

Pleanáil, Comhshaol agus Cruthú Áite Ceanncheathrú Chorparáideach Comhairle Cathrach agus Contae Luimnigh Cé na gCeannaithe, Luimneach V94 EH90

Planning, Environment and Place-Making Corporate Headquarters Limerick City and County Council Merchant's Quay, Limerick V94 EH90

10th November 2023

To: the Cathaoirleach and each Member of Limerick City and County Council

Re: Chief Executive Report to Elected Members on the submission received as part of the public consultation on the Draft Patrickswell Local Area Plan 2024 - 2030

A Comhairleoir, a chara,

I enclose herewith a copy of the Chief Executive's Report on the submission received as part of the public consultation on the Draft Patrickswell Local Area Plan 2024 – 2030.

The proposed Local Area Plan was placed on public display from Saturday 2nd September 2023 to 16th October 2023 inclusive.

A total of 27 no. submissions were received within the statutory timeframe. A report consisting of a summary of the submissions received together with the Chief Executive's responses and recommendations are attached as required by Section 20 of the Planning and Development Act 2000 (as amended).

The submissions can be inspected on https://mypoint.limerick.ie or in the Forward Planning Section of Limerick City and County Council during normal office hours and copies of the original submissions will be available for inspection at the November Meeting of Limerick City and County Council.

The Members of Limerick City and County Council at their November Meeting shall consider the Chief Executive's Report and decide whether to make or amend the Draft Patrickswell Local Area Plan. If the Council decide to amend the Draft Local Area Plan, any material alterations will be put on public display for a further 4 weeks.

A briefing meeting on Chief Executive's Report will be held on **Wednesday 22nd November at 2.30pm, in the Council Chamber, Dooradoyle, Limerick** to brief the Elected Members on the contents of the Report.

If you have any queries on the report please contact Maria Woods, Senior Planner on 061 557228.

Mise le meas,

Vincent Murray

Director of Services

Planning, Environment and Place-Making

Draft Patrickswell Local Area Plan 2024 – 2030

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

10th November 2023

Limerick City and County Council

Forward Planning

Planning, Environment and Place-making Directorate

Merchants Quay

Limerick



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1.0 Introduction

This Chief Executive's Report outlines the submissions made following publication of the Draft Patrickswell Local Area Plan 2024 – 2030. The report sets out the Chief Executive's responses and recommendations to the issues raised and any amendments to the Draft LAP. The report is part of the statutory procedure for preparing a new Local Area Plan (LAP) as set out in Section 20 of the Planning and Development Act, 2000 (as amended).

The Draft Local Area Plan was placed on public display for a six week period from the 2nd of September to the 16th of October inclusive. A public drop in information session was held between 3pm and 7pm on the 14th of September in the Community Resource Centre on Main Street, Patrickswell. 27 written submissions were received within the statutory timeframe. No submissions were received outside the statutory period.

1.1 Structure of this Report

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

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

Part C incorporates any updates to the Environmental reports including Strategic Environment Assessment, Appropriate Assessment and the Strategic Flood Risk Assessment prepared in line with The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009), to support the plan making process.

1.2 Progress to Date and Next

The steps in the process of preparation of the Local Area Plan for Patrickswell are shown in the following table:

Date	Stage
19 th January 2023	Notification of official commencement of Draft Patrickswell
	Local Area Plan 2024 -2030

4 th February – 6 th March	First issues stage: Submissions were invited				
2023					
2 nd September 2023 – 16 th	Draft Plan on public display: Public submissions invited				
October 2023	during statutory period				
The remaining stages of the	Plan are as follows:				
November 2023	Chief Executive's Report issued to the Elected Members of				
	Limerick City and County for consideration				
27 th November Full Council	Elected Members of Limerick City and County shall consider				
Meeting	this report and make or amend the Draft Plan.				
December/January 2024	Material Alterations will be placed on display for a further 4				
	weeks. Public submissions can only be made on the				
	proposed alterations				
January 2024	Chief Executive's Report on submissions issued on the				
	Material Alterations issues to Elected Members for				
	consideration.				
February 2024	Final adoption of Plan by Elected Members, having				
	considered the Chief Executive's Report on the submissions				
	received on the Material Alterations				
March 2024	Plan comes into effect 6 weeks from the date of adoption				

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

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

PART A

2.0 Persons/ Bodies who Made Submissions within the Statutory Timeframe

Submission	Submission received from
No.	
Prescribed Bodi	es
1	Office of the Planning Regulator (OPR)
2	Transport Infrastructure Ireland (TII)
3	National Transport Authority
4	Department of Education
5	Uisce Éireann (UÉ)
6	Office of Public Works (OPW)
7	Department of Transport
8	Department of Housing, Local Government and Heritage(DHLGH)
Other	
9	Jari Howard on behalf of N/M20 Cork to Limerick Project
10	Kate Finnin
11	Leo Dillon
12	Leahy Planning on behalf of Mr Michael and Mrs Marie Field
13	Carmel Mulqueen
14	Michael Walsh
15	AK Planning on behalf of John Leddin
16	Nicola McNamara & Eileen Higgins
17	Diarmuid Keane & Associates on behalf of Denis Lane
18	Cllr. Fergus Kilcoyne

Submission	Submission received from
No.	
19	Michael McSweeney
20	Willie and Noreen Fenton
21	Vincent O'Doherty
22	Mary Byrnes
23	Cllr. Dan McSweeney
24	Patrickswell GAA
25	HRA Planning on behalf of Diceros Ventures Limited
26	Patrickswell Football Club
27	Mid West Roads Design Office (Jari Howard)

2.1 Submissions Outside Statutory Timeframe

There were no submissions received outside the statutory timeframe.

2.2 Submission Summaries, Chief Executive's Responses and Recommendations

1	Name/Group: Office of Planning Reg	
	Ref: LCC-C249-PAT02-	
	Submission:	Response
	Introduction and Overview The OPR acknowledge the considerable, evident work in preparing the Plan against the backdrop of evolving higher level planning policy, regulatory context, and the need to balance competing pressures within an increasingly complex system.	
	The Office has evaluated and assessed the Draft Plan under the provisions of the Planning and Development Act 2000(as amended), the Limerick Development Plan, the RSES and the relevant Section 28 Guidelines. The Office makes five observations in this submission.	
	The Office welcomes the Draft Plan and identifies its consistency with Objective CG016 of the Development Plan. It also commends the inclusion of a detailed and clear settlement capacity audit and infrastructure assessment but notes that cost estimates are not provided with the assessment. The submission does however note that the outstanding infrastructure will be provided by developers and as such the planning authority or any statutory undertaker will be required to undertake significant infrastructural works to accommodate the development of identified sites.	
	The submission outlines that the total area of land proposed to be zoned for New Residential under the Draft Plan exceeds that required to meet the core strategy in the Development Plan. The office does however accept that these lands are well located, serviced and there is extant permission or live planning applications for development on much of these lands. In this regard, the Office cautions against	

additional land use zoning proposals for residential development through material alterations.

The OPR welcomes the provision of Noted and welcomed. employment zoned lands and the identified requirement to ensure that these sites are appropriately serviced. The submission notes that the appropriate scale of the zoning, employment coupled with Objectives SMT O5 and O6 will safeguard the N/M20 corridor. The Office welcomes the approach to the zoning of employment land and is satisfied that there is a sufficient quantum of land zoned in the Draft LAP.

The office welcomes the commitment in the Draft LAP that any new retail development will comply with the provisions of the Retail Strategy for Limerick-Shannon Metropolitan Area and County Limerick 2022-2028. The submission notes that this, coupled with Objective TCF O3 and Section 4.4 of the Draft LAP should ensure that the appropriate

The submission welcomes the crossreferencing of enhancement opportunities with climate action opportunities in Table 8 of the Draft LAP and Table 4.1's identification of Opportunity Sites with development principles and parameters for these sites.

retail development occurs in Patrickswell.

The Office outlines its support for the approach to the Strategic Flood Risk Assessment (SFRA), which was prepared using a detailed hydrological study for the Barnakyle River.

The submission welcomes the approach taken to blue/green infrastructure in Section 8.2 and Objective CHO6 and outlines how approach combined commitment to provide the greenways as part of Objective SMT O2 is consistent with the LDP 2022-2028.

Noted.

Noted and welcomed.

Noted.

1. Consistency with Development Plan Core Strategy, Residential Zoning and Compact Growth (Observation 1)

The submission outlines how the Office is satisfied that the housing growth target of 108 units under the Draft Plan is consistent with the Core Strategy of the Development Plan having regard to both plan periods. The Office accepts the planning authority's calculation that 6.12ha New Residential zoning, inclusive of 1.22ha additional provision, is required to accommodate projected growth. The submission notes the Draft Plans proposal of 13.926ha in New Residential zoning, which states is 'more than double that required, including the discretionary application of additional provision of up to 25%'.

The submission refers to the existing extended Patrickswell Local Area Plan 2015-2021 and the current 38.38ha of New Residential zoning, greatly exceeding the core strategy housing allocation. submission notes the majority of the proposed New Residential zonings have the benefit of extant permission and are favourably located in terms of compact and sequential zoning. submission states that those lands, without the benefit of extant permission, are also favourably located. In this context, the Office considers Draft Plan to provide a reasonable approach to ensure a sufficient supply of zoned land.

The submission refers to the location of Patrickswell within the Limerick-Shannon Metropolitan Area Strategic Plan (MASP) and acknowledges the minimum density provided in Objective DS O3 is 22 units per hectare. The submission notes the Office considers that densities in excess of the minimum density would support the achievement of compact growth in line with Objectives CSP2 and P6 of the Limerick Development Plan 2022-2028. The

1. Consistency with Development Plan Core Strategy, Residential Zoning and Compact Growth

Noted.

Noted, 22 units per hectare is included as a minimum density, and the Draft Plan encourages a range of densities in line with current guidelines and any subsequent revisions.

submission outlines that while this density is considered low for a settlement in the MASP area, it is noted that the objective encourages a range of densities in accordance with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas: Cities, Towns & Villages (2009) and considers that the objectives provides an appropriate policy context for the settlement.

The submission notes that it is expected that the sites will be appropriately developed in line with the aforementioned guidelines and any subsequent replacement documents.

The submission refers to lands zoned existing residential at a peripheral location to the north-east of the settlement along the R526 and opposite SCA Site no. 14. The Office is concerned that the designation of these sites is inconsistent with the agricultural use that may be present on some of the sites and the existing residential zoning could lead to the development of a significant number of houses in a relatively peripheral location contrary to NPO 3, RPO 10 and CGR O1 of the LDP.

Observation 1: Existing Residential Zoning

The submission requests the Planning Authority to review the extent of land zoned Existing Residential along the R526 opposite Site 14 of the Settlement Capacity Audit and should consider if these lands are appropriately zoned and if the land is primarily used for residential or agricultural purposes.

2. Transport and Accessibility (Observation 2 and Observation 3)

(i) The submission notes that Patrickswell, as part of the MASP area has been considered as part of the Limerick Shannon Metropolitan Area Transport Strategy 2040 (LSMATS). The submission notes the referral of LSMATS within the Draft Plan but

A site inspection and additional analysis was carried out following concerns raised in the submission regarding the nature of the existing residential sites on the north east of the settlement. The Council consider the zoning reflects the established boundaries of the existing residential development, and there is not an agricultural use present on these lands. The zoning objective as set out in Section 10.4 General Objectives and Purpose of Land Use Zones for "Existing Residential" allows for appropriate infill development. Therefore, any potential development on these lands would have to be reflective of the existing character and pattern of development and could therefore not lead to the development of a significant number of houses. In this instance, it is recommended that the draft zoning remain in place.

2. Transport and Accessibility

(i) The Council recognise the importance of the provision of major infrastructure to enhance regional connectivity, to promote economic development and to enable the development of new homes. The Draft Plan is aligned and consistent with the objectives of higher-level spatial plans, including the NPF, RSES and the

considers that the contents of LSMATS could be better integrated into the plan.

The submission outlines how the Draft LAP could take the opportunity to include positive objectives and ambition for the village in respect of the potential future rail service in view of measure RL3 of LSMATS, Goals 3 and 4 of the National Sustainable Mobility Policy (2022), and the All Island Strategic Rail Review which was recently out public consultation for Strategic Environmental Assessment (SEA) and environmental assessments.

(ii) The Office welcomes the inclusion of Objective SMT O5 and SMT O6 which safeguard the N/M20 Cork to Limerick Project study area and corridor as well as further support in Objectives EDO1 and EDO2 which ensure that inappropriate development will not affect the delivery of the N/M20 and that the capacity of the road will also be protected. The submission notes consistency with Section 2.9 of the Spatial Planning and National Roads Guidelines for Planning Authorities (2012) in this regard.

The submission notes that the N/M20 Cork to Limerick Project is not indicated on the

Limerick Development Plan 2022-2028 as outlined in Policy I O1, all of which support and facilitate the implementation and delivery of the proposals contained in the Limerick Shannon Metropolitan Area Transport Strategy. As part of this strategy, a number of transport modelling assessments were carried to identify potential rail passenger usage up to and beyond 2040 within the Limerick Shannon Metropolitan Area.

As part of a 'Phase 2 Rail Network for the Limerick Shannon Metropolitan Area', the Plan provides that the feasibility for a full commuter rail network for the study area will be examined, including the re-use of the Foynes line and new stations at appropriate locations. This is part of a more ambitious programme for a regional and commuter rail network to be developed in the long-term, based on a higher level of forecast growth for the Limerick Shannon Metropolitan Area.

While the plan is aligned with higher level plans, it is considered appropriate to include text and associated policy support to safeguard the rail line against encroachment that would compromise the long-term development of this facility and to support any future proposals for passenger rail services in Patrickswell.

(ii) Progress for the N/M20 Cork to Limerick Project is ongoing and while a study area has been identified, it is considered premature to include this 500m wide corridor in the plan. The project team are currently gathering information from the Environmental, Engineering and Project Liaison teams to define the route within the study area. In this instance, it is considered appropriate not to include the study area within the Draft LAP.

maps provided and advises the consideration of the planning authority to review this approach and in doing so, engage with Transport Infrastructure Ireland.

(iii) The submission refers to the submission from TII seeking additional wording in Objective SMT O6 and notes that given the scheme is a National Development Plan investment commitment, it would be appropriate for this matter to be addressed.

Observation 2 – NDP N/M20 Cork to Limerick Project

The submission request that having regard to the provisions of the Limerick Development Plan and TR O29, the Planning Authority

- (i) Amends Objective SMT O6 (b) as follows: 'Protect the capacity of the national and regional road network from inappropriate development, having regard to all relevant Government guidance.....'
- (ii) Include the N/M20 Cork to Limerick Project on relevant LAP mapping, such as the land use zoning map.

(iv) Amenity and Sustainable Transport Map

The submission notes that the car is the primary form of transport in Patrickswell as is highlighted in the Draft Plan referring also to Census Data on workplace travel. The submission refers to the Amenity and Sustainable Transport Map noting existing and proposed pedestrian/cycle links. The submission outlines concern over this representation. The submission notes that the majority of the existing links are simply local roads with no segregated cycle paths or similar infrastructure and includes sections of existing routes that have no footpaths.

The submission notes it is unclear as to exactly what type of infrastructure exists in the town and what will be provided as part of the proposed links. The submission notes

(iii) Noted.

Objective SMT O6 (b) will be amended to reference the national road network.

See Point (ii) above in response to the N/M20 Cork to Limerick Project.

(iv) Amenity and Sustainable Transport Map Noted. See below.

opportunity to outline how this will interact with the village renewal scheme for Patrickswell.

Observation 3 – Walking/Cycling Infrastructure

The submission refers to the provision of the Limerick Development Plan and particularly Objective TR O8 and requests the Planning Authority to review the Draft LAP and provide clearer policies and objectives regarding the delivery and phasing of the key infrastructural requirements, particularly those interventions and measures required enhance pedestrian cycling and infrastructure in the town. The observation refers to the associated map which should identify existing walking/cycling infrastructure, routes that require improved infrastructure as well as locations where new walking/cycling infrastructure is to be provided.

3. Climate Change Mitigation and Adaptation (Observation 4)

- (i) The submission welcomes considerations regarding climate mitigation and adaption integrated into the Draft Plan specifically through Section 8.1 and the inclusion of Policy CH P1 and CHO1.
- (ii) With regard to Flood Risk Management, the submission welcomes the preparation of the SFRA to inform the Draft LAP and particularly commend the **Planning** Authority for preparing the SFRA where no information was available in relation to Catchment Flood Risk Assessment and Management and National Indicative Fluvial Mapping. The submission welcomes the inclusion of the SFRA areas on the Flood map with the zonings, which the submission considers gives clear indication of the zonings at risk of flood.

The submission refers to the submission by the OPW in relation to arterial drainage

The Amenity and Sustainable Transport Map will be updated to provide a clearer picture of existing and proposed infrastructure.

Additional text will be provided in a new Section under Section 7.4 Modal Shift and Target. Text will include a table outlining proposed active travel measures, timeline for delivery and priority routes.

3. Climate Change Mitigation and Adaptation (i) Noted.

(ii) As noted in response to the Office of Public Works, the reference to demountable defences was made in error and will be removed in the SFRA. There are demountable defences within the Draft Local Area Plan Boundary. Given that the demountable defence statement was incorrect, the Council consider that the requirement for a register is no longer required.

schemes and defended areas and note that these matters should be addressed, in consultation with the OPW and the SFRA updated appropriately.

The submission considers that a register of flood risk infrastructure could be included in the Draft LAP to clarify if there are any areas that need further attention in the SFRA. The Office advises that the planning authority engage with the OPW on such matters and adequately responds to their submission.

(iii) SuDS and Nature Based Solutions

The submission welcomes the approach in the SFRA in respect of SuDS as outlined in Section 9.3 of the plan however, the submission considers there is an opportunity to strengthen the Draft Plan in relation to implementing Section 9.3 of the SFRA. The submission notes the Office considers that there is scope to provide a more detailed framework in relation to delivering SuDS and Nature Based Solutions on the four Opportunity Sites identified in Objective TCF O4 of the Draft Plan. The submission further notes that in this regard, integrated SuDS and Nature Based Solution measures could be considered on large sites, such as the opportunity sites and could form part of masterplans example giving an Opportunity Site no. 4.

Observation 4 – SuDS and Nature Based Solutions

The submission requests the Planning Authority to include a robust framework and guidance in relation to the identification and use of SuDS and nature based solutions in the four Opportunity Sites identified in Section 4.5 and Objective TCF O4.

4. Environment, Heritage and Amenity

The Office is not the competent authority for the purposes of SEA or AA however it considers the consistency of the Plan with Section 28 guidelines including Strategic

(iii) SuDS and Nature Based Solutions

The approach taken in the Draft Local Area Plan, in line with the Limerick Development Plan 2022-2028, is to seek to adopt SuDS and nature based solutions as an appropriate measure for dealing with surface water management for all development proposals including the Opportunity Sites. However, to strengthen the support for the implementation and promotion of SuDS and nature based solutions in the design principles, with particular reference the Opportunity Sites provided in Chapter 4, an additional section is proposed to be added to Chapter 4 Town Centre First on the principles of SuDS and ensuring that a climate adaptive and resilient urban green approach is undertaken in the development of the four opportunity sites in Patrickswell.

As above.

4. Environment, Heritage and Amenity Noted.

Environmental Assessment: Guidelines for Regional Assemblies and Planning Authorities (2021). The submission notes that the SEA Screening Assessment has been undertaken based on the findings and that the Draft LAP does not require full SEA. The Office also notes that the AA Screening Report found that the Draft Plan will not result in any significant effects on designated European Sites, alone or in combination with other plans or projects.

5. Monitoring and Implementation (Observation 5)

The submission notes and welcomes Section 11.1, 11.2 and Table 4.2, which provides a timeline for actions/interventions. submission notes however that implementation and monitoring policy objective is included in the Draft LAP. The submission refers to Section 6.5 of the Local Plans Guidelines Area for Planning Authorities (2013) which states that planning authorities are encouraged to periodically review the success or otherwise of the implementation of the policies and objectives of a local area plan by effectively monitoring systems. In addition, the submission refers the review of the development plan as required by Section 15 of the Act, which the submission notes will provide an opportunity to review the policy objectives of the Draft Plan particularly where policy objectives overlap between the development plan and the adopted LAP.

Observation 5 – Monitoring and Implementation

The submission notes that having regard to the duty and function of the planning authority under Section 15(i) and 15(2) of the Planning and Development Act 2000, as amended, as well as Section 6.5 of Local Area Plans Guidelines for Planning Authorities (2013), the planning authority is requested to provide a monitoring and implementation policy objective for the Draft LAP.

5. Monitoring and Implementation

The implementation and monitoring of the delivery of the objectives of the LAP is a key objective of the Council. In this respect, Chapter 13 of the Limerick Development Plan provides for a detailed implementation and monitoring/review of the Plan. After this LAP is adopted, it will form part of the monitoring programme of the LDP. However, to ensure policy support is carried down through to the local area plan, a policy objective will be included in Chapter 11 of the Draft Plan to reflect same.

As above.

The submission concludes with a recommendation for the Authority to address the observation outlined above.

Chief Executive's Recommendations:

- 1. No Change
- **2(i)** Insert the following text into Section 7.5 Rail Transport:

This LAP seeks to safeguard the rail line against encroachment that would compromise the long-term development of this facility.

Insert the following objective under Section 7.5 Rail Transport

Objective SMT: Protection of Existing Rail Route: It is an Objective of the Council to:

- a) Protect the existing rail route against encroachment from inappropriate uses that could compromise the long-term development of the rail facility and support appropriate upgrades, which are in line with the appropriate and necessary environmental and ecological assessments as required.
- b) Support any future proposals for passenger rail services in Patrickswell.
- (ii) No Change
- (iii) Amend SMT O6 (b) to reference national road network as follows:
- 'Protect the capacity of the <u>national and</u> regional road network from inappropriate development, having regard to all relevant Government guidance,'
- (iv) Update the Amenity and Sustainable Transport Map to distinguish between existing and proposed cycling and walking infrastructure
- (v) Provide a new Section under Section 7.4 Modal Shift and Targets and update the text as follows:

There are a number of opportunities, which have the ability to address current travel trends and to examine the existing travel behaviours within Patrickswell to provide for the realisation of a more sustainable transport mode. The Draft Local Area Plan focuses on the provision of increased permeability through future development within the settlement. The plan provides a change of focus towards the town centre first initiatives, development of infill/brownfield sites and the creation of a more compact village and endeavours to improve permeability and localised access through the development of the four identified opportunity sites. Local conditions including lack of infrastructure, inadequate linkages and lack of permeability create physical barriers to enabling a move away from the predominant car travel, as exists in Patrickswell. In relation to cycling, there are no cycle paths in the village with cyclists using footpaths instead, in some instances. Policies contained within this Plan ensure that new development proposals provide for permeability and appropriate linkages that are required to open up future and existing development, creating the conditions to enable active travel modes and improving access for those with mobility issues. The following table identifies active travel infrastructure that seeks to create convenient, efficient routes to key destinations for local amenities, facilities, social infrastructure and services and in doing so, reducing walking/cycling distances and creating the conditions that gives active modes a competitive advantage over the private car. The table below outlines active travel measures to enable the 10-minute town concept prioritising a number of these measures:

- The implementation of pedestrian/cycling safety measures on Main Street as part of the Patrickswell Village Renewal Scheme commenced March 2023;
- Improved connectivity from Main Street to Patrickswell National School as part of Patrickswell Village Renewal Scheme;
- Upgrade of existing pedestrian link from Laurel Park to Lisheen Park at Patrickswell National School;
- Improvement works outside Patrickswell NS for walking and cycling infrastructure and in turn, increase the number of students who cycle to school;
- Active Travel measures as part of the N/M20 Motorway project including cycle and pedestrian infrastructure from Patrickswell to Croom, Bruree and connections into the proposed Limerick Greenway and wider national cycle network;
- Increase permeability through future development within the settlement;
- Change of focus to town centre first initiatives, development of infill/brownfield sites and creation of a more compact village;
- Opportunity sites focused on improving permeability and localised access.

