

Limerick Development Plan 2022-2028 (as varied)

Proposed Variation No. 3

Section 58 (11) Mayor's Report on Proposed Variation No.3 to
the Limerick Development Plan 2022-2028 (as varied)

10th June 2026



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Section 1

1.1 Introduction

This report presents the submissions and observations made following publication of Proposed Variation no. 3 to the Limerick Development Plan, 2022 – 2028 (as varied) and sets out the Mayor’s responses and recommendations to the issues raised. The report forms part of the statutory procedure for preparing a variation to a Development Plan that is set out in Section 58 of the Planning and Development Act 2024 (as amended).

Under the Planning and Development Act 2024, the Mayor is required to prepare a report on the submissions and observations received in respect of the Proposed Variation, to respond to the issues raised and to make recommendations in relation to the proposed variation, taking into account the proper planning and sustainable development of the area, the statutory obligations of the Planning Authority and relevant policies or objectives for the time being of the Government or any Minister of the Government.

This report is submitted to the Members of Limerick City and County Council for their consideration as part of the process of Variation No. 3 to the Limerick Development Plan 2022-2028 (as varied).

1.2 Reason for Proposed Variation No. 3

Proposed Variation No. 3 to the Limerick Development Plan 2022–2028 (as varied) is to respond to the recent changes in National planning policy, namely the publication of the National Planning Framework (NPF) First Revision and the publication of the following Section 28 Guidelines:

- i. NPF Implementation: Housing Growth Requirements, July 2025,
- ii. Planning Design Standards for Apartments, Guidelines for Planning Authorities, July 2025 and
- iii. Sustainable Residential Development and Compact Settlement Guidelines, 2024.

1.3 Contents of Proposed Variation No. 3

The Proposed variation consists of amendments to Volume 1, Written Statement, Volume 2a Maps and Settlement Capacity Audit and Volume 6, Supporting Strategies, in so far as it relates to the Building Heights Strategy and the Housing Strategy and Housing Need Demand Assessment. The variation comprises proposed amendments to the following:

Volume 1, Written Statement and Appendices as follows:

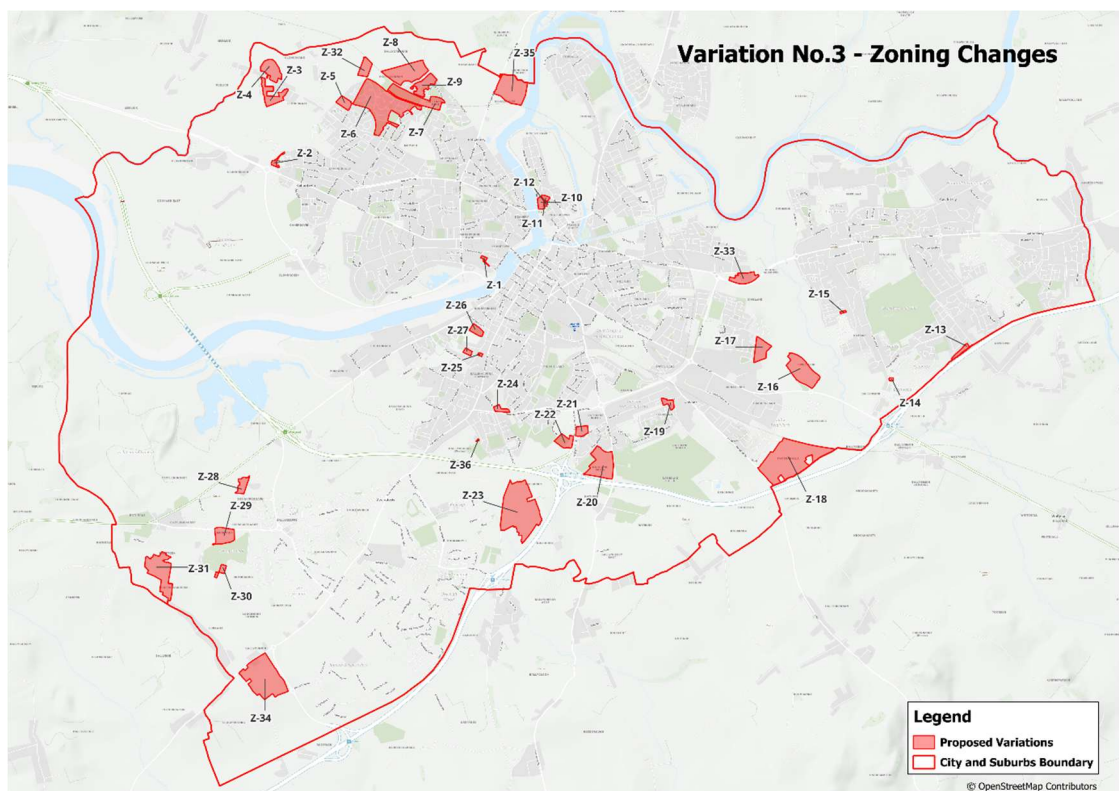
- Amendments to Chapter 2, Core Strategy including updated Core Strategy table, and updated densities ranges to ensure consistency Section 28 Ministerial Guidelines as referenced above

- Amendments to Chapter 3, Spatial Strategy including new objectives and amendments to existing objectives to support and facilitate the activation of zoned lands for residential use.
- Amendments to Chapter 11, Development Management Standards to ensure consistency with Section 28 Ministerial Guidelines as referenced above.
- Amendments to sections of the following chapters of the Plan
 - Chapter 1 – Introduction, Vision and Strategic Overview
 - Chapter 4 – Housing
 - Chapter 5 – A Strong Economy
 - Chapter 7 – Sustainable Mobility and Transport
 - Chapter 8 – Infrastructure

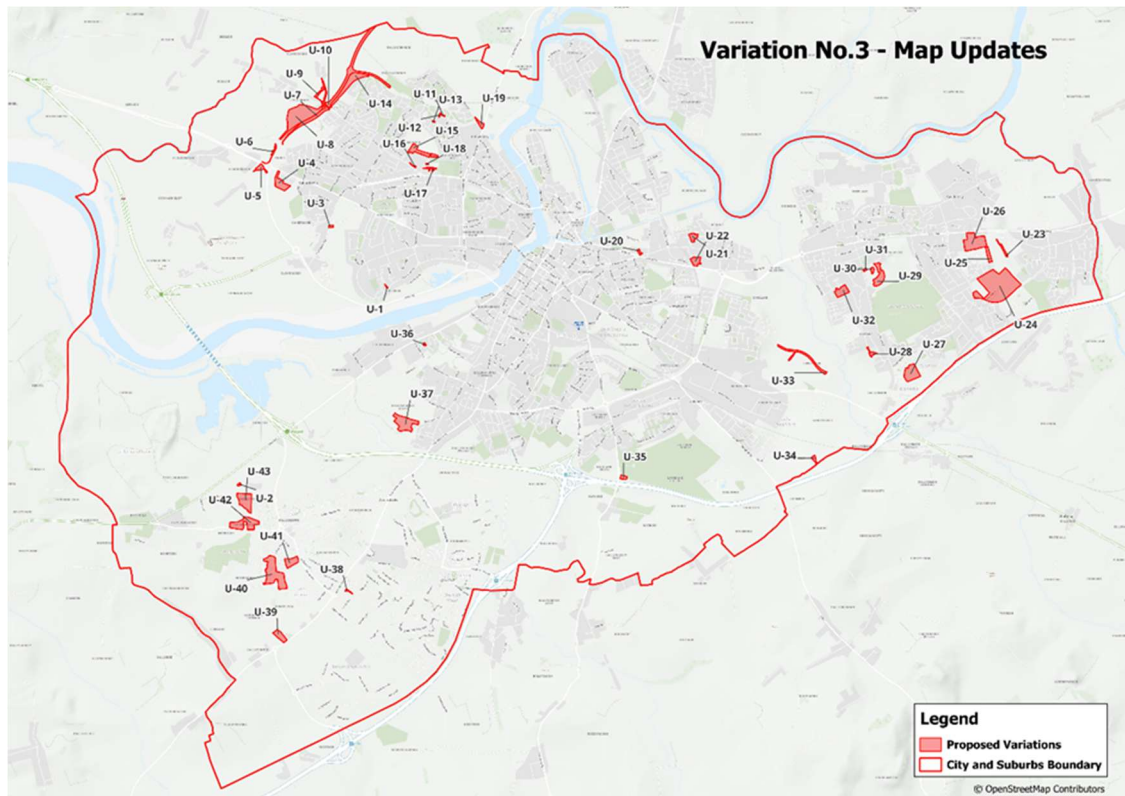
Chapter 12 – Land Use Zoning Strategy

Chapter 13 – Implementation and Monitoring

- I. Amendments to Appendix 1: Section 28 Guidelines Compliance
- II. Volume 2a maps and Settlement Capacity Audit.
- III. Proposed amendments to land use zoning are put forward for a number of identified lands within Limerick City and Suburbs, including Mungret and Annacotty, to facilitate residential development and strategic projects. Sites identified with a “Z” prefix denote specific lands subject to these proposed zoning amendments.



- IV. Proposed amendments to land use zoning are put forward to reflect development that has occurred since the adoption of the Plan and to capture the current land use context within Limerick City and Suburbs, including Mungret and Annacotty. These updates, including ancillary areas such as roads and related infrastructure, are identified by a “U” prefix and denote sites where existing zonings have been revised to align with the established land use pattern.



- V. Proposed amendments to the Settlement Capacity Audit maps and tables for Limerick City and Suburbs reflective of zoning changes and the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024).

Volume 6, Supporting Strategies

- I. Updated Housing Strategy and Housing Need Demand Assessment, to inform policy for the remaining period of the Limerick Development Plan to 2028 and beyond.
- II. Proposed amendments to Policy in the Building Height Strategy and subsequent changes to Development Plan objectives in so far as it relates to building height.

The Proposed Variation is accompanied by:

- A Strategic Environmental Assessment (SEA) Screening Determination and SEA Environmental Report (of the likely significant effects on the environment of implementing the proposed Variation) pursuant to the European Strategic Environmental Assessment Directive (2001/42/EC) and the European Union (Land Use Planning – Strategic Environmental Assessment) Regulations 2025;

- An Appropriate Assessment (AA) Screening Determination and Appropriate Assessment Screening Report – pursuant to Article 6(3) of the European Habitats Directive (92/43/EEC) and the Planning & Development Act 2024 (as amended); and
- A Strategic Flood Risk Assessment (SFRA), in accordance with the relevant Section 28 Guidelines.

1.4 Public Display Period

The Proposed Variation was placed on public display for a period of not less than 4 weeks from Saturday 18th April until Monday 18th May 2026 inclusive. A total of thirty five (35) written submissions were received within the statutory time frame in response to the public display period.

1.5 Structure of the Report

Section 1 (this section) contains an overview of the Proposed Variation, the reason for it, its contents and details of public display.

Section 2 includes a list of bodies / persons who made submissions in relation to the proposed variation, including any submissions on the Strategic Environmental Assessment or Appropriate Assessment. A summary of the submission made and the Mayor's response is included, together with any recommended actions or amendments in respect of the proposed Variation.

Section 3 outlines the recommended Material Alterations.

Note, any paragraph, policy or objective to be amended in the Proposed Variation No. 3 is identified as follows:

- Text in black is as per adopted Limerick Development Plan 2022 – 2028.
- Text in green denotes new text as part of the Proposed Variation No. 3.
- Text in red strikethrough denotes text to be removed as part of the Proposed Variation No. 3.
- Text in blue denotes new or revised wording recommended in this report following consideration of submissions on Variation No. 3 and the accompanying documents.
- Text in blue strikethrough denotes wording recommended for removal in this report following consideration of submissions on Variation No. 3 and the accompanying documents.

Submissions received which are considered to fall outside the scope of Proposed Variation No. 3, and which do not relate specifically to the Proposed Variation, including either the written amendments or the zoning of identified sites within Limerick City and Suburbs including Mungret and Annacotty in the Variation are included within the report.

However, modifications can only be made where they relate back specifically to the proposed Variation and cannot be a material alteration of another provision of the Development Plan which was not the subject of the Proposed Variation.

1.6 Strategic Environmental Assessment (SEA)/Appropriate Assessment (AA)

Taking into account the other measures relating to environmental management and protection that are already integrated into the existing Development Plan and/or the Proposed Variation, the Mayor's Recommendations for amendments would not give rise to any likely significant effect on the environment or any European Site. Therefore, neither SEA nor Stage 2 AA would be required for alterations if these are agreed as such.

Section 58(13)(b) and (c) of the Act requires a determination to be made as to whether Strategic Environmental Assessment (SEA) or Appropriate Assessment (AA) is required in respect of any proposed material alteration of the Proposed Variation. This process will be undertaken once the proposed material amendments are finalised.

1.7 Next Steps

It is required that the report of the Mayor be prepared and submitted to the Elected Members not later than 8 weeks after giving notice of the intention to make the Proposed Variation.

In accordance with Section 58(12)(a) of the Planning and Development Act 2024 the Elected Members shall consider the Proposed Variation and the report of the Mayor. The Elected Members are then required, in accordance with Section 58(12)b of the aforementioned Act, to complete their consideration of the Proposed Variation and the report of the Mayor within 6 weeks of receiving the Mayor's Report. Following this, the Elected Members must, in accordance with Section 58(12)(c) of the Planning and Development Act 2024, by resolution to make the variation to the Development Plan, either with or without the proposed alterations or they may refuse to make it. As material alterations are recommended by the Mayor a further period of public consultation for a minimum of 4 weeks is required.

In reviewing the Development Plan in accordance with Sections 53 and 54 of the Planning and Development Act 2024 (as amended), and in the making of a Development Plan under Section 55 or a variation under Section 58 of the Act, the Planning Authority is required to ensure that the proper planning and sustainable development of the area is provided for. The Planning Authority must also ensure that the Development Plan is materially consistent with the National Planning Framework, the National Marine Planning Framework where applicable, the Regional Spatial & Economic Strategy for the Southern Region, and any relevant national planning policies and measures.

In addition, the Planning Authority is required to take due account of relevant national planning policy guidance, matters pertinent to the preparation and making of the Development Plan, and any likely significant effects on the functional area of adjoining planning authorities. Consideration must also be given to any relevant transport strategies prepared by the National Transport Authority, as well as the protection of water sources. Furthermore, in the case of a coastal planning authority, regard must be had to the Marine Planning Policy Statement prepared under Section 6 the Maritime Area Planning Act 2021.

Section 2 – Submissions Received

Sub. No.	Submission Received	MyPoint Submission Ref. No.
1	Office of the Planning Regulator (OPR)	LCC-C504-V3LDP-28
2	Office of Public Works (OPW)	LCC-C504-V3LDP-16
3	National Transport Authority (NTA)	LCC-C504-V3LDP-31
4	Transport Infrastructure Ireland (TII)	LCC-C504-V3LDP-3
5	Maritime Area Regulatory Authority (MARA)	LCC-C504-V3LDP-2
6	Uisce Éireann (UÉ)	LCC-C504-V3LDP-23
7	Electricity Supply Board (ESB)	LCC-C504-V3LDP-24
8	Department of Education and Youth	LCC-C504-V3LDP-35
9	The Land Development Agency (LDA)	LCC-C504-V3LDP-27
10.	David Kelly	LCC-C504-V3LDP-1
11.	N/M20 Cork to Limerick Project Office	LCC-C504-V3LDP-8
12.	Coakley O'Neill Town Planning Ltd. on behalf of Homeland Projects Ltd.	LCC-C504-V3LDP-4
13.	Coakley O'Neill Town Planning Ltd. on behalf of Homeland Projects Ltd.	LCC-C504-V3LDP-5
14.	Jim Hughes / Fehily Timoney and Company on behalf of Shannon Commercial Enterprises DAC	LCC-C504-V3LDP-18
15.	Town + Country Resources Ltd. on behalf of John Hurley & Olivia Grimes	LCC-C504-V3LDP-12
16.	Coakley O'Neill Town Planning Ltd. on behalf of Homeland Projects Ltd.	LCC-C504-V3LDP-10
17.	Coakley O'Neill Town Planning Ltd. on behalf of Homeland Projects Ltd	LCC-C504-V3LDP-11
18.	Evanwood Residents' Association	LCC-C504-V3LDP-20
19.	Limerick Chamber	LCC-C504-V3LDP-13
20.	Town + Country Resources Ltd. on behalf of Kirkland Developments	LCC-C504-V3LDP-19
21.	AK Planning on behalf of Barice Investment Ltd	LCC-C504-V3LDP-21
22.	Seán McIlfratrick on behalf of An Taisce	LCC-C504-V3LDP-25
23.	Sheila Pitt	LCC-C504-V3LDP-29
24.	Construction Industry Federation (CIF) Mid-West Branch	LCC-C504-V3LDP-32
25.	St Gabriel's Foundation	LCC-C504-V3LDP-33
26.	HRA Planning on behalf of Ballykeefe Property Developments Limited	LCC-C504-V3LDP-7
27.	MKO on behalf of Grangechurch Ltd.	LCC-C504-V3LDP-6
28.	DTW Construction Ltd. on behalf of Montpellier Developments	LCC-C504-V3LDP-9
29.	Tom Doheny on behalf of Clancy Homes	LCC-C504-V3LDP-17
30.	Alan Ryan	LCC-C504-V3LDP-15
31.	Barker McCarthy on behalf of landowners at Dromsally Woods, Cappamore	LCC-C504-V3LDP-14
32.	AK Planning on behalf of Tom O'Connor	LCC-C504-V3LDP-26

33.	Tom Phillips + Associates on behalf of Arrowdale Limited	LCC-C504-V3LDP-22
34.	Laurence and Elizabeth Lahiff	LCC-C504-V3LDP-30
35.	McCarthy and Woulfe	LCC-C504-V3LDP-34

2.1. Submissions Summaries, Responses and Mayor's Recommendations

Thirty-five (35) submissions were received in relation to Proposed Variation No. 3 of the Limerick Development Plan 2022-2028 (as varied).

1	Name/Group: Office of the Planning Regulator Ref: LCC-C504-V3LDP-28	
	Submission summary:	Mayor's Response
	Overview This submission has been made by the Office of the Planning Regulator (OPR) following its statutory assessment of Proposed Variation No. 3 to the Limerick Development Plan 2022–2028. The submission identifies 2 no. Recommendations and 4 no. Observations across 4 no. Key Themes, to ensure consistency with the Planning and Development Act 2024 and alignment with national and regional policy frameworks. The OPR supports the approach taken in the Variation, including the implementation of housing growth requirements, the rezoning of lands to facilitate residential development, the increase in density ranges in sustainable locations, and the focus on compact growth and coordinated infrastructure delivery. The identification of Moyross as a key regeneration opportunity area in Objective M01 and associated compatible land use zonings and the integration of public transport improvements and community infrastructure is also strongly welcomed. 1. Implementation of the Housing Growth Requirements The OPR notes that the proposed Variation appropriately targets population growth to	Overview The Office of the Planning Regulator is thanked for its submission, the contents of which are noted. The Planning Authority acknowledges the positive feedback from the OPR in relation to the overall approach of the proposed Variation, including the alignment with national policy objectives for compact growth, the identification of lands to support housing delivery, and the integration of infrastructure considerations. The recognition of regeneration opportunities, including in areas such as Moyross, is also welcomed and aligns with the strategic objectives of the Development Plan. 1. Implementation of the Housing Growth Requirements Noted.

