b>	
Retain the zoning objectives.	

<b>Submission No.: LCC-C101-16 OPW</b>
<b>Draft Plan Zoning: Existing Residential and Enterprise and Employment at Glin</b>

	
<p><u>The urban settlement is targeted for growth under the National Planning Framework regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act 2000, as amended.</u></p>	<p>Limerick is targeted for growth under the National Planning Framework (NPF) and Regional Spatial and Economic Strategy (RSES) for the Southern Region.</p> <p>Glin is a Level 4 Large Village in the Settlement Hierarchy of the Draft Limerick Development Plan 2022 – 2028. NPO 3c of the National Planning Framework sets out that at least 30% of all new homes that are targeted in settlements other than the five cities and their suburbs should occur within their existing built-up footprints.</p>
<p><u>The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the town and in particular:</u></p>	
<p><u>(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement</u></p>	<p>The lands are proposed to be zoned Existing Residential and Enterprise and Employment reflecting their existing uses. The lands are essential to facilitate regeneration and expansion of the centre of the settlement.</p>
<p><u>(ii) Comprises significant previously developed and/or under-utilised lands</u></p>	<p>These lands are already developed and currently occupied by existing uses as per their proposed zoning objectives.</p>
<p><u>(iii) Is within or adjoining the core of an established or designated urban settlement</u></p>	<p>The lands are within and adjoining the core of the settlement.</p>
<p><u>(iv) Will be essential in achieving compact or sustainable urban growth</u></p>	<p>The lands are essential to compact and sustainable growth of the settlement.</p>
<p><u>(v) 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</u></p>	<p>The lands are currently developed.</p>
<p><u>A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere.</u></p>	<p>Where there is Existing Residential development within Flood Zones A/B future development should be limited to minor development (Section 5.28 of the Planning Guidelines) with no new, major development permitted within this area.</p> <p>The zoning objective for Enterprise and Employment has been retained to reflect the current use of the site, but future development in Flood Zone A must be limited to minor development (Section 5.28 of the Planning Guidelines), provided there is no intensification of use and consequent increase in flood risk.</p>
<p><u>Conclusion</u></p>	
<p>The lands are currently occupied by Existing Residential and Enterprise and Employment uses and it is considered reasonable that the Plan continues to support the existing developments. However, it is proposed that any further development in Flood Zones A and B should be restricted to infill sites and extensions as per Section 5.28 of the Flood Risk Management Guidelines for Planning Authorities.</p>	



**Recommendation**

Retain the zoning objectives.

**Submission No.:** LCC-C101-16 OPW**Draft Plan Zoning:** Existing Residential, Utilities and Education and Community Facilities at Hospital

The urban settlement is targeted for growth under the National Planning Framework regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act 2000, as amended.

Limerick is targeted for growth under the National Planning Framework (NPF) and Regional Spatial and Economic Strategy (RSES) for the Southern Region.

Hospital is a Level 4 Large Village in the Settlement Hierarchy of the Draft Limerick Development Plan 2022 – 2028. NPO 3c of the National Planning Framework sets out that at least 30% of all new homes that are targeted in settlements other than the five cities and their suburbs should occur within their existing built-up footprints.

The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the town and in particular:

(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement

The lands are proposed to be zoned Existing Residential, Utilities and Education and Community Facilities reflecting their existing uses. The lands are essential to facilitate regeneration and expansion of the centre of the settlement.

(ii) Comprises significant previously developed and/or under-utilised lands

These lands are already developed and currently occupied by existing uses as per their proposed zoning objectives.

(iii) Is within or adjoining the core of an established or designated urban settlement

The lands are within and adjoining the core of the settlement.

(iv) Will be essential in achieving compact or sustainable urban growth

The lands are essential to compact and sustainable growth of the settlement.