(vi) Insert Table showing Active Travel Proposal and Priority Route:

Table 7.3 Active Travel Measures and Priorities

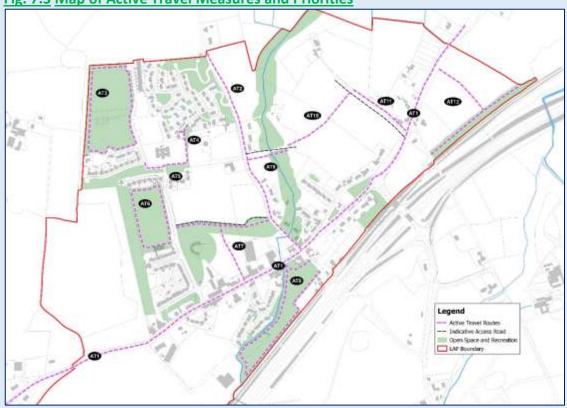
Action/ Intervention Reference	<u>Description</u>	Proposed Link Type/ Active Mode Priority	Expected Timeframe	Need for Intervention
<u>AT1</u>	Main Street Patrickswell Village Centre	Segregated cycle lane Active Mode Priority	Medium to Long Term	- Connection into existing segregated cycle track along R526 to Raheen/Limerick City and future connections associated with Active Travel measures of N/M20 Cork to Limerick Project, Patrickswell to Charleville Greenway and Rathkeale/Limerick Greenway - Increase uptake of active travel modes - Connection between village centre to residential areas/local facilities/services
AT2	Clarina Road	Cycle Infrastructure Active Mode Priority	Short to Medium Term	 Increase uptake of active travel modes Connection between village centre to existing and proposed residential areas/local facilities/services

AT3	Patrickswell	Looped	Short	-	Provision of looped walk
	FC/Lisheen Park/Faha View (Opportunity Site 2)	Pedestrian Walkway Active Mode Priority	<u>Term</u>		around perimeter of site included in proposed development design as part of Opportunity Site 2,
<u>AT4</u>	Sycamore Heights to Patrickswell National School	Pedestrian Link Active Mode Priority	<u>Short</u> <u>Term</u>	1	Upgrade of existing link from residential estate to Patrickswell NS, Lisheen Park and local amenities/facilities
<u>AT5</u>	Site entrance fronting Patrickswell National School	Front entrance and road network at front of Patrickswell NS Active Mode Priority	Short Term	1 1	Realignment of road network and provision of walking and cycling infrastructure at front of Patrickswell NS. Provision of 'school street/school zone'
AT6	Patrickswell GAA Grounds	<u>Looped</u> <u>Pedestrian</u> <u>Walkway</u>	<u>Short</u> <u>Term</u>	-	Provision of looped walk around perimeter of site included as part of future development proposals on the GAA grounds.
AT7	Patrickswell Village Centre Opportunity Site 1/Residential Development	Active Travel Connection – cycle and walking provision. Active Mode Priority	Short Term	1	Provision of connectivity and permeability link between Clarina Road, School Road and the centre of Patrickswell Provision of active travel linkage linked to future residential development.
AT8	Riverside Park off Village Centre	Looped Walking/Cycling pathway	Medium Term	1	Riverside Park as part of Opportunity Site 3
<u>AT9</u>	<u>Barnakyle</u>	Residential Active Travel Connection — cycle and walking provision. Active Mode Priority	Short Term		Provision of active travel linkage linked to residential development granted under Planning File 22/8017. Potential to provide linkages from proposed residential development through to local facilities/services (school, GAA etc).
AT10	Barnakyle Opportunity Site 4	Residential Active Travel Connection – cycle and	Medium to Long Term	-	Provision of active travel linkage linked to future residential development/open space.

		walking provision			
AT11	Barnakyle Opportunity Site 4	Residential Active Travel Connection – cycle and walking provision	Long Term	-	Provision of active travel linkage linked to future residential development/open space.
AT12	Serviced Site at Barnakyle on R526	Residential Active Travel Connection – cycle and walking provision	Medium to Long Term	-	Provision of active travel linkage linked to future residential development/open space.

(vii) Insert Map with associated Action Reference as follows:

Fig. 7.3 Map of Active Travel Measures and Priorities



*Larger map provided for under Part B of this report

3(i). No change

3(ii). No change

3(iii). Insert additional Section into Chapter 4.5 Opportunity Sites as follows:

Opportunity Sites and Climate Adaptive/Resilient Urban Greening

The management of rainwater and flood risk as part of climate adaptive and resilient urban greening should be considered at the outset of the design process of all proposed Opportunity Sites. Proposals should adhere to the rainwater management mechanisms outlined within the national guidance for water sensitive urban design (Nature-Based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas: Water Sensitive Urban

Design: Best Practice Interim Guidance Document). All new development is required to manage and minimise surface water runoff through the use of Nature based Solutions / Sustainable Drainage Systems (SuDS), unless otherwise agreed with the Council. Development will only be permitted where the Council is satisfied that suitable measures have been proposed that mitigate the impact of surface water, through the achievement of control of run-off quantity and quality, while enhancing amenity and habitat.

4. No Change.

5. Insert the following new policy into Chapter 11 Monitoring and Evaluation as follows: **Policy ME P1: Monitoring and Evaluation:** It is policy of the Council to:

Implement in conjunction with key stakeholders, the policies and objectives of this Local Area Plan and to review the success or otherwise of the implementation of policies and objectives in line with Section 15(i) and 15(2) of the Planning and Development Act 2000, as amended, as well as Section 6.5 of Local Area Plans Guidelines for Planning Authorities (2013) and Chapter 13 of the Limerick Development Plan.

SEA/AA Response:

Active travel proposals were considered under the SEA Screening and no significant adverse environmental effects identified.

The proposed inclusion of additional text for the opportunity sites relating to nature based measures and SuDS is positive for the SEOS including Water, Material Assets in particular. The new objective relating to protection of railway corridor is consistent with national, regional and county policy. The new policy as proposed relating to monitoring is consistent with the approach to monitoring in the SEA Directive.

Taking into account the measures that have been already integrated into the Draft Plan that provide for and contribute towards environmental protection, environmental management and sustainable development, it is identified that any potential effects arising from the Proposed Alterations outlined in this Chief Executive's Report: either are present already (beneficial) and will be further contributed towards; or will be mitigated so as not to be significant (adverse). In addition, some alterations merely propose to add clarification or amended context setting text for Plan provisions and these will not result in significant environmental effects. Consequently, the above Proposed Alterations outlined in this Chief Executive's Report do not require SEA.

With regards to the Appropriate Assessment, it is considered that these changes at the plan level are unlikely to have significant effects on the Natura Network. Changes are overall positive. Project level assessments may be required if protection of the watercourse is required in some locations.

2.	Name/Group:	Transport Infrastructure Ireland Ref: LCC-C249-PAT02-04								
	Submission:		Respons	e						
	The submission ide	ntifies that numerous	Noted.	The	Cou	ıncil	is	comm	itted	to
	higher-level spatial p	safeguar	ding	the	nati	onal	road	netw	ork	
	RSES and Section	28 Guidelines include	throughout the county.							

objectives relating to the maintenance of the strategic capacity and safety of the national roads network.

The submission outlines that national roads play a key role within Ireland's overall transport system and in the country's economic, social and physical development referring specifically noting the objective of the EU Trans-European Transport Networks (TEN-T) and the M20, national primary road and associated M20 Junction 5 as part of this network in relation to the gradual development of the transport network by 2030 in achieving an integrated and intermodal long-distance travel routes across Europe .

1. Development Strategy and National Roads

The submission requests the following: wording outlined in green and underlined is included in Objective SMT O6 (b) to ensure conformance with national and regional policy (NPO 74/NSO 2 and RPO 140) 'Protect the capacity of the <u>national and</u> regional road network from inappropriate development, having regard to all relevant Government guidance,'

2. Enhanced Regional Accessibility

The submission welcomes measures providing for and safeguarding the strategic function of the N/M20 Cork to Limerick Scheme included in the Local Area Plan in accordance with National Development Plan investment objectives. The submission recommends that the Council review and consider the appropriateness of including the NDP N/M20 Cork to Limerick Scheme on relevant Local Area Plan mapping, even in an indicative form.

The submission notes other priorities for TII relate to the maintenance of the existing national road network including junctions and safeguarding the Exchequer investment

1. Development Strategy and National RoadsNoted. Objective SMT O6 (b) will be amended to reference the national road network.

2. Enhanced Regional Accessibility

Progress for the N/M20 Cork to Limerick Project is ongoing and while a study area has been identified, it is considered premature to include this 500m wide corridor in the plan. The project team are currently gathering information from the Environmental, Engineering and Project Liaison teams to define the route within the study area. In this instance, it is considered appropriate not to include the study area within the Draft LAP.

Noted.

and to ensure conformance with national and regional policy (included in NPO 74/NSO 2, RPO 140 and RPO 167).

3. TII Publications (Standards) and Road Safety

The submission refers to the Road Safety Authority's Road Safety Strategy, 2021-2030. TII welcomes that the requirement for Road Safety Audit is incorporated into Objective SMT O6 Roads Part (b) of the Draft Local Area Plan and reference to the requirement to apply TII Publication 'The Treatment of Transition Zones to Towns and Villages on National Roads' (TII Publications DN-GEO-03084) in association with DMURS is included in Objective SMT O6 (c) Roads. The submission refers to the TII Publication Standards and where national roads with 60km/h zones traverse areas, this requires different design solutions to reflect the different receiving environment characteristics (residential, mixed use, village/town centres, industrial areas).

The submission would welcome the inclusion in the Draft Plan to ensure the requirement for a Design Report is completed and submitted for works to national roads in accordance with TII Publications DN-GEO-03030 (Design Phase Procedure for Road Safety Improvement Schemes, Urban Renewal Schemes and Local Improvement Schemes) having regard to the extent of proposals with the potential to impact the strategic national road network in the area.

4. Traffic and Transport Assessment (TTA)

TII recommends that planning applications significant development proposals should be accompanied with TTA to be carried out suitably competent by consultants, which are assessed association with their cumulative impact with other relevant developments on the road network. TII welcomes that the requirement for Traffic and Transport

3. TII Publications (Standards) and Road Safety

Noted. Text will be added to SMT O6 as a new point under (b) to reference the requirement for a Design Report, completed and submitted for works to national roads in accordance with TII Publications DN-GEO-03030 (Design Phase Procedure for Road Safety Improvement Schemes, Urban Renewal Schemes and Local Improvement Schemes) having regard to the extent of proposals with the potential to impact the strategic national road network in the area.

Add the following text into SMT O6 (b) (ii) as follows:

(ii) A Design Report will be required in accordance with TII Publications DN-GEO-03030 (Design Phase Procedure for Road Safety Improvement Schemes, Urban Renewal Schemes and Local Improvement Schemes) for works to the strategic national road network.

4. Traffic and Transport Assessment

Noted. Text will be added to SMT O6 (b) to reference TII guidance and publications

Assessment is incorporated into Objective SMT O6 (b) Roads of the Draft Local Area Plan and would welcome referencing to the TII TTA Guidelines 2014 in this regard.

5. National Road Drainage Regimes

TII welcomes that Objective SMT O6 (d) Roads of the Draft Local Area Plan sets out the Council objective to protect and safeguard the capacity and efficiency of the drainage regimes of the road network.

6. Signage

The submission welcomes the inclusion of Objective SMT O6 (e) Roads to prohibit advertising signage adjacent the national road network

7. Noise

The submission welcomes the inclusion of Objective SMT O6 (d) Roads and acknowledges the Draft Plans' reference to S.I. No. 140 of 2006 Environmental Noise Regulations in Objective SMT O6 (c) Roads

8. Renewable Energy and Grid Connection

The submission outlines how TII would welcome consideration being given to including an objective in Section 9.5 of the Draft Local Area Plan, in relation to renewable energy and in relation to safeguarding the national road network, indicating that grid connection cable routing should seek to utilise available alternatives, as opposed to being placed along the strategic national road network contrary to the provisions of official policy.

9. Greenway/Active Travel

The submission refers to Greenway and Active Travel proposals contained in the Draft Plan and consultation with the Councils own internal project and/or design staff is recommended.

Chief Executive's Recommendations:

National Road Drainage Regimes Noted.

6. Signage

Noted.

7. Noise

Noted.

8. Renewable Energy and Grid Connection

Noted. In this instance, the Council considers that the Limerick Development Plan 2022-2028 provides sufficient protection, with regards to the national road network and to which is carried through to the Local Area Plan. In respect of grid connections from renewable energy projects, it would be premature, in the absence of knowledge of all potential grid connection route options for any renewable energy project, to impose a constraint on the route options in the Local Area Plan, and could hinder the delivery of renewable energy projects of a strategic nature.

9. Greenway/Active Travel

Noted. Engagement with the team responsible for the Greenway and active travel delivery has taken place though the plan process and will continue.

- 1. Amend SMT O6 (b) to reference national road network as follows:
- 'Protect the capacity of the <u>national and</u> regional road network from inappropriate development, having regard to all relevant Government guidance,'
- 2. No Change
- 3. Add the following text into SMT O6 (b) (ii) as follows:
- (ii) A Design Report will be required in accordance with TII Publications DN-GEO-03030 (Design Phase Procedure for Road Safety Improvement Schemes, Urban Renewal Schemes and Local Improvement Schemes) for works to the strategic national road network.
- **4.** Add the following text into SMT O6 (b) as follows:

Protect the capacity of the regional road network from inappropriate development, having regard to all relevant Government guidance, Objective TR O39 National Roads and Objective TR O41 Strategic Regional Roads of the Limerick Development Plan 2022-2028 and ensure development does not compromise the performance of the network or future improvements to the network.

- (i) Road Safety Audits and Traffic Impact Assessments, in accordance with TII guidance and publications, will be required to demonstrate implications of development proposals on the national and regional road network.
- 5. No Change
- 6. No Change
- 7. No Change
- 8. No Change
- 9. No Change

SEA/AA Response:

Minor amendments. Taking into account the measures that have been already integrated into the Draft Plan that provide for and contribute towards environmental protection, environmental management and sustainable development, it is identified that any potential effects arising from the recommendations outlined in this Chief Executive's Report, either are present already (beneficial) and will be further contributed towards; or will be mitigated so as not to be significant (adverse). In addition, some recommendations merely propose to add clarification or amended context setting text for Plan provisions and these will not result in significant environmental effects. Consequently, the above recommendations outlined in this Chief Executive's Report do not require SEA.

Furthermore, taking into account the mitigatory measures already in force through the Development Plan and those already included in the Draft Plan, the Proposed Alterations outlined in this Chief Executive's Report the Proposed Alterations will not give rise to any likely significant effect on any European site. Consequently, Stage 2 AA will not be required to be undertaken on the Proposed Alterations.

3.	Name/Group: National Transport Authority Ref: LCC-C249-PAT02-05						
	Submission:		Response				
	1. Consistency wit	th Limerick Shannon	1. Consistency with Limerick	Shannon			
	Metropolitan Area (LSMATS)	Transport Strategy	Metropolitan Area Transport (LSMATS)	Strategy			

It is the view of the NTA that the following objectives of the Draft LAP, individually and in combination, deliver consistency with the LSMATS and it is recommended that these objectives are retained in the final plan:

- Objective DS O1 Residential Phasing;
- Objective DS O2 Residential Development;
- Policy TCF P1 -Town Centre First;
- Objective CO2 Community and Education Facilities (Part G and Part H);
- Objective ED O2Enterprise and Employment
- Objective SMT O1 Public Transport Provision;
- Objective SMT O2 Sustainable Travel Infrastructure;
- Objective SMT O3 Supporting Modal Split and Behavioral Change;
- Objective SMT O4 Freight Rail Network;
- Objective SMT O5 Safeguard Route Study Area and Corridor for N/M20 Cork to Limerick Project.

2. Amenity and Sustainable Transport Map

The NTA note the content of the Amenity and Sustainable Transport Map in Appendix 1. In order to guide future investment in walking and cycling, it is the view of the NTA that it would be more advantageous to show the cycle and pedestrian links according to priority, based on the trip demand they would likely cater for, such as trips to Patrickswell National School. It is also unclear, for example, how the R526 Main Street and other roads, such as Clarina Road, comprise "Existing Pedestrian / Cycle Routes /Links" as described, when there is no specific provision for cycling on those roadways.

The NTA recommends that the Amenity and Sustainable Transport Map is amended in order to show priority locations for investment in the cycle and pedestrian network in Patrickswell, including any potential which may exist for the provision

Noted, it is intended that the objectives, as identified will follow through to the final LAP.

2. Amenity and Sustainable Transport Map

The Amenity and Sustainable Transport Map will be updated to provide a clearer picture of existing and proposed infrastructure.

Additional text will be provided in a new Section under Section 7.4 Modal Shift and Target. Text will include a table outlining proposed active travel measures, timeline for delivery and priority routes.

The Council acknowledges the significant number of residential units provided in extant planning permissions on the Clarina Road. The Council recognises the requirements of providing appropriate active travel infrastructure on this section of the road to enable the uptake of active travel modes ensuring the infrastructure is made available for residents to use alternative modes particular for shorter local journeys. The provision of a cycle link and improved cycling infrastructure will be provided as a proposed

of cycle infrastructure on the Main Street and Clarina Road, or other traffic management measures which would provide for safe and convenient cycling.

link in the Amenity and Transport Map and as a new priority action under a new Active Travel Measures Table and associated map under Section 7.4 Modal Shift and Targets.

Chief Executive's Recommendations:

- 1. No Change.
- **2(i)** Update the Amenity and Sustainable Transport Map to distinguish between existing and proposed cycling and walking infrastructure
- (ii) Provide a new Section under Section 7.4 Modal Shift and Targets and update the text as follows:

There are a number of opportunities, which have the ability to address current travel trends and to examine the existing travel behaviours within Patrickswell to provide for the realisation of a more sustainable transport mode. The Draft Local Area Plan focuses on the provision of increased permeability through future development within the settlement. The plan provides a change of focus towards the town centre first initiatives, development of infill/brownfield sites and the creation of a more compact village and endeavours to improve permeability and localised access through the development of the four identified opportunity. Local conditions including lack of infrastructure, inadequate linkages and lack of permeability create physical barriers to enabling a move away from the predominant car travel, as exists in Patrickswell. In relation to cycling, there are no cycle paths in the village with cyclists using footpaths instead, in some instances. Policies contained within this Plan ensure that new development proposals provide for permeability and appropriate linkages that are required to open up future and existing development, creating the conditions to enable active travel modes and improving access for those with mobility issues. The following table identifies active travel infrastructure that seeks to create convenient, efficient routes to key destinations for local amenities, facilities, social infrastructure and services and in doing so, reducing walking/cycling distances and creating the conditions that gives active modes a competitive advantage over the private car. The table below outlines active travel measures to enable the 10-minute town concept prioritising a number of these measures:

- The implementation of pedestrian/cycling safety measures on Main Street as part of the Patrickswell Village Renewal Scheme commenced March 2023;
- Improved connectivity from Main Street to Patrickswell National School as part of Patrickswell Village Renewal Scheme;
- Upgrade of existing pedestrian link from Laurel Park to Lisheen Park at Patrickswell National School;
- Improvement works outside Patrickswell NS for walking and cycling infrastructure and in turn, increase the number of students who cycle to school;
- Active Travel measures as part of the N/M20 Motorway project including cycle and pedestrian infrastructure from Patrickswell to Croom, Bruree and connections into the proposed Limerick Greenway and wider national cycle network;

- Increase permeability through future development within the settlement;
- Change of focus to town centre first initiatives, development of infill/brownfield sites and creation of a more compact village;
- Opportunity sites focused on improving permeability and localised access.

(iii) Insert Table showing Active Travel Proposal and Priority Route:

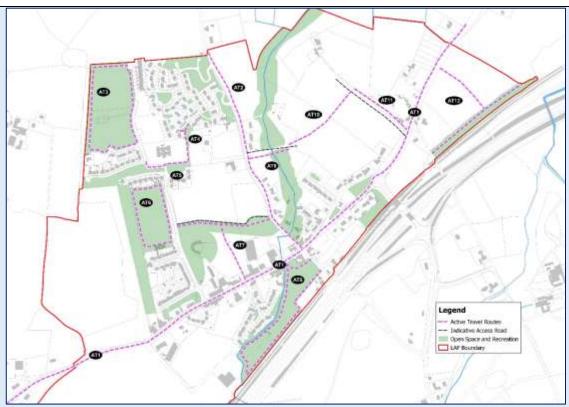
Table 7.3 Active Travel Measures and Priorities

Action/ Intervention Reference	<u>Description</u>	Proposed Link Type/ Active Mode Priority	Expected Timeframe	Need for Intervention
AT1	Main Street Patrickswell Village Centre	Segregated cycle lane Active Mode Priority	Medium to Long Term	- Connection into existing segregated cycle track along R526 to Raheen/Limerick City and future connections associated with Active Travel measures of N/M20 Cork to Limerick Project, Patrickswell to Charleville Greenway and Rathkeale/Limerick Greenway - Increase uptake of active travel modes - Connection between village centre to residential areas/local facilities/services
<u>AT2</u>	<u>Clarina Road</u>	Cycle Infrastructure Active Mode Priority	Short to Medium Term	 Increase uptake of active travel modes Connection between village centre to existing and proposed residential areas/local facilities/services
AT3	Patrickswell FC/Lisheen Park/Faha View (Opportunity Site 2)	Looped Pedestrian Walkway Active Mode Priority	Short Term	- Provision of looped walk around perimeter of site included in proposed development design as part of Opportunity Site 2,
AT4	Sycamore Heights to Patrickswell National School	Pedestrian Link Active Mode Priority	Short Term	- <u>Upgrade of existing link from</u> residential estate to <u>Patrickswell NS, Lisheen Park</u> and local amenities/facilities
<u>AT5</u>	Site entrance fronting Patrickswell National School	Front entrance and road network at front of Patrickswell NS Active Mode Priority	Short Term	 Realignment of road network and provision of walking and cycling infrastructure at front of Patrickswell NS. Provision of 'school street/school zone'

AT6	<u>Patrickswell</u>	Looped	<u>Short</u>	-	Provision of looped wall
	GAA Grounds	<u>Pedestrian</u> <u>Walkway</u>	<u>Term</u>		around perimeter of sit included as part of future development proposals of the GAA grounds.
<u>AT7</u>	Patrickswell Village Centre Opportunity Site 1/Residential Development	Active Travel Connection – cycle and walking provision. Active Mode Priority	Short Term	-	Provision of connectivity and permeability link between Clarina Road, School Road and the centre of Patrickswell Provision of active travel linkage linked to future residential development.
AT8	Riverside Park off Village Centre	Looped Walking/Cycling pathway	Medium Term	-	Riverside Park as part of Opportunity Site 3
<u>AT9</u>	Barnakyle	Residential Active Travel Connection – cycle and walking provision. Active Mode Priority	Short Term	-	Provision of active travelinkage linked to residential development granted under Planning File 22/8017. Potential to provide linkage from proposed residential development through the local facilities/services (school, GAA etc).
AT10	Barnakyle Opportunity Site 4	Residential Active Travel Connection – cycle and walking provision	Medium to Long Term	-	Provision of active travelinkage linked to future residential development/open space.
AT11	Barnakyle Opportunity Site 4	Residential Active Travel Connection – cycle and walking provision	Long Term	-	Provision of active trave linkage linked to future residential development/open space.
AT12	Serviced Site at Barnakyle on R526	Residential Active Travel Connection – cycle and walking provision	Medium to Long Term	-	Provision of active travelinkage linked to future residential development/open space.

(iv) Insert Map with associated Action Reference as follows:

Fig. 7.3 Map of Active Travel Measures and Priorities



*Larger map provided for under Part B of this report

3. Insert additional action under the theme 'Greening' in Table 4.2 Draft Patrickswell LAP Action Timeframe as follows:

Action: <u>Provision of a cycle route and active travel measures on the Clarina Road linking into the village</u>

Lead Responsibility: NTA and LCCC Transport and Mobility Directorate

Timeline: Short to Medium Term

SEA/AA Response:

Active travel proposals were considered under the SEA Screening and no significant adverse environmental effects identified.

Taking into account the measures that have been already integrated into the Draft Plan that provide for and contribute towards environmental protection, environmental management and sustainable development, it is identified that any potential effects arising from the recommendations outlined in this Chief Executive's Report: either are present already (beneficial) and will be further contributed towards; or will be mitigated so as not to be significant (adverse). In addition, some recommendations merely propose to add clarification or amended context setting text for Plan provisions and these will not result in significant environmental effects. Consequently, the above recommendations outlined in this Chief Executive's Report do not require SEA.

Furthermore, taking into account the mitigatory measures already in force through the Development Plan and those already included in the Draft Plan, the Proposed Alterations outlined in this Chief Executive's Report the Proposed Alterations will not give rise to any likely

significant effect on any European site. Consequently, Stage 2 AA will not be required to be undertaken on the Proposed Alterations.

4. Name/Group: Department of Education Ref: LCC-C249-PAT02-06

Submission:

1. Population Projections and School Expansion

This submission sets out the population projections for Patrickswell as outlined in the Limerick Development Plan 2022-2028, the Draft Patrickswell Local Area Plan and the Southern Regional Spatial and Economic Strategy. Based on the population projections set out in the above documents and the recent release of Census population data, at primary level, the Department anticipates that a relatively modest potential increase in school place requirements could arise and is capable of being met at the existing school facilities (or expansion thereof). The Department's preference would be to expand the existing facilities (if possible) of the existing primary school, should there be a requirement for additional school places as a result of the planned population increases. The Department requests the Planning Authority to examine the potential of protecting a land buffer around the primary school to enable it to expand further if required to meet the future population growth in Patrickswell town.

At post-primary level, the Department anticipates that a relatively modest potential increase in school place requirements would be capable of being met at the existing school facility (or expansion thereof).

1. Population Projections and School Expansion

Noted.

Response

The Draft Plan acknowledges that sufficient provision be made for the existing and anticipated educational needs of the population in line with national guidelines/future growth of the village. In this regard, lands at the rear of the school have been zoned for Community and Educational use to allow for potential future expansion of the school, if required and is considered sufficient for such provision.

The Planning Authority notes the comments in relation to post primary education. In this regard, the submission on behalf of the Department of Education to the Draft Limerick Development Plan in September 2021, noted that the Limerick City Southern Environs includes the catchment area for Patrickswell with the new post primary school in Mungret. The new school has capacity for 1000 students meeting demand for the area in the short to medium term.

2. Draft Plan Policy

The Department notes and supports Objective CO2 – Community and Education Facilities and Table 10.2: Land Use Zoning Objectives and Purposes to protect and provide for education, training, adult learning, community, healthcare, childcare, civic, religious and social infrastructure.