Limerick City and its suburbs in line with national policy, and supports the additional residential zoning, considering Limerick is strongly positioned to meet housing growth requirements to 2030. However, it advises that a small number of sites require further review to fully realise a plan-led approach and to avoid zoning lands in peripheral or non-sequential locations without adequate justification. (i) Recommendation 1 - Rosbrien The OPR recommends that a more plan-led and coordinated approach be taken to the lands at Rosbrien (Amendment Z23), including the preparation of a framework plan for the wider Rosbrien area, encompassing lands between the N18, M20 and the potential railway corridor (disused Irish Cement railway). The submission highlights that the lands are not currently served by adequate public transport, are located at a distance from existing services, and would require investment in infrastructure including roads, footpaths, lighting, surface water and wastewater. It further notes that the lands could generate higher traffic volumes and that the rationale for rezoning the lands to New Residential from Data Centre/Agriculture, has not been clearly justified. The OPR therefore recommends that the proposed Variation be made excluding Amendment Z23 pending the preparation of a comprehensive framework plan supported by a transport strategy and engagement with key stakeholders including the NTA, TII, Iarnród Éireann, OPW and Uisce Éireann.	(i) Recommendation 1 - Rosbrien Similar observations were made by the NTA and Transport Infrastructure Ireland on this issue. While it is acknowledged that the lands are not currently served by existing or proposed public transport infrastructure, as identified in the submissions, the subject lands are located within the built-up area of Limerick City and Suburbs and represent a sequential consolidation of the wider urban footprint, situated between the City Centre and the established residential neighbourhood of Dooradoyle. In this context, the lands constitute a logical and sustainable extension of the existing urban structure. Furthermore, it is considered that the zoning of appropriately located, sequential lands is an important enabler of investment in infrastructure, including public transport. In this regard, the absence of zoning would not support the progression of sustainable transport provision in this location. Having considered these submissions, and in particular the requirement for a more coordinated and plan-led
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	approach to transport provision, it is proposed to retain the residential zoning on the lands and include a new Objective requiring that a Local Transport Framework be prepared for the wider Rosbrien area. Accordingly, the site specific Objective RN01 will be amended to require that any development of the Rosbrien lands is guided by the Local transport framework informed by an Area-Based Transport Assessment, which will be prepared by the Local Authority in consultation with Transport Infrastructure Ireland and the National Transport Authority to ensure that the proposed development of this site Z23 is aligned with the capacity of the surrounding transport network and supports a transition towards more sustainable travel patterns.
(ii) Observation 1 - Settlement Hierarchy The OPR advises that, having regard to the city status of Limerick and the likelihood that higher densities will be achievable on serviced, well-located lands within the built-up area boundary, the Planning Authority should include data on expected housing yields derived from the highest density assumptions in Table 2.6. The submission further highlights the need to clearly demonstrate the relationship between projected housing yields, household growth to December 2030, and the overall quantum of zoned land provision, in order to ensure full alignment with National Planning Framework objectives and to substantiate the capacity of zoned lands to deliver the projected growth.	(ii) Observation 1 - Settlement Hierarchy Noted. In response, the relevant table will be amended to include an additional columns identifying the medium and maximum potential housing yield based on the highest density assumptions applied. The existing tables already provide clear information in relation to housing growth and zoned land provision, including “Housing Growth Requirements June 2025 – December 2030”, “Zoned Land Required (ha.) June 2025 – December 2030” and “Total Undeveloped Zoned Land (ha.) with Residential Potential”. It is considered that these columns collectively demonstrate the relationship between projected

2. Masterplans Crossagalla is identified as a strategic site requiring a single integrated masterplan; the OPR notes that the delivery of a proposed new road link between the R512 and the Old Ballysimon Road would necessitate crossing the railway line. (i) Observation 2 - Crossagalla The OPR recommends that Objective CA O1 be amended to require meaningful consultation with Iarnród Éireann and the National Transport Authority prior to the agreement of any masterplan, to ensure that the proposed road connection over the railway line is properly integrated with transport infrastructure and aligned with regional policy on coordinated land use and transport planning. 3. Tall Buildings The Office notes a number of inconsistencies in relation to the policies/objectives relating to tall buildings in respect of maps 3.6 and 6.8. (i) Observation 3 - Tall Buildings The submission identifies inconsistencies in the wording of policies relating to tall buildings. The OPR has highlighted that there is ambiguity in relation to whether development should be assessed “and” or “or” with reference to identified locations in respect of Maps 3.6 and 6.8 – Tall Buildings at City Level. Specifically, the OPR refers to the wording in Objective CGR O9, Policy BH2 and Policy TB2. The OPR	growth, density assumptions and land capacity but will be renamed to provide further clarity. 2. Masterplans Noted (i) Observation 2 - Crossagalla The observations in relation to the need for enhanced coordination at Crossagalla are noted. Objective CA O1 will be amended to ensure that appropriate consultation with relevant transport authorities, including Iarnród Éireann and the National Transport Authority, is clearly provided for in the preparation and agreement of any masterplan for the area. 3. Tall Buildings Noted (i) Observation 3 – Tall Buildings The inconsistency in the use of ‘and’ and ‘or’ between Objective CGR O9, Policy BH2 and Policy TB2 is acknowledged. In the interest of clarity and consistency in application, the text of Policy TB2 will be amended to replace the wording ‘and in accordance with the locations’ with ‘or in accordance with the locations’, to ensure a clear
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recommends that these policies be reviewed and clarified to ensure consistency across the Development Plan. 4. Flood Risk Management – Recommendation 2 The OPR raises concerns in relation to flood risk management and the supporting Strategic Flood Risk Assessment (SFRA). It identifies the absence of Plan Making Justification Test for a number of sites and inconsistencies between flood mapping datasets. Having regard to flood risk management and in consideration of National and Regional policy, the OPR has recommended the following: (i) Include amendments to the written statement which incorporates information from Section 2.1 of the SFRA. (ii) Update the SFRA to provide Justification Tests for a number of identified sites. - Z9 - Z10 - Z11 - U2 - U3 - U8 - U37 - U42 - U43 Further to the justification tests as above, where the criteria cannot be satisfied and the zoning is proposed to be retained to reflect the existing land use, the Planning Authority should include appropriate policies and objectives to restrict any further development which may introduce people or property into areas of identified flood risk, increase flood risk elsewhere, or interfere with established flow path.	and consistent interpretation of the policy framework. 4. Flood Risk Management – Recommendation 2 Noted, see response below (i) Noted, the aforementioned text from the SFRA will be integrated into <i>Objective CAF O21 Identified Flood Risk as requested.</i> (ii) Noted, the sites are addressed as follows: Z9 & U8 - Small Area to which flood relates has been rezoned as open space. (Refer to updated map in Section 3.3 of this report.) Z10, Z11, U2, U3, U37, U42 & U43. - A Justification Test has now been completed (provided in Section 3 of this report). These sites relate to previously developed lands and did not pass the justification test. However, the text to be integrated into Part F) and G) of Written Objective CAF O21 as outlined above, will limit development at these sites. Future development will be subject to site specific flood risk assessments; and comply with the flood risk management provisions of the Plan as
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Where sites satisfy criteria (i) & (ii), and only a portion of the subject sites are at risk of flooding, mitigation may be proposed. (iii) the OPR recommends that further site specific investigation should be undertaken to determine the need for Stage 3 Flood Risk Assessments in respect of Amendments Z17 (Ballysimon / Towlerton), Z23 (Rosbrien), and U24 (Newtown, Castletroy). Amendments to zoning maps may be required as a result. (iv) The OPR also recommends that a register of key flood risk infrastructure is provided in the Development Plan with defended areas shown on a map (v) Observation 4 - Flood Risk Management – Climate Change Scenario	varied, including structural and non-structural risk management measures. (iii)Noted, individual responses to sites outlined are as follows: Z17 (Ballysimon/ Towlerton): Following further analysis, an unmapped watercourse has been identified within this site and in response, a small parcel of land, located within Flood Zone A is proposed to be zoned as Open Space and Recreation. (Refer to updated map in Section 3.3 of this report.) Z23 (Rosbrien) – It is concluded that the watercourse is no longer extant and therefore no need for a Stage 3 SFRA. U24 (Newtown, Castletroy): Following site analysis (inclusive of an onsite visit) it is confirmed that there is no watercourse at U24 therefore there is no Flood Risk A or B and need for Stage 3 SFRA. The rezoning of these lands to Existing Residential reflects what has been fully developed onsite. (iv) The focus of the variation is to accelerate housing delivery and as such the creation of such a register at this point is not considered within this scope. This may be reviewed in the Development Plan review. (v) Observation 4 - Flood Risk Management – Climate Change Scenario See response to Recommendation 2 - Flood Risk Management above -
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The submission also highlights the need to address climate change impacts on flood risk at a number of locations, including - Z7 (Moyross Avenue) - Z10 (King's Island) - U1 (North Circular Road) - U4 (Knockhill, Ennis Road) - U37 (Greenpark, Dock Road), and recommends the inclusion of appropriate policies/objectives within the Development Plan. Conclusion Overall, the OPR requests that the Planning Authority address the recommendations and observations, noting that recommendations relate to potential breaches of legislative or policy requirements and must either be implemented or appropriately justified. The submission emphasises the importance of ensuring that zoning, infrastructure provision and environmental considerations are fully aligned in the finalisation of Proposed Variation No. 3.	As outlined above, additional text is proposed for inclusion into <i>Objective CAF O21 Identified Flood Risk</i> in order to address new or more intensive permissible uses on Variation No. 3 lands that overlap with Flood Zones A or B and with Future Climate Scenario Risk Areas and with extensions of existing uses or minor development on Proposed Variation No. 3 lands that overlap with Flood Zones A or B and with Future Climate Scenario Risk Areas. All future development shall be assessed in accordance with Objective CAF O21 to ensure compatibility and adherence to the criteria set out in this objective. Conclusion Noted. The issues raised have been addressed.
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Mayor's Recommendation:

Recommendation 1 – Rosbrien:

Insert new Amendment after Section 3.4.5.7 Rosbrien in Chapter 3 as follows:

Objective TF 01-Local Transport Framework: It is an objective of the Council to;

Prepare a local transport framework for the wider lands at Rosbrien (taking account of the Area Based Transport Assessment methodology or similar) in consultation with National Transport Authority, Transport Infrastructure Ireland and Iarnród Éireann to include the following;

(i) appropriate provision of sustainable transport options to serve future residents of the area in consultation.

(ii) Pedestrian and cycle linkages through the area and over the railway line towards Dooradoyle to provide greater connections to retail and community facilities.

Insert the following text under section 3.4.5.7 Rosbrien and amend associated **Objective RNO1 – Rosbrien** (Amendment No. 33) as follows:

The frontage of the site has been identified as being at risk of flooding and is accordingly zoned for Open Space and Recreation. Any future development proposals must be supported by a comprehensive Site Specific Flood Risk Assessment (FRA) in accordance with the Planning System and Flood Risk Management Guidelines. Development of the lands shall be guided by an agreed Masterplan which shall include relevant stakeholder consultation, prepared in consultation with Limerick City and County Council and relevant bodies including the National Transport Authority and Iarnród Éireann, which shall address matters including access and movement, phasing, public open space provision, infrastructure delivery, surface water management (inclusive of SuDS), urban design principles and residential layout. The Masterplan shall ensure a coordinated, high-quality and sustainable approach to the development of these lands.

Objective RN 01 - Rosbrien- It is an objective of the Council to:

- a) Require the comprehensive, coordinated and plan-led development of these lands through the preparation of a single, integrated masterplan for the entire landholding. The masterplan shall be informed by the Local Transport Framework as per objective TF O1 prepared by suitably qualified professionals and shall be subject to consultation with, and agreement by, the Planning Authority prior to the submission of any planning application. The masterplan shall include relevant stakeholder consultation, with Limerick City and County Council and relevant bodies including the National Transport Authority and Iarnród Éireann, to ensure a coordinated and plan-led approach to development.
- b) Development shall provide for an appropriate range of residential densities, in accordance with the *Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities*, the principles of compact growth and the efficient use of serviced land.
- c) A Site Specific Flood Risk Assessment which shall provide detail on the most suitable point of access to this site from the Rosbrien Road in line with the provision of the Flood Risk Management Guidelines for Planning Authorities, 2009.
- d) A Transport and Traffic Assessment shall be undertaken to assess the impact of the proposed development and setting out mitigation measures, including the delivery by the developer of a continuous footpath to include active travel measures along the full Rosbrien Road site frontage and the provision of safe, accessible, and permeable pedestrian connections within the site.

Observation 1: Settlement Hierarchy:

Amend Table 2.6 Settlement Hierarchy and Household Growth up to December 2030 plus zoned land provision, to include an additional column identifying the medium and maximum potential housing yield based on the highest density assumptions applied.

Rename Column “Total Undeveloped Zoned Land with Residential Provision” to Zoned Land Provision”.

Observation 2: Crossagalla:

Amend text for Objective CA O1 – Crossagalla as follows:

- a) Require the comprehensive, coordinated and plan-led development of these lands through the preparation of a single, integrated masterplan for the entire landholding. The masterplan shall be prepared by suitably qualified professionals and shall be subject to consultation with, and agreement by, the Planning Authority prior to the submission of any planning application. The masterplan shall include relevant stakeholder consultation, with Limerick City and County Council and other relevant bodies including the National Transport Authority, Transport Infrastructure Ireland and Iarnród Éireann, to ensure a coordinated and plan-led approach to development.
- e) The development shall deliver a coordinated, developer-led road network linking the R512 and the Old Ballysimon Road, including the construction and delivery of those sections of the road network within the ownership/control of the developer, in accordance with Map 6 in Volume 2(A) of the Development Plan and in agreement with the Planning Authority. The design and delivery of this infrastructure shall have regard to the requirements of relevant transport bodies, including Iarnród Éireann and the National Transport Authority, and shall ensure the appropriate integration of the proposed route with existing and planned transport infrastructure, including the railway line.
- f) Any proposal shall require a Transport and Traffic Assessment and Road Safety Audit to assess cumulative impact of development in the area and incorporate measures to safeguard the continued capacity, safety and efficiency of the national road networks and associated junctions.

Observation 3- Tall Buildings

Amend text of Policy TB2: Tall Buildings outside the City Centre

Limerick City and County Council will aim to protect the character and characteristics of the City by limiting the location of tall buildings outside the City Centre (inner and outer areas). Generally tall buildings will only be permitted outside of the City Centre at designated District Centres, at Local Centres, where justified on infill and brownfield sites identified in the Settlement Capacity Audit, at Strategic Employment Locations, at appropriate locations within the Regeneration Areas ~~and~~ or in accordance with the locations and ‘Tall Building Classifications’ shown on Map 6.8 of this Building Height Strategy for Limerick City.

Recommendation 2 - Flood Risk Management

(i) Insert the following Part (f) and Part (g) into *Objective CAF O21 Identified Flood Risk* as follows:

- (f) New or more intensive permissible uses on Variation No. 3 lands that overlap with Flood Zones A or B or with Future Climate Scenario Flood Risk Areas (as identified in Appendix I of the accompanying SFRA Addendum) shall be limited to water compatible uses. This limitation shall take primacy over any other related land use zoning provision. Proposals for developments within these areas shall be accompanied by a site specific flood risk.

(g) Extensions of existing uses or minor development on Proposed Variation No. 3 lands that overlap with Flood Zones A or B or with Future Climate Scenario Flood Risk Areas (as identified in Appendix I of the accompanying SFRA Addendum) shall comply with requirements of the Planning System and Flood Risk Assessment Guidelines, and associated circular, including providing detailed design specifications as may be required to facilitate the impact of development. Extensions of existing uses or minor development within flood risk areas shall not: obstruct important flow paths; introduce a number of people into flood risk areas; entail the storage of hazardous substances; have adverse impacts or impede access to a watercourse, floodplain or flood protection and management facilities; or increase the risk of flooding elsewhere.

(ii) Update the following sites based on further analysis undertaken as part of the Mayor Report:

- Site Z9: Rezone lands in Flood Zone A from Community and Education to Open Space and Recreation to reflect extent of flood zone.
- Site U8: Rezone portion of lands proposed for rezoning from Education and Community to Open Space and Recreation.
- Update SFRA to include Justification Test for Z10 & Z11 at Kings Island, U2 at Mungret, U3 at Clonmacken Road, U37 Greenpark, U42 & U43 Skehacreggan Mungret

(iii) Update the following site based on further analysis undertaken as part of the Mayor Report:

- Z17 (Ballysimon/ Towlerton): Rezone lands identified under Flood Zone A from New Residential to Open Space and Recreation.

(iv) No Change

(v) See change to 5(i)

2	Name/Group: Office of Public Works - Ref: LCC-C504-V3LDP-16	
	Submission summary:	Mayor's Response
	The submission from the Office of Public Works (OPW) welcomes the opportunity to comment on the proposed Variation No. 3 to the Limerick Development Plan and acknowledges the Council's continued commitment to applying the Planning System and Flood Risk Management Guidelines. 1. Flood Risk Management (FRM) - General Guidance The submission highlights the need to integrate flood risk management into plan-making, including avoiding inappropriate development in flood-prone areas and factoring in the impacts of climate change in accordance with the revision of the National Planning Framework (2025) and specifically National Policy Objective 78. 2. Nature-based Solutions and Sustainable Urban Drainage Systems The OPW also highlights the importance of nature-based solutions and Sustainable Urban Drainage Systems (SuDS) to manage surface water and deliver wider environmental benefits. 3. Justification Test The OPW raises concerns regarding a number of proposed zoning changes that would allow highly vulnerable development on lands affected by identified flood risk. It notes that several of these lands overlap with Flood Zones A and B and relevant national flood mapping datasets. In particular, it points out that Plan-Making Justification Tests have not been undertaken for a number of these sites. The submission recommends that these areas be reviewed, with a focus first on avoiding flood risk or, where necessary,	The Office of Public Works (OPW) is thanked for their submission and their contents are noted. 1. Flood Risk Management (FRM) - General Guidance Noted. 2. Nature-based Solutions and Sustainable Urban Drainage Systems Noted, relevant provisions have already been integrated into the existing Limerick Development Plan 2022-2028. 3. Justification Test Flood Zone mapping informed the preparation of land use zoning, allowing the SFRA to arrive at the following conclusion: "All undeveloped sites where land use zoning is proposed to be changed under the Proposed Variation are situated within Flood Zone C. This is the Flood Zone with the lowest flood risk. The uses permissible / open for consideration under the Land Use Zoning Objectives being proposed for

substituting more appropriate land uses. Where such zonings are retained, it emphasises the need for clear justification and strong policy measures to manage development. These sites include: • Z9: Rezoned from Open Space and Recreation/Ancillary Area to highly vulnerable New Residential. • Z10: Rezoned from Existing Residential to City Centre • Z11: Rezoned from New Residential to City Centre • U2: Rezoned from Ancillary Area to Enterprise and Employment • U3: Rezoned from Agriculture to highly vulnerable Existing Residential. • U8: Rezoned from Agricultural to Open Space and Recreation, and from Ancillary Area to Education and Community Facilities. • U37: Rezoned from New Residential to highly vulnerable Existing Residential. • U42: Rezoned from New Residential to highly vulnerable Existing Residential. • U43: Rezoned from New Residential to highly vulnerable Existing Residential. While welcoming the inclusion of provisions within the variation to limit development in flood risk areas and control extensions or minor works, the OPW advises that these measures should be formally embedded as Development Plan policies or objectives.	these sites are considered to be appropriate to the relevant Flood Zone. However, a smaller number of previously developed Proposed Variation No. 3 sites include lands that overlap with Flood Zones A or B. A number of these zoning updates include a change that reflect the current use(s) at this location” Additional text is proposed for inclusion under Objective CAF O21 as is outlined in response to the Office of Planning Regulator. This will ensure that new or more intensive permissible uses shall be limited to water compatible uses and such development involving extensions or minor developments shall comply with requirements of the Planning System and Flood Risk Assessment Guidelines. Individual comments to sites highlighted in submission are provided as follows: • Z9: Proposed Variation provided for the rezoning from Open Space and Recreation/Ancillary Area to New Residential. A small portion of this site falls within Flood zone A. In order to ensure compliance with flood guidelines, it is proposed to rezone this area to Open Space and Recreation. (see Map in Section 3.3 of this report) • Z10, Z11, U2, U3, U37, U42 & U43 - A Justification Test has now been completed (provided in Section 3 ‘Volume 4 – Environmental Reports’ of this report). These sites relate to previously developed lands. The sites did not
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	4. Consideration of Climate Change Impacts The submission also stresses the importance of addressing future flood risk arising from climate change at plan-making stage, noting that some zonings may be affected by projected flood extents and should be dealt with at development management stage: • Z7: Rezoned from Education and Community Facilities/Open Space and Recreation/Ancillary Area to Mixed Use. • Z10: Rezoned from Existing Residential to City Centre. • U1: Rezoned from Open Space and Recreation to Existing Residential. • U4: Rezoned from New Residential to Existing Residential. • U37: Rezoned from New Residential to Existing Residential.	pass the justification test, however, the text to be integrated into the Variation (Part F and G) of Written Objective CAF O21 as outlined above, will limit development at these sites. Future development will be subject to site specific flood risk assessments; and comply with the flood risk management provisions of the Plan as varied, including structural and non-structural risk management measures. • U8: In order to reflect the extent of the Connagh to Knockalisheen Distributor Road, it is proposed to change the portion of lands proposed for rezoning to Education and Community to Open Space and Recreation and, no further action is required. See map in Section 3.3 of this report. 4. Consideration of Climate Change Impacts Noted See response to OPR Submission 1 Recommendation 2 - Additional text is proposed for inclusion into <i>Objective CAF O21 Identified Flood Risk</i> in order to address new or more intensive permissible uses on Variation No. 3 lands that overlap with Flood Zones A or B and with Future Climate Scenario Risk Areas and with extensions of existing uses or minor development on Proposed Variation No. 3 lands that overlap with Flood Zones A or B and with Future Climate Scenario Risk Areas. All future development shall be assessed in accordance with Objective CAF O21 to ensure compatibility and adherence to the criteria set out in this objective.
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5. Unmapped Watercourses The submission further identifies issues relating to unmapped watercourses affecting certain sites. It advises that the Council apply the staged flood risk assessment process to determine the presence and extent of risk, and to undertake detailed assessment where necessary to inform zoning decisions (a Stage 3 Detailed Flood risk Assessment may be required). This applies to the following sites: • Z17 – Bloodmill Road – New Residential • Z23 – Rosbrien – Open Space and Recreation/New Residential • U24 – Newtown – Existing Residential 6. Register of Key Flood Risk Infrastructure The OPW recommends the preparation of a register of flood defence infrastructure, including details such as protection	5. Unmapped Watercourses The SFRA is an Addendum to the original SFRA undertaken for the existing Development Plan, which was subject to a period of public consultation. The SFRA for the existing Development Plan does not identify Flood Zones for the mapped watercourses referred to in the submission at these sites. Individual comments on sites raised are as follows: Z17 (Ballysimon/ Towlerton): Following further analysis, an unmapped watercourse has been identified within this site and in response, a small parcel of land, located within Flood Zone A is proposed to be zoned as Open Space and Recreation. (Refer to updated map in Section 3.3 of this report.) Z23 (Rosbrien) – It is concluded that the watercourse is no longer extant and therefore no need for a Stage 3 SFRA. U24 (Newtown, Castletroy): Following site analysis (inclusive of a onsite visit) it is confirmed that there is no watercourse at U24 therefore there is no Flood Risk A or B and need for Stage 3 SFRA. The rezoning of these lands to Existing Residential reflects what has been fully developed onsite. 6. Register of Key Flood Risk Infrastructure The focus of the variation is to accelerate housing delivery and as such the creation of such a register at
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standards, climate change considerations, ownership, maintenance arrangements and mapping, to ensure such assets are properly considered and safeguarded. 7. Greenpark Dock Road Lands The OPW highlights specific locations where flood risk concerns remain, including lands rezoned for more vulnerable uses despite being within flood risk areas or not meeting justification test requirements. Amendment U37 rezones land from New Residential to Existing Residential. Undeveloped lands to the south are in Flood Zone A and have not passed the Plan Making Justification Test. 8. Conclusion Overall, while supportive of the variation, the submission calls for further refinement of zoning proposals, stronger integration of flood risk policy, and more comprehensive assessment of both current and future flood risk to ensure alignment with national guidance.	this point is not considered within this scope. This may be reviewed in the Development Plan review. 7. Greenpark Dock Road Lands U37 refers to a change of zoning from New Residential to Existing Residential where the development is now built out. The submission refers to lands described as being ‘undeveloped lands in Flood Zone to the South of U37’. While the exact location is not clearly specified, it is considered that the lands in question correspond to those zoned New Residential which are not the subject of this variation and therefore cannot be considered. 8. Conclusion Noted, the issues raised have been addressed.
Mayor’s Recommendation: 1. No Change 2. No Change 3. Update the following sites based on further analysis undertaken as part of the Mayor Report: - Site Z9: Rezone lands in Flood Zone A from Community and Education to Open Space and Recreation to reflect extent of flood zone. - Site U8: Rezone portion of lands proposed for rezoning from community and Education to Open Space and Recreation. - Update SFRA to include Justification Test for Z10 and Z11 at Kings Island, U2 at Mungret, U3 at Clonmacken Road, U37 Greenpark, U42 and U43 at Skehacreggaun, Mungret. 4. Insert the following Part (f) and Part (g) into <i>Objective CAF O21 Identified Flood Risk</i> as follows:	