(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement

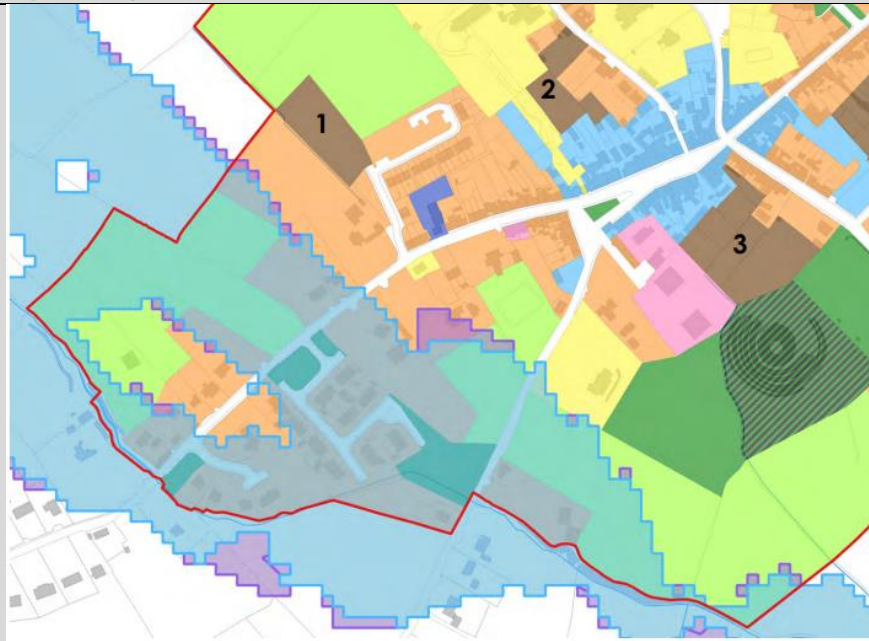
The lands are currently developed.

A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or

Where there is Existing Residential development within Flood Zones A/B future development should be limited to minor development (Section 5.28 of the Planning Guidelines) with no new, major development permitted within this area.

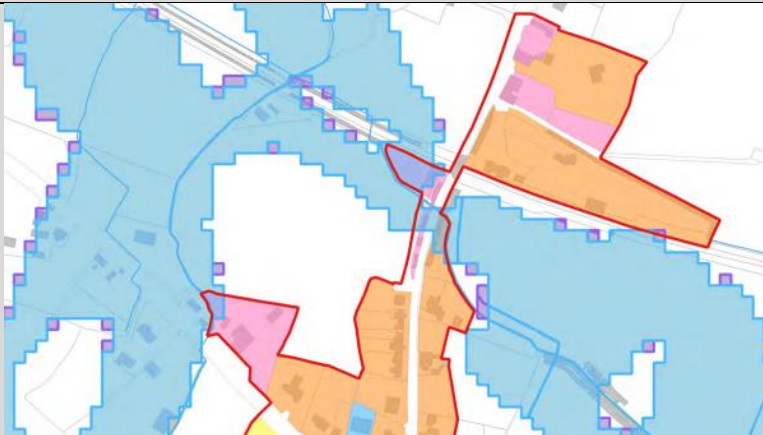
The zoning objective for Utilities and Education and Community Facilities have been retained to reflect the current uses of the sites, but future development in Flood Zones A and B for highly vulnerable uses, must be limited to minor development (Section 5.28 of the Planning Guidelines).

<u>development of the lands will not cause unacceptable adverse impacts elsewhere.</u>	<u>provided there is no intensification of use and consequent increase in flood risk.</u>
<b><u>Conclusion</u></b>	
The lands are currently occupied by Existing Residential, Utilities and Education and Community Facilities uses and it is considered reasonable that the Plan continues to support the existing developments. However, it is proposed that any further development in Flood Zones A and B should be restricted to infill sites and extensions as per Section 5.28 of the Flood Risk Management Guidelines for Planning Authorities.	
<b><u>Recommendation</u></b>	
Retain the zoning objectives.	