The Department Notes Section 7.4 Modal Shift and Targets, specifically that Limerick City and County Council are currently examining the receiving environment around Patrickswell National School and the potential provision of improved safety for pedestrian and cycle access at the school gate, which may require the reassignment of road space to maximize pedestrian and cyclist safety and the removal of some car parking spaces. The Department supports the development of sustainable travel links between schools and residential areas.

3. Assessing Current and Future Capacity

In terms of assessing current and future capacity, the Department of Education has to be mindful of potential unforeseen circumstances such as the Ukrainian crisis, which have the ability to put undue pressure on school place provision and could necessitate reassessments of school place provision from time to time. The Department will engage with the Council where the findings of an assessment require a review of existing or future school site provision within a specific location.

4. Special Education Needs

The Department also anticipates that additional special education needs provision at both primary and post-primary level required in the future throughout the country and this may result in schools requiring additional accommodation to meet this growing need. The Department will consult with the Council if, and when additional special education needs

2. Draft Plan Policy

Noted.

3. Assessing Current and Future Capacity Noted.

4. Special Education Needs

Noted.

accommodation is required within specific locations.

5. Continued Engagement

Finally, the submission welcomes the continued engagement with the Council regarding the development of both new and existing schools, as appropriate, and emphasizes the critical importance of the ongoing work of the Council in ensuring sufficient land is zoned for this purpose.

5. Continued Engagement

Noted.

Chief Executive's Recommendations:

1-5. No Change.

SEA/AA Response: N/A

5.	Name/Group: Uisce Éireann						
		Ref: LCC-C249-PAT02-0	11				
	Submission:		Response				
	opportunity to cor Patrickswell Local A (Draft Plan). The sul that the contents of	JÉ) welcomes the nment on the Draft rea Plan 2024 –2030 omission also requests this submission should in the Environmental	Noted.				
	1. Wastewater Infras	structure	1. Wastewater Infrastructure				
	The submission refers to the 2023		Noted.				
	wastewater treatme	ent capacity register,					
	which indicates that	there is potential spare					
	capacity at the	Limerick Wastewater					
		service the projected					
		well during the Plan					
	•	and LCCC will continue mance of the networks					
	•	nost urgent works are					
		uired. The submission					
	l · ·	re no known major					
	wastewater netw	ork constraints in					
	Patrickswell, bu	ıt localized					
		may be required to					
	facilitate developmer	nt.					
	2. Water Infrastructu	ıre	2. Water Infrastructure				
		nes that Patrickswell is	Noted.				
	served by the L	imerick City Water					

Resource Zone (WRZ) which has capacity available over the Plan period to meet a settlement population target population of 1,255 in 2032.

The submission notes that continuous performance monitoring of the networks will be undertaken to ensure that the most urgent works are prioritised as required. The submission highlights that no known major water network constraints in Patrickswell. However, localised upgrades/extensions may be required to facilitate development.

3. Zoning

The submission outlines how a high level review of the land-use zoning map was available carried out and network information indicates network extensions may be required to service some zoned sites. The submission notes that depending on the extent of development realised, localised network upgrades may also be required, particularly in areas served by sewers with a diameter of 150mm or less, or watermains with a diameter of 80mm or less. The submission specifically refers to Settlement Capacity Audit Sites 6, 7, and 8.

The submission advises that where network reinforcements such as upgrades or extensions are required, these shall be developer driven unless there are committed Uisce Éireann projects in place to progress such works.

The submission states that all new residential and commercial/industrial developments wishing to connect to an Uisce Éireann network are to be assessed on a case by case basis through Uisce Éirean's New Connections process which will determine the exact requirements in relation to network and treatment capacity. New connections to Uisce Éireann networks are subject to their Connections Charging Policy. The submission further notes that third-party agreement will be required where it is proposed to service a new

3. Zoning

It is acknowledged there will be requirements for additional infrastructure to support development in Patrickswell and that this infrastructure will be in many cases at the cost of the developer. Potential developers will be advised to consult with Uisce Eireann at an early stage in the development process.

Additional requirements relating to Settlement Capacity Audit Site 6, 7 and 8 will be provided within the SCA Table as outlined in Part 4 of this submission.

The Council will ensure that early engagement takes place with all relevant stakeholders, in the preparation of any development works that will impact on assets of Uisce Éireann and on all new residential and commercial/industrial developments wishing to connect to an Uisce Éireann network

development via private property or private water services infrastructure.

The submission outlines where Uisce Éireann assets are within a proposed development site e.g. Opp Site 3, these assets must be protected and/or diverted and if there is a possibility that Uisce Éireann assets will need to be altered or diverted as a result of a proposed development, a diversion agreement may be required.

4. Site Specific Site Comments

The submission provides for a number of site specific comments on the Sites provided for in the Settlement Capacity Audit.

Site 1: The submission notes the following: Water supply for this site would require third party agreements as there are no main water pipes that run across the land, connection would be via site 2 or 3, to the watermain in Barnakyle estate or the road to the south-east. There are no sewers for foul water running across or adjacent to this site and third party agreements would be required in order to access provision on the R526 through Site2 or along the boundary of Site 5.

Site 2: The submission notes the following: Water supply for this site could be serviced from the 150mm pipe that runs to the south east of the site along the R526. Foul water could be discharged into a foul or combined sewer on the R526.

Site 3: The submission notes the following: Water supply for this site could be serviced from the 100mm pipe that runs along Barnakyle estate or the 150mm pipe that runs along the R526. There is a combined sewer that runs across the site, this asset will need to be protected and certain separation distanced would apply. However, this asset could be used for foul water from any proposed development.

Site 4: The submission notes the following: Water supply for this site could be serviced from the 200mm pipe that runs along the R526. This route would cross an existing

4. Site Specific Site Comments

The Council notes the site-specific comments made in relation to the Settlement Capacity Audit, and will update the Settlement Capacity Audit Table (Sites 1-16) with the specific comments as identified by Uisce Éireann.

The Settlement Capacity Audit Table will be updated accordingly.

The Settlement Capacity Audit Table will be updated accordingly.

The Settlement Capacity Audit Table will be updated accordingly.

property, but this lies within the land allocation. There is a combined sewer that runs across the site, this asset will need to be protected and certain separation distanced would apply. However, this asset could be used for foul water from any proposed development.

Site 5: The submission notes the following: Third party agreements would be required in order to supply water to this site as there are no mains water pipes that pass across or adjacent to it. The shortest connection would appear to be across land within land allocation 3 to connect to the 100mm pipe in Barnakyle. There is a combined sewer that runs along the western boundary of this site, which could be used for foul water discharge

Site 6: The submission notes the following: Water supply for this site would be serviced from a 75mm pipe that runs along the highway to the west of this site. However, due to the size of this pipe it may need to be upgraded. There is a foul sewer that runs along the highway to the west of

this site and trunk foul and combined sewers that cross the site to the, these assets would need to be protected and certain separation distances would apply. Any of these sewers could be used for the discharge of foul water **Site 7:** The submission notes the following: Water supply for this site would be serviced from a 75mm pipe, which is routed along the

highway, due to the size of the pipe this may require an upgrade. There is a foul sewer than runs across the south of the site and this asset would need to be protected and certain separation distances would apply. In addition, there is a foul sewer that runs along the highway to the west of the site.

Site 8: The submission notes the following: The water supply would be serviced from a 75mm pipe, which is routed along the highway, due to the size of the pipe this may require an upgrade. Alternatively, access across third party land could enable access to a 100mm pipe within Sycamore Heights. There is a combined sewer that runs across

The Settlement Capacity Audit Table will be updated accordingly.

The Settlement Capacity Audit Table will be updated accordingly.

The Settlement Capacity Audit Table will be updated accordingly.

The Settlement Capacity Audit Table will be updated accordingly.

the south of the site as well as one that runs north-south to the east of the site, these assets would need to be protected and certain separation distances maintained. However, these assets could be used for the discharge of foul water.

Site 9: The submission notes the following: Water supply for this site would be serviced from a 150mm pipe from the west of the site, which is routed along the highway. There are no sewers running across this site and third party agreements would be required for the discharge of foul water to the sewer to the north in site 8. Alternatively, connection could be made via a short network extension and upgrade to the Lisheen Park network.

Site 10: The submission notes the following: Water supply for this site could be serviced from a 100mm pipe which is routed along Belgard Grove. There are no sewers running across this site and third party agreements maybe required to connect to the private network in the estate.

Site 11: The submission notes the following: Water supply for this site could be serviced from a 100mm asbestos pipe, which runs along the highway to the west of the site. There is a foul sewer that runs along the highway to the west of the site, which could be used for the connection of foul water discharges.

Site 12: The submission notes the following: Water supply for this site could be serviced from a 100mm asbestos pipe, which runs along the highway to the east of this site. However, attention is drawn to the presence of a 450 trunk sewer main that runs through this site. There will be a requirement to maintain a minimum distance separation, which would typically be between 3.5m to 6m depending on the depth of the sewer.

Site 13: The submission notes the following: Water supply for this site could be serviced from a 200mm pipe within the highway. Foul water could be discharged into the foul sewer that runs along Main Street

The Settlement Capacity Audit Table will be updated accordingly.

The Settlement Capacity Audit Table will be updated accordingly.

The Settlement Capacity Audit Table will be updated accordingly.

The Settlement Capacity Audit Table will be updated accordingly.

The Settlement Capacity Audit Table will be updated accordingly.

Site 14: The submission notes the following: Water supply for this site could be serviced from a 150mm pipe, which runs along the R526. There is a foul water sewer that runs along the R526 to the north of the site, which could be used for foul water discharge.

Site 15: The submission notes the following: Water supply for this site could be serviced from a 100mm pipe within the highway to the west of the site. Third party agreements would be required for foul water discharges in order to reach the foul sewer on Main Street.

Site 16: The submission notes the following: Water supply for this site could be serviced from a 100mm pipe in the highway to the east of the site or from a 200mm pipe on Main Street. Attention is drawn to the 100mm cast iron pipe that runs across this site from the reservoir, which lies to the west of the site. This asset would need to be protected adequate and separation distances maintained. On-site boosting may be required. Foul water discharge connections could be made to the foul sewer that runs along Main Street.

5. Sustainable Drainage and Green-Blue Infrastructure

Uisce Éireann encourages the inclusion of policies and objectives on the use of Sustainable Urban Drainage Systems and Green-Blue Infrastructure in new developments including the public realm and retrofitted in existing developed areas, in line with NPO 57 of the National Planning Framework. The submission outlines how these measures can provide a cost effective sustainable means of managing stormwater and water pollution at source, keeping surface water out of combined sewers (thus increasing capacity for foul drainage from new developments), while providing multiple benefits. The submission notes that Uisce Éireann would be happy to engage with Limerick CCC to discuss The Settlement Capacity Audit Table will be updated accordingly.

The Settlement Capacity Audit Table will be updated accordingly.

The Settlement Capacity Audit Table will be updated accordingly.

5. Sustainable Drainage and Green-Blue Infrastructure

Noted, there is reference to Nature-based Solutions to the Management of Rainwater and Surface Water Run-off in Urban Areas – Best Practice Interim Guidance' document in Section 9.3 of the Draft Plan.

The approach taken in the Draft Local Area Plan, in line with the Limerick Development Plan 2022 – 2028, is to seek to adopt SuDS and nature based solutions as an appropriate measure for dealing with surface water management for all development proposals including the Opportunity Sites. However, to strengthen the support for the implementation and promotion of SuDS and nature based solutions in the design principles with particular reference the Opportunity Sites

stormwater removal opportunities, in particular to progress nature-based rainwater management initiatives in line with the recently issued Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas Best Practice Interim Guidance Document.

6. Planned Road and Public Realm Projects

The submission refers to planned public realm and road projects, which can have the potential to impact on Uisce Éireann assets and projects. The submission advises that development, in the vicinity of Uisce Éireann assets should be in accordance with our Standard Details and Codes of Practise, and Diversion Agreements will be required where an Uisce Éireann asset is diverted or altered. Where planned development may impact on Uisce Éireann assets, early engagement is requested to ensure public water services are protected and access is maintained, and to enable Uisce Éireann to plan works accordingly and ultimately minimise disruption to the public.

provided in Chapter 4, an additional section is proposed to be added to Chapter 4 Town Centre First on the principles of SuDS and ensuring that a climate adaptive and resilient urban green approach is undertaken in the development of the four opportunity sites in Patrickswell.

6. Planned Road and Public Realm Projects

The Council will ensure that early engagement takes place with all relevant stakeholders, in the preparation of the new road projects, public realm plans and upgrades. Any upgrade projects/works stemming from the Local Area Plan will be the subject of a separate statutory process with appropriate public/stakeholder consultation.

Chief Executive's Recommendations:

1-3. No Change

4. Insert the following text into each of the sites identified in Chapter 10 Land Use Framework and Settlement Capacity Audit, Table 10.5 Settlement Capacity Audit.

Site 1: <u>Uisce Eireann Site Specific Comment:</u> <u>Water supply will require third party agreements with likely servicing of these sites to be facilitated via Site 2 or 3, to the watermain in Barnakyle Estate or the road to the south-east. Third party agreements will be required for foul water infrastructure with likely servicing of these sites from the R526 through Site 2 or along the boundary of Site 5.</u>

Site 2: <u>Uisce Eireann Site Specific Comment:</u> <u>Water supply would likely be serviced from the 150mm pipe that runs to the south east of the site along the R526. Foul water servicing likely requiring discharge into a foul or combined sewer on the R526.</u>

Site 3: <u>Uisce Eireann Site Specific Comment:</u> <u>Water supply likely serviced from the 100mm pipe that runs along Barnakyle estate or the 150mm pipe that runs along the R526. There is a combined sewer that runs across the site, this asset will need to be protected and certain separation distanced would apply. This asset could be used for foul water from any proposed development.</u>

Site 4: <u>Uisce Eireann Site Specific Comment:</u> <u>Water supply for this site could be serviced from the 200mm pipe that runs along the R526. This route would cross an existing property, but this lies within the land allocation. There is a combined sewer that runs across the site, this asset will need to be protected and certain separation distanced would apply. This asset could be used for foul water from any proposed development.</u>

Site 5: <u>Uisce Eireann Site Specific Comment Third party agreements would be required in order to supply water to this site as there are no mains water pipes that pass across or adjacent to it. The shortest connection would appear to be across land within SCA Site. No3 to connect to the 100mm pipe in Barnakyle. There is a combined sewer that runs along the western boundary of this site, which could be used for foul water discharge</u>

Site 6: <u>Uisce Eireann Site Specific Comment Water supply for this site likely to be serviced from a 75mm pipe that runs along the highway to the west of this site. However, due to the size of this pipe it may need to be upgraded. There is a foul sewer that runs along the highway to the west of this site and trunk foul and combined sewers that cross the site to the, these assets would need to be protected and certain separation distances would apply. Any of these sewers could be used for the discharge of foul water</u>

Site 7: <u>Uisce Eireann Site Specific Comment: Water supply for this site likely to be serviced from a 75mm pipe, which is routed along the highway, due to the size of the pipe this may require an upgrade. There is a foul sewer than runs across the south of the site and this asset would need to be protected and certain separation distances would apply. In addition, there is a foul sewer that runs along the highway to the west of the site.</u>

Site 8: Uisce Eireann Site Specific Comment The water supply would be serviced from a 75mm pipe, which is routed along the highway, due to the size of the pipe this may require an upgrade. Alternatively, access across third party land could enable access to a 100mm pipe within Sycamore Heights. There is a combined sewer that runs across the south of the site as well as one that runs north-south to the east of the site, these assets would need to be protected and certain separation distances maintained. However, these assets could be used for the discharge of foul water.

Site 9: <u>Uisce Eireann Site Specific Comment</u>: <u>Water supply for this site would likely be serviced from a 150mm pipe from the west of the site, which is routed along the highway. There are no sewers running across this site and third party agreements would be required for the discharge of foul water to the sewer to the north in SCA Site 8. Alternatively, connection could be made via a short network extension and upgrade to the Lisheen Park network.</u>

Site 10: <u>Uisce Eireann Site Specific Comment:</u> <u>Water supply for this site would likely be serviced from a 100mm pipe, which is routed along Belgard Grove. There are no sewers running across this site and third party agreements may be required to connect to the private network in the estate.</u>

Site 11: <u>Uisce Eireann Site Specific Comment</u>: <u>Water supply for this site likely to be serviced from a 100mm asbestos pipe, which runs along the highway to the west of the site. There is a foul sewer that runs along the highway to the west of the site, which could be used for the connection of foul water discharges.</u>

Site 12: <u>Uisce Eireann Site Specific Comment</u>: <u>Water supply for this site likely to be serviced from a 100mm asbestos pipe, which runs along the highway to the east of this site. However, attention is drawn to the presence of a 450 trunk sewer main that runs through this site. There will be a requirement to maintain a minimum distance separation, which would typically be between 3.5m to 6m depending on the depth of the sewer.</u>

Site 13: <u>Uisce Eireann Site Specific Comment</u>: <u>Water supply for this site likely to be serviced from a 200mm pipe within the highway. Foul water could be discharged into the foul sewer that runs along Main Street</u>

Site 14: <u>Uisce Eireann Site Specific Comment</u>: <u>Water supply for this site likely to be serviced from a 150mm pipe, which runs along the R526. There is a foul water sewer that runs along the R526 to the north of the site, which could be used for foul water discharge.</u>

Site 15: <u>Uisce Eireann Site Specific Comment</u>: <u>Water supply for this site likely to be serviced from a 100mm pipe within the highway to the west of the site. Third party agreements would be required for foul water discharges in order to reach the foul sewer on Main Street.</u>

Site 16: <u>Uisce Eireann Site Specific Comment:</u> <u>Water supply for this site likely to be serviced from a 100mm pipe in the highway to the east of the site or from a 200mm pipe on Main Street. Attention is drawn to the 100mm cast iron pipe that runs across this site from the reservoir, which lies to the west of the site. This asset would need to be protected and adequate separation distances maintained. On-site boosting may be required. Foul water discharge connections could be made to the foul sewer that runs along Main Street.</u>

5. Insert additional Section into Chapter 4.5 Opportunity Sites as follows:

Opportunity Sites and Climate Adaptive/Resilient Urban Greening

The management of rainwater and flood risk as part of climate adaptive and resilient urban greening should be considered at the outset of the design process of all proposed Opportunity Sites. Proposals should adhere to the rainwater management mechanisms outlined within the national guidance for water sensitive urban design (Nature-Based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas: Water Sensitive Urban Design: Best Practice Interim Guidance Document). All new development is required to manage and minimise surface water runoff through the use of Nature based Solutions / Sustainable Drainage Systems (SuDS), unless otherwise agreed with the Council. Development will only be permitted where the Council is satisfied that suitable measures have been proposed that mitigate the impact of surface water, through the achievement of control of run-off quantity and quality, while enhancing amenity and habitat.

6. No Change

SEA/AA Response:

The new text for the opportunity sites relating to nature based measures and SuDS is positive for Strategic Environmental Objectives including Water, Material Assets in particular. Additional information relating to sites and opportunity sites as provided by Uisce Eireann provides greater detail and information on water services.

Taking into account the measures that have been already integrated into the Draft Plan that provide for and contribute towards environmental protection, environmental management and sustainable development, it is identified that any potential effects arising from the recommendations outlined in this Chief Executive's Report: either are present already (beneficial) and will be further contributed towards; or will be mitigated so as not to be significant (adverse). In addition, some recommendations merely propose to add clarification or amended context setting text for Plan provisions and these will not result in significant environmental effects. Consequently, the above recommendations outlined in this Chief Executive's Report do not require SEA.

With regards to the Appropriate Assessment, it is identified that changes are unlikely to have a significant effect on the Natura Network. Measures such as nature-based solutions and SuDS are likely to have an overall positive effect. The measures that have been already integrated into the Draft Plan provide for environmental protection for the Natura Network.

Name/Group: 6. Office of Public Works Ref: LCC-C249-PAT02-12 **Submission:** Response The OPW welcome the opportunity to Noted. comment on the preparation of the Draft Local Area Plan and makes the submission specifically concerning flood management. The OPW welcomes Objective IUO4 Surface Water Management and SuDS, IUO5 Flood Risk Management Part (a) and (c). 1. Flood Zones 1. Flood Zones The submission welcomes the modelling undertaken to produce the flood zones for Patrickswell. (i) The submission refers to Section 7.6.1 (i) Section 7.6.1 will be updated to reflect the Development in Defended Areas in the SFRA difference between channel conveyance improvement and informal embankments. whereby the following is stated: 'Patrickswell is not defended by any OPW embankments, but the River Barnakyle is known as channel C1/10/4 under the Maigue Arterial Drainage Scheme, in this case, the channel capacity been increased to typically cater for the 1 in 30 year event and the channel is maintained by the OPW'. The submission notes that Arterial Drainage Schemes were to improve land for agriculture and the lands which may benefit are called benefitting lands, however, this is not the same as defended areas which are generally associated with engineered flood defence schemes. The OPW recommends further detail be added to Section 7.6.1 to make the distinction between flood defences and areas benefitting from Arterial Drainage Schemes. (ii) The submission notes the reference in (ii) The reference to demountable defences

- the SFRA to 'demountable defences' referencing the following: 'It is noted that the demountable defences in Patrickswell seem to be retained in-place, but with demountable defences there is the risk to human error in their installation/preparedness'. The submission recommends that the SFRA provide more information on these demountable
- (ii) The reference to demountable defences was made in error and will be removed in the SFRA. There are no demountable defences located within the Draft Local Area Plan boundary.

defences, such as their location, ownership and flood risk areas that benefit from them.

(iii) The submission further requests that a register of key flood risk infrastructure is included in the Local Area Plan.

2. Consideration of Climate Change Impacts

- (i) The submission outlines the specific impacts of climate change and notes that in line with the Guidelines, while Flood Zones are defined on the basis of current flood risk, planning authorities need to consider such impacts in the preparation of plans.
- (ii) The OPW welcomes that climate change was also considered referring to Figure 7.1 JBA mapping in the SFRA, 1% vs 1%+ Climate Change (HEFS). The submission notes it would be beneficial to detail the impact that Climate Change may have on the 0.7% AEP flood extents, as this will impact Flood Zone B. The submission further notes it would be useful to have these maps overlaid on the land use zoning map.
- (iii) The submission advises that the Council should consider detailing in the SFRA how this mapping has informed the Draft Plan.

3. Arterial Drainage Schemes and Drainage Districts

The OPW requests that the Council have regard in zoning land for development to access requirements for the maintenance of Arterial Drainage Schemes and Drainage Districts. The submission requests the consideration of including an objective in this regard.

(iii) The Council notes that reference to Demountable Defences was made incorrectly in the plan and will be removed. In this instance, the Council considers that a flood risk infrastructure register is not required.

2. Consideration of Climate Change Impacts

- (i) Noted. The Strategic Flood Risk Assessment was prepared having regard to impacts of climate change. Climate change is discussed in Section 7 of the SFRA in relation to its incorporation into the overall assessment. Furthermore a comment on the likely impacts of climate change, on settlement basis, is provided in Section 8. In turn, all recommendations were integrated into the Draft Plan.
- (ii) Note. The SFRA will be updated to provide that the climate change mapping will include 0.1% AEP and LU Zoning background applied to the figures presented.

(iii) Under Section 8 the impacts of climate change are reviewed for each specific area within Patrickswell. Additional information will be provided in Section 7.7 of the SFRA as to how the Climate Change Mapping has informed the plan.

3. Arterial Drainage Schemes and Drainage Districts

Noted. Objective IU O5 - Flood Risk Management will be amended to ensure that access requirements for the maintenance of Arterial Drainage Schemes and Drainage Districts will be provided.

4. Nature-based Solutions and SuDS

- (i) The OPW welcomes Objective IUO4 (c) to require all new developments to include SuDS measures and proposals to have regard to Nature-based Solutions to Management of Rainwater and Surface Water Run-off in Urban Areas – Best Practice Interim Guidance. In addition, the OPW welcomes Objective IUO6 to 'promote integration and delivery of blue green infrastructure in new developments, public realm and community projects as a means of managing flood risk and enhancing the natural environment.
- (ii) The submission refers to the recommendations of the Guidelines that the SFRA provide guidance on the likely applicability of different SuDS techniques for managing surface water run-off at key development sites, and also identifies where integrated and area based provision of SuDS and green infrastructure are appropriate in order to avoid reliance on individual site by site solutions.
- (iii) The submission notes there are four opportunity sites and sixteen sites in the Settlement Capacity Audit identified in the Draft Plan where integrated and area based provision of SuDS and green infrastructure may be appropriate.

4. Nature-based Solutions and SuDS

(i) Noted.

(ii)-(iii) The approach taken in the Draft Local Area Plan, in line with the Limerick Development Plan 2022 - 2028, is to seek to adopt SuDS and nature based solutions as an appropriate measure for dealing with surface water management for all development proposals including the Opportunity Sites. However, to strengthen the support for the implementation and promotion of SuDS and nature based solutions in the design principles with particular reference the Opportunity Sites provided in Chapter 4, an additional section is proposed to be added to Chapter 4 Town Centre First on the principles of SuDS and ensuring that a climate adaptive and resilient urban green approach is undertaken in the development of the four opportunity sites in Patrickswell.