- (f) New or more intensive permissible uses on Variation No. 3 lands that overlap with Flood Zones A or B or with Future Climate Scenario Flood Risk Areas (as identified in Appendix I of the accompanying SFRA Addendum) shall be limited to water compatible uses. This limitation shall take primacy over any other related land use zoning provision. Proposals for developments within these areas shall be accompanied by a site specific flood risk.
- (g) Extensions of existing uses or minor development on Proposed Variation No. 3 lands that overlap with Flood Zones A or B or with Future Climate Scenario Flood Risk Areas (as identified in Appendix I of the accompanying SFRA Addendum) shall comply with requirements of the Planning System and Flood Risk Assessment Guidelines, and associated circular, including providing detailed design specifications as may be required to facilitate the impact of development. Extensions of existing uses or minor development within flood risk areas shall not: obstruct important flow paths; introduce a number of people into flood risk areas; entail the storage of hazardous substances; have adverse impacts or impede access to a watercourse, floodplain or flood protection and management facilities; or increase the risk of flooding elsewhere.
5. Update the following site based on further analysis undertaken as part of the Mayor Report:
- Z17 (Ballysimon/ Towlerston): Rezone lands identified under Flood Zone A from New Residential to Open Space and Recreation.
6. No Change
7. No Change
8. No change

3	Name/Group:	National Transport Authority (NTA) - Ref: LCC-C504-V3LDP-31
	Submission summary:	Mayor's Response
	The National Transport Authority (NTA) has reviewed the Proposed Variation No. 3 and with reference to the Limerick Shannon Metropolitan Transport Strategy 2040 makes the following observations and recommendations: 1. Proposed Rezoning – Amendment Z23 – Rosbrien The NTA raises strong concerns regarding Amendment Z23 at Rosbrien, noting that the lands are poorly connected to existing services, lack footpaths and cycling infrastructure, and are not served by existing or proposed public transport, including BusConnects. The NTA notes that while the site is classified as having moderate ('orange') access to public	The NTA is thanked for their submission and its contents are noted. 1. Proposed Rezoning Amendment Z23 – Rosbrien See response to OPR submission, recommendation no. 1.

transport and footpaths (criteria used in the Settlement Capacity Audit), it considers that the site falls outside acceptable walking distance to public transport. It advises that acceptable walking distances are typically 400–600m to a bus stop, or up to 1km to a rail station, rather than 1.5km. The distances to public transport may result in a car-dependent form of development. The NTA recommend that in the absence of both existing and proposed sustainable transport provision to the subject lands, any future rezoning of the site should be carefully guided and planned to ensure the appropriate provision of sustainable transport options to serve future residents. However, it has not been sufficiently demonstrated at this time how these challenges would be addressed. It is therefore recommended that the proposed rezoning is not included at this time. 2. Parking Standards The submission also comments on proposed changes to parking standards, noting a relaxation of requirements for high-tech science uses in certain locations (for example Raheen Business Park). The NTA recommends that clear justification be provided for this approach, particularly in areas that will benefit from enhanced public transport under BusConnects.	2. Parking Standards Noted. With regard to the parking standards for High Tech Science proposed changes relates to Limerick City and Suburbs, including Mungret and Annacotty in accessible and intermediate & peripheral locations only. Furthermore, a review of comparable local authorities, indicates that existing parking provision in Limerick is already relatively low for similar uses. Limerick City and County Council is committed to advancing changes to parking standards to support a modal shift towards sustainable transport, in line with the NTA’s objectives, and the 2022 Limerick Development Plan
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		was prepared on the basis that BusConnects would be in place by 2025. However, the Sectoral Investment Plan for Transport 2025, published by the Department of Transport in November 2025, states that the tender for the rollout of BusConnects in Limerick has not yet been awarded and indicates an anticipated construction period of between 2026 and 2030 or later. In this context, a high quality, frequent and reliable public transport service is not yet in place to support a significant shift in travel behaviour towards public transport and it is considered the proposed amendment to the aforementioned parking standard is acceptable in this instance. However, this will be reviewed in the Development Plan review, when more clarity is available on the delivery timeline of BusConnects in Limerick. Accordingly, it is considered appropriate to retain the existing parking standards for High Tech Science uses, as set out in Proposed Variation No. 3 at this time.
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Mayor's Recommendation:

1(i) Amend Objective RN O1 Rosbrien as follows:

It is an objective of the Council to:

- a)** Require the comprehensive, coordinated and plan-led development of these lands through the preparation of a single, integrated masterplan for the entire landholding. The masterplan shall be informed by the Local Transport Framework as per objective TF O1 prepared by suitably qualified professionals and shall be subject to consultation with, and agreement by, the Planning Authority prior to the submission of any planning application. The masterplan shall include relevant stakeholder consultation, with Limerick City and County Council and other relevant bodies including the National Transport Authority and Iarnród Éireann, to ensure a coordinated and plan-led approach to development.

- b) Development shall provide for an appropriate range of residential densities, in accordance with the *Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities*, the principles of compact growth and the efficient use of serviced land.
- c) A Site Specific Flood Risk Assessment which shall provide detail on the most suitable point of access to this site from the Rosbrien Road in line with the provision of the Flood Risk Management Guidelines for Planning Authorities, 2009.
- d) A Transport and Traffic Assessment shall be undertaken to assess the impact of the proposed development and setting out mitigation measures, including the delivery by the developer of a continuous footpath to include active travel measures along the full Rosbrien Road site frontage and the provision of safe, accessible, and permeable pedestrian connections within the site.

(ii) Insert new Objective into Section 3.4.5.7 Rosbrien in Chapter 3

Objective TF 01- Local Transport Framework: It is an objective of the Council to:

Prepare a local transport framework for the wider lands at Rosbrien (taking account of the Area Based Transport Assessment methodology or similar) in consultation with National Transport Authority, Transport Infrastructure Ireland and Iarnród Éireann to include the following;

(i) appropriate provision of sustainable transport options to serve future residents of the area in consultation.

(ii) Pedestrian and cycle linkages through the area and over the railway line towards Dooradoyle to provide greater connections to retail and community facilities

2. No Change

7 Name/Group: Transport Infrastructure Ireland (TII) - Ref: LCC-C504-V3LDP-3		
	Submission summary:	Mayor's Response
	Transport Infrastructure Ireland welcomes consultation on Proposed Variation No. 3 to Limerick Development Plan 2022-2028. 1. Amendment No. 27 TII refers to the amendments associated with Objective TN O1 – Towlerton which requires the submission of a Mobility Management Plan, Traffic and Transport Assessment and Road Safety Audits for any development proposal in the area. TII states that the Council will be aware that the nearby M7/N24 Junction (J29) currently has very little reserve capacity to facilitate further trip generating developments.	TII is thanked for their submission, the contents of which are noted. 1. Amendment No. 27 Noted. The requirement for Mobility Management Plans, Traffic and Transport Assessments and Road Safety Audits under Objective TN O1 – Towlerton is acknowledged as an important mechanism in assessing development proposals. It is proposed to amend Objective TN O1 – Towlerton to strengthen requirements for the assessment of

The submission notes the importance of carrying out Traffic and Transport Assessments in accordance with Objective TN O1 – Towlerton, which assesses the cumulative impact of development in the area and includes measures to safeguard the capacity, safety and efficiency of the national road network and relevant key junctions, in accordance with policy requirements. 2. Amendment No. 32 TII notes the proposed rezoning of lands measuring c. 24.5ha at Crossagalla from Enterprise and Employment and Existing Residential to New Residential. While a masterplan is proposed to guide development, no detail is provided on its preparation, stakeholder consultation or adoption. TII considers that clarity is required in relation to this proposed masterplan, including stakeholder engagement and an appropriate adoption framework. Given the proximity to the M7 and junctions with capacity issues, TII emphasises the need for a coordinated, plan led approach to safeguard the capacity, safety and operational efficiency of the national road network and mitigation measures should be included in this regard. TII emphasises that the cumulative impacts of any proposals for the area should be considered and assessed as part of any masterplan. This would be carried out as part of a transport framework in consultation with TII and the NTA utilising the Area Based Transport Assessment methodology. It is important that stakeholder consultation is carried out and	cumulative transport impacts, in line with national policy, and to promote sustainable travel patterns while minimising impacts on the national road network. The need to safeguard the capacity, operational efficiency and safety of the M7, N24 and associated junctions will continue to inform the assessment of development proposals in this area. 2. Amendment No. 32 The importance of a coordinated, plan led approach to development at Crossagalla, having regard to the proximity to the M7 and associated junction capacity constraints is recognised. It is proposed to amend the wording of Proposed Amendment No. 32 to provide greater clarity on the preparation, consultation and agreement of any future masterplan including stakeholder engagement with TII and the NTA, and the potential need for an appropriate framework to support its role in informing development management decisions. In addition, the need for an evidence-based transport and movement framework, including assessment of cumulative impacts and identification of mitigation measures to safeguard the operational efficiency and safety of the national road network, will be examined. In this regard, it is proposed to amend text of Proposed Amendment No. 32, Objective CA O1 Crossagalla
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the framework plan should be incorporated into a statutory plan, especially if the masterplan will guide decisions for the area. Necessary mitigation measures should be incorporated into the framework to safeguard the network. 3. Amendment No. 33 TII notes the proposed rezoning of lands measuring c. 23ha at Rosbrien from Data Centre / Agriculture to New Residential / Open Space and Recreation / Agriculture, located near M7 Junction 30 and M20 Junction 2. They note that a masterplan will be prepared for the lands. TII considers that clarity is required in relation to this proposed masterplan, including stakeholder engagement and an appropriate adoption framework, particularly if it is to inform development management decisions. TII acknowledges that the amendment requires a Traffic and Transport Assessment but considers that site specific transport assessments are insufficient in the context of multiple nearby growth areas (including Z20, Z21, Z22 and Z23), and emphasises the need for a coordinated, area-based approach. TII recommends the preparation of a Strategic Transport Assessment for the wider area, informed by an Area Based Transport Assessment methodology (or similar), in consultation with TII and the NTA.	to require Transport and Traffic Assessment and Road Safety Audit to assess cumulative impact of development in the area and incorporate measures to safeguard the continued capacity, safety and efficiency of the national road networks and associated junctions. 3. Amendment No. 33 See response to OPR submission, recommendation no. 1.
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Mayor's Recommendation:		
1. Amend Objective TN O1 – Towlerton as follows: a) (e) Require all development proposals to be accompanied by a Mobility Management Plan, Traffic and Transport Assessment, and Road Safety Audit to assess cumulative impact of development in the area and incorporate measures to safeguard the continued capacity, safety and efficiency of the national road networks and associated junctions, prepared in accordance with Chapter 3 of the DoECLG Spatial Planning and National Roads Guidelines, to support sustainable movement patterns and safeguard road safety. 2. Amend Proposed Amendment No. 32, Objective CA O1 Crossagalla as follows: a) Require the comprehensive, coordinated and plan-led development of these lands through the preparation of a single, integrated masterplan for the entire landholding. The masterplan shall be prepared by suitably qualified professionals and shall be subject to consultation with, and agreement by, the Planning Authority prior to the submission of any planning application. The masterplan shall include relevant stakeholder consultation, with Limerick City and County Council and other relevant bodies including the National Transport Authority, Transport Infrastructure Ireland and Iarnród Éireann, to ensure a coordinated and plan-led approach to development. e) The development shall deliver a coordinated, developer-led road network linking the R512 and the Old Ballysimon Road, including the construction and delivery of those sections of the road network within the ownership/control of the developer, in accordance with Map 6 in Volume 2(A) of the Development Plan and in agreement with the Planning Authority. The design and delivery of this infrastructure shall have regard to the requirements of relevant transport bodies, including Iarnród Éireann and the National Transport Authority, and shall ensure the appropriate integration of the proposed route with existing and planned transport infrastructure, including the railway line f) Any proposal shall require a Transport and Traffic Assessment and Road Safety Audit to assess cumulative impact of development in the area and incorporate measures to safeguard the continued capacity, safety and efficiency of the national road networks and associated junctions. 3. Insert new Objective into Section 3.4.5.7 Rosbrien in Chapter 3 as follows: Objective TF O1-Local Transport Framework: It is an objective of the Council to Prepare a local transport framework for the wider lands at Rosbrien (taking account of the Area Based Transport Assessment methodology or similar) in consultation with National Transport Authority, Transport Infrastructure Ireland and Iarnród Éireann to include the following; (i) appropriate provision of sustainable transport options to serve future residents of the area in consultation.		

- (ii) Pedestrian and cycle linkages through the area and over the railway line towards Dooradoyle to provide greater connections to retail and community facilities

Amend **Objective RN O1 Rosbrien** as follows:

It is an objective of the Council to:

- a) Require the comprehensive, coordinated and plan-led development of these lands through the preparation of a single, integrated masterplan for the entire landholding. The masterplan shall be informed by the Local Transport Framework as per objective TF O1 prepared by suitably qualified professionals and shall be subject to consultation with, and agreement by, the Planning Authority prior to the submission of any planning application. The masterplan shall include relevant stakeholder consultation, with Limerick City and County Council and other relevant bodies including the National Transport Authority and Iarnród Éireann, to ensure a coordinated and plan-led approach to development.
- b) Development shall provide for an appropriate range of residential densities, in accordance with the *Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities*, the principles of compact growth and the efficient use of serviced land.
- c) A Site Specific Flood Risk Assessment which shall provide detail on the most suitable point of access to this site from the Rosbrien Road in line with the provision of the Flood Risk Management Guidelines for Planning Authorities, 2009.
- d) A Transport and Traffic Assessment shall be undertaken to assess the impact of the proposed development and setting out mitigation measures, including the delivery by the developer of a continuous footpath to include active travel measures along the full Rosbrien Road site frontage and the provision of safe, accessible, and permeable pedestrian connections within the site.

5.	Name/Group:	Maritime Area Regulatory Authority (MARA) Limited - Ref: LCC-C5O4-V3LDP-2
	Submission summary:	Mayor's Response
	The Maritime Area Regulatory Authority (MARA) acknowledges the proposed Variation No. 3 to the Limerick Development Plan 2022-2028 and outlines its statutory role under the Planning and Development Act. MARA highlights its responsibility for regulating development within and adjacent to the maritime area.	MARA is thanked for their submission and their responsibility for regulating development within and adjacent to maritime areas is noted.
	It also reminds Limerick City and County Council of its obligation to refer relevant planning applications to MARA at validation stage. The submission	Noted.

emphasises Limerick City and County Council's duty to ensure that the proposed variation is materially consistent with the National Marine Planning Framework (NMPF), particularly in relation to land-sea interactions. While most zoning changes will not directly impact on or interact with the maritime area, attention is drawn to lands at King's Island (Z10, Z11 and Z12) and Monabraher (Z35) which directly adjoin the Maritime Area. In this regard, MARA advise that any planning application located below the High-Water Mark may require a Maritime Area Consent (MAC).	Noted, the Planning Authority acknowledge that any planning application located below the High-Water Mark may require a Maritime Area Consent (MAC) prior to the submission of any planning application.
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Mayor's Recommendation:

No change.

6	Name/Group: Uisce Éireann (UÉ) - Ref: LCC-C504-V3LDP-23	
	Submission summary:	Mayor's Response
	Uisce Éireann (UÉ) welcomes the proposed Variation No. 3 and continues to engage with the Council as the Limerick Development Plan progresses. 1. Water and Wastewater Services UÉ states that updated Water and Wastewater Capacity Registers issued in April 2026 reflect current and planned capacity (planned capacity considered where projects are planned for completion within the 2025–2029 Capital Investment Plan period). However, all projects remain subject to change, due to funding availability and potential delays, including delays associated with statutory consents. Capacity levels may need to be reassessed if demand increases, with capacity increases possible subject to future investment plans. UÉ also highlights its support for growth in smaller settlements through the Small Towns and Villages Growth Programme,	Uisce Éireann is thanked for their submission, the contents of which are noted. 1. Water and Wastewater Services Noted. The Council will continue to align growth with infrastructure delivery through ongoing engagement with Uisce Éireann. Noted.

which targets locations already served by UÉ where capacity constraints have been identified. 2. Developer-Led Infrastructure UÉ refers to a Guidance Document for developer-led infrastructure, including standards for both nature-based and non-nature-based solutions to support smaller multi-unit housing developments. 3. Water Treatment and Network Capacity Limerick City and Suburbs are supplied by the Clareville Water Treatment Plant. Upgrades are underway to improve drinking water quality and environmental compliance, alongside a major project that will increase capacity by 30–40% by 2029. Additional investment in the wider water network is also planned, including in Moyross and Mungret. 4. Wastewater Treatment and Network Capacity The city is served by Bunlicky and Castletroy wastewater treatment plants. While both currently have capacity, Castletroy is more constrained and is being upgraded, with additional capacity expected by 2028/2029. Planned improvements at Bunlicky will enhance capacity and environmental performance. Associated upgrade works are also planned for Corcanree pump station. Ongoing network upgrades including sewer rehabilitation and new pump stations are facilitating growth. 5. Provision for Utilities within Zoning Matrices	2. Developer-Led Infrastructure Noted. The variation supports developer-led infrastructure, subject to compliance with Uisce Éireann standards, environmental safeguards and the protection of receiving waters, as reflected in amendment No.42 of Chapter 8. 3. Water Treatment and Network Capacity The projects underway and planned are noted and welcomed. The Planning Authority will continue to liaise with Uisce Éireann on an on-going basis. 4. Wastewater Treatment and Network Capacity The projects underway and planned, are noted and welcomed. The Planning Authority will continue to liaise with Uisce Éireann on an on-going basis. 5. Provision for Utilities within Zoning Matrices
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UÉ emphasises that sufficient provision must be made in the Development Plan to allow for the delivery of water services infrastructure on zoned and unzoned lands. They request that public services and utilities is a land use category in the matrix and that these services are ‘permissible’ or ‘open for consideration’ across all zoning types. Text is included in relation to suggested zoning matrix definitions in this regard including for <i>Public Services, Utilities</i> and <i>Zoning Matrix</i>. They also highlight the need to include a specific provision for lands adjacent to Bunlicky WWTP and Corcanree pump station to facilitate upgrades, ensure adequate capacity, and support long-term growth in line with environmental and national policy requirements. They suggest the following objective: <i>“It is the objective of Limerick City and County Council to support Uisce Éireann in the upgrade of Limerick Wastewater Treatment Plant, Corcanree pumpstation and the development of the Regional Bioresource Centre, to ensure continued environmental compliance, to support both the existing and future growth and development of Limerick City into the future and to comply with the National Wastewater Sludge Management Plan.”</i> They further note that to ensure these infrastructure projects can proceed, it is critical that lands adjacent to this plant site and the pump station site are zoned appropriately to ensure that utilities are permitted.	The request to facilitate utilities across zoning categories is acknowledged. However, this is not considered warranted as such uses are not precluded in any zoning type. Furthermore, objectives IN O6 & IM O9(chapter 8) supports the appropriate development of water services infrastructure. While the Development Plan and the proposed variation support the delivery of essential infrastructure, subject to proper planning and environmental considerations, It is considered appropriate to add text to Objective IN O9 – Public Wastewater contained within Amendment No. 42 of this Variation to support the appropriate development of Bunlicky WWTP and Corcanree pump station as requested. As above, public services infrastructure is not precluded in zoning categories.
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6. Response to Proposed Amendments Observations on the proposed amendments are set out below. (i) General It is recommended that all references to Irish Water be updated to Uisce Éireann. (ii) Volume 1 Chapter 1: Introduction, Vision and Strategic Overview Amendment No. 1,2 - No comment. (iii) Chapter 2: Core Strategy Amendment Numbers 3,4,5 - UÉ note the proposed growth of over 40% in Limerick City and suburbs to 2040, together with updated population and housing projections to 2030. (iii) Chapter 2: Core Strategy Amendment Numbers 6,7,8,9,10,11,12 Clarification is required regarding annual housing targets, population projections and the distribution of growth across settlements in the Metropolitan area and lower tier settlements in the county, including alignment with NPF targets. A similar table to Table 2.6 in current Development Plan would be useful to show projected population increase to 2028 and/or 2030. Inclusion of this table would be useful to outline the rationale for the targeting of population increases set out in the NPF to 2040 and how this works within	6. Response to Proposed Amendments (i) General Text has been incorporated as part of Amendment No. 2 to provide clarity that where organisations or departments are renamed, the most up to date official titles shall apply. In this context, any reference to Irish Water shall be taken to mean Uisce Éireann. (ii) Volume 1 Noted (iii) Chapter 2: Core Strategy Amendment Numbers 3,4,5 Noted. (iii) Chapter 2: Core Strategy 6,7,8,9,10,11,12 The Core Strategy is informed by Section 28 Guidelines NPF Implementation: Housing Growth Requirements. The new Housing Growth Requirements are distributed across all settlements in the Core Strategy as per amendment No.17. Variation No.3 relates to identified zoning changes in Limerick City and Suburbs, including Mungret and Annacioty only and further variations will be undertaken for
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the 2030 timeframe for Limerick, Annacotty, Mungret. UÉ query whether additional population projections are being considered for other settlements in the county. It is further noted that UÉ relies on these projections to assess infrastructure capacity, which may need to be reviewed where higher demand arises. (iv) Chapter 2: Core Strategy Amendment No.'s 12,13 UÉ refer to the lands zoned for town centre/mixed use development within certain settlements and note they are detailed in an infrastructure assessment report and zoning map for Limerick City and Suburbs and a number of Level 4 settlements. Clarification is requested on what level 4 settlements are included. (v) Chapter 2: Core Strategy Amendment No.'s 14,15 It will be necessary to revisit available capacity for existing Local Area Plan areas, and for new plans prepared since the Development Plan was adopted including Newcastle West, Abbeyfeale, Adare, Caherconlish, Castleconnell, Kilmallock, Patrickswell and Rathkeale. If there is a significant increase in overall demand for water services, especially if a settlement falls within the same agglomeration and/or water resource zone as Limerick City and its suburbs, available capacity will need to be reviewed. (vi) Chapter 2: Core Strategy Amendment 16	other zoned settlements across the County. (iv) Chapter 2: Core Strategy Amendment No.'s 12,13 Level 4 Large Villages are contained within Volume 2b of the Limerick Development Plan and do not form part of this Variation. Text relating to the preparation of Local Area Plans for the remaining Level 4 settlements has been removed in line with the provisions of the new Planning Act. No Level 4 villages are being reviewed as part of this Variation. This matter will be considered in further variations. (v) Chapter 2: Core Strategy Amendment No.'s 14,15 As outlined above, Level 4 settlements, including those with associated Local Area Plans, will be incorporated into the Development Plan at a later stage as part of a potential future Variation and do not form part of Variation No. 3. The submission is noted, and further input will be welcomed when this process is undertaken. (vi) Chapter 2: Core Strategy Amendment 16
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No comment. (vii) Update to Table 2.7, footnotes and associated text Amendment No. 17 UÉ note that it would be welcomed if population projections were included in Table 2.7 (including re-number to Table 2.6). UÉ refer to the time period for housing numbers being extended to 2030, with the lowest density scenario representing a potential housing yield of 17,570 to 2030. If medium/higher density scenario is achieved, available capacity will need to be reviewed, and there may be a requirement for network capacity assessments and reinforcements may also be required. (viii) Chapter 3: Spatial Strategy Amendment No's: 18,19,20 and 21-33 Updated Census 2022 population figures and adjustments to zoned land are noted, including reductions in residential and employment zoned lands. UÉ note that ongoing engagement with the Council in relation to infrastructure capacity and the sequencing of development in these areas will continue. (ix) Chapters 4, 5 and 7 Amendment No's. 34, 35, 36, 37, 38, 39,40, 41 No comment. (x) Chapter 8: Infrastructure Amendment No's 42,43 The inclusion of text relating to developer-led and bridging infrastructure is welcomed by UÉ. Reference to Circular NSP 01-2026 is recommended, with an emphasis on	Noted (vii) Update to Table 2.7, footnotes and associated text Amendment No. 17 In the interest of clarity, the medium and high housing growth potential will be added to the Core Strategy. (viii) Chapter 3: Spatial Strategy Amendment No.'s: 18,19,20 and 21-33 The proposed variation updated the zoning of lands that have been developed since the making of the Plan in addition to adding more lands thus providing the most up to date picture of land available. The Proposed Variation adds approximately 106ha of new zoning suitable for residential development, which has the potential by itself to deliver in the order of 4,705, 9,027 or 13,346 units at low, medium and high densities respectively. (ix) Chapters 4, 5 and 7 Amendment No's. 34, 35, 36, 37, 38, 39,40, 41 Noted (x) Chapter 8: Infrastructure Amendment No's 42,43 The Planning Authority notes UÉ's suggestion to add additional text in this area. However, the objective referred to by Uisce Éireann already
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environmental sustainability and protection of the quality receiving waters. Additional text is requested to be included as follows (in bold text): <i>“The provision of developer-led and bridging infrastructure for new residential developments will be considered in line with Circular NSP 01-2026 Developer Led Infrastructure (DLI) Initiative for Wastewater Services to support Housing Delivery and any subsequent revisions. The provision of such facilities will be considered, where the solution is environmentally sustainable and would not affect the quality status of receiving waters.”</i> (xi) Chapter 11 Amendment No’s 44-69 No comment. (xii) Chapter 12: Land Use Zoning Strategy Amendment No’s 70,71,73 Reference is made to earlier comments in Section 1 regarding requested changes to the zoning matrix. No further issues raised. (xiii) Chapter 13, Appendix 1 (Section 28 Compliance) Amendment No. 72 Ongoing engagement in relation to the serviceability of zoned lands is welcomed. 7.Volume 2a: Mapping and Capacity Audits Ongoing engagement on the serviceability of newly zoned lands is welcomed. Potential requirements for network reinforcement and upgrades are highlighted, especially in areas that are served by sewers with a diameter of 150mm or less or watermains with a diameter of 80mm or less.	includes the reference ‘<i>and any subsequent revisions</i>’ and therefore no change is recommended at this time. (xi) Chapter 11 Amendment No’s 44-69 Noted (xii) Chapter 12: Land Use Zoning Strategy Amendment No’s 70,71,73 See response above in <i>Provision for Utilities within Zoning Matrices</i>. (xiii) Chapter 13, Appendix 1 (Section 28 Compliance) Amendment No. 72 Noted 7. Volume 2a: Mapping and Capacity Audits Observations on serviceability, network constraints, SuDS and the separation of surface water are noted. The Council fully supports the use of SuDS and recognises the role of developer-led infrastructure. Issues relating to density and phasing will be addressed through development management. The
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UÉ advise that discharging additional surface water to combined sewers is not permitted. UÉ encourage the separation of stormwater from combined sewers and the use of sustainable drainage measures. Infrastructure upgrades are expected to be developer-led in most cases (unless works already committed by UÉ). On-going engagement with LCCC is welcomed in relation to newly zoned lands including Z6 (>1500 units), Z9 (approx. 450 units), Z17 Ballysimon/Towlerton (approx. 450 units), Z18 (>1500 units), Z22 Toppins Field (>700 units) and Z23 Rosbrien (>700 units) (medium density scenario). UÉ would welcome further detail in relation to the potential densities and sequencing of development at these sites (particularly Crossagalla and Rosbrien). A review of available network capacity will be required if the high-density scenario is progressed. It is noted that connection feasibility is subject to formal agreement and available capacity, which may change over time. A positive Pre-Connection Enquiry does not guarantee a connection, a Connection Agreement with UÉ is required. If connection agreements are entered into or there are any changes to the non-domestic load, the availability of spare capacity may be reduced further. UÉ emphasise that they utilise Core Strategy targets to assess future capacity, and they highlight again that available capacity needs to be revisited if there is a significant increase in demand for water services. While additional zoning is supported, full build-out could place pressure on existing treatment capacity.	need for ongoing capacity assessment is noted. Noted. In the interest of clarity, the medium and high housing growth potential will be added to the Core Strategy. Noted.
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	8. Volume 6: Accompanying Strategies No comment. 9.Environmental Reports UÉ note that their submission should be taken into account in the Environmental Reports.	8.Volume 6: Accompanying Strategies Noted 9.Environmental Reports Noted.
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Mayor's Recommendation:

1. No change
2. No change
3. No change
4. No change
5. Add the following text to **Objective IN 09 – Public Wastewater** contained within Amendment No. 42.
It is the objective of Limerick City and County Council to:

“Support Uisce Éireann in the upgrade of Limerick Wastewater Treatment Plant, Corcanree pumpstation and the development of the Regional Bioresource Centre, in line with the appropriate and necessary environmental and ecological assessments, as required, to support both the existing and future growth and development of Limerick City into the future and to comply with the National Wastewater Sludge Management Plan.”
- 6(i) No change
- (ii) No change
- (iii) No change
- (iv) No change
- (v) No change
- (vi) No change
- (vii) Medium and high housing growth potential will be added to the Core Strategy
- (viii) No change
- (ix) No change
- (x) No change
- (xi) No change
- (xii) No change
- (xiii) No change
7. Medium and high housing growth potential will be added to the Core Strategy
8. No change
9. No change

7	Name/Group: Electricity Supply Board (ESB) - Ref: LCC-C504-V3LDP-24
	Submission summary: Mayor's Response
	ESB welcomes the Variation and acknowledges its role in facilitating housing delivery in response to updated national policy, including the National Planning Framework First Revision and Section 28 Housing Growth Requirements Guidelines. 1. ESB Strategy, Networks and Planning Policy The submission outlines ESB's role in delivering and maintaining electricity infrastructure and highlights their plans for significant investment in infrastructure, including substations and network reinforcement, to address current constraints and facilitate future growth. ESB notes that network capacity constraints already exist in certain areas and that additional infrastructure, including substations and network upgrades, will be required to accommodate increased demand. 2. ESB Networks Primary Engineering Centre - Rosbrien, Limerick The Rosbrien ESB site (2.8 ha) serves as a Primary Engineering Centre, delivering essential services to approximately 250,000 domestic and commercial customers across Limerick, Ennis, Newcastle West, Tipperary, Nenagh, and Roscrea. Purpose-built facilities include a main depot, telecommunications building, garages, workshops, and stores. While ESB is reviewing the site as part of its Net Zero by 2040 strategy, any redevelopment will require independent regulatory approval. Ongoing engagement with stakeholders highlights the need for a regional Networks Depot in Limerick, and The Electricity Supply Board (ESB) is thanked for their submission, the contents of which are noted. 1. ESB Strategy, Networks and Planning Policy Noted. 2. ESB Networks Primary Engineering Centre - Rosbrien, Limerick Noted. In the interest of clarity the site detailed in this submission is not an identified site as part of Proposed Variation No. 3, and no change has been made to the zoning on this site. While the text objective BW O1 has been amended in the variation, this relates to potential redevelopment of Our Lady of Lourdes Community Centre only. Part d) of the objective relating the ESB depot and Adapt House remains unchanged. Notwithstanding the above the importance of the site for essential

any relocation of this facility would require careful consideration, given ESB's licence obligations and the CRU price review process. In this regard, ESB references Objective BW01 – Ballinacurra Weston, which seeks to improve permeability and promote the reuse of underutilised sites, including lands associated with the ESB Rosbrien Engineering Depot. ESB indicates support for engagement on the redevelopment potential of these lands but emphasises the necessity of retaining sufficient lands for essential energy infrastructure. 3. Energy Infrastructure – Medium and Low Voltage Network The submission also references Objective IN O13 (Energy Networks – Resource Efficiency, Electricity and Gas Networks), which supports the sustainable reinforcement and provision of new energy infrastructure, and requests that the Development Plan continue to support and strengthen this approach. ESB further calls for provisions within the zoning framework to ensure that public utilities are permissible across all land use zoning objectives in the zoning matrix, to facilitate timely and cost-effective delivery of infrastructure. 4. Conclusion The submission requests due consideration of the issues raised in the submission	energy infrastructure as outlined in the submission is recognised. The Planning Authority acknowledges ESB's welcome for engagement with LCCC to discuss the potential development of the lands associated with the depot in the knowledge that EBS would require a portion of said lands for essential energy transmission and distribution and look forward to engagement on same as appropriate. 3. Energy Infrastructure – Medium and Low Voltage Network The request to facilitate utilities across zoning categories is acknowledged. However, this is not considered warranted as such uses are not precluded in any zoning type and IN O13 (chapter 8) supports the appropriate development of energy infrastructure. 4. Conclusion Due consideration has been given to the issues raised.
Mayor's Recommendation: 1-4 No change.	

8	Name/Group: Department of Education and Youth - Ref: LCC-C504-V3LDP-35
Submission summary:	Mayor's Response
This submission from the Department of Education and Youth highlights the significant population growth arising from the proposed Variation and the consequent increased demand for school places across Limerick, placing significant pressure on existing schools. 1. Future Provision of Education Infrastructure The submission emphasises the need to plan proactively for education infrastructure, including a preference to expand existing schools for future additional school spaces, providing sites for new schools where required, and ensuring that enabling infrastructure and integration with communities are delivered in tandem with new housing development. The Department specifically asks the Planning Authority to examine the potential of protecting a land buffer around each school to enable them to expand further if required. 2. Future School Provision In terms of future school place provision, the Department notes the following settlements in Table 2.6 of the Proposed Variation and has made the following observations. City and Suburbs, Mungret and Annacotty The Department notes significant projected population growth arising from over 15,000 additional housing units, which would place pressure on existing school capacity and may necessitate the provision of at least two additional primary schools and a potential post-primary school.	The Department of Education and Youth is thanked for its submission the contents of which are noted. 1. Future Provision of Education Infrastructure Where there are undeveloped lands adjoining existing schools, they are zoned for educational purposes to allow for future expansion. 2. Future School Provision Noted. An existing site for Educational and Community is zoned in the Castletroy/Ballysimon area which is capable of providing for future school development with potential to facilitate a primary and secondary school.

Castleconnell The Department considers that projected growth is likely to increase demand for school places; however, this demand may be accommodated through the expansion of existing primary and post-primary facilities, if required. Patrickswell It is noted that projected population increases may result in additional demand for school places, which could potentially be met through expansion of existing school infrastructure. Newcastle West The Department identifies an increase in projected population, which may result in a requirement for an additional primary school, while post-primary demand may be addressed through planned expansion of existing facilities. Abbeyfeale The Department outlines that the projected growth is likely to result in increased demand for school places; however, this could potentially be accommodated through expansion of existing facilities. Kilmallock The Department notes that additional population growth may lead to increased demand for school places, which could be met through the expansion of existing primary and post-primary schools. Rathkeale The Department outlines that projected population increases are expected to generate additional demand for school places, which could be met through the	The Planning Authority acknowledges the importance of integrating educational infrastructure with planned residential development and recognises the role of schools as key enabling infrastructure in supporting sustainable communities. In this regard, the Planning Authority will continue to have regard to the need to facilitate the provision and expansion of educational facilities, including the potential to protect lands or provide for expansion of existing school sites, where appropriate. This is supported by Objective SCS1 010 Educational Facilities of the Development Plan 2022-2028 (as varied). The observations made in respect of individual settlements are noted. Proposed Variation No. 3, identified zoning amendments within the settlement boundary of Limerick City and Suburbs, including Annacotty and Mungret only, in order to ensure that sufficient land is identified to meet accelerated housing demand. Further variations to the Development Plan will consider settlements across the County.
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expansion of existing primary and post-primary schools. Caherconlish The Department highlights that future population growth may result in additional school place demand, which could potentially be addressed through the expansion of existing facilities. 3. General Comments The Department also made reference to the fact that schools are generally considered as enabling infrastructure for housing and, as such, schools should be located within expanding communities. Required infrastructure (i.e. roads, electricity, water, travel links) should be provided in advance (not in the remit of the Department to deliver/fund). 4. Rezoning at Moyross The Department refer to proposed rezonings that are relevant to the education sector. Particular reference is made to Moyross and the objective to relocate the National School. The Department notes their intention to continue operating the school at its current site for the foreseeable future. It is noted that the existing site is proposed to be rezoned to Mixed Use and the Department request that all school sites be appropriately zoned to support school provision. 4. Special Education Needs (SEN) Provision The Department details information regarding the anticipated requirement for additional Special Education Needs (SEN) provision at both primary and post-primary level and highlights the need for flexibility within the system to accommodate this growing demand.	3. General Comments Noted, the Planning Authority agree that schools must be considered as enabling infrastructure for housing. 4. Rezoning at Moyross The Mixed-Use zoning at Moyross will not impact the operation or potential expansion of the school on its current site but rather allows for flexibility at this location having regard to the delivery of the Moyross train Station. 4. Special Education Needs (SEN) Provision Noted.
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	5. School Capacity The submission also highlights the potential pressures on school capacity arising from unforeseen circumstances, such as the Ukrainian crisis, and notes the importance of maintaining flexibility in planning for school provision. The Department welcomes continued engagement with the Planning Authority in relation to the development of both new and existing schools and emphasises the importance of ensuring that sufficient land is zoned to facilitate future educational infrastructure.	5. School Capacity Noted. The Planning Authority will continue to engage proactively with the Department of Education and Youth to ensure that sufficient land is zoned and that appropriate planning frameworks are in place to facilitate the delivery and expansion of school infrastructure in line with population growth as appropriate.
Mayor's Recommendation: 1-5 No change.		

9	Name/Group: Land Development Agency (LDA) - Ref: LCC-C504-V3LDP-27	
	Submission summary: The Land Development Agency (LDA) welcomes the proposed Variation No. 3 and the opportunity to comment. The submission outlines the statutory role of the LDA in delivering affordable and social housing, including through Project Tosaigh and in partnership with local authorities. Reference is made to ongoing and completed collaborations with Limerick City and County Council, including the Gasworks (Dock Road), Mungret College lands, Careys Road and the Colbert Quarter. 1. Register of Relevant Public Lands The LDA refers to the Register of Relevant Public Lands and the 2025 Report on Relevant Public Land, noting that a number of publicly owned sites within Limerick City have been identified with capacity to deliver significant levels of housing, subject	Mayor's Response The Land Development Agency is thanked for its submission, the contents of which are noted. Noted. 1. Register of Relevant Public Lands Noted. In the interest of clarity, the sites profiled here are not identified sites as part of Proposed Variation No. 3, and no change has been made to the zoning on these sites by way of this variation.

	to land availability and enabling infrastructure. A profile is provided of these site, which include - The Gas Works Site - Colbert Quarter - Limerick City Docklands - Sarsfield Barracks Field - University Maternity Hospital - ESB Rosbrien and Clarina Park Land - 2. Proposed Rezoning The submission supports the proposed rezonings under Variation No. 3, including Lands at Roxboro Road (Z20) and Rosbrien (Z23). This will support in providing a housing supply pipeline by enabling publicly owned lands to be progressed for new residential use in a central and strategic locations. 3. Additional Policy Amendments The submission also welcomes the proposed amendments relating to residential density assumptions, the Building Heights Strategy and the integration of the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024) into the Variation.	2. Proposed Rezoning Noted. 3. Additional Policy Amendments Noted, as outlined in the variation it seeks to respond to the recent changes in National planning policy, including the Sustainable Residential Development and Compact Settlement Guidelines, 2024.
Mayor's Recommendation:		
1-3 No change		

10	Name/Group: David Kelly - Ref: LCC-C504-V3LDP-1	
	Submission summary:	Mayor's Response
	1. Scale and Impact of Variation This submission outlines that Proposed Variation No. 3 represents a significant policy shift rather than a minor re-alignment with national policy. Specific reference is made to the increase in permitted densities, the decrease in local growth controls and the fact that the Variation transfers greater	1. Scale and Impact of Variation Proposed Variation No. 3 responds to the recent changes in National planning policy, namely the publication of the National Planning Framework (NPF) First Revision and the publication of the following Section 28 Guidelines:

discretion to the Planning Authority and future guidelines, which will have long-term consequences for residents. 2. Removal of Clear Growth Limits It raises concerns that the removal of settlement-level growth controls reduces certainty for communities and makes it difficult for residents to understand the extent of further development. 3. Apartment Standards, Quality of Life, Parking and Infrastructure It highlights concerns regarding: - apartment standards, particularly in relation to reduced requirements for dual-aspect units, unit mix and storage, noting that reliance on minimum national standards risks poorer quality, less liveable homes and undermines long-term occupancy. - widespread maximum parking standards and car-light/car-free policies which they consider premature without guaranteed public transport improvements, potentially leading to congestion and overspill parking. 4. Discretion vs Certainty	-NPF Implementation: Housing Growth Requirements, July 2025, -Planning Design Standards for Apartments, Guidelines for Planning Authorities, July 2025 and -Sustainable Residential Development and Compact Settlement Guidelines, 2024. The revised densities that form part of this variation have taken due account of the aforementioned Section 28 Guidelines and are consistent with national policy. 2. Removal of Clear Growth Limits The variation includes a revised Core Strategy for settlements across the County which clearly sets out the Housing Growth requirement in each instance. 3. Apartment Standards, Quality of Life, Parking and Infrastructure Noted, however the proposed changes referred to in relation to apartment standards and parking standards are required to ensure compliance with Section 28 Ministerial Guidelines, including the <i>Planning Design Standards for Apartments Guidelines for Planning Authorities and Sustainable Residential Development and Compact Settlements</i>. These Guidelines include Specific Planning Policy Requirements (SPPRs), which planning authorities are obliged to comply with and which take precedence over any conflicting Development Plan policies or objectives. 4. Discretion vs Certainty
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	The submission expresses concern that increased discretion and vague wording reduces certainty for residents by using phrases such as “case-by-case”, “where appropriate”, and “subject to guidelines”). 5. Conclusion The submission requests that Limerick City and County Council reinstate clear growth caps, maintain higher apartment quality standards, provide better sequencing of parking reductions aligned with increased transport provision, and prioritise liveability alongside compact growth.	Noted, as above the amendments reflect changes to national policy and Section 28 Ministerial Guidelines. 5. Conclusion The Core Strategy sets out growth requirements in line with Section 28 Guidelines- NPF Implementation: Housing Growth Requirements. In relation to apartment and parking standards the proposed changes are consistent with SPPR’s which planning authorities are obliged to comply with and which take precedence over any conflicting Development Plan policies or objectives. Accordingly, the proposed variation aligns with national policy.
Mayor’s Recommendation:		
No change.		

11	Name/Group: N/M20 Cork to Limerick Project Office - LCC-C504-V3LDP-8	
	Submission summary:	Mayor’s Response
	1. N/M20 Project Summary The submission outlines the strategic importance of the N/M20 Cork to Limerick Project as a key element of national and regional policy under the National Planning Framework and National Development Plan. It highlights the role of the project in enhancing connectivity between Cork and Limerick by providing a transport corridor, facilitating balanced regional growth, and supporting projected population increases. The submission describes the project as a multi-modal transport solution incorporating active travel, public transport improvements, road infrastructure upgrades and environmental	1. N/M20 Project Summary The N/M20 Cork to Limerick Project Team is thanked for their submission, the contents of which are noted.

	integration measures. It emphasises the project's potential to reduce journey times, improve reliability, enhance road safety and support economic development. 2. Variation No.3 This submission supports proposed Variation No. 3 and notes that the projected population growth for Limerick City and Suburbs reinforces the need for enabling infrastructure such as the N/M20 Project and highlights that the scheme will support planned residential growth areas, including lands in the west and southwest of the city and suburbs, as well as integration with BusConnects. The submission requests that the Council ensure alignment between the N/M20 project and future development areas, and that any zoning changes or alterations to the Development Plan do not adversely impact the design, planning or delivery of the project.	2. Variation No.3 Noted. The Planning Authority will continue to proactively engage with the M20 Project Office, TII and NTA in relation to the assessment of planning applications and zoning changes.
Mayor's Recommendation:		
1-2. No change.		

12.	Name/Group:	Coakley O'Neill on behalf of Homeland Projects Ltd - Ref: LCC-C504-V3LDP-4
	Submission summary:	Mayor's Response
	This submission supports Amendment Z31, which provides for the rezoning of lands at Caheranardrish, Mungret from Agriculture and Existing Residential to New Residential. The submission identifies that the subject lands are appropriately located to support compact and sequential growth. The submission highlights the site's scale, location within the Limerick-Shannon Metropolitan Area, and proximity to services and employment, and notes that	Homeland Projects Ltd., as represented by Coakley O'Neill Town Planning Ltd., is thanked for their submission, the contents of which are noted. Variation No.3 seeks to respond to statutory requirements under the NPF and associated Section 28 Guidelines, which mandate that sufficient land is identified to meet

	adjacent lands are subject to a live large-scale residential development. The submission also references the Limerick Development Plan Core Strategy objectives for Limerick City and Suburbs, Mungret and Annacotty, and the identified need to increase housing delivery to meet projected growth targets. The submission further states that the lands are not subject to Flood Risk Zones A or B, that servicing is feasible, and that the Strategic Environmental Assessment and Strategic Flood Risk Assessment undertaken as part of the Proposed Variation have not identified any likely constraints in relation to the zoning of the site. An Architectural Design Statement accompanies the submission, illustrating how the site can be feasibly developed for housing. The submission requests that the zoning of the lands for residential use under Amendment Z31 be retained in the adopted Variation No. 3.	accelerated housing demand. The subject lands are deemed suitable for this purpose having regard to planning and environmental considerations. Noted. Noted, no change is proposed to Amendment Z31.
Mayor's Recommendation:		
No change.		