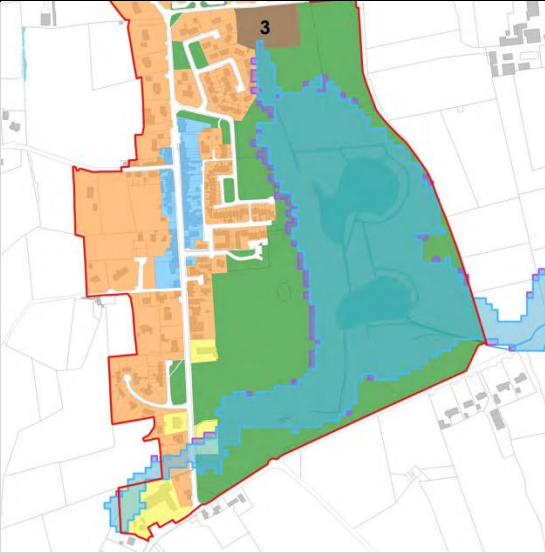


<u>The urban settlement is targeted for growth under the National Planning Framework regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act 2000, as amended.</u>	Limerick is targeted for growth under the National Planning Framework (NPF) and Regional Spatial and Economic Strategy (RSES) for the Southern Region. Kilfinane is a Level 4 Large Village in the Settlement Hierarchy of the Draft Limerick Development Plan 2022 – 2028. NPO 3c of the National Planning Framework sets out that at least 30% of all new homes that are targeted in settlements other than the five cities and their suburbs should occur within their existing built-up footprints.
<u>The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the town and in particular:</u>	
<u>(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement</u>	The lands are proposed to be zoned Existing Residential and Education and Community Facilities reflecting their existing uses. The lands are essential to facilitate regeneration and expansion of the centre of the settlement.
<u>(ii) Comprises significant previously developed and/or under-utilised lands</u>	These lands are already developed and currently occupied by existing uses as per their proposed zoning objectives.
<u>(iii) Is within or adjoining the core of an established or designated urban settlement</u>	The lands are within and adjoining the core of the settlement.
<u>(iv) Will be essential in achieving compact or sustainable urban growth</u>	The lands are essential to compact and sustainable growth of the settlement.
<u>(v) 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</u>	The lands are currently developed.
<u>A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately</u>	Where there is Existing Residential development within Flood Zones A/B future development should be limited to minor development (Section 5.28 of the Planning Guidelines) with no new, major development permitted within this area. The zoning objective for Education and Community Facilities has been retained to reflect the current use of the site, but future development in Flood Zones A and B for highly vulnerable uses, must be limited to minor

managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere.	development (Section 5.28 of the Planning Guidelines), provided there is no intensification of use and consequent increase in flood risk.
<b>Conclusion</b>	
The lands are currently occupied by Existing Residential and Education and Community Facilities uses and it is considered reasonable that the Plan continues to support the existing developments. However, it is proposed that any further development in Flood Zones A and B should be restricted to infill sites and extensions as per Section 5.28 of the Flood Risk Management Guidelines for Planning Authorities.	
<b>Recommendation</b>	
Retain the zoning objectives.	

<b>Submission No.: LCC-C101-16 OPW</b>	
<b>Draft Plan Zoning: Existing Residential and Enterprise and Employment at Pallasgreen</b>	
	
The urban settlement is targeted for growth under the National Planning Framework regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act 2000, as amended.	Limerick is targeted for growth under the National Planning Framework (NPF) and Regional Spatial and Economic Strategy (RSES) for the Southern Region. Pallasgreen is a Level 4 Large Village in the Settlement Hierarchy of the Draft Limerick Development Plan 2022 – 2028. NPO 3c of the National Planning Framework sets out that at least 30% of all new homes that are targeted in settlements other than the five cities and their suburbs should occur within their existing built-up footprints.
<b>The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the town and in particular:</b>	
(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement	The lands are proposed to be zoned Existing Residential and Enterprise and Employment reflecting their existing uses. The lands are essential to facilitate regeneration and expansion of the centre of the settlement.
(ii) Comprises significant previously developed and/or under-utilised lands	These lands are already developed and currently occupied by existing uses as per their proposed zoning objectives.
(iii) Is within or adjoining the core of an established or designated urban settlement	The lands are within and adjoining the core of the settlement.
(iv) Will be essential in achieving compact or sustainable urban growth	The lands are essential to compact and sustainable growth of the settlement.
(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement	The lands are currently developed.
A flood risk assessment to an appropriate level of detail has been	Where there is Existing Residential development within Flood Zones A/B future development should be limited to minor development (Section 5.28

carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere.	of the Planning Guidelines) with no new, major development permitted within this area. The zoning objective for Enterprise and Employment has been retained to reflect the current use of the site, but future development in Flood Zone A must be limited to minor development (Section 5.28 of the Planning Guidelines), provided there is no intensification of use and consequent increase in flood risk.
<b>Conclusion</b>	
The lands are currently occupied by Existing Residential and Enterprise and Employment uses and it is considered reasonable that the Plan continues to support the existing developments. However, it is proposed that any further development in Flood Zones A and B should be restricted to infill sites and extensions as per Section 5.28 of the Flood Risk Management Guidelines for Planning Authorities.	
<b>Recommendation</b>	
Retain the zoning objectives.	

<b>Submission No.:</b> LCC-C101-16 OPW	
<b>Draft Plan Zoning:</b> Existing Residential, New Residential and Education and Community Facilities at Pallaskenry	
	
The urban settlement is targeted for growth under the National Planning Framework regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act 2000, as amended.	Limerick is targeted for growth under the National Planning Framework (NPF) and Regional Spatial and Economic Strategy (RSES) for the Southern Region. Pallaskenry is a Level 4 Large Village in the Settlement Hierarchy of the Draft Limerick Development Plan 2022 – 2028. NPO 3c of the National Planning Framework sets out that at least 30% of all new homes that are targeted in settlements other than the five cities and their suburbs should occur within their existing built-up footprints.
<b>The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the town and in particular:</b>	
(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement	The lands are proposed to be zoned Existing Residential and Education and Community Facilities reflecting their existing uses. The majority of the New Residential zone is within Flood Zone C. The lands are essential to facilitate regeneration and expansion of the centre of the settlement.
(ii) Comprises significant previously developed and/or under-utilised lands	These lands are already developed and currently occupied by existing uses as per their proposed zoning objectives.



<u>(iii) Is within or adjoining the core of an established or designated urban settlement</u>	<u>The lands are within and adjoining the core of the settlement.</u>
<u>(iv) Will be essential in achieving compact or sustainable urban growth</u>	<u>The lands are essential to compact and sustainable growth of the settlement.</u>
<u>(v) 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</u>	<u>The lands are currently developed.</u>
<u>A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere.</u>	Where there is Existing Residential development within Flood Zones A/B future development should be limited to minor development (Section 5.28 of the Planning Guidelines) with no new, major development permitted within this area. The zoning objective for Education and Community Facilities has been retained to reflect the current use of the site, but future development in this area must be limited to minor development (Section 5.28 of the Planning Guidelines), provided there is no intensification of use and consequent increase in flood risk. In the area of New Residential, development should follow the sequential approach and avoid highly vulnerable development in Flood Zones A and B, or less vulnerable development in Flood Zone A.
<b><u>Conclusion</u></b>	
The lands are currently occupied by Existing Residential and Education and Community Facilities uses and it is considered reasonable that the Plan continues to support the existing developments. However, it is proposed that any further development in Flood Zones A and B for highly vulnerable uses, should be restricted to infill sites and extensions as per Section 5.28 of the Flood Risk Management Guidelines for Planning Authorities. Development in the New Residential zone should follow the sequential approach and avoid highly vulnerable development in Flood Zones A and B, or less vulnerable development in Flood Zone A.	
<b><u>Recommendation</u></b>	
Retain the zoning objectives.	