Separately, Objective IU O4 Surface Water Management and SuDS requires that 'all new developments to include Sustainable Urban Drainage Systems (SuDS) to control surface water outfall and protect water quality. Proposals shall have regard to the Nature-based Solutions to the Management of Rainwater and Surface Water Run-off in Urban Areas — Best Practice Interim Guidance Document'. All development proposals including any of the Settlement Capacity Audit Sites provided in Chapter 10 of the Draft Plan, will be required to align with this Objective

5. Past Flood Events

The submission refers to the SFRA's identification of previous flood events which are not included in the OPW past flood event database on www.floodinfo.ie and request that if the Council have records for these events, to forward these reports to reportfloodevent@opw.ie

through the development management process.

5. Past Flood Events

Flood events identified as part of the research undertaken for the drafting of the local area plan was provided through the Operations Department of Limerick City and County Council. The Forward Planning Department will request that this information is forwarded to the relevant authorities.

Chief Executive's Recommendations:

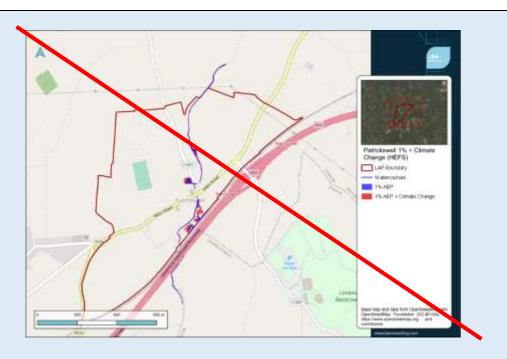
1 (i)-(ii)Amend Section 7.6.1 Development in Defended Areas in the Strategic Flood Risk Assessment as follows:

Patrickswell is not defended by any OPW embankments, but the River Barnakyle is known as channel C1/10/4 under the Maigue Arterial Drainage scheme, in this case the channel capacity has been increased to typically cater for the 1 in 30 year event and the channel is maintained by the OPW. The OPW Arterial Drainage Schemes were designed to improve land for agriculture and the lands which may benefit are referred to as 'benefitting lands'. This is not the same as lands that benefit from flood defences, as defined and discussed in the next paragraph.

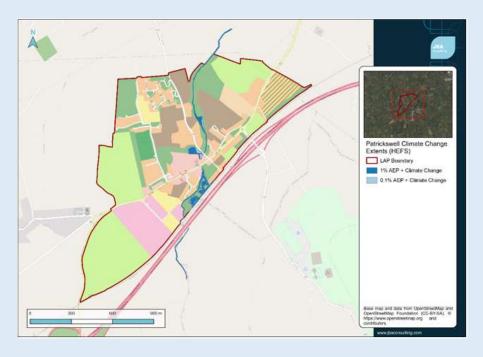
In general it should be noted that where a site or area is referred to as being defended for the purposes of determining flood mitigation it is assumed that the defences provide a minimum of the 1% AEP (fluvial) or 0.5% AEP (tidal) standard of protection, and have been through a formal detailed design process and approved by OPW or Limerick City and County Council. Informal defences, which may only be at an agricultural standard, or those developed under the minor works scheme which may provide a lesser standard of protection, are not considered to provide a robust enough standard of protection to allow a moderation in the flood risk mitigation required at a site. The understanding of risks of developing behind defences needs to be explored in the site specific FRA.

The assessment of breach within the scope of a site specific FRA should be proportionate to the likelihood of the defence failing, taking into account the age, maintenance regime, construction type and the presence of any demountable or mechanically operated components. Proximity of the site to the defence and location within the floodplain will also influence the impact of defence breach and overtopping. Defence overtopping during events which exceed the design standard of protection also present a risk to developments and should be addressed regardless of the likelihood of the defence breaching. It is noted that the demountable defences in Patrickswell seem to be retained in place, but with demountable defences there is the risk of human error in their installation/preparedness.

- 1(iii) No Change
- 2(i) No Change
- (ii) Replace Figure 7.1 of Strategic Flood Risk Assessment as follows:



Insert new Figure 7-1 as follows:



2(iii) Amend Final Paragraph in Section 7.7 of the Strategic Flood Risk Assessment as follows: The JBA fluvial outlines for the 1%+Climate Change show moderate to high sensitivity to climate change within Patrickswell village. JBA mapping illustrating the 1% AEP against the and 0.1% AEP plus climate change (HEFS) is seen in Figure 7-1. Climate Change is specifically reviewed for each area within the settlement under Section 8.

3. Insert the following into Chapter 9 Infrastructure and Utilities as Part (f) to Objective IU O5 – Flood Risk Management:

Developments on lands benefitting from Arterial Drainage Schemes shall preserve the maintenance and access to these drainage channels. Land identified as benefitting from these

systems may be prone to flooding, as such site specific flood risk assessments will be required as appropriate, at planning application stage.

4(i) No Change

4(i)-(ii) Insert additional Section into Chapter 4.5 Opportunity Sites as follows:

Opportunity Sites and Climate Adaptive/Resilient Urban Greening

The management of rainwater and flood risk as part of climate adaptive and resilient urban greening should be considered at the outset of the design process of all proposed Opportunity Sites. Proposals should adhere to the rainwater management mechanisms outlined within the national guidance for water sensitive urban design (Nature-Based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas: Water Sensitive Urban Design: Best Practice Interim Guidance Document). All new development is required to manage and minimise surface water runoff through the use of Nature based Solutions / Sustainable Drainage Systems (SuDS), unless otherwise agreed with the Council. Development will only be permitted where the Council is satisfied that suitable measures have been proposed that mitigate the impact of surface water, through the achievement of control of run-off quantity and quality, while enhancing amenity and habitat.

5. No Change

SEA/AA Response:

The new text for the opportunity sites relating to nature based measures and SuDS is positive for Strategic Environmental Objectives including Water, Material Assets in particular.

Taking into account the measures that have been already integrated into the Draft Plan that provide for and contribute towards environmental protection, environmental management and sustainable development, it is identified that any potential effects arising from the recommendations outlined in this Chief Executive's Report, either are present already (beneficial) and will be further contributed towards; or will be mitigated so as not to be significant (adverse). In addition, some recommendations merely propose to add clarification or amended context setting text for Plan provisions and these will not result in significant environmental effects. Consequently, the above recommendations outlined in this Chief Executive's Report do not require SEA.

With regards to the Appropriate Assessment, it is identified that changes are unlikely to have a significant effect on the Natura Network. Measures such as nature-based solutions and SuDS are likely to have an overall positive effect. The measures that have been already integrated into the Draft Plan provide for environmental protection for the Natura Network. Project level assessments (e.g. nature based solutions) may provide opportunities for enhancement of the Barnakyle River, and run-off locations can consider the smaller habitat features important at local level or for Annex II aquatic species that may be present.

7.	Name/Group:	Department of Transport				
		Ref: LCC-C249-PAT02-10				
	Submission:	Submission:			Response	
	1. Reference to	National	Policy a	and	1. Reference to Nation	nal Policy and
	Guidelines				Guidelines	
	The submission notes important policy			olicy	The Draft LAP aligns wi	th the Limerick
	developments which are relevant to			to	Development Plan 2022 –	2028, and policy
	accessible, integrated	d and susta	inable pu	blic	support is provided in this p	an for the 'Whole

transport and considers it should be reflected in the Plan. These include accessible public transport for all and especially for person with disabilities, reduced mobility and older people.

- The 'Whole of Government' National Disability Inclusion Strategy (NDIS) 2017-2022
- The United Nations Convention on the Rights of Persons with Disabilities (UNCRPD)
- The Design Manual for Urban Roads and Streets (DMURS) Interim Advice Note – Covid-19 Pandemic Response 2020
- The Connecting Ireland Rural Mobility Plan (2022-2025) which will see a 25% overall increase in rural bus services and 60 new connections to regional cities.

2. Design Manual for Urban Roads and Streets

The submission notes that references in the Draft Plan to the 2019 version of DMURS should be replaced with reference to the 2020 DMURS Interim Advise Note – Covid 19 Pandemic Response

3. Universal Design Approach

The submission notes to make public transport fully accessible to people with disabilities requires a 'whole journey approach' which refers to all elements that constitute a journey from the starting point to destination and that this should be reflected in the LAP. The submission notes that Local Authorities are key stakeholders by ensuring a universal design approach to the built environment.

of Government' National Disability Inclusion Strategy (NDIS) 2017-2022 and support for the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD).

It is not considered necessary to reiterate policies and objectives contained in the Development Plan, in lower tier plans, as in assessing proposals for development, both the Development Plan and Local Area Plan will be considered in tandem.

Section 7.2.2 Future Public Transport Provision refers to the Connecting Ireland Rural Mobility Plan (2022-2025) as a 'major national public transport initiative that will increase connectivity, particularly for people living outside the major cities such as Limerick' while the Design Manual for Urban Roads and Streets (DMURS) Interim Advise Note — Covid-19 Pandemic Responses 2020 is awarded support through Objective SMT O6 (c)—Roads.

2. Design Manual for Urban Roads and Streets

The Draft Plan refers to the replaced and correct version of Design Manual for Urban Roads and Streets (DMURS) Interim Advise Note – Covid-19 Pandemic Responses 2020 in Objective SMT O6(c) – Roads.

3. Universal Design Approach

The Council acknowledges the importance of a 'whole journey approach' through implementing a universal design approach to the design of new and retrofitted infrastructure in accordance with but not limited to the

- Design Manual for Urban Roads and Streets
- Objective CGR O2 Place-making,
- Universal Design and Public Realm and
- Section 7.5 Sustainable Mobility of the Limerick Development Plan

The Council is committed to advocate for and support high quality, accessible and permeable transport links incorporated into

all urban public realm designs. It is not considered necessary to reiterate policies and objectives contained in the Development Plan, in lower tier plans, as in assessing proposals for development, both the Development Plan and Local Area Plan will be considered in tandem.

4. Other

The submission outlines how the Department of Transport can assist with appropriate text in the Plan regarding integrated accessible public transport.

4. Other

Chapter 7 of the Draft Plan provides the policy support for the facilitation of integrated land use and transport for the village of Patrickswell. In this instance, the Council considers the provision of such has been addressed in the chapter. The NTA, in their submission are satisfied with the approach undertaken by the Council.

Chief Executive's Recommendations:

1-4. No Change

SEA/AA Response: N/A

8.	Name/Group:	Department of Housing, Local Government and Heritage				
		Ref: LCC-C249-PAT02-15				
	Submission:		Response			
	The submission on be	half of the Department	Noted.			
	of Housing, Local Gov	vernment and Heritage				
	outlines how the Do	epartment is not in a				
	position to make spe	ecific comment on this				
	particular referral	at this time. The				
	submission further n	otes that no inference				
	should be from this t	that the Department is				
	satisfied or otherwis	se with the proposed				
	activity.					
	Chief Executive's Rec	commendations: No Cha	nge			
	SEA/AA Response: N	/A				

9.	Name/Group:	Jari Howard on behalf of N/20 Cork to Limerick Project		
		Ref: LCC-C249-PAT02-1		
	Submission:		Response	
	Submission outlines how the strong policy		Noted.	
	support provided for the N/M20 Cork to		Reference to the N/M20 Cork to Limerick	
	Limerick Project is welcomed.		Project will be amended as per the submission	
	Identified two inconsistencies with regards		received.	
	to references to the scheme within the Draft			
	Plan text. Reference	to the Project to be		

amended to 'N/M20 Cork to Limerick Project'.

Chief Executive's Recommendations:

1. Amend Section 7.3 of Chapter 7 Sustainable Mobility and Transport as follows:

The N/M20 Cork to Limerick Motorway Scheme Project also includes the provision of active travel infrastructure ensuring that sustainable development principles are core considerations in the scheme. The Scheme Project will not just enhance Patrickswell's motorised connectivity, but also create improved active travel linkages and connections from the village to the south of the Country.

2. Amend Section 7.4 of Chapter 7 as follows:

Active Travel measures as part of the N/M20 Cork to Limerick Motorway Project including cycle and pedestrian infrastructure from Patrickswell to Croom, Bruree connections to the proposed Limerick Greenway and wider national cycle network;

SEA/AA Response:

Taking into account the measures that have been already integrated into the Draft Plan that provide for and contribute towards environmental protection, environmental management and sustainable development, it is identified that any potential effects arising from the Proposed Alterations above in this Chief Executive's Report: either are present already (beneficial) and will be further contributed towards; or will be mitigated so as not to be significant (adverse). In addition, some alterations merely propose to add clarification or amended context setting text for Plan provisions including implications for public realm to enhance village viability and these will not result in significant environmental effects. Consequently, the above Proposed Alterations outlined in this Chief Executive's Report do not require SEA.

Furthermore, taking into account the mitigatory measures already in force through the Development Plan and those already included in the Draft Plan, the Proposed Alterations outlined in this Chief Executive's Report the Proposed Alterations will not give rise to any likely significant effect on any European site. Consequently, Stage 2 AA will not be required to be undertaken on the Proposed Alterations.

10.	Name/Group:	Kate Finnin			
		Ref: LCC-C249-PAT02-2	2		
	Submission:		Response		
	Submission refers	to passenger rail	The Council recognise the importance of the		
	provision. The sul	bmission notes that	provision of major infrastructure to enhance		
	restricting rail provisi	on to freight only is not	regional connectivity, to promote economic		
	utilising an asset for	Patrickswell and also	development and to enable the development		
	Adare/Rathkeale. Pa	assenger rail provision,	of new homes. The Draft Plan is aligned and		
	according to the sub	mission would reduce	consistent with the objectives of higher-level		
	CO2 emissions and	act as a magnet for	spatial plans, including the NPF, RSES and the		
	potential residents	and businesses. The	Limerick Development Plan 2022-2028 as		
	provision of rail ne	etwork would provide	outlined in Policy I O1 and all of which support		
	faster and easier acc	cess from Limerick City	to facilitate the implementation and delivery		
	Centre to Limerick vi	illages. The submission	of the proposals contained in the Limerick		
	notes that further co	insultation needs to be	Shannon Metropolitan Area Transport		

undertaken between the Council and larnród Éireann to make this happen.

Strategy. As part of this strategy, a number of transport modelling assessments were carried out to identify potential rail passenger usage up to and beyond 2040 within the Limerick Shannon Metropolitan Area.

As part of a 'Phase 2 Rail Network for the Limerick Shannon Metropolitan Area', the Plan provides that the feasibility for a full commuter rail network for the study area will be examined, including the re-use of the Foynes line and new stations at appropriate locations. This is part of a more ambitious programme for a regional and commuter retail network to be developed in the long-term, based on a higher level of forecast growth for the Limerick Shannon Metropolitan Area.

While the plan is aligned with higher level plans, it is considered appropriate to include text and associated policy support to safeguard the rail line against encroachment that would compromise the long-term development of this facility and to support any future proposals for passenger rail services in Patrickswell.

Chief Executive's Recommendations:

(i) Insert the following text into Section 7.5 Rail Transport:

This LAP seeks to safeguard the rail line against encroachment that would compromise the long-term development of this facility.

(ii) Insert the following objective under Section 7.5 Rail Transport

Objective SMT: Protection of Existing Rail Route: It is an Objective of the Council to:

a) Protect the existing rail route against encroachment from inappropriate uses that could compromise the long-term development of the rail facility and support appropriate upgrades, which are in line with the appropriate and necessary environmental and ecological assessments as required.

b) Support any future proposals for passenger rail services in Patrickswell.

SEA/AA Response:

The new Objective (Objective SMT: Protection of Existing Rail Route) relates to protection of the railway line and is consistent with National, Regional and County policy. Taking into account the measures that have been already integrated into the Draft Plan that provide for and contribute towards environmental protection, environmental management and sustainable development, it is identified that any potential effects arising from the recommendations outlined in this Chief Executive's Report: either are present already (beneficial) and will be further contributed towards; or will be mitigated so as not to be significant (adverse). In addition, some recommendations merely propose to add clarification or amended context setting text for Plan provisions and these will not result in significant

environmental effects. Consequently, the above recommendations outlined in this Chief Executive's Report do not require SEA.

With regards to the Appropriate Assessment, the measures that have been already integrated into the Draft Plan provide for environmental protection for the Natura Network. Project level assessments will provide ongoing protection for the Natura Network. No significant effects are anticipated at the plan level from the inclusion of this objective.

Response

11. Name/Group:

Leo Dillon

Ref: LCC -C249-PAT02-03

Submission:

The submission refers to the Amenity and Sustainable Transport Map that accompanies the Draft Plan and notes it presents a false picture of Patrickswell's existing cycle network. The submission refers to the blue dashed line used to highlight existing pedestrian/cycling routes and outlines how, by combining both modes, which have completely different needs, the existence of a footpath in some areas appears to meet the definition of a pedestrian/cycle route. The submission refers to this as being misleading.

The submission outlines how currently, cyclists of all ages and abilities are expected to share the Main Street with motor traffic which cannot be considered an official 'cycle route' as it is neither safe, attractive or comfortable (3 of the 5 basic needs of cycle routes as set out in the National Cycle Manual).

The submission states that the complete absence of pedestrian/cycling infrastructure doesn't prevent it from being considered an "existing pedestrian/cycling route" referring to the R526 to the north of the village which is zoned residential but the 'existing pedestrian/cycling route' consists of an unprotected hard shoulder of a busy 80kph former national road.

The Amenity and Sustainable Transport Map will be updated to provide a clearer picture of existing and proposed infrastructure.

Additional text will be provided in a new Section under Section 7.4 Modal Shift and Target. Text will include a table outlining proposed active travel measures, timeline for delivery and priority routes.

A new objective will be inserted into Chapter 7 to support the provision of a cycle track/lane through Patrickswell Village linking into the existing segregated cycle track along the R526 to Limerick City and link into proposed active travel infrastructure as part of the N/M20 Cork to Limerick Project, the Patrickswell to Charleville Greenway, and the Rathkeale to Limerick Greenway.

The submission notes that, in reality, the only location in Patrickswell that could be considered suitable for cycling as defined in the National Cycle Manual is an off-road 60m shared pedestrian/cycle path near the roundabout to the north of the village.

The submission outlines how presenting such a false image of existing cycling infrastructure will negatively impact funding and the urgency to deliver a cycle network suitable for people of all ages and cycling ability. The submission requests that the map should be updated to reflect the reality on the ground.

Chief Executive's Recommendations:

- **1(i)** Update the Amenity and Sustainable Transport Map to distinguish between existing and proposed cycling and walking infrastructure
- (ii) Provide a new Section under Section 7.4 Modal Shift and Targets and update the text as follows:

There are a number of opportunities, which have the ability to address current travel trends and to examine the existing travel behaviours within Patrickswell to provide for the realisation of a more sustainable transport mode. The Draft Local Area Plan focuses on the provision of increased permeability through future development within the settlement. The plan provides a change of focus towards the town centre first initiatives, development of infill/brownfield sites and the creation of a more compact village and endeavours to improve permeability and localised access through the development of the four identified opportunity. Local conditions including lack of infrastructure, inadequate linkages and lack of permeability create physical barriers to enabling a move away from the predominant car travel, as exists in Patrickswell. In relation to cycling, there are no cycle paths in the village with cyclists using footpaths instead, in some instances. Policies contained within this Draft Plan, ensure that any new development provides for permeability and appropriate linkages that is required to open up future and existing development, creating the conditions to enable active travel modes and improving access for those with mobility issues. The following table identifies active travel infrastructure that seeks to create convenient, efficient routes to key destinations for local amenities, facilities, social infrastructure and services and in doing so, reducing walking/cycling distances and creating the conditions that gives active modes a competitive advantage over the private car. The table below outlines active travel measures to enable the 10-minute town concept prioritising a number of these measures:

• The implementation of pedestrian/cycling safety measures on Main Street as part of the Patrickswell Village Renewal Scheme commenced March 2023;

- Improved connectivity from Main Street to Patrickswell National School as part of Patrickswell Village Renewal Scheme;
- Upgrade of existing pedestrian link from Laurel Park to Lisheen Park at Patrickswell National School;
- Improvement works outside Patrickswell NS for walking and cycling infrastructure and in turn, increase the number of students who cycle to school;
- Active Travel measures as part of the N/M20 Motorway project including cycle and pedestrian infrastructure from Patrickswell to Croom, Bruree and connections into the proposed Limerick Greenway and wider national cycle network;
- Increase permeability through future development within the settlement;
- Change of focus to town centre first initiatives, development of infill/brownfield sites and creation of a more compact village;
- Opportunity sites focused on improving permeability and localised access.

(iiI) Insert Table showing Active Travel Proposal and Priority Route:

Table 7.3 Active Travel Measures and Priorities

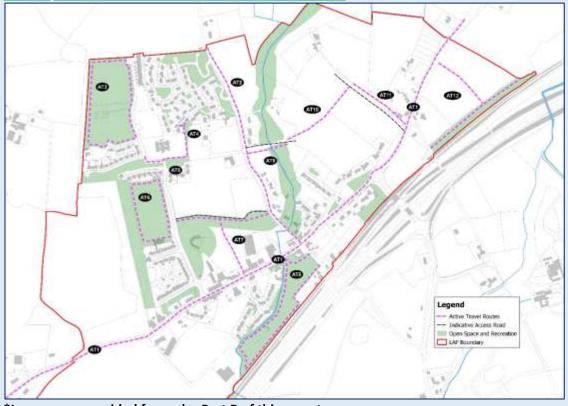
Action/ Intervention Reference	Description	Proposed Link Type/ Active Mode Priority	Expected Timeframe	Need for Intervention
AT1	Main Street Patrickswell Village Centre	Segregated cycle lane Active Mode Priority	Medium to Long Term	- Connection into existing segregated cycle track along R526 to Raheen/Limerick City and future connections associated with Active Travel measures of N/M20 Cork to Limerick Project, Patrickswell to Charleville Greenway and Rathkeale/Limerick Greenway - Increase uptake of active travel modes - Connection between village centre to residential areas/local facilities/services
AT2	Clarina Road	Cycle Infrastructure Active Mode Priority	Short to Medium Term	 Increase uptake of active travel modes Connection between village centre to existing and proposed residential areas/local facilities/services
AT3	Patrickswell FC/Lisheen Park/Faha View (Opportunity Site 2)	Looped Pedestrian Walkway Active Mode Priority	Short Term	- Provision of looped walk around perimeter of site included in proposed development design as part of Opportunity Site 2

<u>AT4</u>	Sycamore Heights to Patrickswell National School	Pedestrian Link Active Mode Priority	Short Term	-	Upgrade of existing link from residential estate to Patrickswell NS, Lisheen Park and local amenities/facilities
<u>AT5</u>	Site entrance fronting Patrickswell National School	Front entrance and road network at front of Patrickswell NS Active Mode Priority	Short Term	-	Realignment of road network and provision of walking and cycling infrastructure at front of Patrickswell NS. Provision of 'school street/school zone'
<u>AT6</u>	Patrickswell GAA Grounds	Looped Pedestrian Walkway	Short Term	-	Provision of looped walk around perimeter of site included as part of future development proposals on the GAA grounds.
<u>AT7</u>	Patrickswell Village Centre Opportunity Site 1/Residential Development	Active Travel Connection – cycle and walking provision. Active Mode Priority	Short Term	1	Provision of connectivity and permeability link between Clarina Road, School Road and the centre of Patrickswell Provision of active travel linkage linked to future residential development.
<u>AT8</u>	Riverside Park off Village Centre	Looped Walking/Cycling pathway	Medium Term	-	Riverside Park as part of Opportunity Site 3
<u>AT9</u>	Barnakyle	Residential Active Travel Connection – cycle and walking provision. Active Mode Priority	Short Term	-	Provision of active travel linkage linked to residential development granted under Planning File 22/8017. Potential to provide linkages from proposed residential development through to local facilities/services (school, GAA etc).
<u>AT10</u>	Barnakyle Opportunity Site 4	Residential Active Travel Connection – cycle and walking provision	Medium to Long Term	-	Provision of active travel linkage linked to future residential development/open space.
<u>AT11</u>	Barnakyle Opportunity Site 4	Residential Active Travel Connection – cycle and	Long Term	-	Provision of active travel linkage linked to future residential development/open space.

		walking provision			
AT12	Serviced Site at Barnakyle on R526	Residential Active Travel Connection – cycle and walking provision	Medium to Long Term	-	Provision of active travel linkage linked to future residential development/open space.

(iv) Insert Map with associated Action Reference as follows:





*Larger map provided for under Part B of this report

2. Insert a new Part B into Objective SMT O2 – Sustainable Travel Infrastructure as follows: Support the provision of a cycle track/lane through Patrickswell Village linking into the existing segregated cycle track along the R526 to Limerick City and link into proposed active travel infrastructure as part of the N/M20 Cork to Limerick Project, the Patrickswell to Charleville Greenway, and the Rathkeale to Limerick Greenway.

SEA/AA Response:

Active travel proposals were considered under the SEA Screening and no significant adverse environmental effects identified.

Taking into account the measures that have been already integrated into the Draft Plan that provide for and contribute towards environmental protection, environmental management and sustainable development, it is identified that any potential effects arising from the recommendations outlined in this Chief Executive's Report: either are present already (beneficial) and will be further contributed towards; or will be mitigated so as not to be significant (adverse). In addition, some recommendations merely propose to add clarification

or amended context setting text for Plan provisions and these will not result in significant environmental effects. Consequently, the above recommendations outlined in this Chief Executive's Report do not require SEA.