13.	Name/Group: Coakley O'Neill on behalf of Homeland Projects Ltd - Ref: LCC-C504-V3LDP-5						
	<table> <tr> <th data-bbox="306 1617 887 1653">Submission summary:</th><th data-bbox="887 1617 1394 1653">Mayor's Response</th></tr> <tr> <td data-bbox="306 1653 887 1944">This submission supports Amendment Z14, which proposes the rezoning of lands at Golf Links Road, Monaleen from Open Space and Recreation to New Residential and requests that it form part of the adopted Variation No.3</td><td data-bbox="887 1653 1394 1944">Homeland Projects Ltd., as represented by Coakley O'Neill Town Planning Ltd., is thanked for their submission, the contents of which are noted.</td></tr> <tr> <td data-bbox="306 1944 887 2018">The submission states that the site is a small brownfield parcel of approximately</td><td data-bbox="887 1944 1394 2018">Amendment Z14 relating to lands at Golf Links Road, Monaleen, proposed</td></tr> </table>	Submission summary:	Mayor's Response	This submission supports Amendment Z14, which proposes the rezoning of lands at Golf Links Road, Monaleen from Open Space and Recreation to New Residential and requests that it form part of the adopted Variation No.3	Homeland Projects Ltd., as represented by Coakley O'Neill Town Planning Ltd., is thanked for their submission, the contents of which are noted.	The submission states that the site is a small brownfield parcel of approximately	Amendment Z14 relating to lands at Golf Links Road, Monaleen, proposed
Submission summary:	Mayor's Response						
This submission supports Amendment Z14, which proposes the rezoning of lands at Golf Links Road, Monaleen from Open Space and Recreation to New Residential and requests that it form part of the adopted Variation No.3	Homeland Projects Ltd., as represented by Coakley O'Neill Town Planning Ltd., is thanked for their submission, the contents of which are noted.						
The submission states that the site is a small brownfield parcel of approximately	Amendment Z14 relating to lands at Golf Links Road, Monaleen, proposed						

0.24 hectares located within the development boundary of Limerick City and Suburbs and directly adjoining established residential development. The submission outlines that the lands were previously zoned for residential use and formed part of earlier planning permissions, including a permission for residential development and a subsequently permitted but unimplemented crèche. It is argued that the rezoning of the lands to Open Space and Recreation under the currently adopted Development Plan does not reflect the site's planning history, character or intended use, noting that the site is fenced, not accessible to the public and does not function as public open space. The submission further states that sufficient public open space is already provided within the adjoining Evanwood estate and the permitted large-scale residential development currently under construction. The submission further states that the proposed rezoning represents an appropriate infill and consolidation of the existing urban area and aligns with national and local policy objectives promoting compact growth, brownfield development and the efficient use of serviced land within existing settlements. Reference is made to the National Planning Framework First Revision, housing delivery targets, and the Core Strategy policies for Limerick City and Suburbs. The submission notes that the site is fully serviced, capable of accommodating a modest, infill, residential development, and is not subject to flood risk or environmental constraints. It also states that the Strategic Environmental	a change of zoning from Open Space and Recreational to New Residential. This site had previously been zoned residential as part phase 3 of the Evanwood development and had planning permission (Pl.ref 16/705) for the provision of a crèche facility intended to serve the surrounding residential estates; however, this was not delivered and the zoning changed to Open Space in the Limerick Development Plan 2022-2028. It is noted that this submission includes plans for an apartment building on the site. It is further noted that the proposed rezoning of the site under Proposed Variation No. 3 to "New Residential" would, in principle, permit the provision of childcare facilities as part of permissible uses. However, the Planning Authority recognises the need for childcare facilities within this part of Limerick City and Suburbs, particularly having regard to the scale of established and permitted residential development in the immediate vicinity. Submission no. 18 (Ref. LCC/C504/V3LDP/20) is also noted from the Evanwood Residents Association expressing clear support for the delivery of childcare infrastructure on these lands, as opposed to further residential development. Therefore, it is considered appropriate to amend the proposed land use zone to Education and Community, which would provide a
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Assessment and Strategic Flood Risk Assessment prepared as part of the Proposed Variation have not identified any likely constraints to the zoning of the lands. The submission requests that the proposed residential zoning under Amendment Z14 be retained in the adopted Variation No. 3. An Architectural Design Statement accompanies the submission, illustrating how the site can be feasibly developed in a compact manner for residential apartments of 1 and 2 bed apartments.	more appropriate and targeted policy framework to ensure the delivery of a crèche / childcare facility on the site, having regard to the established context, needs of the area and the history on site.
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Mayor's Recommendation:

Amend Proposed Amendment Z14 to rezone the lands at Golf Links Road, Castletroy, from proposed *New Residential* to *Education and Community*, having regard to the significant planning history of the site and the identified need for childcare facilities within this established and expanding residential area.

14.	Name/Group:	Fehily Timoney and Company on behalf of Shannon Commercial Enterprises DAC - LCC-C504-V3LDP-18
	Submission summary:	Mayor's Response
	This submission relates to lands at Rosbrien, Limerick, comprising a landholding of approximately 20 hectares, and supports the proposed rezoning of the lands for residential development under Proposed Variation No. 3 to the Limerick Development Plan 2022–2028. The submission welcomes the identification of the lands as a significant opportunity for residential development within the inner suburban area of Limerick City, in close proximity to established residential areas, employment, healthcare, education, retail and recreational facilities. The submission outlines the strategic location of the lands immediately south of the junction of the N18, M20 and M7, with access to existing road infrastructure, and also access connections to foul and surface	Shannon Commercial Enterprises DAC, as represented by Fehily Timoney & Company, is thanked for their submission, the contents of which are noted. Proposed Variation No. 3 includes a site-specific zoning objective for Rosbrien under Objective RN01, which provides for residential development while identifying lands along the site frontage as Open Space and Recreation due to flood risk considerations. The open space and recreation zoning does not preclude the creation of an entrance along the Rosbrien Road. The request to explicitly provide for vehicular access through lands zoned

water drainage arising from the Limerick Main Drainage Scheme. While the overall zoning objective and mapping for the site are welcomed, concern is raised regarding the proposed zoning of lands fronting Rosbrien Road as Open Space and Recreation due to flood risk. The submission contends that Rosbrien Road represents the most appropriate and logical access point for the site, and that a centrally located access through lands identified as Flood Zone B would not exacerbate flood risk. Reference is made to a Site Specific Flood Risk Assessment commissioned in 2019, which identified this suitable access location. The submission requests that Objective RN01 be amended to provide clarity that vehicular access may be accommodated through lands zoned for Open Space and Recreation, subject to a Site Specific Flood Risk Assessment and a Transport and Traffic Assessment, and that the objective allows for the delivery of a vehicular access from Rosbrien Road.	for Open Space and Recreation is noted and deemed appropriate to amend the objective to include same. In addition, and having regard to submissions from the OPR, TII and NTA it is deemed appropriate to further amend RN01 such that any masterplan prepared for the site is informed by a Local Transport Framework to be prepared by the Local Authority.
Mayor's Recommendation: Amend Objective RNO1 Rosbrien as follows Objective RN O1 - Rosbrien- It is an objective of the Council to: a) Require the comprehensive, coordinated and plan-led development of these lands through the preparation of a single, integrated masterplan for the entire landholding. The masterplan shall be informed by the Local Transport Framework as per objective TF O1 prepared by suitably qualified professionals and shall be subject to consultation with, and agreement by, the Planning Authority prior to the submission of any planning application. The masterplan shall include relevant stakeholder consultation, with Limerick City and County Council and relevant bodies including the National Transport Authority and Iarnród Éireann, to ensure a coordinated and plan-led approach to development. b) Development shall provide for an appropriate range of residential densities, in accordance with the <i>Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities</i>, the principles of compact growth and the efficient use of serviced land.	

- c) A Site Specific Flood Risk Assessment which shall provide detail on the most suitable point of access to this site from the Rosbrien Road in line with the provision of the Flood Risk Management Guidelines for Planning Authorities, 2009.
- d) A Transport and Traffic Assessment shall be undertaken to assess the impact of the proposed development and setting out mitigation measures, including the delivery by the developer of a continuous footpath to include active travel measures along the full Rosbrien Road site frontage and the provision of safe, accessible, and permeable pedestrian connections within the site.
- e) The masterplan shall provide for high-quality public open space and recreational facilities and shall incorporate design measures that integrate with and complement the adjoining lands zoned for Open Space and Recreation, respond sensitively to any archaeological features on site, and deliver a coherent, high-quality environment. Sustainable Urban Drainage Systems (SuDS) shall be fully integrated into the layout and design of the development, contributing to effective surface water management, enhanced biodiversity, climate resilience and placemaking.

15. Name/Group: Town + Country Resources Ltd. on behalf of John Hurley & Olivia Grimes - Ref: LCC-C504-V3LDP-12		
	Submission summary:	Mayor's Response
	This submission relates to lands at Crossagalla, Kilmallock Road, Limerick, and expresses full support for Proposed Variation No. 3 as it pertains to these lands. The submission notes that Proposed Variation No. 3 includes amendments to rezone the subject lands from Enterprise & Employment / Existing Residential to New Residential, together with the insertion of a site-specific objective (Objective CA01) to facilitate housing delivery guided by an agreed Masterplan. The submission confirms that the landowners fully support the proposed zoning amendment (Z18) and Insert No. 32 as published, and request that the Planning Authority adopt the proposed provisions without modification.	John Hurley & Olivia Grimes, as represented by Town & Country Resources Ltd., are thanked for their submission, the contents of which are noted. Variation No.3 seeks to respond to statutory requirements under the NPF and associated Section 28 Guidelines, which mandate that sufficient land is identified to meet accelerated housing demand. The subject lands are deemed suitable for this purpose having regard to planning and environmental considerations. Noted, no change is proposed to Amendment Z18.
Mayor's Recommendation:		
No change.		

16.	Name/Group:	Coakley O'Neill Town Planning Ltd. on behalf of Homeland Projects Ltd. – Ref: LCC-C504-V3LDP-10
	Submission summary:	Mayor's Response
	This submission relates to lands at Old Cratloe Road, Clonconane, Limerick, and supports their inclusion under Proposed Variation No. 3 for rezoning to New Residential (Amendment Z4). The submission notes that these lands were previously put forward through the Expression of Interest process and welcomes their inclusion in the Variation. The submission outlines the strategic location of the lands within Limerick City and Suburbs, adjoining existing and proposed residential development, and highlights that the lands are serviceable, accessible and in single ownership. It is identified that the site can contribute to meeting housing targets in line with the National Planning Framework and the Core Strategy of the Development Plan. The submission further provides extensive planning policy justification, emphasising compact growth, sequential development and the need to increase housing supply. Technical information is submitted demonstrating that the lands are capable of delivery, including architectural and engineering feasibility assessments, and it is contended that development can proceed without significant environmental or flood risk constraints.	Homeland Projects Ltd., as represented by Coakley O'Neill Town Planning Ltd., is thanked for their submission, the contents of which are noted. Variation No.3 seeks to respond to statutory requirements under the NPF and associated Section 28 Guidelines, which mandate that sufficient land is identified to meet accelerated housing demand. The subject lands are deemed suitable for this purpose having regard to planning and environmental considerations. Noted, no change is proposed to Amendment Z4.
Mayor's Recommendation:		
No change.		

17.	Name/Group:	Coakley O'Neill Town Planning Ltd. on behalf of Homeland Projects Ltd. – Ref: LCC-C504-V3LDP-11
	Submission summary:	Mayor's Response
	This submission relates to lands at Old Cratloe Road / Redgate, Clonconane, Limerick, and supports their inclusion	Homeland Projects Ltd., as represented by Coakley O'Neill Town Planning Ltd., is thanked for their

	under Proposed Variation No. 3 for rezoning to New Residential (Amendment Z3). The submission confirms that the lands were previously advanced through the Expression of Interest process and welcomes their inclusion in the Variation. The submission outlines the strategic location of the lands within Limerick City and Suburbs, adjoining existing and permitted residential development, and highlights that the lands are serviceable, accessible, capable of delivery and are in single ownership. Supporting documentation is provided, including architectural and engineering feasibility reports, demonstrating servicing via existing and planned infrastructure along the Old Cratloe Road and available access to the site. It is contended that development can proceed without significant environmental or flood risk constraints It is further stated that the lands can contribute to meeting housing delivery targets in accordance with the National Planning Framework and the Core Strategy, and that their development would represent a logical consolidation of the urban area.	submission, the contents of which are noted. Variation No.3 seeks to respond to statutory requirements under the NPF and associated Section 28 Guidelines, which mandate that sufficient land is identified to meet accelerated housing demand. The subject lands are deemed suitable for this purpose having regard to planning and environmental considerations. Noted, no change is proposed to Amendment Z33.
Mayor's Recommendation:		
No change.		

18.	Name/Group:	Evanwood Residents Association – Ref: LCC-C504-V3LDP-20
	Submission summary:	Mayor's Response
	The Evanwood Residents' Association raises concerns regarding the proposed rezoning of lands at Golf Links Road, Castletroy (Amendment Z14) from Open Space/Recreation to New Residential.	The Evanwood Residents' Association is thanked for their submission, the contents of which are noted.

The site was previously granted planning permission for a crèche (ref. 16/705), and there is documented demand for childcare in the area in tandem with residential development. The submission states that essential community infrastructure, particularly childcare, should be delivered alongside or ahead of new housing. As such, they consider the land would be more appropriately zoned for Education and Community uses, to support a sustainable and balanced neighbourhood.	Amendment Z14 proposes a change of zoning from Open Space and Recreational to New Residential. This site had previously been zoned residential as part the wider Evanwood development and had permission for the provision of a crèche facility intended to serve the surrounding residential estates; however, this was not delivered and the zoning changed to Open Space and Recreation in the LDP 2022-2028. It is further noted that the proposed rezoning of the site under Proposed Variation No. 3 to “New Residential” would, in principle, permit the provision of childcare facilities as part of permissible uses. However, the need for childcare facilities is recognised within this part of Limerick City and Suburbs, particularly having regard to the scale of established and permitted residential development in the immediate vicinity. Submission no. 13 (Ref. LCC-C504-V3LDP-5) from Coakley O’Neill on behalf of Homeland Projects Ltd is also noted where indicative apartments are proposed on the site. Therefore, it is considered appropriate to amend the zoning objective to Education and Community which would provide a more appropriate development use to ensure the delivery of a crèche / childcare facility on the site, having regard to the established context, needs of the area and the history on site.
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Mayor's Recommendation:

Amend Proposed Amendment Z14 to rezone the lands at Golf Links Road, Castletroy, from *New Residential* to *Education and Community*, having regard to the significant planning history of the site and the identified need for childcare facilities within this established and expanding residential area.

19.	Name/Group:	Limerick Chamber - Ref: LCC-C504-V3LDP -13
	Submission summary:	Mayor's Response
	1. Introduction Limerick Chamber welcomes LCCC's effort to accelerate housing delivery. Concerns are raised that the variation fails to adequately address critical implementation capacity gaps. 2. Scene Setting Outlines the following four key points to set the scene of their submission: <i>"1. Limerick needs to triple / quintuple its housing output to meet existing demand (lower and upper targets calculated by the Housing Commission).</i> <i>2.The number of homes being built in "city" Local Electoral Areas decreased by one third in 2025.</i> <i>3.Other parts of the "city" i.e. city east, has provided over half the housing of the three city local electoral areas with the city centre area seeing minimal new homes built.</i> <i>4.Limerick is almost 6,000 homes behind its existing LDP target."</i>	1. Introduction Limerick Chamber is thanked for their submission and the contents of it are noted. 2. Scene Setting The National Planning Framework – First Revision (NPF) was published in 2025. The NPF identifies a requirement to plan for approximately 50,000 new homes per annum across Ireland between now and 2034. Further to the publication of the NPF, the Department of Housing, Local Government and Heritage on the 29th of July 2025 issued Section 28 Guidelines – National Planning Framework Implementation Housing Growth Requirements. These Guidelines require Local Authorities to review housing targets in line with the NPF as a key step to accelerate housing delivery. The Guidelines allocate housing targets for each Local Authority to 2034 and subsequently to 2040. Housing targets set out in the Guidelines are based on ESRI modelling of population growth, structural housing demand and

		assumptions relating to “unmet demand”. In this regard, the national target of approximately 55,000 new homes per annum includes a provision for “unmet demand” which will be addressed up to 2034. The housing growth figures included in the proposed variation are therefore based on the allocation provided to Limerick as required under the Guidelines to comply with the higher level NPF. The revised housing growth requirements allocated to Limerick are proposed to be distributed across all settlement levels in the hierarchy as set out in the Core Strategy. As set out in the Guidelines, an additional provision of up to 50% over and above the housing growth requirement was made available to Local Authorities and has been incorporated into the proposed Core Strategy of 3,898 units annually as per amendment No. 17. Since the adoption of the Limerick Development Plan in July 2022, a total of 3,242 residential units were completed across Limerick City and County. This represents 33% of the 9,746 target to date and an underperformance in dwelling delivery is acknowledged. With respect to the City and Suburbs, over 500 units have been completed annually in the three City electoral divisions since 2022. It is noted that 2024 saw an increase in completions
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		to over 751 units, however the underperformance is acknowledged. As a result of underperformance in delivery on the supply side, a significant amount of existing zoned land remains available for development. In this regard, the Planning Authority notes that approximately 4,010 no. residential units have planning permission and are awaiting commencement across Limerick City and Suburbs.
	3. Observations on the Variation The submission outlines the following concerns with the potential delivery of homes on zoned lands: <i>State-owned land</i> -There is a heavy reliance on State-owned land to meet housing delivery targets. State-owned lands are unlikely to deliver the number of homes required by the end of the Plan period and other suitable lands may be omitted that are closer to delivery. Upwards of 3,800 homes are estimated in to be in the category of State-owned land to meet the capacity of the overall zoned lands (approximately 17,500 homes). This represents 22% of housing delivery outlined in the Development Plan. Previous home delivery on State-owned land has been slow which is a concern for housing delivery set out in the Development Plan. <i>Tier 2 Sites</i> -It is also argued that there is a reliance on Tier 2 sites that are not currently serviced	3. Observations on the Variation The Core Strategy Table sets out a Housing Growth Requirement (HGR) of 15,734 units for Limerick City and Suburbs including Mungret and Annacotty to 2030. The 15,743 units includes for a 50% additional provision (ie HGR of 10,489 + 50%). Zoned land provided has a capacity of 17,570 units at the lowest density, 35,911 at medium density and 54,252 at the highest density. The Planning Authority acknowledges the inclusion of state owned lands in the Core Strategy allocation and Settlement Capacity Audit sites. Sites such as the Colbert Quarter are essential to facilitate regeneration, compact and consolidated growth of the City, viability of public transport and reduction in carbon emissions. The removal of state lands such as the Colbert Quarter site would result in a leapfrogging approach and urban sprawl. This would be contrary to National Policy and the proper

	and they are concerned that these homes may also not be deliverable in the Plan period (approximately 1,700 homes which is 10% of the overall capacity). -They consider that these homes will likely not be delivered during the Plan period due to issues such as Irish Water and grid connections. -It is argued that if the lands that are not currently serviced are removed and combined with State-owned lands that are unlikely to be delivered, the potential yield is reduced to just over 11,000 homes. The submission emphasises the importance of sufficient zoned and serviced lands, as quoted by Minister Browne. <i>Other Sites</i> -It is outlined that other lands are challenging to deliver due to issues associated with acquiring sites with multiple folios, legal disputes, lack of sewer connections, reluctance to sell land etc. Approximately 1,800 homes may not be delivered due to these challenges and could reduce the potential yield to 9,000 homes. -Providing housing close to Loughmore Common/Canal could be challenging due to experience of previous planning applications putting approximately 2,000 homes at risk, which could reduce the potential yield to 7,000 homes. 4. Updated HNDA	planning and sustainable compact development of Limerick City and Suburbs. The Local Authority is actively working with all state bodies and landowners in order to facilitate the progression of planning applications and support housing delivery as far as possible within their scope. This includes addressing issues of infrastructure deficits in conjunction with providers such as Uisce Éireann and ESB. The Local Authority is also working to achieve solutions to address issues such as surface water disposal at Loughmore Common. The Planning Authority considers that the majority of lands within the settlement boundary of Limerick City and Suburbs are serviced or serviceable. As set out in the Settlement Capacity Audit, the majority of lands in the City and Suburbs are classified as Tier 1 serviced lands, with lands having access to infrastructure essential to enable development such as water, wastewater and roads etc.. Where lands have been classified as Tier 2 serviceable, this may be on the basis of requiring extensions to water services, however it may alternatively be as a result of requiring extensions to footpaths or public lighting which will ultimately not prevent the progression of development. 4. Updated HNDA
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	The updated HNDA sets out that 10,000 homes must be constructed by 2028. However, only potentially 7,000 dwellings may realistically be developed. 5. City Centre Development/ Flood Zones Concerns are raised with the lack of residential zoning of scale in proximity to the city centre. Since 2022, when initial consultations were taking place for the Development Plan, the Chamber have maintained that sites on the Dock Road are suitable for residential development. The delivery potential of the Dock Road and wider Shannon area remains unrealised. A previous submission made at Material Alterations Amendments stage for the Development Plan identified the Greenpark lands as suitable for development and highlights that the lack of new homes available within walking distance of the city centre is constraining the potential of the city and businesses to thrive. Landbanks at Greenpark and at Colbert Station could deliver housing proximate to the city centre. However, a planning application for Colbert Quarter has not been made. The Greenpark lands should be considered for rezoning to provide residential units given the owners occupation and proven track record for delivery.	The HNDA forecasts a need from 2026-2035. With a need identified of 4,263 per year from 2026-2028 which front loads the longer-term need having regard to the Housing Growth Requirement Figures. 5. City Centre Development / Flood Zones The submission appears to misinterpret the application of the Plan Making Flood Justification test. The lands referred to in the submission are located within Flood zones A and B. NPO 78 of the Revised National Planning Framework states “Promote sustainable development by ensuring flooding and flood risk management informs place-making by: • Avoiding inappropriate development in areas at risk of flooding that do not pass the Justification Test, in accordance with the Guidelines on the Planning System and Flood Risk Management; • Taking account of the potential impacts of climate change on flooding and flood risk, in line with national policy regarding climate adaptation”. The Planning and Development Act both 2000 and 2024 infer a statutory obligation of compliance with this NPO and not mere have regard to. The Planning System and Flood Risk Management – Guidelines for Planning Authorities, 2009 (the Flood Risk Guidelines), deem residential
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	NPO 78 of the NPF states: <i>“Avoiding inappropriate development in areas at risk of flooding that do not pass the Justification Test, in accordance with the Guidelines on the Planning System and Flood Risk Management”</i>. The flood zone lands that are subject to sufficient assessment and pass the Justification Test in the city centre can deliver housing, in a similar manner to LDA development on a site on Dyke Road in Galway. It is disappointing that these areas are not zoned for residential development. Much of the city centre is within a flood zone. To ensure the future development of the city, the Development Plan needs to zone lands that can pass the justification test. Failure to do so will make compact growth extremely difficult.	development highly vulnerable to flooding and inappropriate in Flood Zones A and B. The “sequential approach” for assessment requires the Planning Authority first to consider whether inappropriate development can be avoided and whether a less flood vulnerable development type can be substituted where possible. Only if avoidance and substitution do not rule out the proposed development type is a justification test required. A justification test then must happen at two stages of the planning process: First, a Plan-Making Justification Test (PMJT) – this is done for land-use zoning any flood vulnerable development on land in Flood Zone A and for zoning moderately flood vulnerable development on land in Flood Zone B, during the spatial plan/variation making process. Second, a Development Management Justification Test (DMJT), which is completed in the context of a planning application for any flood vulnerable development land in Flood Zone A and for moderately flood vulnerable development land in Flood Zone B. The Planning Authority have identified sufficient lands as being more suitable for the provision of highly vulnerable uses in accordance with the sequential approach of the Guidelines.
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	6. Density While supporting densification of the city centre, concern is expressed with the viability of developments once the requirement to exceed 50 units per hectare applies, which could constrain development. Concern is raised that housing will no longer be constructed under new density guidelines for “urban neighbourhoods” such as Castletroy, Raheen, Mungret Annacotty, Monaleen etc. without adequate funding mechanisms. They note that Limerick City East has delivered 51% of housing provision over the last 10 years. Developers may increasingly rely on Approved Housing Bodies for higher density developments in these areas. The submission queries whether LCCC have prepared a viability analysis to consider this issue under the new density guidelines. Similar concern is raised with providing densities of 100+ dwellings per hectare in the city centre zone.	6. Density The proposed variation has been prepared in accordance with National planning policy, the National Planning Framework (NPF) First Revision and Section 28 Guidelines, including the Sustainable Residential Development and Compact Settlement Guidelines, 2024. These Guidelines set national planning policy and guidance in relation to the planning and development of urban and rural settlements, with a focus on sustainable residential development and the creation of compact settlements. The Guidelines set out density ranges which are intended to respond to different settlement sizes and contexts, with particular regard to proximity to public transport corridors, commercial and employment centres. It is the Government’s intention that the Guidelines allow for greater flexibility and innovation, while supporting the delivery of a greater range of housing options. In accordance with the provisions of the Planning and Development Act, the Planning Authority are required to prepare the proposed variation in accordance with the Ministerial Guidelines. In this regard, the proposed density zones have been developed in order to comply with the aforementioned Guidelines.
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	7. Targets / Housing Delivery Plan The submission queries whether LCCC has utilised the maximum headroom outlined by the Minister’s Guidelines. This allows for 50% uplift on target number of homes, which would result in 3,898 homes per year. They argue that the higher figure should be aimed for in the Development Plan which aligns with the Housing Commission’s upper demand analysis for Limerick. The submission outlines that a Housing Delivery Plan is needed for Limerick. Previously these plans were only required to consider social and affordable housing. They consider that these previous plans lacked sufficient detail and did not focus on realistic delivery actions. There was an emphasis previously on targets and tenure mixes which is not considered adequate. The HNDA completed as part of the variation outlines that of the 8,738 homes that have planning permission in Limerick, 36% have been commenced. It is considered that Limerick needs an updated Housing Delivery Plan which acknowledges the delivery of schemes with planning permission, and that focuses on both public and private homes.	The preparation of a viability audit is outside of the remit of the Planning Authority. 7. Targets / Housing Delivery Plan As indicated under Item No. 1 above, in accordance with the requirements of the Section 28 Guidelines – National Planning Framework Implementation Housing Growth Requirements, the Planning Authority has incorporated an additional provision of 50% into the Core Strategy figures. This additional provision equates to a housing growth requirement of 3,898 units per annum as set out in the Core Strategy to December 2030. The need for an updated Housing Delivery Plan is outside of the scope of the proposed Variation. However, Mayoral Programme objective ML02 seeks to publish a more credible Housing Delivery Plan, and work is on-going. The Planning Authority, through the Development Plan and proposed Variation have ensured that sufficient lands have been zoned to allow achievement of the housing growth requirements set out in the Core Strategy. In addition, as of the end of April 2026 planning permission is in place for 5,862 no. residential units which are awaiting commencement, across Limerick (4,010 in the City and Suburbs).
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	They consider that a clear disconnect exists between national policy and the enabling of local development. Without sufficient intervention, they consider that it will take over 20 years for the 17,500 homes outlined in the Development Plan to be delivered, thus not meeting the requirements to 2028 and onwards.	
Mayor's Recommendation:		
No change		