With regards to the Appropriate Assessment, the measures that have been already integrated into the Draft Plan provide for environmental protection for the Natura Network. Project level assessments will provide ongoing protection for the Natura Network. No significant effects are anticipated at the plan level from the inclusion of these measures at a plan level.

12. Name/Group: Leahy Planning Ltd. on behalf of Mr. Michael and Mrs. Marie Field Ref: LCC –C249-PAT02-07

Submission:

Submission requests the rezoning of the subject site from Agricultural to Residential Serviced Sites, retaining the current zoning of the subject site.

Submission infers that reducing the quantum of the residential services sites zoning from 14.8 ha to 4.7 ha, on land where planning permission exists, is not appropriate and represents a dramatic change in the nature of the plan for the village and will have a significant negative impact on efforts of the village to maintain a sustainable level of development.

The provision of an adequate quantum of Residential Serviced Sites zoned land at a moderate density strikes an appropriate balance in terms of enabling people to provide housing for themselves, giving them a good deal of privacy while at the same time allowing the occupants to have access to the services that are available in a village community.

Submission lists the reasons why the "oneoff" house has been popular in Ireland including the ability to self-build, the availability of privacy, adequate child play space/recreation space.

Submission states that the pressure for development in a town such as Patrickswell will not be as high as in a larger urban area Response

The Council have zoned sufficient lands to cater for the future growth of Patrickswell in

line with Core Strategy requirements of the Limerick Development Plan 2022 – 2028.

In this context, the settlement capacity audit seeks to identify lands, which should be prioritized based on infrastructural requirements such as water, wastewater, footpaths etc and land use criteria such as compact growth and co-ordinated development. Lands that are serviced or serviceable within the life of the plan and lead considered compact growth are sequentially preferable and are therefore zoned within the Draft Plan.

The land, the subject of this submission is peripheral relative to the village core and to the residential zoned land in this plan cycle, and would not lead to the consolidation of the village.

The Draft Plan places a strong emphasis on providing high quality residential development with mixed type and tenure. As stated by the observer this includes making provision for a variety of house types. The provision of land zoned for serviced sites is just one component of this.

It is acknowledged that the 4.77ha of land zoned as serviced sites has a live permission but is yet to be developed. The provision of and it is appropriate that a variety of houses should be made available to people which will attract them to an area which would otherwise struggle to maintain its population.

Submission infers that the provision of housing within an estate in a village such as Patrickswell is far less desirable in terms of attracting people to live within a small community. A large part of the focus of the LAP should be attracting people to live in the Patrickswell community.

Submission indicates that the population of the village has remained stagnant over the last intercensal period between 2016 and 2022 with every effort made including the provision of house types and variety, should be made.

Submission infers that the main reason cited in the proposed development plan for the significant reduction in level of zoning for the provision of serviced sites is that a planning permission has recently been granted on one site to one developer for 36 houses. The submission notes this development will follow a pattern of development, with all units having a certain uniformity rather than an individual design, as offered by a residential serviced site.

Submission infers that the Local Area Plan is self-contradictory, indicating that the Plan states in section 3.5.2 (Serviced Low-density Sites) that 'In Patrickswell, zoned land is included for the potential development of low-density serviced sites, offering an alternative to one-off rural houses in the open countryside.' However, the LAP goes on to state that as planning permission has been granted for what it describes as serviced sites immediately across from the site in question (Planning Ref 20/281), no provision is made for further serviced sites within the plan area. Submission goes on to state that the above statement

4.77ha of lands zoned for this purpose goes over and beyond what is required for Patrickswell over the lifetime of this plan. An oversupply of land zoned for serviced sites could result in an overconcentration of this type of low-density development and an inefficient use of serviced land. In turn, this would not be in accordance with the principles of compact growth, co-ordinated and sustainable development

It is considered that there is adequate quantum of land zoned serviced sites relative to New Residential in the Draft Plan for this plan cycle.

As stated previously, the Draft Local Area Plan has already zoned an excess of residential serviced sites over and above what is required by the Core Strategy to serve the village of Patrickswell for the lifetime of the LAP.

A submission received from the Office of the Planning Regulator, who have a statutory obligation to independently assess LAP's, states that

"Given the sufficient supply of appropriately located zoned land to meet the housing targets set out in the Development Plan, the Office cautions against additional land use zoning proposals for residential development through material alterations".

The consideration of extant planning permissions was just one element in considering the drafting of the plan. The Council cannot guarantee that anv development granted on a site may come into fruition. The provision of 4.77ha for serviced sites in itself, exceeds what is required for Patrickswell.

contradicted by objective DSO4 which states:

Objective DSO4 – Serviced Sites: It is an objective of the Council to: Permit serviced sites on adequately zoned lands within the settlement boundary of Patrickswell, in line with requirements outlined in the Limerick Development Plan. The Council requires a minimum net density of 10 dwelling units per hectare on lands zoned Serviced Sites.

Submission argues that reducing the amount of residential serviced sites because of an extant planning permission to develop a regular housing estate is not appropriate. Submission quotes National Policy (Section 28 Guidelines – Sustainable Rural Housing – Guidelines for Planning Authorities, 2005 and Sustainable Residential Development in Urban Areas, 2009) in terms of supporting individual serviced sites and states that failure to make adequate provision for this type of housing is a breach of a mandatory government guidance document.

The submission refers to the Limerick Development Plan 2022 – 2028, in terms of its very strong emphasis on the provision of serviced sites in small villages and stresses the importance of enabling individual people to design their own houses in order to provide an effective alternative to the one-off rural house in the countryside.

The submission outlines how the subject site is very well located being in close proximity to the motorway access point, as well as other vehicular and pedestrian routes, and water and wastewater infrastructure.

Chief Executive's Recommendations:

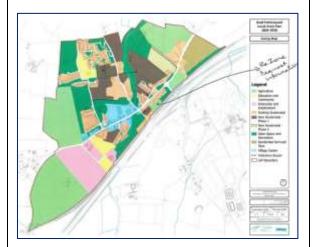
No Change

SEA/AA Response: N/A

13.	Name/Group:	Carmel Mulqueen		
		Ref: LCC-C249-PAT02-08		
	Submission:		Response	

The submission refers to lands currently zoned Existing Residential in the 2015 Plan and zoned Agriculture in the Draft Local Area Plan.

The submission provides an image of the proposed Draft Zoning Map where the lands in questions are identified. The submission requests more information on the process of the Local Area Plan and the possibilities of changing a zoning.



For clarity purposes and the basis of the assessment of this submission, the submission refers to lands outlined in an accompanying image, as 'Existing Residential' in the 2015 LAP, which has been changed to 'Agriculture' zoning in the Draft Plan. The submission requests that this site remains zoned 'Existing Residential'.

As part of research undertaken in drafting the Local Area Plan, a noise report was undertaken to establish noise pollution on lands adjacent to the M20 Motorway. The report highlighted serious concern that road noise would potentially have a significant adverse impact for any residents of any proposed residential development. The report further highlighted that, environmental noise levels will be potentially greater, at least intermittently, with the proposed reinstatement by Irish Rail of the Limerick to Foynes rail line for freight services (and potentially passenger services) at the southeast boundary of the site. Taking into account potential noise impact based on The World Health Organisation (WHO) Environmental Noise Guidelines (ENG) and issues with noise raised by existing residents in the vicinity of the site, the Council considered it necessary to rezone the parcel of land, the subject of this submission to agricultural use.

Chief Executive's Recommendations:

No Change

SEA/AA Response: N/A

14.	Name/Group:	Mike Walsh		
		Ref: LCC-C249-PAT02-09		
	Submission:		Response	
	1. General		1. General	
	The submission acknowledges the plan in a positive manner and notes, The need for new pitches and play areas Acknowledges the greenway expansion and proposal for the Barnakyle River as something to look forward to.		Noted.	

2. Orchard/Allotment Proposal

- The submission refers to the 'orchard/allotment' proposals as 'great' but the submission raises concern over its location.

2. Orchard/Allotment Proposal

Noted. Opportunity Site 2, in the Draft Plan does not include the area of land zoned Education and Community immediately north of Patrickswell N.S, on which the community orchard is identified. However it is noted that this area is included in the "Proposed Layout" in Figure 4.9.

In order to remove any confusion as to the future use of this land and to safeguard the future expansion of educational requirement in Patrickswell, Figure 4.9 will be updated to remove the proposed layout on the land zoned educational and community identified as a Community Orchard and instead refer solely to the zoning on this portion. Furthermore, the layout should be seen and referenced as an indicative design or schematic and does not represent a final design. Therefore, Figure 4.9 should be entitled Indicative Layout instead of Proposed Layout.

This will not impact on the wider redevelopment of Community facilities at Faha View and Lisheen Park. The Council are committed to ensuring that all stakeholders, interested parties and local residents are involved in the future design of Opportunity Site 2 and are committed to providing additional consultation prior to any Part 8 application being submitted.

Objective CO4 - Sports and Recreational Facilities provides the policy support for the protection of existing open space. In order to provide clarity to this objective and to ensure open space and recreation is protected from inappropriate development and facilitate/support development in line with the uses set out in the zoning matrix, Objective CO4 will be updated to reflect this provision. As set out in the Land Use Zoning Matrix, Allotments are 'Open for Consideration' in lands zoned Open Space and Recreation.

3. Cycle Infrastructure

 The submission refers to bike parking and notes that bicycle theft is an issue in the village with children not cycling due to lack of proper secure bike facilities. The submission outlines a requirement for safe and secure parking outside the new community centre, new the post office and near Centra.

3. Cycle Infrastructure

Objective SMT O3 - Supporting Modal Split and Behavioural Change provides the policy support in the facilitation of sustainable travel infrastructure. As part of the Public Realm Works, a number of public bike parking areas was provided on street where passive surveillance provides active security. As part of the final stages of the public realm plan, additional bike parking will be provided within the village.

Separately, through the development management process, the Council actively seek to secure bike parking and active travel infrastructure in support of the transition to sustainable forms of transport. This is also supported in Objective SMT O3 - Supporting Modal Split and Behavioural Change Part (c) Improve and create additional facilities for pedestrians and cyclists, as part of a coherent and integrated active travel network, as opportunities arise as part of new developments.

Chief Executive's Recommendations:

- 1. No Change
- **2.** Amend Objective CO4 Part (c) **Sports and Recreation Facilities** in Chapter 5 Sustainable Communities as follows: Protect <u>land zoned open space and recreation</u> existing space by not permitting development, which encroaches on such open space and land zoned open space and recreation from inappropriate development and facilitate/support the provision of allotment or community gardens at appropriate locations development in line with the uses set out in the zoning matrix and subject to appropriate environmental assessments.
- 3. No Change

SEA/AA Response: N/A

15.	Name/Group:	AK Planning on behalf of John Leddin			
		Ref: LCC - C249-PAT02	-10		
	Submission:		Response		
	Submission is made b	y AK Planning on behalf	The Local Area Plan seeks to ensure that		
	of John Leddin		population growth is met and future needs of		
	- The submission is regarding subject		the village are accommodated in a		
	lands 0.45ha in size, located 600m		consolidated manner. Planning policy requires		
	southwest of the village centre adjacent		Local Authorities to ensure a sequential		
	to Patrickswell Church and to which are		approach to the zoning of land, with a primary		
	outside the curre	nt 2015 Local Area Plan	focus on the consolidation of settlements		

- and outside the proposed zoning map for the Draft Plan.
- The lands are accessed by the R526, the submission outlines how pedestrian connectivity is served by a road and a footpath, public lighting and high speed broadband. Furthermore, the submission outlines how the site is in walking/cycling distance of local amenities.
- The submission notes that the site is not currently served by a foul sewer.
- The submission refers to the lands zoned as serviced sites in the Draft Plan with an extant permission about to commence development. The submission notes that there will not be any new lands zoned serviced sites over the subsequent plan period.
- The submission proposes that the site be brought within the plan area and zoned serviced sites with potential to deliver between 2-4 dwellings as an alternative to one off housing.



though the zoning of lands within or contiguous to the village centre.

The site proposed and subject of this submission is outside and not contiguous to the proposed boundary for the Draft Plan. To zone the subject site and include it within the Local Area Plan boundary would not be in line with the sequential approach to zoning of land nor the consolidation of the settlement and would result in the leapfrogging of more suitable lands, which is contrary to regional and national policy in this regard. In addition, the provision of 4.77ha of lands zoned for serviced sites as provided for in the Draft Plan, goes over and beyond what is required for Patrickswell over the lifetime of this plan.

It is also considered that zoning the site in question would not be in line with the requirements of the Settlement Capacity Audit, which seeks to identify lands which should be prioritized based on infrastructural requirements such as water, wastewater, footpaths, etc. and land use criteria such as growth compact and co-ordinated development. Lands that are serviced or serviceable within the life of the plan and lead compact growth are considered sequentially preferable and are therefore zoned within the Draft Plan. The inclusion of residential land zoning on un-serviced lands is not supported by national guidance for land zoning, and therefore cannot be applied.

In terms of extant permissions being factored into the zoning of land, this is just one element in considering the zoning of land. Other factors such as those outlined above, must also be considered. It is also worth noting that the Council cannot guarantee that any development granted on a site come to fruition. With regard to how extant permission were factored into the drafting of the LAP, the submission received from the Office of the Planning Regulator, who have a statutory

obligation to independently assess LAP's, considers "The total area of land proposed to be zoned New Residential under the Draft LAP exceeds that required to meet the core strategy under the Development Plan'. The Office does accept, however, that the lands proposed for zoning 'are well-located, serviced, and that there is extant planning permission or live planning applications for development on much of these lands'. As such, the Planning Authority's approach to the zoning of land in Patrickswell is considered appropriate.

Chief Executive's Recommendations:

No Change

SEA/AA Response: N/A

Name/Group: **16.** Diarmuid Keane & Associates on behalf of Denis Lane Ref: LCC - C249-PAT02-13

Submission:

Overview

Submission is made by Diarmuid Keane & Associates on behalf of Denis Lane with regards to a portion of lands 3.43ha in size currently zoned Residential Service Sites (Phase 2) and requests that the Local Authority retains the current land use zoning as Phase 2 Serviced Sites.

The submission notes the opportunity to develop these lands is already present having been zoned Serviced Sites Phase 2 however refers to planning guidelines which state that Phase 2 developments can only commence construction once 50% of Phase 1 developments have been completed. The submission notes that their client has been postponing site works in order to fully develop the site in accordance with the wishes of the Local Authority and aims to start works immediately once the Phase 1 target threshold has been realised. There are no planning applications recorded on the site and the site does not form part of any conservation delineation.

Response

The Local Area Plan seeks to ensure that population growth is met and future needs of the village are accommodated consolidated manner. Planning policy requires Local Authorities to ensure a sequential approach to the zoning of land, with a primary focus on the consolidation of settlements though the zoning of lands within or contiguous to the village centre.

The Settlement Capacity Audit (SCA) set out under Chapter 10 of the Draft Plan examines the availability of services for lands identified for residential and employment purposes. The SCA examines whether services are, or will be, available to facilitate development within the lifetime of the Plan. Lands that are serviced or serviceable within the life of the plan and lead compact growth are considered sequentially preferable and are therefore zoned within the Draft Plan. In addition, the provision of 4.77ha of lands zoned for serviced sites as provided for in the Draft Plan, goes over and beyond what is required for Patrickswell over the lifetime of this plan.

The submission describes the site as in proximity to the main village centre (75 meters), located on the Clarina Road, north of the inherent public facilities and an ideal location to contribute to much needed low density residential housing. In addition, the submission outlines how the lands are already serviced with direct access to the public sewer mains, which traverse the site, satisfactory sightlines and linked to the village via a public footpath and lighting. In referring to transport, the submission outlines how two available bus routes are within 752m of the site.

The submission refers to the population growth of Patrickswell due to its strategic location and notes the demand for housing remains high as outlined in the Draft Plan. The submission refers to the Limerick Development Plan's Core Strategy growth target of 36% over the 2016 Census figure for Patrickswell and a requirement for an additional 95 residential units to 2028. The submission refers to allowance made for longer lifetime of the Draft LAP and consideration for vacancy. In addition, the submission refers to previous submissions where future growth capacity for the Mid-West Limerick City region to grow to 800,000 by 2040. The submission notes the current shortfall in the provision of permanent, social and affordable housing in the village and the potential for the site, the subject of the submission, to provide a small number of residential houses for permanent occupation.

The submission refers to the existing established residential development neighbouring the lands and zoning it for any other purpose would create a haphazard approach to village development.

Development Intent

The submission refers to the identification of Patrickswell as Level 4 Large Village as

The site, the subject of this submission, is outside the proposed boundary for the Draft Plan and would not be in line with sequential approach to zoning of land, consolidation of the settlement, and would not lead to compact growth. The Council have zoned sufficient lands to cater for the future growth of Patrickswell in this plan cycle 2024-2030, over and above what is required in the Core Strategy requirements of the Limerick Development Plan 2022 – 2028. The Office of the Planning Regulator having reviewed the Draft Plan considers the Plan presents a "sufficient supply of appropriately located zoned land to meet the housing targets set out in the Development Plan....and cautions against additional land use zoning proposals for residential development through material alterations." Therefore, the overall location and quantum of zoning it considered acceptable.

As stated by the observer the NPF seeks to achieve more compact and sustainable growth through consolidation of development within the existing build footprint of settlements and the reuse of previously developed buildings and land and building up 'infill' centrally located in settlements. The land the subject of this observation are outside the Plan boundary and would not lead to compact growth in this plan cycle.

provided for in the Limerick Development Plan 2022-2028 and the associated objectives provided for Level 4 Large Village settlements.

The submission also refers to Policy TCF P1 Town Centre First and outlines the scope in Patrickswell to promote greater connections and linkages through appropriate design and design stage of further developments and in doing so reducing the carbon footprint of the settlement.

The submission refers to the decline of villages, which needs to be addressed by focusing on policies such as Town Centre First, creating attractive public realm and providing the environment where people want to live and shop. The submission notes it is the intent of the applicant to retain the current site zoning designation and utilise the existing network of public infrastructure to develop low-density serviced sites. In doing so, the submission states its aim is to create an alternative to un-serviced sites reducing overall cost in servicing and in open countryside enabling the end use more flexibility to build their own designed house, more sensitively located and effectively screened from adjacent roadside contiguous elevation. The submission outlines that the development of a residential serviced site would provide visual improvements through landscaping, improve access routes, improve the management and movement of traffic in and around the site, benefitting the public and boost local biodiversity.

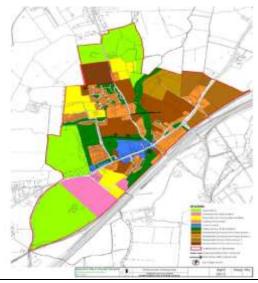
Material Considerations

The submission refers to the Draft Development Plan Guidelines by the Department of Housing, Local Government and Heritage which provides the following 'planning authorities should approach the development plan with a clear focus on the delivery of expected development outcomes'. The submission outlines the

intent of their applicant to a plan to revitalise and regenerate the Local/Neighbourhood Centre and is fully committed to the regeneration of the site in the short term subject to securing the appropriate zoning.

The submission refers to the National Planning Framework which seeks to achieve more compact and sustainable growth consolidation future through of development within the existing build footprint of settlements and the reuse of previously developed buildings and land and building up 'infill' centrally located in settlements. The submission describes the site as 'underutilised' in an urban area surrounded by residential development with access to public transport, which can be comprehensively regenerated making efficient use of valuable serviced land meeting national objectives.

The submission outlines how with little alternative development opportunity sites in the area to accommodate similar developments, it is submitted that the subject site provides a realistic opportunity for delivery.



Chief Executive's Recommendations:

No Change

SEA/AA Response: N/A

17. Name/Group:

Nicola McNamara & Eileen Higgins on behalf of the Faha View Residents Ref: LCC – C249-PAT02-14

Submission:

The submission is made on behalf of the residents from Faha View. (A list of signatures in support of the submission is provided with signatures from all 1-14 residential dwellings).

1. Opportunity Site 2

The submission refers to the provision of carparking as part of Opportunity Site 2 to serve the playing pitches which is part of the development proposals provided for under this Opportunity Site.

The submission outlines how the residents of the estate are opposed to the location of the carpark and state that this opinion is shared among all their neighbours. In addition, the submission provides a number of images portraying the traffic within the estate. The submission notes that the residents are not opposed to the plans and are very welcoming of it and the benefits for local people.

The submission describes the location of the carpark and expected increase in traffic as extremely worrisome as traffic issues are an existing significant safety concern for the The residential estate. submission describes how existing traffic to the estate is already creating a safety concern for children noting that the design and location of the waste collection sheds for each residential dwellings creates poor visibility and increasing risk of harm to the children within the residential estate. The submission requests that the design concept for the Opportunity Site is relooked at to ensure traffic is not increased up through the residential estate with the provision of the carpark location.

Response

Noted.

1. Opportunity Site 2

Noted. While Figure 4.9 for Opportunity Site 2 "Proposed Layout" labelled as Community facilities at Faha View and Lisheen Park, this is an indicative design or schematic and does not represent a final design. In the interests of clarity Figure 4.9 should be entitled Indicative Layout instead of Proposed Layout. Concerns regarding the carparking provision as part of the indicative design is recognised. The layout of the full proposal will be relooked at prior to submission for Part 8. The Council are committed to ensuring that all stakeholders, interested parties and local residents are involved in the future design of Opportunity Site 2 and are committed to providing additional consultation prior to any Part 8 application being submitted.

Policy support is included in the Draft Local Area Plan to facilitate this development and interested parties will have a further consultation opportunity through the Part 8 process.

2. Lighting

The submission refers to the lack of lighting within the estate and requests that improving lighting be considered for the housing estate within the plan.

3. Junction at Lisheen Park/Faha View

The submission refers to the junction driving from Lisheen Park into Faha View as another safety issue due to the traffic layout and congestion at school drop offs/school parking. The submission requests that consideration is given to improve this junction to address traffic safety concerns given the future plans for the area and potential increase in traffic with the proposed Opportunity Site 2.

4. Playground

The submission notes the need for a playground with inclusive play provision and accessibility for children of all abilities and ages in Patrickswell and notes it is one of the very few villages in the County that doesn't have one.

2. Lighting

The provision of lighting in established residential estates is outside the remit of the Local Area Plan and is an operational issue. The concern highlighted will be forwarded to LCCC's Operations Department.

3. Junction at Lisheen Park/Faha View

The Council are currently working on a design to improve active travel infrastructure to the front of the school. The junction at Lisheen Park/Faha View is not within the scope of these improvement works. However, safety concerns have been forwarded to the relevant department for inclusion in future upgrades to the road network around the school.

4. Playground

The need for a playground and play spaces is acknowledged in the Draft Plan. Four locations have been identified as having the potential to accommodate such spaces.

Chief Executive's Recommendations:

- **1.** Amend the title of Figure 4.9 in Chapter 4 Town Centre First Approach as follows: Proposed Indicative Layout: Community facilities at site fronting Faha View and Lisheen Park including
- St. Patrick's AFC
- 2. No change
- 3. No change
- 4. No change

SEA/AA Response: N/A

18. Name/Group: Cllr. Fergus Kilcoyne Ref: LCC - C249-PAT02-17 **Submission:** Response 1. De-zoning of Land 1. De-zoning of Land The submission is undertaken by Elected The Local Area Plan seeks to ensure that independent Representative for Limerick population growth is met and future needs of City West, Fergus Kilcoyne. The submission accommodated village are refers to the de-zoning of tracts of land consolidated manner. Planning policy requires

currently zoned residential in the 2015-2021 Local Area Plan. Cllr Kilcoyne vehemently expresses his opposition to this decision. The submission includes a zoning map with the lands, the subject of the submission outlined.

The submission describes Patrickswell as a strategic village within the metropolitan area of Limerick City, 3.5km from Raheen and connected to the Limerick Municipal Sewage system. The submission also provides that the village is accessible from the motorway, will have freight rail services reinstated in the short term with passenger services a possibility in time.

Cllr Kilcoyne outlines his belief that Patrickswell should retain all residentially zoned lands and be allowed to grow. The submission outlines how the village needs to accommodate its own younger people who need homes and to accommodate the adjacent Raheen area where industrial expansion is outpacing the supply of zoned lands.

2. Limerick Metropolitan Area

In addition, the submission requests that the village be subsumed into the Metropolitan area for the purposes of forward planning in the next iteration of the Limerick Development Plan to allow the village to become a de facto metropolitan area akin to

Local Authorities to ensure a sequential approach to the zoning of land, with a primary focus on the consolidation of settlements through the zoning of lands within or contiguous to the village centre.

The Settlement Capacity Audit (SCA) set out under Chapter 10 of the Draft Plan examines the availability of services for lands identified for residential and employment purposes. The SCA examines whether services are, or will be, available to facilitate development within the lifetime of the Plan. Lands that are serviced or serviceable within the lifetime of the Plan and lead to compact growth are considered to be sequentially preferable and are therefore zoned within the Draft Plan.

The site, the subject of this submission is outside the proposed boundary for the Draft Plan and would not be in line with sequential approach to zoning of land, consolidation of the settlement, and would not lead to compact growth. The council have zoned sufficient lands to cater for the future growth of Patrickswell in this plan cycle for the timeframe 2024-2030 over and above what is required in the Core Strategy requirements of the Limerick Development Plan 2022-2028. The Office of the Planning Regulator, having reviewed the Draft Plan, considers the Plan presents a 'sufficient supply of appropriately located zoned land to meet the housing targets set out in the Development Plan... and cautions against additional land use zoning residential proposals for development through material alterations'. Therefore the overall location and quantum of zoning is considered acceptable.