20.	Name/Group:	Town + Country Resources Limited on behalf of Kirkland Investments Limited - Ref: LCC-C504-V3LDP-19
	Submission summary:	Mayor's Response
	This submission relates to Amendment No. 27 & objective TN 01-Towlerto, specifically Item (g) which requires the location of car parking underground or to the rear of buildings at the Towlerton campus. They request that this objective is broadened to consider the option of a multi-storey car park at this location, as pre-planning consultation has commenced with the Planning Authority for a multi-storey car park and medical building at the Towlerton campus.	Kirkland Investments Limited, as represented by Town + Country Resources Limited, is thanked for their submission, the contents of which are noted. The Planning Authority consider that appropriately designed multistorey car park may be considered on the subject lands. Item (g) of Objective TN 01 – Towlerton will be amended accordingly.
Mayor's Recommendation:		
Amend Item (g) of Objective TN 01 – Towlerton as follows: Locate car parking underground, or to the rear of buildings or in multi-storey provision, with any necessary surface parking adequately screened, landscaped, and fully integrated into the site design in line with high-quality urban design and placemaking principles.		

21.	Name/Group:	AK Planning on behalf of Barice Investment Ltd - Ref: LCC-C504-V3LDP-21
	Submission summary:	Mayor's Response
	This submission relates to Site 105 in the Settlement Capacity Audit (SCA) located at Kilmallock Road / Ros Mór, identified as a	Barice Investment Ltd. is thanked for their submission, and the issues raised are noted.

	Local Centre zoned site. The submission seeks the removal of Footnote 3 of the SCA, which currently restricts residential development to a maximum of 25% of the overall floor area, thereby requiring a predominantly commercial development on the site. The submission contends that the restriction is no longer appropriate having regard to the revised density provisions under Proposed Variation No. 3, which increase the density range for the site to 35–50 units per hectare. It is argued that the requirement for a 75% commercial floor area is not supported by market demand and renders the site unviable for development. The submission includes an indicative site development strategy demonstrating a predominantly residential scheme with a limited commercial element positioned at the main road frontage and argues that such an approach would better reflect market conditions, support housing delivery, and align with national housing policy. It is proposed that the Planning Authority either remove the restriction entirely or replace it with a more flexible policy approach whereby the mix of uses would be determined at planning application stage based on demonstrated commercial viability.	The subject lands at Ros Mór are zoned as a Local Centre within the Development Plan, the purpose of which is to provide for a mix of uses, including retail, commercial, community and residential development, serving the needs of the surrounding area. In the interest of clarity this site is not the subject of a zoning amendment by way of this variation. In relation to SCA Site 105, Footnote 3, limits the proportion of residential development to 25%. This provision is intended to ensure that Local Centre zoned lands fulfil their intended function by providing an appropriate level of commercial and community uses supporting balanced and sustainable neighbourhood development. The retention of a defined commercial component remains necessary to protect the role and function of the Local Centre zoning and to ensure the provision of local services for the surrounding existing and future residential population. Proposed Variation No. 3 includes the rezoning of lands in the vicinity of the subject site, including Amendment Z18, which provides for new residential development. In this context, the subject site is considered to represent an appropriate and sustainable location for the provision of a Local Centre to support existing and emerging residential communities in the area, including those arising from newly zoned lands.
Mayor's Recommendation:		
No change		

22.	Name/Group: Seán McIlfratrick on behalf of An Taisce Limerick - LCC-C504-V3LDP-25	
	Submission summary:	Mayor's Response
	The submission highlights concern regarding housing delivery in Limerick, referring to recent data indicating significant rent increases and a shortfall in the delivery of housing including social and affordable housing relative to previous targets. It is contended that delivery has not kept up to speed with demand. An Taisce refer to Government targets set in Q4 2025, which indicate that Limerick City and County Council are required to deliver 2,599 council homes by 2034. It is noted that these targets reflect a shift from annual target in favour of long-term targets. In previous annual targets, it is contended that the government assigned Limerick with a target of 1,580 "own built" council houses for 2022 to 2024. It is argued that only 273 units were delivered, which provides a deficit of 1,307 units for this time period. The submission notes that Limerick is facing a significant delivery challenge if this deficit of 1,307 units for 2022-2024 is combined with the new target of delivering 2,599 council houses by 2034 (total requirement is noted as a combined 4,179 units). The submission argues that an average of 600 council houses would need to be built per year until 2034. Further commentary is provided in relation to social and affordable housing targets for Limerick City and County Council. The submission raises concerns regarding the pace and scale of delivery of key strategic housing sites, including projects at Colbert Quarter, the Gasworks and the Cleeves site, and notes the absence of major apartment construction within the city centre. It also highlights issues relating to urban sprawl, the need to maximise the use of existing built-up areas, and concerns	An Taisce Limerick is thanked for their submission, the contents of which are noted. While the concerns in relation to the pace of delivery of development is acknowledged, in the interest of clarity there appears to be some confusion in the figures quoted in the submission. As set out in Amendment No.7 to the written statement, the new Housing Growth Requirement (HGR) 2025 to 2034 for Limerick City and County is 2,599 units annually, adding an additional 50% additional provision to this is 3,898 annually. This HGR relates to all housing tenures and is not purely Council housing as referenced in the submission. The Core Strategy sets a HGR of 21,438 from June 2025-December 2030 providing for 3,898 units annually across Limerick. The HGR figures as provided for in the Section 28 Guidelines – National Planning Framework Implementation Housing Growth Requirements issued July 2025 includes provision for unmet demand. Additional zoning included in the proposed variation is located within the existing built-up area (BUA) and within the existing boundary of Limerick City and Suburbs including Mungret and Annacotty.

	regarding over reliance on Approved Housing Bodies. The submission advocates for residential development within the Docklands and city centre and considers that flood risk on a later phase of the Cleeves site can be mitigated to provide housing rather than offices. It recommends greater prioritisation of apartment development, the retrofitting of existing buildings such as Sarsfield House for residential use, and measures to support “over the shop” living through targeted supports. It also calls for enhanced involvement of the Land Development Agency, including the establishment of a regional office in Limerick, and for analysis of sites with planning permission that have not yet commenced.	In relation to areas of the city identified at risk of flooding located within Flood Zones A and B including the Docklands area, the Flood Risk Management Guidelines for Planning Authorities (2009), issued under Section 28, and national policy including National Planning Objective 78 of the Revised National Planning Framework, the zoning of such lands for highly vulnerable development, including residential use, would be inconsistent with the sequential approach and would not satisfy the Plan-Making Justification Test. While the submission raises relevant issues, it is noted that some of the content of the submission is not directly related to the scope of Proposed Variation No. 3.
Mayor’s Recommendation:		
No change		

23.	Name/Group: Sheila Pitt – Ref: LCC-C504-V3LDP-29				
	<table> <tr> <th data-bbox="303 1361 887 1406">Submission summary:</th><th data-bbox="887 1361 1401 1406">Mayor’s Response</th></tr> <tr> <td data-bbox="303 1406 887 2029"> This submission raises two points in relation to Proposed Variation No. 3. 1. Amendment No. 38 The submission relates to Amendment No. 38 concerning the provision of shared accommodation/co-living on a case-by-case basis on State-owned lands within Limerick. Concern is expressed regarding the potential standard and quality of such accommodation, and it is requested that due consideration be given to safeguarding the living conditions and where this living option is suitable for Limerick. </td><td data-bbox="887 1406 1401 2029"> Sheila Pitt is thanked for their submission and the contents of same have been noted. 1. Amendment No. 38 Noted. Regard is given to Specific Planning Policy Requirement (SPPR) 7 of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines (2025), which provides that shared accommodation may be considered where a specific demand is identified by the Planning Authority further to the Housing Need and Demand Assessment (HNDA) </td></tr> </table>	Submission summary:	Mayor’s Response	This submission raises two points in relation to Proposed Variation No. 3. 1. Amendment No. 38 The submission relates to Amendment No. 38 concerning the provision of shared accommodation/co-living on a case-by-case basis on State-owned lands within Limerick. Concern is expressed regarding the potential standard and quality of such accommodation, and it is requested that due consideration be given to safeguarding the living conditions and where this living option is suitable for Limerick.	Sheila Pitt is thanked for their submission and the contents of same have been noted. 1. Amendment No. 38 Noted. Regard is given to Specific Planning Policy Requirement (SPPR) 7 of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines (2025), which provides that shared accommodation may be considered where a specific demand is identified by the Planning Authority further to the Housing Need and Demand Assessment (HNDA)
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	2. Amendments to Volume 6 The submission raises concerns in relation to the Housing Needs and Demand Assessment (HNDA), specifically in respect of housing need by tenure. It is contended that the current proposal does not clearly set out target percentages for tenure mix in residential developments of 25 units or more, as had been the case previously (original objective PO12), and that greater clarity is required to clearly set out what is acceptable to the policy makers(elected members) of Limerick City and County Council.	process. As an SPPR, this provision takes precedence over Development Plan policy. Accordingly, any proposals for shared accommodation will be considered on a case-by-case basis, informed by the demand established through the HNDA and analysis further to the HNDA that established how co-living could accommodate part of the identified need. All such proposals will also be subject to detailed assessment at planning application stage and will be required to comply with all relevant standards in force at that time including regard to national policy objectives, including those supporting innovation in housing delivery. 2. Amendments to Volume 6 It should be noted that Table 36 of the HNDA “Estimated housing need by tenure” sets out an overview of the entire tenure distribution for the city and county for the period 2026-2035. The use of ranges is deemed appropriate in the Limerick context given the variance in profile between the city and county. The ranges presented for each tenure are intended to provide an upper and lower band for potential split of housing need, allowing flexibility in future delivery. This submission relates specifically to PO12 of the HNDA relating to tenure mix for new social and affordable turnkey housing delivery which is a subset of Table 36 and is not directly identifiable within Table 36. The intention of PO12 is to allow individual development proposals to be assessed on a case by case basis relative to the needs of the area in
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		which any such development is located and having regard to the prevailing economic and social conditions of the time rather than defined percentages. The minimum social and affordable tenure mix is set out in the Planning and Development Act. The Elected Members can at their discretion review tenure mix having regard to minimum standards set in legislation.
Mayor's Recommendation:		
No Change		

24.	Name/Group:	Construction Industry Federation (CIF) Mid-West Branch – Ref: LCC-C504-V3LDP-32
	Submission summary:	Mayor's Response
	1. Introduction This submission welcomes the intention behind the changes proposed under the variation and considers that change is essential to respond to the need for increased housing delivery in Limerick. The submission specifically refers to proposed amendments to Chapter 2 (Core Strategy), Chapter 3 (Spatial Strategy), Chapter 11 (Development Management Standards) and Volume 2A (Zoning Maps and the Settlement Capacity Audit) and notes the following: 2. Density The submission is concerned that the projected housing delivery relies on the densification of lands rather than increasing the quantum of serviced residential land supply. It is noted in the submission that the Development Plan identified 365.82 hectares of undeveloped zoned land with an estimated capacity of 12,750 units. Under the variation, it is noted that the	1. Introduction The Construction Industry Federation (CIF) is thanked for their submission, the contents of which are noted. 2. Density Noted, the interpretation of the quantum of land zoning appears to be misinterpreted. In the interest of clarity the proposed zoning amendments in the variation are twofold, ie - Zoning changes represented with a Z prefix, identify significant zoning changes.

extent of land zoned for residential use decreases to 364.74 hectares, while the presumed residential capacity increases to a minimum of 17,570 units, with a medium-density scenario providing over 35,000 units (representing a 38% increase in projected housing output despite a reduction in zoned land). In this regard, the CIF consider that the variation appears to increase theoretical housing numbers through higher densities while reducing reliance on geographical expansion and provision of additional serviced land. Furthermore, they raise concerns regarding the density proposals, which are considered extremely ambitious for the Limerick market and will place significant pressure on higher density apartment formats that are already experiencing viability challenges.	- Updates to zoning-represented with a U prefix, identifies changes to zoning which has occurred since the adoption of the Limerick Development Plan 2022. In this regard, a number of 'U' amendments reclassify lands that were previously zoned for future residential development as "Existing Residential", where development has been completed. For example, Amendment U24 reclassifies approximately 13.36 hectares at Newtown Meadows/Manor, Castletroy from "New Residential" to "Existing Residential" to reflect development that has taken place on the site. A number of similar updates are included throughout the Variation. Accordingly, the Variation presents an up-to-date and accurate position in respect of available residential lands. Having removed lands that have already been developed, and added the newly zoned sites, a total of 364.74 hectares of land with residential development potential remains available. In fact, the variation has added 106ha of new zoning to facilitate residential development. This 106 ha by itself adds potential for 4,705/9,027/13,346 units at lowest, medium and highest densities. Therefore, the variation does not simply increase housing numbers theoretically through higher densities as implied but rather adds a significant portion of new zoning with residential potential.
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3. Viability / Deliverability of Identified Sites CIF welcomes the proposals to correct anomalies to reflect current land use patterns. However, they highlight concerns in the submission that several large sites identified for high density development in the city centre will face challenges in achieving the quantum of housing identified for the Plan period. It is argued that Development Plans often rely on sites that cannot realistically deliver housing due to issues associated with infrastructure availability, landownership issues or environmental considerations. They emphasise that zoned sites must be capable of delivering residential units during the Plan period, and that sufficient headroom should be incorporated to allow for any sites that cannot be delivered. It is argued that many sites contributing to the increased theoretical housing numbers are large, complex, regeneration sites such as Colbert Quarter, the Cleeves site and the Gasworks. The submission contends that while these are strategically important sites, they do not envisage that the sites will deliver the quantum of houses anticipated within the Plan period, as they require infrastructure upgrades, etc. It is noted that there are often large costs and viability challenges associated with higher density schemes outside of Dublin. There is evidence in the industry that higher densities do not automatically increase housing output. It is noted that the opposite occurs in many cases, and as such, there is a risk that housing delivery will slow down.	3. Viability / Deliverability of Identified Sites See response above relating to zoning updates. The Development Plan and associated variation incorporate a tiered approach to land zoning, which seeks to prioritise the development of serviced and serviceable lands within the lifetime of the Plan. Ongoing engagement with infrastructure providers, including Uisce Éireann and the OPW, will be critical in supporting the timely delivery of key sites. The variation seeks to provide a flexible policy framework that enables a range of housing typologies and densities, while the updated Development Management Standards allow for design innovation and context-sensitive proposals. It is considered that this approach supports both policy compliance and market responsiveness over the lifetime of the Plan. As identified above, the variation is not built on increased theoretical housing numbers but rather the addition of 106 ha of zoned lands with residential potential.
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4. Infrastructure-Dependent Sites It is argued that the shift towards higher densities will place significant pressure on the smaller infrastructure-dependent sites to deliver a significant number of units, particularly where upgrades are required to roads, wastewater and flood management infrastructure. They emphasise that increased residential capacity must consider viability and servicing constraints to ensure that units can be realistically delivered. It is also noted that many of the larger sites are Tier 2 lands, which require infrastructure upgrades before they can be developed. The CIF supports zoning additional serviced and serviceable lands in alignment with Uisce Éireann and transport investment. 5. Housing Delivery/Sterilised Land The submission notes there is a risk that that the variation could result in a reduction, rather than an increase, in housing delivery. It is suggested that none of the lands proposed to be rezoned will be purchased by small or medium builders, and that the variation does not address lands that have been sterilised by planning and zoning. 6. Development Management Standards The submission outlines that Chapter 11 (Development Management Standards) should be flexible to support innovation and allow practical solutions to be brought forward within the evolving construction sector.	4. Infrastructure-Dependent Sites As identified above, the variation is not built on increased theoretical housing numbers but rather the addition of 106 ha of zoned lands with residential potential. 5. Housing Delivery/Sterilised Land The Development Plan seeks to ensure a sufficient pipeline of development opportunities across a range of site sizes and locations, including more readily deliverable sites. 6. Development Management Standards The amendments proposed are largely in response to recent changes in National planning policy, and the publication of Section 28 Guidelines including Planning Design Standards for Apartments, Guidelines for Planning Authorities, July 2025 and Sustainable Residential Development
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7. HNDA The updated HNDA is welcomed, and the realistic analysis of pipeline developments is encouraged. They also encourage using the revised NPF Housing Growth Requirements (which project higher levels of housing required than previously estimated) as an evidence base to ensure sufficient land is zoned and serviced to meet targets. 8. Building Height Strategy They support the changes to the Building Height Strategy and request that height policies facilitate, rather than constrain, sustainable urban development. 9. Conclusion Overall, the submission acknowledges that the variation provides a necessary update to the Development Plan, aligning with national policy. It is emphasised that the success of the variation is dependent on the provision of sufficient, viable and serviced land, and prioritising sites that can realistically deliver units within the lifetime of the plan. The submission requests a more balanced approach, including increasing volumes of serviced and deliverable residential land. They are concerned that the variation will reduce realistic housing provision rather than	and Compact Settlement Guidelines, 2024. 7. HNDA Noted. The Core Strategy is based on the NPF Housing Growth Requirements and includes 50% additional provision. The Core Strategy Table sets out a Housing Growth Requirement (HGR) of 15,734 units for Limerick City and Suburbs including Mungret and Annacotty to 2030. The 15,743 units includes for a 50% additional provision (ie HGR of 10,489 + 50%). Zoned land provided has a capacity of 17,570 units at the lowest density, 35,911 at medium density and 54,252 at the highest density. 8. Building Height Strategy Noted, the amendments in this regard are to provide clarity in relation to areas outside the City Centre (inner and outer areas) to ensure they are not constrained. 9. Conclusion Noted. The variation relates to the identified zoning changes to lands within the settlement boundary of Limerick City and Suburbs including Annacotty and Mungret only. Further variations will be progressed concentrating on accelerating housing in zoned settlements across the county as appropriate and in due course. As detailed above and contrary to the interpretation of CIF the variation has added 106ha of new zoning to facilitate residential development.
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	accelerate this delivery if this balanced approach is not taken.	This 106 ha by itself adds potential for 4,705/9,027/13,346 units at lowest, medium and highest densities.
Mayor's Recommendation:		
No change		

25.	Name/Group: St. Gabriel's Foundation - Ref: LCC-C504-V3LDP-33	
	Submission summary:	Mayor's Response
	This submission from St. Gabriel's Foundation relates to Amendment Z29 which rezones lands at Monteen, Mungret from New Residential to Education and Community Facilities. St. Gabriel's Foundation have been progressing plans to provide necessary services for persons in need including respite accommodation etc. Therefore they seek an amendment to Footnote 6 of the Land Use Zoning Matrix located in Section 12.4 of the Development Plan to recognise St. Gabriel's as an 'exception' (alongside Milford Care Centre and the Little Company of Mary Milford), whereby Nursing Homes, Residential Care or Institutional/Retirement Village uses would be "Open for Consideration", noting that such uses are already open for consideration under the Education and Community Infrastructure zoning. In support of this request, St. Gabriel's outlines their design intentions for the expansion of their services at Mungret to serve children and young people with complex disabilities. The proposal includes the delivery of a second 6-bed respite house, two 4-bed residential care homes, and an alternative respite facility providing structured and community-based programmes. The submission sets out a clear and urgent need for enhanced respite and residential services in the Mid-West, noting that	St. Gabriels is thanked for their submission, the contents of same are noted. The significant societal and community benefits associated with the provision of expanded care and respite services are acknowledged. The request to amend Footnote 6 of Table Section 12.4 of the Development Plan to recognise St. Gabriel's Foundation as an exception, alongside Milford Care Centre and the Little Company of Mary Milford, whereby Nursing Homes, Residential Care or Institutional/Retirement Village uses is considered appropriate on the subject lands (Z29) zoned Education and Community. The design intentions for a healthcare-led campus, as outlined in the submission, are also noted in this context. Accordingly, Footnote 6 of Table Section 12.4 to include St. Gabriel's Foundation as an identified exception, will be altered under Amendment No. 71.

existing facilities are operating at full capacity, with increasing demand, significant waiting lists, and reliance on out of county placements. The proposed development is noted as aligning with national disability policy objectives, including person centred care, community inclusion, and the provision of services within local areas, while also offering wider benefits such as reduced pressure on acute hospital services and improved outcomes for families. The submission also includes a high-level cost estimate of approximately €12.3 million for the works and provides an indicative layout and scale of the proposed campus development.	
Mayor's Recommendation:	
Amend Footnote no.6 under Table 12.4 as follows: ⁶. Except at Milford Care Centre, St.Gabriels Foundation and Little Company of Mary Milford, where Nursing Homes/ Residential Care or Institution/ Retirement Village are Open for Consideration	

Out of Scope: Submissions which include requests for zoning amendments that are out of scope.

The zoning requests in the following submissions do not relate to identified zoning amendments in Variation No.3 as published. Modifications can only be made where they relate back specifically to the proposed Variation and cannot be a material alteration of another provision of the Development Plan which was not the subject of the Proposed Variation.

26.	Name/Group: HRA Planning on behalf of Ballykeefe Property Developments Limited - Ref: LCC-C504-V3LDP-7
	Submission summary: Mayor's Response
	This submission seeks the rezoning of approximately 7.95 hectares of land at Ballykeefe from Enterprise and Employment use to Residential to facilitate the accelerated delivery of housing. The submission outlines that the lands are located within the existing built-up footprint of Limerick City, proximate to services, public transport and existing residential areas, and are therefore well suited to contribute to compact growth objectives. The submission sets out that the lands could accommodate approximately 470 residential units and highlights the potential for significant planning gain, including the upgrade of the Ballykeefe Road (L1441) and the provision of supporting infrastructure and community facilities. It is argued that the lands are serviceable, not subject to flooding, and do not present environmental or other constraints to development, with the applicant committing to phased delivery within the lifetime of the Development Plan. As part of developing the land, it is proposed that the L1411 be upgraded from the Dock Road to the railway line to include a 5.5m wide road with footpaths and cycle paths. HRA Planning, on behalf of Ballykeefe Property Developments Limited, is thanked for their submission, the contents of which are noted. These lands are not identified for a zoning change under Proposed Variation No. 3. Modifications can only be made where they relate back specifically to the proposed Variation and cannot be a material alteration of another provision of the Development Plan which was not the subject of the Proposed Variation. Therefore, the zoning of this site cannot be altered in this process. Notwithstanding the above the following should be noted in relation to this site; - There are sufficient alternative lands zoned to meet the Housing Growth Requirements figures. - Part of the site is within a Flood Zone, therefore contrary to national policy. - Site is not serviced in terms of road infrastructure and zoning is premature pending preparation of a Local Transport Framework.

The submission notes that current housing delivery within Limerick has fallen below projected targets and it is considered that additional land, beyond that already identified in the Proposed Variation, is required to be zoned to facilitate sufficient housing delivery, which includes unmet need arising from population changes. There is also an unmet housing need in relation to the population increase arising from the conflict in Ukraine which has not been represented in the NPF projections. The submission requests that Limerick City and County Council amend Proposed Variation No. 3 to rezone the subject lands for residential use.	
Mayor's Recommendation:	
No change – The zoning request is outside the scope of the proposed variation as published. Modifications can only be made where they relate back specifically to the proposed Variation and cannot be a material alteration of another provision of the Development Plan which was not the subject of the Proposed Variation.	

27.	Name/Group: MKO on behalf of Grangechurch Ltd - Ref: LCC-C504-V3LDP-6
Submission summary:	Mayor's Response
This submission relates to lands at Condell Road, Limerick, comprising a site of approximately 4.55 hectares, and seeks an amendment to Proposed Variation No. 3 to rezone the entirety of the lands as New Residential. The submission states that the site is currently partially zoned New Residential and partially zoned Agriculture, the latter arising from rezoning during the preparation of the Limerick Development Plan 2022–2028 due to flood risk concerns. The submission places significant emphasis on the extant planning permission for a residential development of 165 no. units, granted by An Coimisiún Pleanála under ABP31268322 (life of the permission was subsequently extended to May 2030). It is contended that the current split zoning	Grangechurch Ltd., as represented by MKO, is thanked for their submission, the contents of which are noted. These lands are not identified for a zoning change under Proposed Variation No. 3. Modifications can only be made where they relate back specifically to the proposed Variation and cannot be a material alteration of another provision of the Development Plan which was not the subject of the Proposed Variation. Therefore, the zoning of this site cannot be altered in this process. Notwithstanding the above these lands are located within an area

	does not accurately reflect the extant permission on the site. The submission argues that the earlier downzoning was based on outdated and inaccurate flood risk data contained in the Strategic Flood Risk Assessment prepared for the Development Plan. It is stated that the Site Specific Flood Risk Assessment submitted with the permitted development utilised more accurate and up-to-date topographical information and coastal flood modelling data, including the Irish Coastal Wave and Water Level Study (2020), and that the development was found to have passed the justification test for residential development, and this was acknowledged by An Coimisiún Pleanála in their assessment. The submission further contends that the site is strategically located within walking distance of the city centre, close to employment areas and public transport, and capable of delivering compact, transport-oriented development in line with the National Planning Framework First Revision and the updated housing growth requirements. The submission also argues that the site is better located than other sites that are proposed to be rezoned. On this basis, it is requested that the partial agricultural zoning be removed and that the entirety of the lands be zoned New Residential in the adopted Variation No. 3.	identified at risk of flooding and are not suitable for residential development in line with National Policy.
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Mayor's Recommendation:

No change – The zoning request is outside the scope of the proposed variation as published.

Modifications can only be made where they relate back specifically to the proposed Variation and cannot be a material alteration of another provision of the Development Plan which was not the subject of the Proposed Variation.

28	Name/Group:	DTW Construction Ltd on behalf of Montpellier Coolbawn Developments Ltd - Ref: LCC-C504-V3LDP-9
	Submission summary:	Mayor's Response

This submission relates to lands at Coolbawn Meadows, Castleconnell, and seeks the reinstatement of residential zoning on lands previously zoned as residential under an earlier Local Area Plan. The submission notes that the lands are centrally located within Castleconnell village, adjacent to the railway station, and are served by existing infrastructure including foul and surface water drainage, roads and electricity. It is stated that the applicant previously submitted an Expression of Interest to the Planning Authority identifying the lands as capable of supporting the accelerated delivery of housing. The submission contends that Castleconnell has a high level of services and amenities, benefits from road and rail connectivity to Limerick City, and lies within the Limerick–Shannon Metropolitan Area. The submission acknowledges that Proposed Variation No. 3 currently focuses on lands within Limerick City and Suburbs, including Annacotty and Mungret, but urges that Castleconnell be included within the scope of the Variation. It is stated that a masterplan has been prepared, that development is already underway on part of their lands, and that a planning application could be lodged immediately should the residential zoning be reinstated.	Montpellier Coolbawn Developments Ltd. is thanked for their submission, the contents of which are noted. These lands are not identified for a zoning change under Proposed Variation No. 3. Modifications can only be made where they relate back specifically to the proposed Variation and cannot be a material alteration of another provision of the Development Plan which was not the subject of the Proposed Variation. Therefore, the zoning of this site cannot be altered in this process. Notwithstanding the above, the information will be retained and may be considered in the context of future plan-making exercises, including any forthcoming variations or reviews relating to zoned settlements across the County.
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Mayor's Recommendation:

No change – The zoning request is outside the scope of the proposed variation as published.

Modifications can only be made where they relate back specifically to the proposed Variation and cannot be a material alteration of another provision of the Development Plan which was not the subject of the Proposed Variation.

29	Name/Group: Tom Doheny on behalf of Clancy Homes - Ref: LCC-C504-V3LDP-17
	Submission summary: Mayor's Response
	This submission relates to lands at Monaleen, Limerick, and seeks the rezoning of approximately 20.5 acres of land to facilitate residential development. The submission confirms agreements across three landholdings and indicates a potential yield of over 200 dwellings, with capacity for further expansion. It emphasises that the lands are free from significant development constraints and are fully serviced, with infrastructure and public transport provision already in place, supporting their immediate deliverability. The submission builds on a previous Expression of Interest made in December 2025 and states that the lands are fully serviced or capable of being serviced within a short timeframe, with a commitment to submit a planning application within three months of zoning and to commence housing delivery shortly thereafter. The submission outlines that the lands are located immediately adjacent to the development boundary of Limerick City and Suburbs, in close proximity to existing residential areas, employment centres, schools, retail facilities and public transport services within the Castletroy area. It is stated that the lands have no viable agricultural function and are not subject to flood risk, based on a review of CFRAM mapping. The submission emphasises national policy objectives relating to compact growth, sequential development and accelerated housing delivery, and contends that the subject lands represent a logical extension of the existing residential area. Reference is made to supporting reports prepared by MKO Planning Consultants and BDB Clancy Homes is thanked for their submission, the contents of which are noted. These lands are not identified for a zoning change under Proposed Variation No. 3. Modifications can only be made where they relate back specifically to the proposed Variation and cannot be a material alteration of another provision of the Development Plan which was not the subject of the Proposed Variation. Therefore, the zoning of this site cannot be altered in this process. Notwithstanding the above, the information will be retained and may be considered in the context of future plan-making exercises, including any forthcoming variations or reviews relating to zoned settlements across the County.

	Consulting in relation to planning policy and servicing feasibility, including Confirmation of Feasibility from Uisce Éireann.	
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Mayor's Recommendation:

No change – The zoning request is outside the scope of the proposed variation as published.

Modifications can only be made where they relate back specifically to the proposed Variation and cannot be a material alteration of another provision of the Development Plan which was not the subject of the Proposed Variation.

30	Name/Group: Alan Ryan - Ref: LCC-C504-V3LDP-15	
	Submission summary:	Mayor's Response
	This submission relates to lands in Monaleen which formed part of a previous Expression of Interest submitted by Clancy Homes Ltd., with whom the landowner has entered into an agreement to develop the site subject to appropriate zoning and the grant of planning permission. The submission emphasises the national policy priority to accelerate housing delivery and argues that additional lands should be made available for residential development. It expresses dissatisfaction that the subject lands have not been included in Proposed Variation No. 3, describing this omission as unjustified in the context of the ongoing housing crisis. The submission highlights Clancy Homes' proven delivery capacity, including the completion of approximately 250 units in the previous year and a pipeline of over 1,000 units, and confirms that the developer is in a position to prepare and lodge a planning application immediately upon rezoning. A clear request is made that the lands be zoned for residential use as part of the current variation process.	Alan Ryan is thanked for the submission, the contents of which are noted. These lands are not identified for a zoning change under Proposed Variation No. 3. Modifications can only be made where they relate back specifically to the proposed Variation and cannot be a material alteration of another provision of the Development Plan which was not the subject of the Proposed Variation. Therefore, the zoning of this site cannot be altered in this process. Notwithstanding the above, the information will be retained and may be considered in the context of future plan-making exercises, including any forthcoming variations or reviews relating to zoned settlements across the County.
	Mayor's Recommendation:	
	No change – The zoning request is outside the scope of the proposed variation as published.	

Modifications can only be made where they relate back specifically to the proposed Variation and cannot be a material alteration of another provision of the Development Plan which was not the subject of the Proposed Variation.

31	Name/Group:	Barker McCarthy on behalf of landowners at Dromsally Woods, Cappamore - Ref: LCC-C504-V3LDP-14
	Submission summary:	Mayor's Response
	The submission is made with respect to lands at Dromsally Woods, Cappamore and seeks to highlight the strategic potential of the lands to provide residential development. It is requested that the Planning Authority consider these lands as a future residential zoning option in order to support housing delivery in Cappamore. The submission is framed in the context of Proposed Variation No. 3, particularly its focus on accelerating housing delivery, ensuring continuity of supply, and promoting sequential, plan-led growth through the consolidation of serviced settlement edges The lands are described as being immediately adjacent to the existing settlement boundary and contiguous with existing and emerging residential development. While currently unzoned, they are considered to be a natural extension of an established residential area, with strong physical and functional links to the village. Their proximity to the village core, combined with existing and planned pedestrian connections, supports the submission's argument that the lands are well integrated and not isolated from services or infrastructure. The submission highlights that Cappamore has a defined role as a Level 4 large village within the Limerick Development Plan 2022-2028, with an expectation of accommodating residential growth in a compact and sustainable manner. It is argued that there is limited remaining	Barker McCarthy is thanked for their submission and its contents are noted. These lands are not identified for a zoning change under Proposed Variation No. 3. Modifications can only be made where they relate back specifically to the proposed Variation and cannot be a material alteration of another provision of the Development Plan which was not the subject of the Proposed Variation. Therefore, the zoning of this site cannot be altered in this process. Notwithstanding the above, the information will be retained and may be considered in the context of plan-making exercises, including any forthcoming variations or reviews relating to zoned settlements across the County.

	zoned land in Cappamore as it is outlined that much of the existing zoned residential land is already developed, under construction or has active permissions. A strong planning policy context is outlined, linking the proposal to national policy promoting compact growth and housing delivery, regional policy supporting development in well-serviced settlements, and Limerick Development Plan objectives favouring sequential growth. It is contended that the lands are consistent with these principles, particularly as they represent a logical extension rather than leapfrogging development. An indicative layout plan for the site provided with the submission demonstrates that the lands could accommodate a residential scheme of approximately 59 dwellings, primarily family housing, in a layout that integrates with adjoining development. The design focuses on permeability, open space with an emphasis on walkability, and connections to the village. The submission also highlights the accessibility of the site, both locally and regionally. It is within walking distance of schools, shops and community facilities, and benefits from improved pedestrian infrastructure arising from recent public realm works. In addition, Cappamore's connectivity to Limerick City and other employment centres is noted, reinforcing its role within the wider housing market. The submission notes that recent upgrades to infrastructure have facilitated the delivery of residential schemes in the area. It is therefore contended that infrastructure services in the village can support further development.	
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	The landowner's stated intention to bring forward development is outlined and it is noted that the lands could be activated within the lifetime of the current Development Plan. Overall, the submission concludes that the lands represent a logical, well-located and deliverable opportunity to support housing growth in Cappamore. It requests that the lands be considered in future zoning and settlement capacity reviews, particularly in light of the limited remaining residential zoned land in Cappamore.	
Mayor's Recommendation:		
No change – The zoning request is outside the scope of the proposed variation as published.		
Modifications can only be made where they relate back specifically to the proposed Variation and cannot be a material alteration of another provision of the Development Plan which was not the subject of the Proposed Variation.		

32	Name/Group: AK Planning on Behalf of Tom O'Connor - Ref: LCC-C04-V3LDP-26	
	Submission summary: This submission relates to lands at Killonan, Limerick, comprising approximately 4.62 hectares, and seeks the rezoning of the lands for residential development. The lands are located adjacent to the development boundary of the Limerick Metropolitan Area and are contiguous with recently permitted residential development to the north. The submission highlights the accessibility of the site, noting its proximity to the M7 motorway, existing overpass connections, and established pedestrian and public transport infrastructure. It is stated that the lands are serviced by existing water and foul drainage infrastructure and the lands are capable of delivering approximately 150–200 dwellings in the short term. The submission also refers to the availability of nearby educational facilities,	Mayor's Response Tom O'Connor is thanked for the submission, the contents of which are noted. These lands are not identified for a zoning change under Proposed Variation No. 3. Modifications can only be made where they relate back specifically to the proposed Variation and cannot be a material alteration of another provision of the Development Plan which was not the subject of the Proposed Variation. Therefore, the zoning of this site cannot be altered in this process. Notwithstanding the above, the information will be retained and may be considered in the context of future plan-making exercises, including any forthcoming variations

employment hubs such as the University of Limerick and National Technology Park, and local services. It is further noted that the development of the lands would support compact growth objectives and contribute to addressing housing demand within Limerick. It is noted that these lands were identified in December during the expression of interest stage.	or reviews relating to zoned settlements across the County.
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Mayor's Recommendation:

No change – The zoning request is outside the scope of the proposed variation as published.

Modifications can only be made where they relate back specifically to the proposed Variation and cannot be a material alteration of another provision of the Development Plan which was not the subject of the Proposed Variation.

33. Name/Group: Tom Phillips + Associates on behalf of Arrowdale Limited - Ref: LCC-C504-V3LDP-22		
	Submission summary:	Mayor's Response
	The submission focuses on the rezoning of two sites at Greenpark (c. 11.6ha) from Enterprise and Employment and Open Space and Recreation to New Residential, as part of Variation No. 3 to the Limerick Development Plan. Purpose and Scope of the Submission The lands were previously submitted as part of the Expression of Interest launched by Limerick City and County Council in December 2025 which sought submissions of land to be rezoned for residential development. The sites are Greenpark were not included as part of Variation No. 3. The applicant argues they are a logical extension of an already permitted and partially completed nearby housing scheme (371 units), demonstrating strong demand and deliverability.	Arrowdale Limited is thanked for their submission and its contents have been noted. These lands are not identified for a zoning change under Proposed Variation No. 3. Modifications can only be made where they relate back specifically to the proposed Variation and cannot be a material alteration of another provision of the Development Plan which was not the subject of the Proposed Variation. Therefore, the zoning of this site cannot be altered in this process. Notwithstanding the above these lands are located within an area identified at risk of flooding and are not suitable for residential development in line with National Policy.

	i. Analysis of Housing Strategy – Delivery Shortfall/Poor Delivery Track Record The submission outlines the shortfall in housing delivery in Limerick, with completions below the targets set out in the Limerick Development Plan 2022–2028 and a large proportion of permitted units not yet commenced. It sets out the following: -The Section 28 Guidelines on Housing Growth Requirements (July 2025) requires an annual average of 2,599 units to be delivered to 2034, rising to 2,740 units annually from 2035-2040. This target would require a total of 36,960 units by 2040, with up to 50% additional headroom. -In relation to these figures, Table 2.6 in the variation was amended and LCCC identified a total target of 21,438 units for 2025-2030, which is an annual average of 3,298 units. Limerick City and Suburbs, Mungret and Annacotty have an identified target of 15,734 units, or 2,421 units per year. -The current Development Plan identifies a target delivery of 15,591 units for Limerick City and County, which is an annual average of 2,598.5 units per year. -The amended HNDA as part of the variation show just 2,533 units were completed between 2022-2025 (requirement was 7,795.5 units for this time period). This is a shortfall of 5,242.5 units). -The current Development Plan identifies a target delivery of 11,442 units for Limerick City and Suburbs including Mungret and Annacotty (which is an annual average of 1,907 units). -According to the Mayor’s Report issued in January 2025 (NPF Implementation: Housing Growth Requirements), 1,586 units were completed in Limerick City and Suburbs including Mungret and Annacotty from 2022-2025 (which is an annual	
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average of 529 units). This does not meet the 1,907 units needed annually as set out in the Development Plan and provides a shortfall of 4,135 units from 2022-2025. -Commencement rates are also noted and the submission refers to Table 20 of the amended HNDA in the variation. Table 20 notes that as of February 2026, there are 8,738 units with live planning permission, and 3,128 units (36%) have commenced. Some 5,610 units have not yet commenced which demonstrates slow/non-delivery in Limerick. -The NPF housing growth requirements to 2034 do consider unmet demand/need, but there is a large shortfall to date since the adoption of the Development Plan. -It is critical that sufficient zoned land is provided in the right locations. If 50% headroom is provided for, the target can only be met if appropriate land is zoned. -Land must be in the ownership of a landowner that is in a position to deliver housing in the short term. It is noted that Arrowdale have a proven track record for housing delivery. Analysis of Housing Strategy – Failure to Adopt a Sequential Approach This section of the submission reiterates the argument that Limerick is not currently meeting housing targets based on lands currently zoned for residential development and outlines the following: -It is contended that the variation directs housing growth to peripheral lands such as in Mungret and Annacotty, which conflicts with the sequential approach. -The submission outlines that the current Development Plan takes a similar approach and refers to the Mayor’s Report (January 2026) which notes that no new units were delivered between 2022-2025 in Mungret and 79 units were delivered in Annacotty.	
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This was under the overall target of 195 units. -They note that the Greenpark lands meet the sequential approach and rezoning the lands would represent compact growth. -The lands would deliver c. 500 units and they argue that the lands should not be excluded on flood grounds only. Analysis of Housing Strategy – Reliance on Tier 2 Lands -They outline that various sites zoned for residential are Tier 2 land which are not serviced but have potential to be serviced during the lifetime of the Development Plan. Therefore, they argue that the development of these lands is uncertain between now and 2030. -The submission notes that there are 18 sites classified as Tier 2 lands in the Residential Settlement Capacity Table, which comprises a combined potential yield of c. 1,778 units. The delivery of these units may be delayed due to delivery constraints. Analysis of Housing Strategy – Unrealistic Density Classifications The submission refers to amendments to the Density Zones map of the Development Plan proposed as part of the variation and notes the following: -A key change relates to the mid-range density zone which has increased from 45+ dwellings per hectare to a range of 50-200 dwellings per hectare (described as ‘urban neighbourhood’). -The mid-range zone has also expanded into areas such as Cloughkeating, located c. 11 km from the city centre and lacks a frequent bus service. The submission argues that it is unrealistic to consider that sites on the edge of the city centre and	
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those c. 10 km from the city centre will achieve comparable densities. -Reference is made to the car parking zones map which highlights that the majority of the city and suburbs area are identified as 'intermediate and peripheral locations'. The submission argues that the densities identified in these areas are unrealistic. They suggest that including these areas in the mid-range density zone inflates the potential housing yield on zoned lands and may contribute to a shortfall in housing delivery, as well as delayed/non-commencement of planning permissions. -The submission also queries if delivering apartment developments at densities of up to 200 dwellings per hectare in peripheral locations aligns with the intent of national policy on compact growth. In this regard, the submission notes that new housing should be prioritised at sustainable locations and at an appropriate scale (reference made to NPO 43 of the National Planning Framework First Revision). Analysis of Housing Strategy – Summary of Analysis of Limerick’s Housing Strategy -In summary, the submission concludes that the wrong land is being zoned for residential development, and the right lands are being overlooked, as there is too much focus on peripheral lands, which should only occur when more central lands have been exhausted. 1. Suitability of the Greenpark Lands for Residential Zoning The submission outlines the reasons why the Greenpark land are suitable for residential zoning: -Location of the lands within the city and suburbs. -The development of the lands would align with the sequential approach.	
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-Reference is made to the neighbouring SHD and An Coimisúin Pleanála's Inspector's Report which considers the adjacent lands suitable to provide densities that reflect its urban location and context. -The site is well served by public transport. -The site has access to a wide range of employment opportunities and social infrastructure. -The site is well connected to the existing road network, is served by foul and surface water sewage network, and a new watermain has recently been installed within the Greenpark lands. Flood Risk The submission argues that the Flood Risk Management Guidelines allow planning authorities to consider residential development in flood risk areas. Reference is made to NPO 78 of the National Planning Framework First Revision which states: <i>"Promote sustainable development by ensuring flooding and flood risk management informs place-making by avoiding inappropriate development in areas at risk of flooding that do not pass the Justification Test, in accordance with the Guidelines on the Planning System and Flood Risk Management."</i> Therefore, it is argued in the submission that there is a mechanism for residential development/zoning to be accommodated in the context of the Justification Test, subject to the implementation of mitigation measures which ensure no increased flood risk elsewhere. The submission contends that there is an overriding planning need to provide residential development at Greenpark as there is a housing crisis and housing targets are not being met in Limerick. The lands represent compact growth and sustainable	
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development and align with climate action policies and the sequential approach. It is argued that using flood risk to determine the development potential of the lands to provide housing is at odds with the Flood Guidelines, which intentionally allows consideration and zoning of lands vulnerable to flood risk. Reference is made to the High Court judgement of Holland J dated 16 December 2025 (<i>High Court 2022 No 1132 JR</i>), <i>Voyage Property Limited v Limerick City and County Council and others [2025] IEHC 696</i>. The submission notes that the legal interpretation of the judgement states that there are exceptions in the Flood Risk Guidelines that allow planning authorities to zone lands for residential development in Flood Zones A and B. This requires the Avoidance Principle and Justification Test firstly). They outline that the judgement does not prohibit the Council from zoning residential lands in the future, rather lands can be zoned following the sequential approach and Justification Test. The submission refers to the submission made at 'Call for Sites' stage, where it was demonstrated that the lands can pass the Justification Test. Reference is made to one criterion of the 'Call for Sites' stage where there was a presumption against lands at risk of flooding. However, there are examples of lands being zoned for residential development by other planning authorities in flood zones A and B and residential is listed as 'open for consideration'. Specific reference is made to Dyke Road Car Park in Galway (ACP Ref. JH61.322166). Conclusion The conclusion highlights the following key points raised in the submission that	
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demonstrate the site's suitability for rezoning: -There is a residential development under construction on the adjacent site. -The under delivery of housing in Limerick. The wrong land is being zoned, and 50% headroom will not yield increased housing delivery if land is not zoned correctly. The only reason the subject lands aren't being zoned is due to flood risk which is contrary to national guidelines. Residential development has been provided on other flood vulnerable lands. The site can pass the Justification Test. -The zoning of lands in peripheral location and sites defined as tier 2 rather than zoning more central and serviced lands. -The locational characteristics of the lands demonstrate the housing is suitable at the site.	
Mayor's Recommendation: No change – The zoning request is outside the scope of the proposed variation as published. Modifications can only be made where they relate back specifically to the proposed Variation and cannot be a material alteration of another provision of the Development Plan which was not the subject of the Proposed Variation.	