2. Limerick Metropolitan Area

The Limerick-Shannon Metropolitan Area includes Annacotty, Castleconnell, Clarina, Mungret and Patrickswell in Limerick, as is provided by the Regional Spatial Economic Strategy for the Southern Region. The Limerick Development Plan's Core Strategy

Annacotty and Mungret and to benefiting accordingly from the levels of investment afforded to these areas.

provides a breakdown of population targets associated requirement of zoned and residential land across a settlement hierarchy. At Level 1 of this hierarchy is Limerick City and Suburbs (in Limerick), Mungret and Annacotty, of which is designated for significant growth under the NPF and RSES. Patrickswell is provided for under Level 4 Large Villages. It would not be appropriate to include Patrickswell as part of the Level 1 designation given the village is physically separated from the category boundary. In comparison, both Annacotty and Mungret are contiguous to Limerick City with no physical separation to the built up environment.

Chief Executive's Recommendations:

- 1. No Change.
- 2. No Change.

SEA/AA Response: N/A

19.	Name/Group:	Michael McSweeney			
		Ref: LCC - C249-PAT02)2-18		
	Submission:		Response		
	The submission is ma	ide by an active farmer	Noted.		
		village and outlines			
		family have farmed in			
		umber of generations			
		their income from			
	farming.				
	The submission wal	comes the Draft Plan			
		ning of the land holding			
		otes appreciation that			
	_	nts be made to the land			
	holding as part of the	plan making process.			
		. 51			
	Chief Executive's Rec	commendations:			
	No Change.				
	SEA/AA Response: N	/A			

20.	Name/Group:	Willie and Noreen Fenton Ref: LCC – C249-PAT02-19						
	Submission:			Response				
	The submission is ma	No	ted. While	Figu	re 4.9 for Opp	ortunity S	ite 2	
	adjoining property to	is	labelled	as	"Proposed	Layout"	for	

notes they are broadly welcoming of the plans for the green area adjoining Lisheen Park and Faha View and the need to develop the area.

The submission outlines how the plans have been considered and the main concern is the close proximity of the playing pitch to the front door and overall property. The submission requests that the Council consider the reorientation of the proposed pitch away from the property in his ownership.

Community facilities at Faha View and Lisheen Park, this is an indicative design or schematic and does not represent a final design. In the interests of clarity Figure 4.9 should be entitled Indicative Layout instead of Proposed Layout. The Council are committed to ensuring that all stakeholders, interested parties and local residents are involved in the future design of Opportunity Site 2 and are committed to providing additional consultation prior to any Part 8 application being submitted.

Policy support is included in the Draft Local Area Plan to facilitate this development and interested parties will have a further consultation opportunity through the Part 8 process.

Chief Executive's Recommendations:

Amend the title of Figure 4.9 as follows: Proposed Indicative Layout: Community facilities at site fronting Faha View and Lisheen Park including St. Patrick's AFC

SEA/AA Response:

Taking into account the measures that have been already integrated into the Draft Plan that provide for and contribute towards environml protection, environmental management and sustainable development, it is identified that any potential effects arising from the Proposed Alterations above in this Chief Executive's Report: either are present already (beneficial) and will be further contributed towards; or will be mitigated so as not to be significant (adverse). In addition, some alterations merely propose to add clarification or amended context setting text for Plan provisions including implications for public realm to enhance village viability and these will not result in significant environmental effects. Consequently, the above Proposed Alterations outlined in this Chief Executive's Report do not require SEA.

Furthermore, taking into account the mitigatory measures already in force through the Development Plan and those already included in the Draft Plan, the Proposed Alterations outlined in this Chief Executive's Report the Proposed Alterations will not give rise to any likely significant effect on any European site. Consequently, Stage 2 AA will not be required to be undertaken on the Proposed Alterations.

21.	Name/Group:	Vincent O'Doherty Ref: LCC-C249-PAT02-	20
	Submission:		Response
	The submission refers	to the masterplan for	Noted.
	the area adjoining Fa	ha View and Lisheen	Noted. Opportunity Site 2, in the Draft Plan
	Park and raises conce	erns in relation to the	does not include the area of land zoned
	reopening of the prop	osed permeability link	Education and Community immediately
	with Sycamore Heights	. The submission notes	

that in 2012, working with Limerick City and County Council, this link was closed due to ongoing anti-social behavior and the Council removed the lighting in the area without permission or consultation with the residents of Sycamore Heights.

The submission requests that the Council remove reference to the reopening of this link in the Draft Plan.

north of Patrickswell N.S, on which the community orchard is identified. However it is noted that this area is included in the "Proposed Layout" in Figure 4.9.

In order to remove any confusion as to the future use of this land and to safeguard the future expansion of educational requirement in Patrickswell, Figure 4.9 will be updated to remove the proposed layout on the land zoned educational and community identified as a Community Orchard and instead refer solely to the zoning on this portion. The removal of this area from Fig. 4.9 will include reference to the link concerned. Furthermore, the layout should be seen and referenced as an indicative design or schematic and does not represent a final design. Therefore, Figure 4.9 should be entitled Indicative Layout instead Proposed Layout.

This will not impact on the wider redevelopment of Community facilities at Faha View and Lisheen Park. The Council are committed to ensuring that all stakeholders, interested parties and local residents are involved in the future design of Opportunity Site 2 and are committed to providing additional consultation prior to any Part 8 application being submitted.

Chief Executive's Recommendations:

- **1.** Amend the title of Figure 4.9 as follows: Proposed Indicative Layout: Community facilities at site fronting Faha View and Lisheen Park including St. Patrick's AFC
- **2.** Insert revised Indicative Layout of Opportunity Site 2 with updated layout to area adjacent to Patrickswell National School as follows:



SEA/AA Response:

Taking into account the measures that have been already integrated into the Draft Plan that provide for and contribute towards environmental protection, environmental management and sustainable development, it is identified that any potential effects arising from the Proposed Alterations above in this Chief Executive's Report: either are present already (beneficial) and will be further contributed towards; or will be mitigated so as not to be significant (adverse). In addition, some alterations merely propose to add clarification or amended context setting text for Plan provisions including implications for public realm to enhance village viability and these will not result in significant environmental effects. Consequently, the above Proposed Alterations outlined in this Chief Executive's Report do not require SEA.

Furthermore, taking into account the mitigatory measures already in force through the Development Plan and those already included in the Draft Plan, the Proposed Alterations outlined in this Chief Executive's Report the Proposed Alterations will not give rise to any

likely significant effect on any European site. Consequently, Stage 2 AA will not be required to be undertaken on the Proposed Alterations.

22. Name/Group: Mary Byrnes Ref: LCC – C249-PAT02-21

Submission:

The submission is made by a resident of an adjoining property to Opportunity Site 2 and notes the broad welcoming of the plans for the green area adjoining Lisheen Park and Faha View and the need to develop the area.

The submission outlines how the plans have been considered and the main concern is the close proximity of the playing pitch to the front door and overall property. The submission requests that the Council consider the reorientation of the proposed pitch away from the property in her ownership.

Response

Noted. While Figure 4.9 for Opportunity Site 2 "Proposed Layout" labelled as Community facilities at Faha View and Lisheen Park, this is an indicative design or schematic and does not represent a final design. In the interests of clarity Figure 4.9 should be entitled Indicative Layout instead of Proposed Layout. The Council are committed to ensuring that all stakeholders, interested parties and local residents are involved in the future design of Opportunity Site 2 and are committed to providing additional consultation prior to any Part 8 application being submitted.

Policy support is included in the Draft Local Area Plan to facilitate this development and interested parties will have a further consultation opportunity through the Part 8 process.

Chief Executive's Recommendations:

Amend the title of Figure 4.9 as follows: Proposed Indicative Layout: Community facilities at site fronting Faha View and Lisheen Park including St. Patrick's AFC

SEA/AA Response:

Taking into account the measures that have been already integrated into the Draft Plan that provide for and contribute towards environmental protection, environmental management and sustainable development, it is identified that any potential effects arising from the Proposed Alterations above in this Chief Executive's Report: either are present already (beneficial) and will be further contributed towards; or will be mitigated so as not to be significant (adverse). In addition, some alterations merely propose to add clarification or amended context setting text for Plan provisions including implications for public realm to enhance village viability and these will not result in significant environmental effects. Consequently, the above Proposed Alterations outlined in this Chief Executive's Report do not require SEA.

Furthermore, taking into account the mitigatory measures already in force through the Development Plan and those already included in the Draft Plan, the Proposed Alterations outlined in this Chief Executive's Report the Proposed Alterations will not give rise to any

likely significant effect on any European site. Consequently, Stage 2 AA will not be required to be undertaken on the Proposed Alterations.

Noted.

23. Name/Group: Cllr. Dan McSweeney Ref: LCC – C249-PAT02-22 Submission: Response

The submission is made on behalf of Cllr. Dan McSweeney.

1. Opportunity Site 2

The submission refers to the masterplan provided as part of the Opportunity Site and notes it is broadly welcomed. Cllr. McSweeney has met with a number of local residents and notes the following concerns: The close proximity of the grass pitch to the houses in Lisheen Park and in particular the proposed location of the goals.

The Proposal to significantly increase traffic into Faha View which the submission notes has already general safety issues with layout. The submission requests that further consideration needs to be given to this issue before the plan is finalised.

The submission outlines the need for a community pitch to become all weather to allow for use all year round.

2. Lands for Enterprise and Employment

The submission notes that Draft Plan does not significantly increase the lands available for Enterprise and Employment use. The submission notes that having considered the plan, only one additional parcel of land (1.8 acres circa) has been zoned for such use. The submission outlines that additional lands needs to be included to allow for employment to increase in Patrickswell as population grows.

1. Opportunity Site 2

Noted. While Figure 4.9 for Opportunity Site 2 labelled as "Proposed Layout" Community facilities at Faha View and Lisheen Park, this is an indicative design or schematic and does not represent a final design. In the interests of clarity Figure 4.9 should be entitled Indicative Layout instead of Proposed Layout. The Council are committed to ensuring that all stakeholders, interested parties and local residents are involved in the future design of Opportunity Site 2 and are committed providing additional to consultation prior to any Part 8 application being submitted.

Policy support is included in the Draft Local Area Plan to facilitate this development and interested parties will have a further consultation opportunity through the Part 8 process.

2. Lands for Enterprise and Employment

Together National Planning with the Framework, Regional the Spatial and Economic Strategy (RSES) for the Southern Region places a strong emphasis on compact, smart, sustainable, appropriate and inclusive economic growth in settlements. The Draft Local Area Plan seeks to support this and in line with National and Regional policy, the current Enterprise and Employment zoned lands are identified as meeting this criteria for Patrickswell. Each site selected for enterprise and employment development is supported by an assessment set out the Settlement Capacity Audit in Chapter 10. This assesses the

availability of key infrastructure to serve the individual sites zoned for the provision of Enterprise and Employment.

A total of 9.99 hectares of land was zoned for Enterprise and Employment use in the 2015 Patrickswell LAP which has been increased to 10.814 in the Draft Plan. No Enterprise and Employment zoned land was developed over the lifetime of the Plan and remains in agricultural use. Futhermore, Patrickswell is located under 6km from Raheen Business Park. In this instance, the Council considers the proposed lands zoned as Enterprise and Employment in the Draft Plan as meeting what is required for the village within the lifetime of the plan.

3. Playground

The submission notes that at present, no definite site has been identified for a playground in the Draft Plan. The submission refers to the Patrickswell Community Plan which was submitted as part of the First Issues Consultation Stage which noted the need for additional play facilities.

3. Playground

Submissions received at Issues Stage in the review of the existing Patrickswell Local Area Plan, were reviewed and taken into account in the drafting of the Draft Local Area Plan. The Community Council provided an in-depth submission at Issues Stage, which included a list of actions provided as part of their Community Plan 2019. This included to 'Engage with LCCC for the inclusion of a public park and green areas for recreation, for walks and cycling'. The Draft Plan acknowledges the need for good quality open space and recreation for the village of Patrickswell and places huge significance on the creation of a walking and cycling friendly village. The need for a playground and play spaces is also acknowledged in the Draft Plan. Four locations have been identified as having the potential to accommodate such spaces.

Chief Executive's Recommendations:

- **1.** Amend the title of Figure 4.9 as follows: Proposed Indicative Layout: Community facilities at site fronting Faha View and Lisheen Park including St. Patrick's AFC
- **2.** Insert revised Indicative Layout of Opportunity Site 2 with updated layout to area adjacent to Patrickswell NS as follows:



2-3. No change

SEA/AA Response:

Taking into account the measures that have been already integrated into the Draft Plan that provide for and contribute towards environmental protection, environmental management and sustainable development, it is identified that any potential effects arising from the Proposed Alterations above in this Chief Executive's Report: either are present already (beneficial) and will be further contributed towards; or will be mitigated so as not to be significant (adverse). In addition, some alterations merely propose to add clarification or amended context setting text for Plan provisions including implications for public realm to enhance village viability and these will not result in significant environmental effects. Consequently, the above Proposed Alterations outlined in this Chief Executive's Report do not require SEA.Furthermore, taking into account the mitigatory measures already in force through the Development Plan and those already included in the Draft Plan, the Proposed Alterations outlined in this Chief Executive's Report the Proposed Alterations will not give rise

to any likely significant effect on any European site. Consequently, Stage 2 AA will not be required to be undertaken on the Proposed Alterations.

24.	Name/Group:	Patrickswell GAA Club	b						
		Ref: LCC-C249-PAT02-2	24						
	Submission:		Response)					
	1. Introduction and C	Overview of Club	1. Introduction and Overview of Club						
		behalf of Patrickswell	Noted. Th	ne Coun	cil ackn	owle	edge the i	ole th	nat
	GAA and Camogie Clu	b, which is run as a one	the GAA	A and	Camo	gie	Club p	lays	in
		er one umbrella in	Patricksw	æll.					
	Patrickswell. The club	currently has close to							
	500 members, which	the submission notes is							
	approximately half t	the population of the							
	village. The submission	on states that the club							
	is at the heart of t	he community, is the							
	primary sports club	in the village and the							
	only underage sports	club.							
	The submission outling	nes how to continue to							
	-	st level and provide the							
	much needed servi	ce for the youth of							
	Patrickswell, the clul	o facilities need to be							
	developed including t	the provision of quality							
		and support the growth							
		and encourage new							
	members.								
	2. Pobal Deprivation	Indices	2. Pobal I	Depriva	tion Ind	lices			
	The submission re		Noted.						
	127120005 within t	he Pobal Deprivation							
		h the club is located							
	which is defined as	very disadvantage'. In							
		club's surrounding							
	,	reas are defined as							
	'marginally belov	v average' and							
	'disadvantaged'.	5							
	The submission refe								
	identification of need								
	what the submission refers to as a								
	'disadvantaged comn								
		•							
	3. Draft Plan Policy	and Planned Future	3. Draft	Plan I	Policy a	and	Planned	Futu	ıre
	Growth		Growth						

The submission refers to *Policy CP1* Community Infrastructure, Recreation and Open Space Strategic Policy and notes that in this regard, there is a need to make provision for the improvement and expansion of club sports facilities and amenities within the Local Area Plan. The submission refers to the 300 new houses planned for the local area and the importance to ensure sporting facilities are provided for a growing community particularly when the village currently lacks these services.

The submission refers to Objective CO2 Community and Education Facilities and notes the established relationship that the local GAA has with Patrickswell NS. A license agreement is provided with the school given their restrictions on their own site for playing facilities, the school uses the facilities at the GAA club grounds for training and matches. The submission notes the importance of providing improved facilities at the GAA grounds given the population growth planned for the village the need for a continued relationship with the school and the proposed expansion of facilities to encourage more pupils to Patrickswell National School and to promote and support the children within the community.

The submission refers to Objective CO4 Sports and Recreational Facilities and refers to the strategic vision for Patrickswell as set out in Chapter 3 of the Limerick Development Plan, which recognizes that if Patrickswell is to fulfill its role as a Level 4 settlement, community infrastructure needs to be provided in tandem with population growth.

4. Opportunity Site 4

The Council acknowledges the Clubs wish to improve and expand the GAA facilities within the village.

The Draft Plan fully supports the expansion of such facilities through Objective CO2 Community and Education Facilities and the importance of sports and recreational facilities through Objective CO4.

Noted, the sustainable intensification and consolidation of the existing built environment supported by the necessary physical and community infrastructure is a cross cutting theme of the Draft Plan.

4. Opportunity Site 4

The submission refers to Objective CO4 Sports and Recreation and referring to the community shared space near Patrickswell National School (Opportunity Site 2), requests that provision is made here to provide for a full sized GAA pitch. The Club have inspected the site themselves and feel there is opportunity here to provide a full pitch for shared use between the Soccer Club and the National School. The submission notes that currently the existing GAA pitch is shared for all training and matches for all club members from Under 6s to Senior Level and that often matches cannot be accommodated there. The GAA Club would welcome a meeting with LCCC, Patrickswell Soccer Club and Patrickswell National School to create an overall plan for the site meeting all the needs of the community.

5. Future Plans for the Club

The submission notes that the club are embarking on a development plan and are seeking support for future developments within the Plan. This includes:

- (i) The upgrading of the pitch to a floodlit playing pitch
- (ii) A 2-meter lit and accessible walking track around the perimeter of the pitch for community use.
- (iii) Upgrade to the existing clubhouse

The submission outlines priority for development is given to the playing pitch, floodlights and walking track.

6. Additional Commercial Zoned Land

The submission notes that any businesses willing to startup or expand in Patrickswell should be supported in order to ensure there are job opportunities for the GAA players and the growth population of Patrickswell.

The Draft Local Area Plan includes an indicative layout for Opportunity Site 2 rather than a final design. Policy support is included in the Draft Local Area Plan to facilitate the redevelopment at Lisheen Park/Faha View. The Council are committed to ensuring that all stakeholders, interested parties and local residents are involved in the future design of Opportunity Site 2 and are committed to providing additional consultation prior to any Part 8 application being submitted.

In addition, further consultation will take place through the Part 8 process to inform the final design of the proposal.

5. Future Plans for the Club

Noted.

The Draft Plan will be updated to reference the proposed walking loop around the GAA Pitch as a future development proposal by Patrickswell GAA Club.

The Council supports the appropriate future development of the club subject to planning.

6. Additional Commercial Zoned Land

The Draft Local Area Plan seeks to support the compact, smart, sustainable, appropriate and inclusive economic growth in Patrickswell in line with national and regional policy. The Draft Plan further acknowledges the

important economic role that Patrickswell plays in the daily and weekly needs of its residents and the needs of the surrounding wider catchment area. A total of 10.814 land is zoned Enterprise and Employment in the Draft Plan with a further 4.76ha zoned Village Centre. The Council considers the proposed lands zoned as Enterprise and Employment in the Draft Plan as meeting what is required for the village within the lifetime of the plan.

Chief Executive's Recommendations:

- 1. No Change
- 2. No Change
- 3. No Change
- 4. No Change
- **5(i)** Update Amenity and Sustainable Transport Map to reference walking loop proposed as part of future plans of Patrickswell GAA.
- (ii) Include proposed pedestrian loop within GAA Grounds under new table inserted into Chapter 7 Proposed Active Travel Infrastructure.
- **6.** No Change

SEA/AA Response: Active travel proposals were considered under the SEA Screening and no significant adverse environmental effects identified. A proposed walking loop within the vicinity of Patrickswell GAA is not identified as giving rise to significant adverse effects.

Taking into account the measures that have been already integrated into the Draft Plan that provide for and contribute towards environmental protection, environmental management and sustainable development, it is identified that any potential effects arising from the recommendations outlined in this Chief Executive's Report, either are present already (beneficial) and will be further contributed towards; or will be mitigated so as not to be significant (adverse). In addition, some recommendations merely propose to add clarification or amended context setting text for Plan provisions and these will not result in significant environmental effects. Consequently, the above recommendations outlined in this Chief Executive's Report do not require SEA.

With regards to the Appropriate Assessment, the measures that have been already integrated into the Draft Plan provide for environmental protection for the Natura Network. Project level assessments will provide ongoing protection for the Natura Network. No significant effects are anticipated at the plan level from the inclusion of these measures at a plan level.

25.	Name/Group:	HRA Planning on behal	If of Diceros Ventures Limited
	Submission:		Response

1. Introduction and Overview of Submission

The submission is made by HR Planning Chartered Town Planning Consultants on behalf of Diceros Ventures Limited with regards to 14.4ha of land which is outlined in attached images.

- The submission refers to the existing Patrickswell Local Area Plan, which provides the following zoning types on the land; 14.4ha of land is zoned for Residential Development Phase 1 (7.1ha), Residential Development Phase 2 (6.4ha) and Open Space and Recreation (0.9ha).
- The submission outlines how the proposed zoning provided in the Draft Plan seeks to radically amend the zoning provisions currently afforded to the land 4.9 hectares remains zoned as New Residential Phase 1 and 2.78 hectares is zoned as New Residential Phase 2.The Draft LAP seeks to zone a significant 3.97 hectares of the land as open space and recreation with a further 3.42 hectares dedicated to agricultural use.
- The submission provides a site location and context of the lands, the subject of the submission and provides an overall masterplan that was prepared for the site demonstrating capacity to accommodate 131 no. units. The submission provides a planning history on the site (P17/1083 now expired and 18/346 'remains live' for a total of 98 units).
- The submission notes the land has not been developed to date as development is dependent on a distributor road to be partially delivered by the Local Authority and to which there is no timeframe for delivery

1. Introduction and Overview of Submission Noted.



Figure 1.0 Draft LAP 2024 - 2030 (site in blue)



Figure 2.8 Existing LAP 2015- 2021 (site in blue)

 The submission outlines objection to the proposed zoning for the following reasons:

2. Loss of Residential Zoned Land

- The loss of residential zoned land is contrary to the provisions of the Development Plans –Guidelines for Planning Authorities, June 2022.
- The submission notes that identifying the lands as an Opportunity Site confirms the potential for the land to satisfy national strategic objectives (compact growth, delivery of sustainable communities) and that in doing so, the land is recognized as being serviced and capable of immediate development as provided for in the Settlement Capacity Audit. The SCA confirms that all key

2. Loss of Residential Zoned Land

In preparation of the Draft Plan and associated Draft Zoning Map, an extensive review and thorough analysis of extant planning permissions, lands considered 'serviced' or 'servicable' and the delivery of compact growth was undertaken to inform the plan. In accordance with the Limerick Development Plan's Core Strategy, vacancy and town centre allowance and the provision of 'Additional Zoned Land Provision as per 'Development Plan Guidelines for Planning Authorities' 2022, the Draft Plan established that 6.12ha of new residential was required within the lifetime of this Draft Plan.

- infrastructure is available to the site and the lands are developable over the lifetime of the plan.
- The submission refers to Section 4.4.1 of the 'Development Plans Guidelines for Planning Authorities and quotes "land and sites already zoned for residential purposes may be regarded as providing a baseline or starting point to meet projected population and housing targets, especially in cases where planning permission has already been granted, based on the presumption that land subject to planning permission is already serviced or serviceable". It is submitted that the subject land, inclusive of existing Phase 1 & 2 Residential zoned land falls within this classification as the land is already zoned, planning permission has been granted and the land is serviced.
- The submission, referring to the guidelines again quotes "It is a policy and objective of these Guidelines that zoned housing land in an existing development plan, that is serviced and can be developed for housing within the life of the new development plan under preparation, should not be subject to dezoning'.
- The submission notes that the Guidelines recommend that in instances where there is a surplus of well-located zoned and fully serviced land, to meet population and housing supply targets already zoned for development in any local authority area, when reviewing a development plan, it is recommended best practice, that a phased approach be taken to prioritise the preferred sequence of development of such sites. However, phasing should be applied where there is a sound planning rationale for doing so, based on factors

The Draft Plan has made provision of 16.861 total ha for New Residential (inclusive of Phase 2 New Residential) within the lifetime of the plan, +175.5% over what is required. The lands to which the submission refers to in its request to increase the Phase 2 provision was not considered within the Settlement Capacity Audit for the provision of residential development as it would further exceed the population growth required in accordance with the Core Strategy and it was not considered to be serviced or serviceable within the lifetime of the plan. A submission received from the Office of the Planning Regulator, who have a statutory obligation to independently assess LAP's, states that

"Given the sufficient supply of appropriately located zoned land to meet the housing targets set out in the Development Plan, the Office cautions against additional land use zoning proposals for residential development through material alterations".

The Council acknowledge the various sections of the Development Plan Guidelines quoted in the submission, and are confident that the quantum and location of zoning as presented in the Draft Plan are consistent with the Core Strategy of the Limerick Development Plan 2022-2028 and relevant guidelines. Lands that are serviced or serviceable within the life of the plan and lead to compact growth are considered sequentially preferable and are therefore zoned within the Draft Plan.

The existing Patrickswell Local Area Plan 2015-2021 provided 38.38ha of New Residential and 14.88ha of Serviced Sites. This greatly exceeded the Core Strategy requirements as outlined in the Limerick Development Plan. The residential land carried through into the Draft Plan was included based on a number of factors including the benefit of extant

such as site location, the availability or proximity of, or capacity to provide, off-site services, facilities or infrastructure.

- It is requested that all existing residential zoned land is reinstated in the Draft Plan, including Phase I and Phase II lands. The submission seeks to increase the provision of Residential Phase 2 zoning and a reduction in the Open Space and Recreation Zoning.
- The submission requests the following change in zoning:
 - Maintain Residential Phase I land –
 4.09 hectares
 - Reduce Open Space & Recreation Zoning from 3.97 hectares to 1.62 hectares.
 - Change Agricultural zoning to Residential Phase II zoning -3.42 hectares
 - Partially change open space & recreation zoning to Residential Phase II –2.35 hectares

3. Open Space Provision

- The submission outlines that the zoning of 3.07ha of existing Residential Phase 2 to Open Space and Recreation use represents a significant and unacceptable burden on Diceros Ventures Limited.
- The submission notes that the lack of open space provision in Patrickswell is not quantified in the Draft Plan instead relying on views of the public during the consultation stage.
- The submission notes there are no Irish standards in quantifying open space and recreational need and instead refers to the National Playing Fields Association in the UK outlining the organisation's standards. In this regard, the submission outlines how a requirement for open space provision for Patrickswell based on

permission and favourably located in terms of compact growth and sequential zoning.

3. Open Space Provision

The Council is committed to both protection of existing community infrastructure upgrade and development of future open space and recreation provision. Policy SCSI P1 Sustainable Communities outlines the Council's policy support in ensuring a high standard quality of life for existing and future residents and provides the following: 'It is a policy of the Council to: Seek to improve the provision of community infrastructure and recreational opportunities for the wider community, in co-operation with relevant bodies, in a sustainable manner in accordance with the settlement strategy of the Plan. This is conducive to ethical principles of healthy communities, inclusivity and accessibility to facilities for all abilities and sustainability to ensure that Limerick is a greener, cleaner, more welcoming place to live, work and attract population targets would equate to 2.76ha while the Draft Plan seeks to provide 12.97ha. The submission notes, there is adequate land zoned open space in the village to serve the population without having to zone the subject land.

investment.' Provision for new social infrastructure entails ensuring adequate land is set aside, either as part of new development proposals where appropriate, or in zoned land for this purpose as part of LAP process.

The consultation process of the Local Area Plan forms an integral part of the plan making process and the Council place great emphasis on ensuring that the views and opinions of those living and working within the Local Area Plan boundary are central to that process. The consultation stages from Issues stage through to the Draft Plan raised significant concerns regarding the lack of open space and recreation provision in the village of Patrickswell.

The 2022 Census data for Patrickswell provided for a population total of 848 people. Should all lands zoned new residential/serviced sites be developed, the population increase for the village would be in excess of 786 people increasing the population of the village to 1,634. The existing open space and recreation provision in Patrickswell serves the existing settlement and at a shortfall. The proposal to increase open space and recreation provision provides scope for essential social infrastructure that the village currently requires and makes provision for future population growth.

4. Provision of Playing Pitches

The submission notes that it is their understanding that the subject land may be required for the purpose of a playing pitch to serve clubs such as the GAA. Diceros Ventures Limited has been in discussions with the local GAA Club in respect of the subject land and have advised that they have no interest in that area of land zoned as open space, having regard to the location of the site

4. Provision of Playing Pitches

The design principles provided in Opportunity Site 4 includes the 'Potential to guide the sustainable development of future village amenities and critical social infrastructure to coincide with future residential development'. This could include playing pitches, playground/play space, tennis courts etc. In addition, Open Space and Recreation use is not always for physical development and can also be served as an active or passive amenity

removed from existing club facilities. The submission notes that the GAA are looking at alternative lands to accommodate additional pitches and that the GAA are not interested in the subject lands.

 The land identified as open space is not suitable for the provision of a pitch as the land slopes in a north-western direction and would require significant fill to facilitate a level playing pitch. use such as wildlife corridors and to support regeneration of local natural ecosystems. The lands, the subject of this submission is not zoned solely for an end user and instead focuses on insuring that the future growth of the village is supported by adequate social and community infrastructure sensitive to environmental considerations and existing land uses.

5. Increase to Existing Open Space and Recreation

The submission notes that the Draft LAP seeks to zone 3.07 hectares of existing Residential Phase 2 land to open space and recreation use. The submission states that this area of land is significant in the context of the overall landholding in the ownership of Diceros Ventures Limited, representing 21.3% of the overall landholding and a third of the land zoned for a development purpose in the Draft Plan.

It is submitted to the planning authority that this represents a significant and unacceptable burden on Diceros Ventures Limited.

The submission outlines how, in order to contribute to the extent of intended open space and recreation zoning at this location, it is proposed to increase the existing open space and recreation zoning along the eastern site boundary from 0.9 hectares in as provided in the 2015 LAP to 1.62 hectares in the Draft LAP.

The submission requests that what is proposed in the Draft Plan as Open Space and Recreation zoning (on lands that the submission refers to in Fig 1.0 above) be

5. Increase to Existing Open Space and Recreation

The Local Area Plan seeks to ensure that population growth is met and future needs of the village are accommodated in a consolidated manner. Planning policy requires Local Authorities to ensure a sequential approach to the zoning of land, with a primary focus on the consolidation of settlements though the zoning of lands within or contiguous to the village centre.

The Settlement Capacity Audit (SCA) set out under Chapter 10 of the Draft Plan examines the availability of services for lands identified for residential and employment purposes. The SCA examines whether services are, or will be, available to facilitate development within the lifetime of the Plan. The lands identified in the SCA are considered to be serviced by existing roads, footpaths, public lighting, water and wastewater services.

A submission received from the Office of the Planning Regulator, who have a statutory obligation to independently assess LAP's, considers the Draft LAP outlines "The total area of land proposed to be zoned New Residential under the Draft LAP exceeds that required to meet the core strategy under the Development Plan'. The Office does accept,

reduced from 3.97ha (proposed in Draft Plan) to 1.62ha.

The submission then requests to partially change the Agriculture zoning proposed in the Draft Plan and to what is in their ownership (see Fig 1.0 above) to Residential Phase 2.

however, that the lands proposed for zoning 'are well-located, serviced, and that there is extant planning permission or live planning applications for development on much of these lands'. The submission concludes by "cautioning against additional land use zoning proposals for residential development through material alterations."

Chief Executive's Recommendations:

No Change

SEA/AA Response: N/A

26.	Name/Group:	Patrickswell Football C	llub				
		Ref: LCC-C249-PAT02-2	26				
	Submission:		Response				
	Ref: LCC-C249-PAT02-20 Submission: The submission outlines its support for the proposed Opportunity Site 2 as part of the Draft Plan and hope that the planning process can be expedited promptly. The submission provides for three changes to the indicative design proposal as follows: (i) The inclusion of a wheelchair access pathway around the playing area (ii) The inclusion of a community playing surface synthetic astroturf pitch to allow for the facility to be available all year round. (iii) That the sports facility be lit.		Noted. While Figure 4.9 for Opportunity Site 2 is labelled as "Proposed Layout" for Community facilities at Faha View and Lisheen Park, this is an indicative design or schematic and does not represent a final design. In the interests of clarity Figure 4.9 should be entitled Indicative Layout instead of Proposed Layout. The Council are committed to ensuring that all stakeholders, interested parties and local residents are involved in the future design of Opportunity Site 2 and are committed to providing additional consultation prior to any Part 8 application being submitted. Policy support is included in the Draft Local Area Plan to facilitate this development and interested parties will have a further consultation opportunity through the Part 8 process.				

Chief Executive's Recommendations:

Amend the title of Figure 4.9 as follows: Proposed Indicative Layout: Community facilities at site fronting Faha View and Lisheen Park including St. Patrick's AFC

SEA/AA Response:

Taking into account the measures that have been already integrated into the Draft Plan that provide for and contribute towards environmental protection, environmental management and sustainable development, it is identified that any potential effects arising from the Proposed Alterations above in this Chief Executive's Report: either are present already (beneficial) and will be further contributed towards; or will be mitigated so as not to be significant (adverse). In addition, some alterations merely propose to add clarification or

amended context setting text for Plan provisions including implications for public realm to enhance village viability and these will not result in significant environmental effects. Consequently, the above Proposed Alterations outlined in this Chief Executive's Report do not require SEA.

Furthermore, taking into account the mitigatory measures already in force through the Development Plan and those already included in the Draft Plan, the Proposed Alterations outlined in this Chief Executive's Report the Proposed Alterations will not give rise to any likely significant effect on any European site. Consequently, Stage 2 AA will not be required to be undertaken on the Proposed Alterations.

27	No /C						
27.	Name/Group:			n Office (Jari Howard)			
		Ref: LCC-C249-PAT	02-2				
	Submission:		Response				
	Submission made on	behalf of the Mid W	est	Noted.			
	Roads De	sign Offi	ce.	The Draft Plan focuses on the provision of			
				increased and improved permeability and			
	The submission out	lines how the MW	RD	upgrade to the provision of active travel			
	would welcome the ir	nclusion of an Object	ive	infrastructure to overcome physical barriers to			
	to provide a cycle la	ne or cycle track alo	ng	enabling a move away from predominant car			
	the R526 through Pat	rickswell's village M	ain	travel.			
	Street connecting to	the existing segregat	ted	A new objective will be inserted into Chapter 7			
	cycle track along t	the R526 heading	to	to support the provision of a cycle track/lane			
	Raheen/Limerick	С	ity.	through Patrickswell Village linking into the			
				existing segregated cycle track along the R526			
	The submission note	s that the provision	of	to Limerick City and link into proposed active			
	such infrastructure v	will help facilitate a	nd	travel infrastructure as part of the N/M20 Cork			
	encourage sustainabl	e active travel journ	eys	to Limerick Project, the Patrickswell to			
	between Patricks\	well and Limer	ick	Charleville Greenway, and the Rathkeale to			
	City/Croom/Adare.			Limerick Greenway.			
	The provision of a cy	cle track would also	tie				
	into the propo	sed active tra					
	infrastructure for	the N/M20 Cork	to				
	Limerick Project,	the Patrickswell	to				
	Charleville Greenway	, and the Rathkeale	to				
	Limerick Greenway.						

Chief Executive's Recommendations:

1. Insert a new Part B into Objective SMT O2 – Sustainable Travel Infrastructure as follows: Support the provision of a cycle track/lane through Patrickswell Village linking into the existing segregated cycle track along the R526 to Limerick City and link into proposed active travel infrastructure as part of the N/M20 Cork to Limerick Project, the Patrickswell to Charleville Greenway, and the Rathkeale to Limerick Greenway.

SEA/AA Response:

Active travel proposals were considered under the SEA Screening and no significant adverse environmental effects identified. The new text provided under Objective SMT 02 relates to supporting the provision of a cycle track and would be subject to detailed design and the application of planning consent process, including environmental and ecological assessment as appropriate.

Taking into account the measures that have been already integrated into the Draft Plan that provide for and contribute towards environmental protection, environmental management and sustainable development, it is identified that any potential effects arising from the recommendations outlined in this Chief Executive's Report: either are present already (beneficial) and will be further contributed towards; or will be mitigated so as not to be significant (adverse). In addition, some recommendations merely propose to add clarification or amended context setting text for Plan provisions and these will not result in significant environmental effects. Consequently, the above recommendations outlined in this Chief Executive's Report do not require SEA.

With regards to the Appropriate Assessment, the measures that have been already integrated into the Draft Plan provide for environmental protection for the Natura Network. Project level assessments will provide ongoing protection for the Natura Network. No significant effects are anticipated at the plan level from the inclusion of these measures at a plan level.

Part B

3.0 Proposed Amendments to Draft Patrickswell Local Area Plan 2024 – 2030

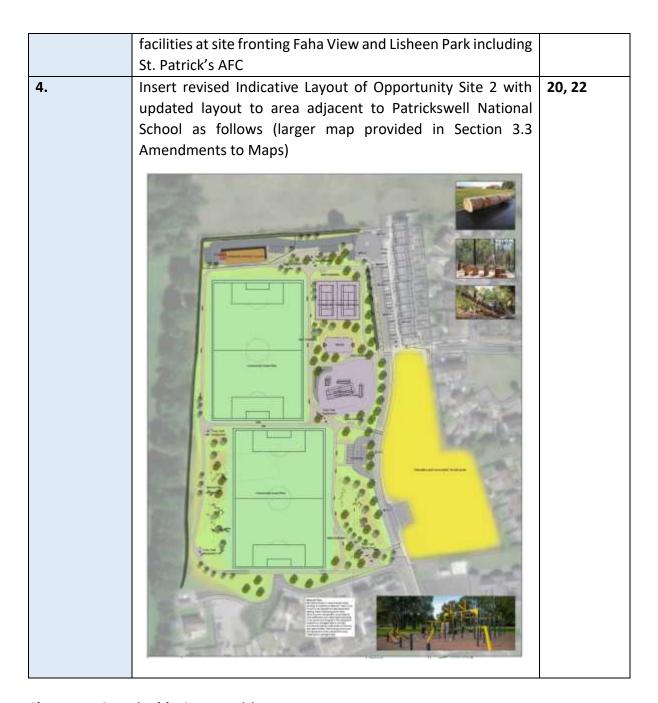
(To be read in tandem with Part A)

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

3.1 Amendment to Draft Local Area Plan Text

Chapter 4: Town Centre First Approach

Text	Proposed Amendment	Submission
Amendment		No.
No.		
1.	Insert additional Section into Chapter 4.5 Opportunity Sites	11, 12, 23
	as follows:	
	Opportunity Sites and Climate Adaptive/Resilient Urban	
	Greening	
	The management of rainwater and flood risk as part of	
	climate adaptive and resilient urban greening should be	
	considered at the outset of the design process of all proposed	
	Opportunity Sites. Proposals should adhere to the rainwater	
	management mechanisms outlined within the national	
	guidance for water sensitive urban design (Nature-Based	
	Solutions to the Management of Rainwater and Surface	
	Water Runoff in Urban Areas: Water Sensitive Urban Design:	
	Best Practice Interim Guidance Document). All new	
	development is required to manage and minimise surface	
	water runoff through the use of Nature based Solutions /	
	Sustainable Drainage Systems (SuDS), unless otherwise	
	agreed with the Council. Development will only be permitted	
	where the Council is satisfied that suitable measures have	
	been proposed that mitigate the impact of surface water,	
	through the achievement of control of run-off quantity and	
	quality, while enhancing amenity and habitat.	_
2.	Insert additional action under the theme 'Greening' in Table	5
	4.2 Draft Patrickswell LAP Action Timeframe as follows:	
	Action: Provision of a cycle route and active travel measures	
	on the Clarina Road linking into the village	
	Lead Responsibility: NTA and LCCC Transport and Mobility Directorate	
	Timeline: Short to Medium Term	
	Timeline. Short to Mediani Term	
3.	Amend the title of Figure 4.9 in Chapter 4 Town Centre First	14, 19, 20,
	Approach as follows: Proposed Indicative Layout: Community	21, 22, 26
		,,



Chapter 5: Sustainable Communities

Text Amendment No.	Proposed Amendment	Submission No.
5.	Amend Objective CO4 Part (c) Sports and Recreation Facilities in Chapter 5 Sustainable Communities as follows: Protect land zoned open space and recreation existing space by not permitting development, which encroaches on such open space and land zoned open space and recreation from inappropriate development and facilitate/support the provision of allotment or community gardens at appropriate locations development in line with the uses set out in the	9

zoning	matrix	and	subject	to	appropriate	environmental	
assessn	nents.						

Chapter 7: Sustainable Mobility

Text	Proposed Amendment	Submissi					
Amendm							
ent No.							
6.	Amend Section 7.3 of Chapter 7 as follows: The N/M20 Cork to Limerick Motorway Scheme Project also includes the provision of active travel infrastructure ensuring that sustainable development principles are core considerations in the scheme. The Scheme Project will not just enhance Patrickswell's motorised connectivity, but also create improved active travel linkages and connections from the village to the south of the Country.	1					
7.	Amend Section 7.4 of Chapter 7 as follows: Active Travel measures as part of the N/M20 Cork to Limerick Motorway Project including cycle and pedestrian infrastructure from Patrickswell to Croom, Bruree connections to the proposed Limerick Greenway and wider national cycle network	1					
8.	Insert the following text into Section 7.5 Rail Transport: This LAP seeks to safeguard the rail line against encroachment that would compromise the long-term development of this facility. Insert the following objective under Section 7.5 Rail Transport Objective SMT: Protection of Existing Rail Route: It is an Objective of the Council to: a) Protect the existing rail route against encroachment from inappropriate uses that could compromise the long-term development of the rail facility and support appropriate upgrades, which are in line with the appropriate and necessary environmental and ecological assessments as required. b) Support any future proposals for passenger rail services in Patrickswell.	23					
9.	Amend SMT O6 (b) to reference national road network as follows: 'Protect the capacity of the <u>national and</u> regional road network from inappropriate development, having regard to all relevant Government guidance,'	4, 23					
10.	Update the Amenity and Sustainable Transport Map to distinguish between existing and proposed cycling and walking infrastructure. (updated map provided for under Section 3.3 Amendments to Maps)	3, 5, 23					

Provide a new Section under Section 7.4 Modal Shift and Targets and update the text as follows:

3, 5, 23

There are a number of opportunities, which have the ability to address current travel trends and to examine the existing travel behaviours within Patrickswell to provide for the realisation of a more sustainable transport mode. The Draft Local Area Plan focuses on the provision of increased permeability through future development within the settlement. The plan provides a change of focus towards the town centre first initiatives, development of infill/brownfield sites and the creation of a more compact village and endeavours to improve permeability and localised access through the development of the four identified opportunity sites. Local conditions including lack of infrastructure, inadequate linkages and lack of permeability create physical barriers to enabling a move away from the predominant car travel, as exists in Patrickswell. In relation to cycling, there are no cycle paths in the village with cyclists using footpaths instead, in some instances. Policies contained within this Plan ensure that new development proposals provide for permeability and appropriate linkages that are required to open up future and existing development, creating the conditions to enable active travel modes and improving access for those with mobility issues. The following table identifies active travel infrastructure that seeks to create convenient, efficient routes to key destinations for local amenities, facilities, social infrastructure and services and in doing so, reducing walking/cycling distances and creating the conditions that gives active modes a competitive advantage over the private car. The table below outlines active travel measures to enable the 10minute town concept prioritising a number of these measures:

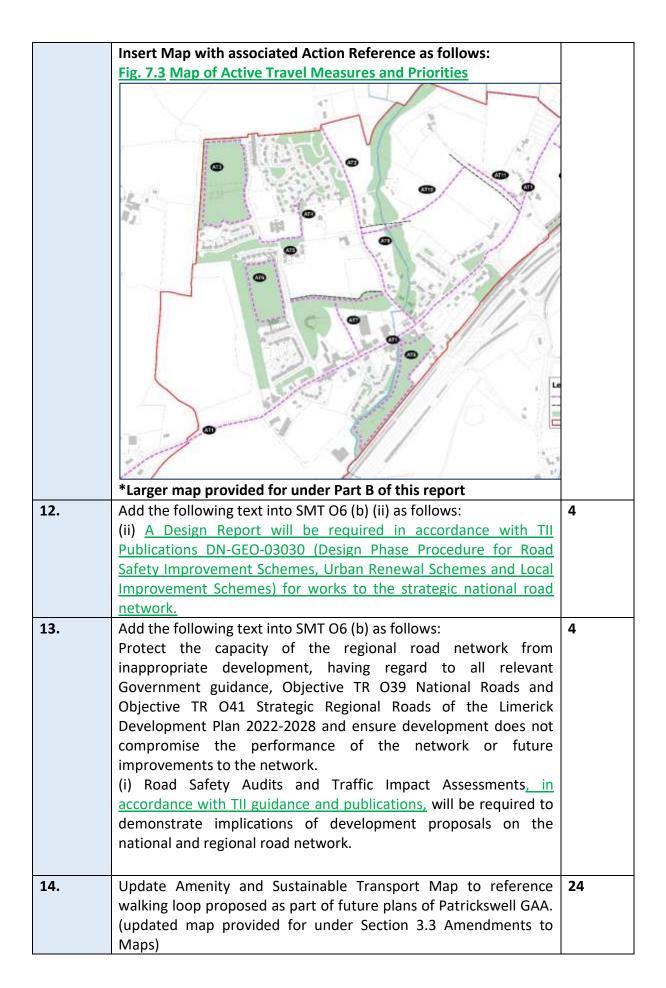
- The implementation of pedestrian/cycling safety measures on Main Street as part of the Patrickswell Village Renewal Scheme commenced March 2023;
- Improved connectivity from Main Street to Patrickswell National School as part of Patrickswell Village Renewal Scheme;
- Upgrade of existing pedestrian link from Laurel Park to Lisheen
 Park at Patrickswell National School;
- Improvement works outside Patrickswell NS for walking and cycling infrastructure and in turn, increase the number of students who cycle to school;
- Active Travel measures as part of the N/M20 Motorway project including cycle and pedestrian infrastructure from Patrickswell

- to Croom, Bruree and connections into the proposed Limerick Greenway and wider national cycle network;
- Increase permeability through future development within the settlement;
- Change of focus to town centre first initiatives, development of infill/brownfield sites and creation of a more compact village;
- Opportunity sites focused on improving permeability and localised access.

Insert Table showing Active Travel Proposal and Priority Route: Table 7.3 Active Travel Measures and Priorities

Action/ Intervention Reference	Description	Proposed Link Type/ Active Mode Priority	Expected Timeframe	Need for Intervention
ATI	Main Street Patrickswell Village Centre	Segregated cycle lane Active Mode Priority	Medium to Long Term	- Connection into existing segregated cycle track along R526 to Raheen/Limerick City and future connections associated with Active Travel measures of N/M20 Cork to Limerick Project, Patrickswell to Charleville Greenway and Rathkeale/Limerick Greenway Increase uptake of active travel modes - Connection between village centre to residential areas/local facilities/services.
ATZ	Clarina Road	Cycle Infrastructure Active Mode Priority	Short to Medium Term	Increase uptake of active travel modes Connection between village centre to existing and proposed residential areas/local facilities/services
AT3	Patrickswell FC/Lisheen Park/Faha View (Opportunity Site 2)	Looped Pedestrian Walkway Active Mode Priority	Short Term	 Provision of looped walk around perimeter of site included in proposed development design as part of Opportunity Site 2,
AT4	Sycamore Heights to Patrickswell National School	Pedestrian Link Active Mode Priority	Short Term	Upgrade of existing link from residential estate to Patrickswell NS, Lisheen Park and local amenities/facilities

AT5	Site entrance fronting	Front entrance and road network at	Short Term	 Realignment of road network and provision
	Patrickswell National School	front of Patrickswell NS Active Mode	<u>rem</u>	of walking and cycling infrastructure at front of Patrickswell NS.
		Priority		 Provision of 'school street/school zone'
AT6	Patrickswell GAA Grounds	Looped Pedestrian Walkway	Short Term	 Provision of looped walk around perimeter of site included as part of future development proposals on the GAA grounds.
<u>A17</u>	Patrickswell Village Centre Opportunity Site 1/Residential Development	Active Travel Connection – cycle and walking provision. Active Mode Priority	Short Term	Provision of connectivity and permeability link between Clarina Road, School Road and the centre of Patrickswell Provision of active travel linkage linked to future residential development.
AT8	Riverside Park off Village Centre	Looped Walking/Cycling pathway	Medium Term	- Riverside Park as part of Opportunity Site 3
AT9	Barnakyle	Residential Active Travel Connection— cycle and walking provision, Active Mode Priority	Short Term	 Provision of active travel linkage linked to residential development granted under Planning File 22/8017. Potential to provide linkages from proposed residential development through to local facilities/services (school, GAA etc).
AT10	Barnakyle Opportunity Site 4	Residential Active Travel Connection— cycle and walking provision	Medium to Long Term	 Provision of active travel linkage linked to future residential development/open space.
AT11	Barnakyle Opportunity Site 4	Residential Active Travel Connection— cycle and walking provision	Long Term	 Provision of active travel linkage linked to future residential development/open space.



	Include proposed pedestrian loop within GAA Grounds under new Table inserted into Chapter 7 Proposed Active Travel Infrastructure.	
15.	Insert a new Part B into Objective SMT O2 – Sustainable Travel Infrastructure as follows:	27
	Support the provision of a cycle track/lane through Patrickswell Village linking into the existing segregated cycle track along the R526 to Limerick City and link into proposed active travel infrastructure as part of the N/M20 Cork to Limerick Project, the Patrickswell to Charleville Greenway, and the Rathkeale to Limerick Greenway.	

Chapter 9: Infrastructure and Utilities

Text	Proposed Amendment	Submission
Amendment		No.
No.		
16.	Insert the following into Chapter 9 Infrastructure and Utilities	LCC-C249-
	as Part (f) to Objective IU O5 – Flood Risk Management:	PAT02-12
	Developments on lands benefitting from Arterial Drainage	
	Schemes shall preserve the maintenance and access to these	
	drainage channels. Land identified as benefitting from these	
	systems may be prone to flooding, as such site specific flood	
	risk assessments will be required as appropriate, at planning	
	application stage.	

Chapter 11: Monitoring and Evaluation

Text	Proposed Amendment	Submission
Amendment		No.
No.		
17.	Insert the following new policy into Chapter 11 Monitoring and Evaluation as follows: Policy ME P1: Monitoring and Evaluation: It is policy of the Council to: Implement in conjunction with key stakeholders, the policies and objectives of this Local Area Plan and to review the success or otherwise of the implementation of policies and objectives in line with Section 15(i) and 15(2) of the Planning and Development Act 2000, as amended, as well as Section 6.5 of Local Area Plans Guidelines for Planning Authorities (2013) and Chapter 13 of the Limerick Development Plan.	LCC-C249- PAT02-23

3.2 Amendments to Settlement Capacity Audit

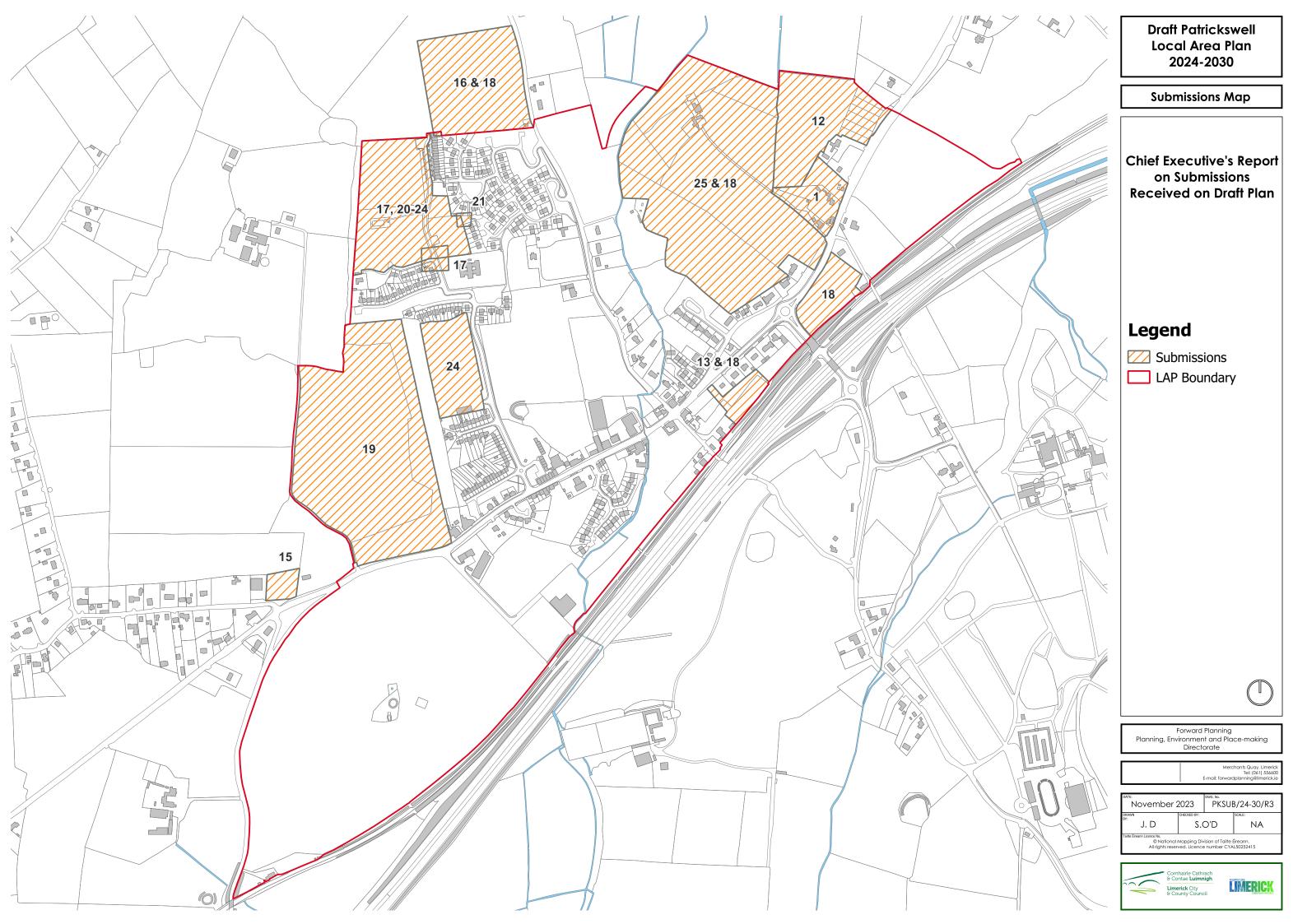
Site No.	Location/ Zoning	Area (ha)	Density	Lighting	Footpaths	Public Transport	Road Access	Water	Foul	Surface Water	Flood Risk	Infill/ Brown-field	Timeline	Comments if Applicable	Tier
	Land Use Zoning – New Residential														
1	Barnakyle (R526 main Limerick to Patrickswell Road)	4.086	Extant	√	✓	•	√	✓	√	√	✓	√	S	 Part of site includes grant of permission for 49 units under File No. 18/346 Opportunity Site 4 (refer to Section 4.5 Opportunity Sites for Development Potential and Guidance) <u>Uisce Eireann Site Specific Comment: Water supply will require third party agreements with likely servicing of these sites to be facilitated via Site 2 or 3, to the watermain in Barnakyle Estate or the road to the south-east. Third party agreements will be required for foul water infrastructure with likely servicing of these sites from the R526 through Site 2 or along the boundary of Site 5.</u> 	1
2	Barnakyle (R526 main Limerick to Patrickswell Road)	2.935	22 units/ha	√	✓	•	√	✓	√	√	✓	✓	L	 Outline planning permission for one off dwelling on part of site (Planning Reference No. 18/64) Opportunity Site 4 (refer to Section 4.5 Opportunity Sites for Development Potential and Guidance) <u>Uisce Eireann Site Specific Comment: Water supply would likely be serviced from the 150mm pipe that runs to the south east of the site along the R526. Foul water servicing likely requiring discharge into a foul or combined sewer on the R526.</u> 	1
3	Barnakyle Adjacent to Bearna Coille Estate	0.42	22 units/ha	√	√	√	√	✓	√	!	s c	√	s	 Grant of Permission for 6 detached units under File No. 17/100- expired January 2023 Infill development, connection to surface water will be required provision available within 150m <u>Uisce Eireann Site Specific Comment: Water supply likely serviced from the 100mm pipe that runs along Barnakyle estate or the 150mm pipe that runs along the R526. There is a combined sewer that runs across the site, this asset will need to be protected and certain separation distanced would apply. This asset could be used for foul water from any proposed development.</u> 	1
4	Barnakyle Adjacent to Bearna Coille Estate	0.483	Extant	√	✓	√	√	✓	√	!	*	√	S	 Grant of permission for 5 x houses under Planning File No. 21/873 Infill development, connection to surface water will be required provision available within 150m <u>Uisce Eireann Site Specific Comment: Water supply for this site could be serviced from the 200mm pipe that runs along the R526. This route would cross an existing property, but this lies within the land allocation. There is a combined sewer that runs across the site, this asset will need to be protected and certain separation distanced would apply. This asset could be used for foul water from any proposed development.</u> 	1
5	Barnakyle (Clarina Road)	0.731	Extant	✓	✓	•		✓	✓	✓	*	*	S	 Grant of Permission for 24 houses - Part 8 Planning Permission File No. 22/8017 Western edge of site boundary within flood zone and to which has been incorporated into design for open space element of scheme <u>Uisce Eireann Site Specific Comment Third party agreements would be required in order to supply water to this site as there are no mains water pipes that pass across or adjacent to it. The shortest connection would appear to be across land within SCA Site. No3 to connect to the 100mm pipe in Barnakyle. There is a combined sewer that runs along the western boundary of this site, which could be used for foul water discharge</u> 	1
6	Barnakyle (Clarina Road)	0.39	22 units/ha	√	✓	•	✓	✓	√	√	*	✓	S	 Infill site, northern boundary of site providing access to SCA No. 4 under Planning File No. 22/8017 Uisce Eireann Site Specific Comment Water supply for this site likely to be serviced from a 75mm pipe that runs along the highway to the west of this site. However, due to the size of this pipe it may need to be upgraded. There is a foul sewer that runs along the highway to the west of this site and trunk foul and combined sewers that cross the site to the, these assets would need to be protected and certain separation distances would apply. Any of these sewers could be used for the discharge of foul water 	1

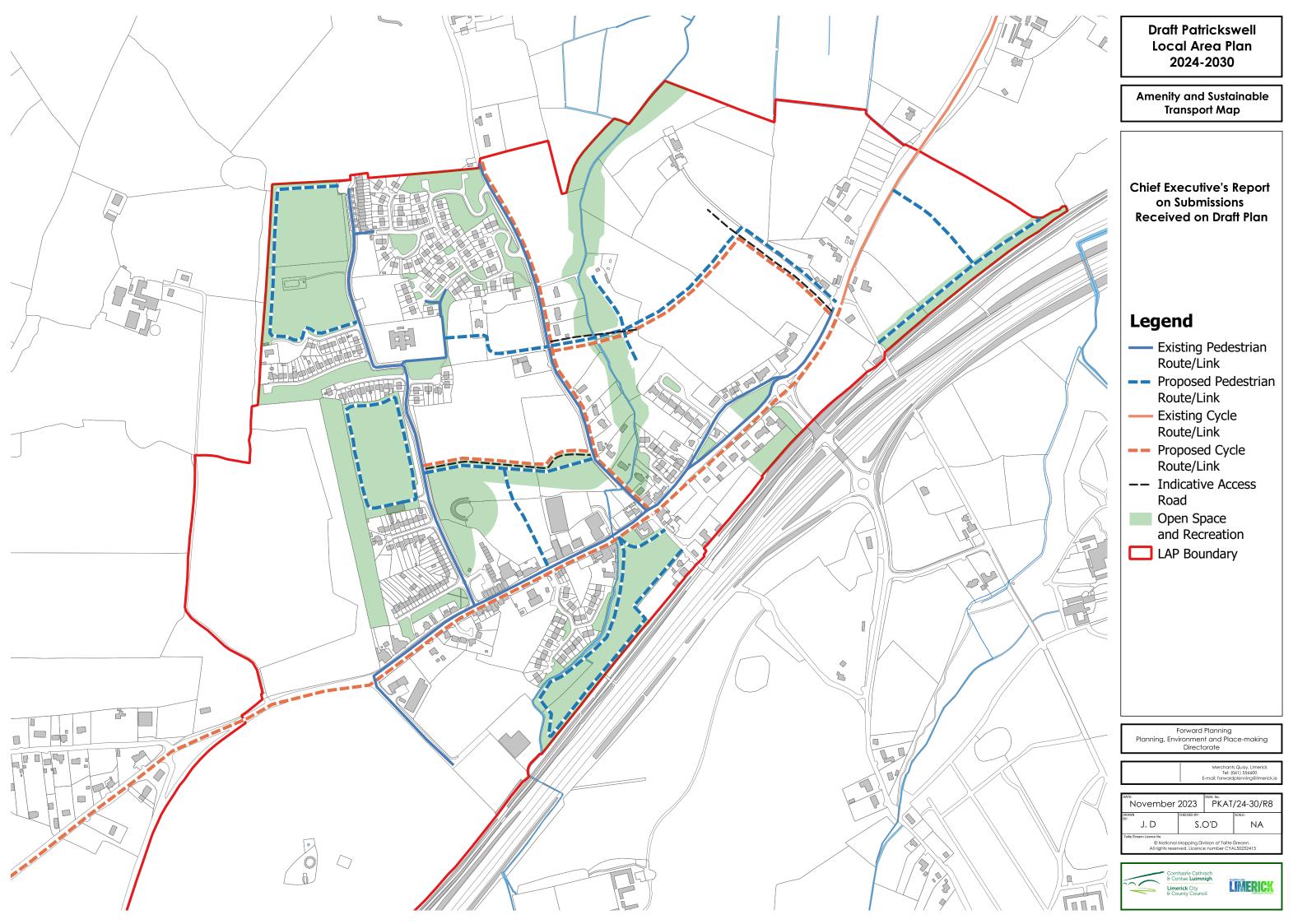
8	Ballyanrahan East (Clarina Road)	1.772	22 units/ha 22 units/ha	✓ ✓	✓ ✓	•	✓ ✓	✓	✓ ✓	✓ ✓ ✓	×	*	S	 Uisce Eireann Site Specific Comment: Water supply for this site likely to be serviced from a 75mm pipe, which is routed along the highway, due to the size of the pipe this may require an upgrade. There is a foul sewer than runs across the south of the site and this asset would need to be protected and certain separation distances would apply. In addition, there is a foul sewer that runs along the highway to the west of the site. Live Application under Planning File No. 23/60144 – Further information requested – Permission for a development comprising 41 no. residential units and outline permission for childcare facility. Request through FI for full permission for childcare facility element Uisce Eireann Site Specific Comment The water supply would be serviced from a 75mm pipe, which is routed along the highway, due to the size of the pipe this may require an upgrade. Alternatively, access across third party land could enable access to a 100mm pipe within Sycamore Heights. There is a combined sewer that runs across the south of the site as well as 	1
														one that runs north-south to the east of the site, these assets would need to be protected and certain separation distances maintained. However, these assets could be used for the discharge of foul water.	
9	Ballyanrahan East (Clarina Road)	2.398	22 units/ha	√	✓	•	✓	✓	√	✓	×	✓	S	 Grant of permission – 18/1193 for 48 units and 19/444 for 16 units. Phase 2 and Phase 3 development following Phase 1 under Planning Grant 18/200 for 48 units currently under construction. Uisce Eireann Site Specific Comment The water supply would be serviced from a 75mm pipe, which is routed along the highway, due to the size of the pipe this may require an upgrade. Alternatively, access across third party land could enable access to a 100mm pipe within Sycamore Heights. There is a combined sewer that runs across the south of the site as well as one that runs north-south to the east of the site, these assets would need to be protected and certain separation distances maintained. However, these assets could be used for the discharge of foul water. 	1
10	Main Street, behind Gala	0.867	22 units/ha	√	✓	✓	✓	✓	✓	✓	×	✓	S	 Infill site adjacent to town centre zoning. Uisce Eireann Site Specific Comment: Water supply for this site would likely be serviced from a 100mm pipe which is routed along Belgard Grove. There are no sewers running across this site and third party agreements may be required to connect to the private network in the estate. 	1
11	Barnakyle	0.386	Extant	√	√	✓	✓	√	✓	√	×	√	S	 Existing planning permission File No. 19/689 for the construction of 8 x number of dwelling houses. Uisce Eireann Site Specific Comment: Water supply for this site likely to be serviced from a 100mm asbestos pipe, which runs along the highway to the west of the site. There is a foul sewer that runs along the highway to the west of the site, which could be used for the connection of foul water discharges. 	1
											Land Use	Zoning –	Town Ce	ntre	
12	Barnakyle (Clarina Road)	0.14	Extant	✓	✓	•	✓	√	√	✓	✓	√	S	 Grant of permission for 13 x number of apartments under File No. 21/980 - On appeal to An Bord Pleanala Uisce Eireann Site Specific Comment: Water supply for this site likely to be serviced from a 100mm asbestos pipe, which runs along the highway to the east of this site. However, attention is drawn to the presence of a 450 trunk sewer main that runs through this site. There will be a requirement to maintain a minimum distance separation, which would typically be between 3.5m to 6m depending on the depth of the sewer. 	1

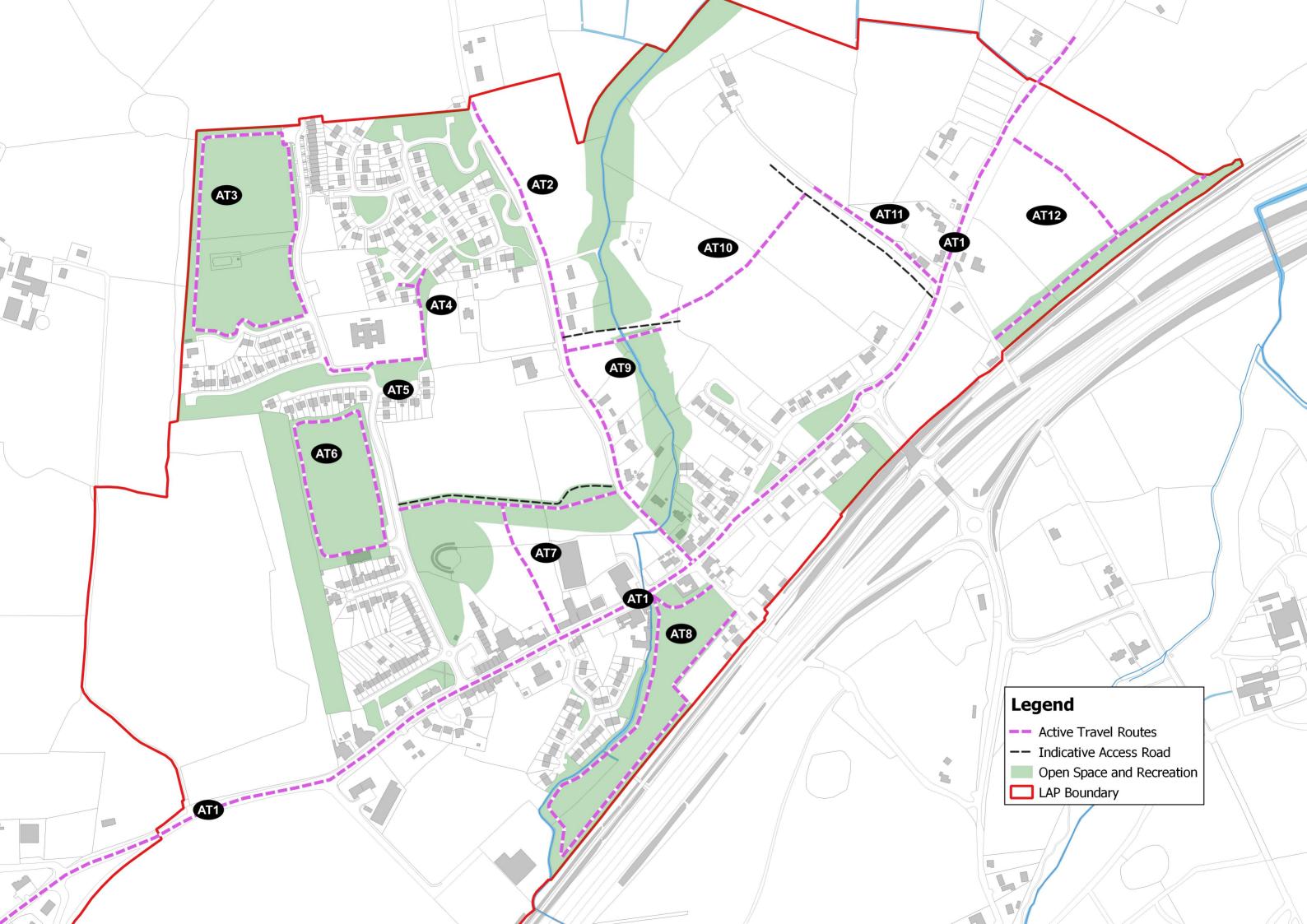
13	Main Street Town Centre	0.61	Extant	✓	√	•	√	√	✓	✓	* Land Use	Zoning –	S Serviced	- Grant of permission for 5 x number of terraced houses under File No. 20/125 - <u>Uisce Eireann Site Specific Comment</u> : Water supply for this site likely to be serviced from a 200mm pipe within the highway. Foul water could be discharged into the foul sewer that runs along Main Street Sites	1
14	Barnakyle Residential Serviced Sites 4.773 Extant I I V I X S S - Existing grant of permission File No. 20/281 – 36 serviced sites, development pre commencement August 2023 - Infill development, connection to surface water will be required provision available within 150m - Uisce Eireann Site Specific Comment: Water supply for this site likely to be serviced from a 150mm pipe, which runs along the R526. There is a foul water sewer that runs along the R526 to the north of the site, which could be used for foul water discharge.												2		
15	Enterprise and Employment	0.745	n/a	✓	✓	•	√	√	✓	✓	*	✓	s	 Infill site within Patrickswell Enterprise Centre Lands will be served via the existing enterprise centre access roadway Uisce Eireann Site Specific Comment: Water supply for this site likely to be serviced from a 100mm pipe within the highway to the west of the site. Third party agreements would be required for foul water discharges in order to reach the foul sewer on Main Street. 	1
16	Enterprise and Employment	8.783	n/a	✓	√	•	√	√	✓	✓	*	×	М	 Lands adjacent to Patrickswell Enterprise Centre Lands will be served via the existing enterprise centre access roadway <u>Uisce Eireann Site Specific Comment: Water supply for this site likely to be serviced from a 100mm pipe in the highway to the east of the site or from a 200mm pipe on Main Street. Attention is drawn to the 100mm cast iron pipe that runs across this site from the reservoir, which lies to the west of the site. This asset would need to be protected and adequate separation distances maintained. On-site boosting may be required. Foul water discharge connections could be made to the foul sewer that runs along Main Street.</u> 	2

3.3 Amendments to Maps

- 1. Update to Amenity and Sustainable Transport Map
- 2. Provision of new map outlining Active Travel Measures and Priorities
- 3. Update map outlining Indicative Layout of Opportunity Site 2









DO NOT SCALE from this drawing.
Use figured dimensions. Contractor to check all dimensions on site prior to commencement of works. Any discrepancies are to be referred to the ARCHITECT.

DRAWN: CHECKED: DATE REV. BY. CH. JOB NO:

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Part C

4.0 Amendments to Strategic Environmental Assessment and Natura Impact Report

There are no material alterations proposed for the Strategic Environmental Assessment and Natura Impact Report.

5.0 Amendments to the Strategic Flood Risk Assessment

1. Amend Section 7.6.1 Development in Defended Areas in the SFRA as follows:

Patrickswell is not defended by any OPW embankments, but the River Barnakyle is known as channel C1/10/4 under the Maigue Arterial Drainage scheme, in this case the channel capacity has been increased to typically cater for the 1 in 30 year event and the channel is maintained by the OPW. The OPW Arterial Drainage Schemes were designed to improve land for agriculture and the lands which may benefit are referred to as 'benefitting lands'. This is not the same as lands that benefit from flood defences, as defined and discussed in the next paragraph.

In general it should be noted that where a site or area is referred to as being defended for the purposes of determining flood mitigation it is assumed that the defences provide a minimum of the 1% AEP (fluvial) or 0.5% AEP (tidal) standard of protection, and have been through a formal detailed design process and approved by OPW or Limerick City and County Council. Informal defences, which may only be at an agricultural standard, or those developed under the minor works scheme which may provide a lesser standard of protection, are not considered to provide a robust enough standard of protection to allow a moderation in the flood risk mitigation required at a site. The understanding of risks of developing behind defences needs to be explored in the site specific FRA.

The assessment of breach within the scope of a site specific FRA should be proportionate to the likelihood of the defence failing, taking into account the age, maintenance regime, construction type and the presence of any demountable or mechanically operated components. Proximity of the site to the defence and location within the floodplain will also influence the impact of defence breach and overtopping. Defence overtopping during events which exceed the design standard of protection also present a risk to developments and should be addressed regardless of the likelihood of the defence breaching. It is noted that the demountable defences in Patrickswell seem to be retained in-place, but with demountable defences there is the risk of human error in their installation/preparedness.

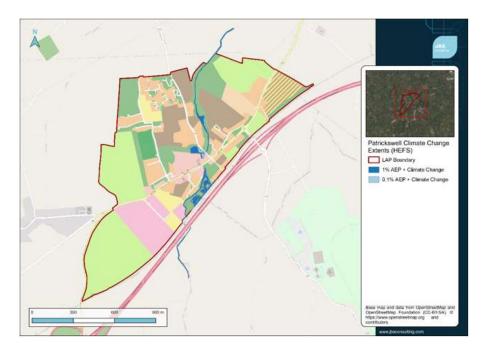
2. Amend Final Paragraph in Section 7.7 of the SFRA as follows:

The JBA fluvial outlines for the 1%+Climate Change show moderate to high sensitivity to climate change within Patrickswell village. JBA mapping illustrating the 1% AEP against the and 0.1% AEP plus climate change (HEFS) is seen in Figure 7-1. Climate Change is specifically reviewed for each area within the settlement under Section 8.

3. Replace Figure 7.1 of SFRA as follows:



Insert new Figure 7-1 as follows:



In accordance with Section 20 of the Planning and Development Act 2000 (as amended), it is recommended that the Local Area Plan is made in accordance with the Draft Plan published on the 2nd September 2023 and the alterations outlined in the Chief Executives Report above.

Taking into account the measures that have been already integrated into the Draft Plan that provide for and contribute towards environmental protection, environmental management and sustainable development, it is identified that any potential effects arising from the Proposed Alterations outlined in this Chief Executive's Report: either are present already (beneficial) and will be further contributed towards; or will be mitigated so as not to be significant (adverse). In addition, some alterations merely propose to add clarification or amended context setting text for Plan provisions and these will not result in significant environmental effects. Consequently, the Proposed Alterations outlined in this Chief Executive's Report do not require SEA.

Furthermore, taking into account the mitigatory measures already in force through the Development Plan and those already included in the Draft Plan, the Proposed Alterations outlined in this Chief Executive's Report the Proposed Alterations will not give rise to any likely significant effect on any European site. Consequently, Stage 2 AA will not be required to be undertaken on the Proposed Alterations.

Screening for SEA and AA and, if required, full SEA/Stage 2 AA will be undertaken on all Proposed Alterations following agreement by the Members.

Vincent Murray

Director of Services – Planning, Environment and Place – Making