34.	Name/Group:	Laurence and Elizabeth Lahiff - Ref: LCC-C504-V3LDP-30
	Submission summary:	Mayor's Response
	This submission requests that the Planning Authority reconsider the zoning of additional lands at Ballykeeffe for residential development, with the aim of improving the viability of housing delivery on the site. While lands within the accompanying map are already zoned for New Residential development, the submission seeks an extension of this zoning to include additional lands within the ownership of the applicant.	Laurence and Elizabeth Lahiff are thanked for their submission, the contents of which are noted. These lands are not identified for a zoning change under Proposed Variation No. 3. Modifications can only be made where they relate back specifically to the proposed Variation and cannot be a material alteration of another provision of the Development Plan which was not the subject of the Proposed Variation.

		Therefore, the zoning of this site cannot be altered in this process. Notwithstanding the above these lands are located within an area identified at risk of flooding and are not suitable for residential development in line with National Policy.
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Mayor's Recommendation:

No change – The zoning request is outside the scope of the proposed variation as published.

Modifications can only be made where they relate back specifically to the proposed Variation and cannot be a material alteration of another provision of the Development Plan which was not the subject of the Proposed Variation.

35.	Name/Group:	McCarthy & Woulfe Ltd. - Ref: LCC-C504-V3LDP-34
	Submission summary:	Mayor's Response
	This submission seeks the reconsideration of the zoning status of lands at Anglers Walk, Rhebogue for residential development. The submission is accompanied by technical evidence including a Flood Risk Assessment and an Ecological Impact Assessment for an adjacent site. The applicant states that the site is suitable for residential development, noting that it has previously passed the Limerick City and County Council Justification Test for flood risk. It is contended in the submission that the civil engineering design for residential development levels on site will ensure there is no risk of flooding. The submission further provides an Ecological Impact Assessment for a residential development on an adjacent site, which outlines that the site predominately comprises highly managed habitats of relatively low biodiversity value, including amenity grassland, wet grassland and recolonising bare ground. It is noted that the treelines along the site boundaries hold the greatest biodiversity value, providing suitable habitat for various	McCarthy Woulfe Ltd. is thanked for their submission, the contents of which are noted. These lands are not identified for a zoning change under Proposed Variation No. 3. Modifications can only be made where they relate back specifically to the proposed Variation and cannot be a material alteration of another provision of the Development Plan which was not the subject of the Proposed Variation. Therefore, the zoning of this site cannot be altered in this process. Notwithstanding this, and in the interest of clarity the following should be noted. - There are ecological constraints relating to the Lower River Shannon SAC. - Part of the lands are identified as being at elevated risk of flooding, being

	species (such as breeding and foraging birds, bats and terrestrial mammals). The submission notes that no significant change is foreseen in relation to bat activity on the subject site as a result of adjacent development.	situated within the OPW's Mid-Range and High-End Future Scenario Flood Extent and therefore may not be suitable for residential development in line with National Policy.
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Mayor's Recommendation:

No change – The zoning request is outside the scope of the proposed variation as published.

Modifications can only be made where they relate back specifically to the proposed Variation and cannot be a material alteration of another provision of the Development Plan which was not the subject of the Proposed Variation.

Section 3 – Material Alteration to Limerick Development Plan 2022-2028 (as varied)

3.1. – Material Alterations to Text

Volume 1: Chapter 2 - Core Strategy

Amendment No.	Proposed Alteration	Submission No.
17	Table 2.76: Settlement hierarchy, population and household growth up to December 2030 end of Plan period Q2-2028 plus zoned land provision	1

Level	Settlements	Census 2022 Population	Housing Growth Requirement June 2025 - December 2030	Residential Density Range (UPH) (See also Table 2.5)	Zoned Land Required (ha.) June 2025 - December 2030	Total Undeveloped Zoned Land Provision (ha.) with Residential Potential	Household Growth 1 - Potential Yield No. of Residential Units at Lowest Density	Household Growth 2 - Potential No. of Residential Units at Medium Density	Household Growth 3 - Potential No. of Residential Units at Highest Density
Limerick Shannon Metropolitan Area (in Limerick)	City and Suburbs (in Limerick), Mungret and Annacotty	101,622	15,734	100-250/ 50-200/ 35-50	328.33	364.74 364.56	17,570 17,564	35,903	54,243
	Castleconnell	2,488	282	50-150/ 35-50/ 100+	8.05	12.20	472	523	615
	Patrickswell	848	400	25+	16	19.46	493	493	493
	Clarina	501	28	25+	-	-	-		

	Montpelier	172	9	-	-	-	-		
	Rural Metro Area	9,061	143	-	-	-	-		
	Remainder of Metro Area	13,070	862	-	24.05	31.66	965	1,016	1,108
	Limerick Shannon Metropolitan Area (in Limerick)	114,692	16,596	-	352.38	396.4 396.22	18,535 18,529	36,919	55,351
Key Town	Newcastle West	7,209	971	40-100/ 30-50/ 80+	31.36	56.83	1,738	2,501	2,993
Level 3 Towns	Abbeyfeale	2,206	290	25-40	11.6	13.56	309	374	439
	Kilmallock	1,761	223	25-40	8.92	20.97	411	512	613
	Rathkeale	1,231	202	25-40	8.08	9.62	207	263	319
	Caherconlish	1,569	172	25-40	6.88	8.43	180	274	337
	Level 3 Aggregate	6,767	887	-	35.48	52.58	1,107	1,107	1,107
Level 4 Large Villages	Adare	1,224	200	-	9.09	16.87	330	330	330
	Askeaton	1,236	163	-	7.40	23.62	386	386	386
	Ballingarry	570	74	-	3.36	5.71	78	78	78
	Bruff	887	114	-	5.18	5.92	113	113	113
	Bruree	641	53	-	2.40	2.13	38*	38*	38*
	Cappamore	668	89	-	4.04	0.84	11*	11*	11*
	Croom	1,240	143	-	6.5	10.56	174	174	174
	Doon	651	72	-	3.27	2.69	48*	48*	48*
	Dromcolliher	509	75	-	3.40	2.42	44*	44*	44*
	Foynes	512	75	-	3.40	3.49	56	56	56

	Glin	644	81	-	3.68	3.06	56*	56*	56*
	Hospital	674	88	-	4.0	3.32	61*	61*	61*
	Kilfinane	757	112	-	5.09	3.39	56*	56*	56*
	Murroe	1,432	161	-	7.31	5.82	105*	105*	105*
	Pallasgrean	572	83	-	3.77	2.49	42*	42*	42*
	Pallaskenry	610	86	-	3.90	1.97	32	32	32
	Level 4 settlements Aggregate	12,827	1,668	-	75.79	94.3	1,630	1,630	1,630
Level 5	Small Villages	5,711	431	-	-				
Level 6	Rural Clusters	2,160	125	-	-				
Level 7	Open countryside	60,170	760	-	-				
City and County	Total	209,536	21,438	-	495.01	600.11 599.93	23,010 23,004	42,157	61,081

Table 2.76 Footnotes Advisory Notes

The following advisory notes should be read in conjunction with Table 2.6 Settlement Hierarchy, and Household Growth up to December 2030 plus zoned land provision:

- Housing Growth is ¹dependent on the capacity of the settlement to absorb development.
~~²The average densities for all settlements outside of the City area are derived by combining serviced sites at 10 units per hectare to accommodate 20% of the requirements for housing in this form and the remainder as “Residential Development Areas”. The densities for “Residential Development Areas” are set at 22 units per hectare for all settlements outside of the City and Suburbs (in Limerick), Mungret and Annacotty, except Newcastle West where the density shall be 35 units per hectare for 80% of units.~~
- The Housing Growth Requirement identified in the table takes account of the new annual Housing Growth Requirement as per the 'The NPF Implementation: Housing Growth Requirements - Guidelines for Planning Authorities (July 2025)' which is 2,599 per annum for Limerick from 2025-2034, and adding 50% additional provision that is allowed for in the 2025 Guidelines, which is then assigned to the settlements.

3. ~~³The NPF requires that the proportion of new homes within the existing built-up footprint should be at least 50% for the City and 30% for all other settlements.~~ The target in the Revised NPF is for at least 40% of all new housing to be delivered within the existing built-up areas of cities, towns and villages on infill and/or brownfield sites. It should be noted that the zoning for new housing development in the settlements of Bruff, Cappamore and Foynes are immediately contiguous to the built up area.
 4. Densities are derived in accordance with the Sustainable Residential Development and Compact Growth Settlements Guidelines for Planning Authorities as outlined in Table 2.6 Density Assumptions per Settlement Hierarchy.
~~⁴The growth allocation of Clarina between 2016 and 2028 is high, but this is largely accounted for by growth already taken place between 2016 and 2022. New population growth since 2016 is estimated at being 244, constituting 82% of the total projected growth up to 2028. Therefore, new growth is proposed at 28%.~~
- ^{*5}A percentage of the population growth ranging from 5% to 15% is expected to be accommodated within the town or village centre zoning. Where there are deficits between the quantum of zoned land required and that which is available, it is expected that the balance of demand will be met from within the town or village centers through renovations or infill development

Volume 1: Chapter 3 - Spatial Strategy

Amendment No.	Proposed Alteration	Submission No.
1	Objective TN O1 – Towlerton It is an objective of the Council to: a) Promote and facilitate the sustainable, coordinated development of the remaining undeveloped lands at Towlerton, including lands zoned Mixed Use and Enterprise and Employment, through an integrated and coherent development approach. b) Ensure residential development shall be the primary component of the remaining Mixed Use zoned lands with supporting secondary uses and amenities. All future development proposals to demonstrate excellence in urban design, delivering a coherent sense of place and a high-quality, integrated mixed-use environment that supports residential uses, employment activity, innovation, and a vibrant community. c) Ensure that new development incorporates high levels of accessibility, providing safe and convenient connections for pedestrians, cyclists, and public transport users, where feasible, and contributing to a permeable and well-connected urban structure. d) Integrate the portion of land zoned Groody Valley Green Wedge into any future residential scheme, ensuring its protection, enhancement, and appropriate incorporation as part of the wider green infrastructure network. e) Require all development proposals to be accompanied by a Mobility Management Plan, Traffic and Transport Assessment, and Road Safety Audit, prepared in accordance with Chapter 3 of the DoECLG Spatial Planning and National Roads Guidelines, to support sustainable movement patterns and safeguard road safety and to assess cumulative impact of development in the area and incorporate measures to safeguard the continued capacity, safety and efficiency of the national road networks and associated junctions.	4

	f) Ensure that building heights and finishes respect the established character of the surrounding area. g) Locate car parking underground, or to the rear of buildings or in multi-storey provision, with any necessary surface parking adequately screened, landscaped, and fully integrated into the site design in line with high-quality urban design and placemaking principles.	
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Volume 1: Chapter 3 – Spatial Strategy

Amendment No.	Proposed Alteration	Submission No.
2	Objective CA O1 - Crossagalla- It is an objective of the Council to: a) Require the comprehensive, coordinated and plan-led development of these lands through the preparation of a single, integrated masterplan for the entire landholding. The masterplan shall be prepared by suitably qualified professionals and shall be subject to consultation with, and agreement by, the Planning Authority prior to the submission of any planning application. The masterplan shall include relevant stakeholder consultation, with Limerick City and County Council and other relevant bodies including the National Transport Authority, Transport Infrastructure Ireland and Iarnród Éireann, to ensure a coordinated and plan-led approach to development. b) The masterplan shall establish a clear and robust spatial framework for the phased and sustainable development of the lands and shall demonstrate how residential development will be delivered in tandem with the timely provision of supporting community, social, recreational and physical infrastructure, having regard to the needs of both existing and future residents. c) Development shall provide for an appropriate range of residential densities, in accordance with the Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities, the principles of compact growth and the efficient use of serviced land. Higher densities shall be focused in accessible locations within the site, subject to high-quality urban design and residential amenity standards.	1, 4

	Pending the delivery of key infrastructural elements on this site and to facilitate delivery of housing, flexible density ranges may be considered in the early phases of the development subject to ensuring that later phases facilitate the overall achievement of density targets across the whole masterplan site. This shall be addressed clearly in a phasing plan within the masterplan. d)The masterplan shall incorporate a high-quality, connected network of public open spaces and green infrastructure, including the provision of usable and accessible open space play and recreation facilities which incorporates the strategic Blue-Green Infrastructure corridor route in accordance with the objectives and Development Management Standards of the Limerick Development Plan. Sustainable Urban Drainage Systems (SuDS) shall be fully integrated into the layout and design of the development and shall contribute to surface water management, biodiversity enhancement, climate resilience and placemaking. e) The development shall deliver a coordinated, developer-led road network linking the R512 and the Old Ballysimon Road, including the construction and delivery of those sections of the road network within the ownership/control of the developer, in accordance with Map 6 in Volume 2(A) of the Development Plan and in agreement with the Planning Authority. The design and delivery of this infrastructure shall have regard to the requirements of relevant transport bodies, including Iarnród Éireann and the National Transport Authority, and shall ensure the appropriate integration of the proposed route with existing and planned transport infrastructure, including the railway line. f) Any proposal shall require a Transport and Traffic Assessment and Road Safety Audit to assess cumulative impact of development in the area and incorporate measures to safeguard the continued capacity, safety and efficiency of the national road networks and associated junctions.	
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Volume 1: Chapter 3 – Spatial Strategy

Amendment No.	Proposed Alteration	Submission No.
3	Insert the following text into Variation Section 3.4.5.7 Rosbrien and amend associated Objective RNO1 – Rosbrien (Amendment No. 33) as follows: The Rosbrien lands comprise a strategic landbank of approximately 23.12 hectares, characterised by a generally flat topography. The site is bounded to the west by the L-1144-1 Rosbrien Road, to the rear by the M20 Motorway, and to the northeast by a cul-de-sac laneway providing access to a small number of residential properties and agricultural buildings. Forming the southern edge of the built-up area of Rosbrien, the lands present a significant opportunity to consolidate development within close proximity to Limerick City Centre. The site is well located in relation to established social and community infrastructure, including educational facilities, healthcare services, sports clubs and retail amenities. The frontage of the site has been identified as being at risk of flooding and is accordingly zoned for Open Space and Recreation. Any future development proposals must be supported by a comprehensive Site Specific Flood Risk Assessment (FRA) in accordance with the Planning System and Flood Risk Management Guidelines. Development of the lands shall be guided by an agreed Masterplan which should include relevant stakeholder consultation and a framework agreement, prepared in consultation with Limerick City and County Council and other relevant bodies including TII and the NTA, which shall address matters including access and movement, phasing, public open space provision, infrastructure delivery, surface water management (inclusive of SuDS), urban design principles and residential layout. The Masterplan shall ensure a coordinated, high-quality and sustainable approach to the development of these lands. Objective RN 01 - Rosbrien- It is an objective of the Council to: a) Require the comprehensive, coordinated and plan-led development of these lands through the preparation of a single, integrated	1, 3, 4, 14

	masterplan for the entire landholding. The masterplan shall be informed by the Local Transport Framework as per objective TF O1 prepared by suitably qualified professionals and shall be subject to consultation with, and agreement by, the Planning Authority prior to the submission of any planning application. The masterplan shall include relevant stakeholder consultation, with Limerick City and County Council and relevant bodies including the National Transport Authority and Iarnród Éireann, to ensure a coordinated and plan-led approach to development. b) Development shall provide for an appropriate range of residential densities, in accordance with the <i>Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities</i>, the principles of compact growth and the efficient use of serviced land. c) A Site Specific Flood Risk Assessment which shall provide detail on the most suitable point of access to this site from the Rosbrien Road in line with the provision of the Flood Risk Management Guidelines for Planning Authorities, 2009. d) A Transport and Traffic Assessment shall be undertaken to assess the impact of the proposed development and setting out mitigation measures, including the delivery by the developer of a continuous footpath to include active travel measures along the full Rosbrien Road site frontage and the provision of safe, accessible, and permeable pedestrian connections within the site. e) The masterplan shall provide for high-quality public open space and recreational facilities and shall incorporate design measures that integrate with and complement the adjoining lands zoned for Open Space and Recreation, respond sensitively to any archaeological features on site, and deliver a coherent, high-quality environment. Sustainable Urban Drainage Systems (SuDS) shall be fully integrated into the layout and design of the development,	
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	contributing to effective surface water management, enhanced biodiversity, climate resilience and placemaking.	
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Volume 1: Chapter 3 – Spatial Strategy

Amendment No.	Proposed Alteration	Submission No.
4	Insert new Objective TF O1 – Local Transport Framework after Section 3.4.5.7 Rosbrien in Chapter 3. Objective TF O1-Local Transport Framework: It is an objective of the Council to Prepare a local transport framework for the wider lands at Rosbrien (taking account of the Area Based Transport Assessment methodology or similar) in consultation with National Transport Authority, Transport Infrastructure Ireland and Iarnród Éireann to include the following; (i) appropriate provision of sustainable transport options to serve future residents of the area in consultation. (ii) Pedestrian and cycle linkages through the area and over the railway line towards Dooradoyle to provide greater connections to retail and community facilities	1, 3, 4

Volume 1: Chapter 8 - Infrastructure

Amendment No.	Proposed Alteration	Submission No.
5	Objective IN O9 - Public Waste Water - It is an objective of the Council to: a) Ensure adequate and appropriate wastewater infrastructure is available to cater for existing and proposed development, in collaboration with Irish Water, to avoid any deterioration in the quality of receiving waters and to ensure that discharge meets the requirements of the Water Framework Directive. b) Require all new developments to connect to public wastewater infrastructure, where available and to encourage existing developments that are in close proximity to a public sewer to connect to that sewer. These will be subject to a connection agreement with Irish Water and evidence of this agreement will be required as part of any planning application. c) Require all new development to provide separate foul and surface water drainage systems, to	6

	maximise the capacity of existing collection systems for foul water. d) Apply a presumption against any development that requires the provision of private wastewater treatment facilities (i.e. Developer Provided Infrastructure) other than single house systems and in very exceptional circumstances. d) Consider the provision of developer-led and bridging infrastructure at appropriate locations having regard to Circular NSP 01-2026 Developer Led Infrastructure (DLI) Initiative for Wastewater Services to support Housing Delivery and any subsequent revisions where the proposed development is subject to appropriate environmental assessment. Such a solution will only be considered where it is environmentally sustainable and would not affect the quality status of receiving waters. e) Support Uisce Éireann in the upgrade of Limerick Wastewater Treatment Plant, Corcanree pumpstation and the development of the Regional Bioresource Centre, in line with the appropriate and necessary environmental and ecological assessments, as required, to support both the existing and future growth and development of Limerick City into the future and to comply with the National Wastewater Sludge Management Plan.	
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Volume 1: Chapter 9 – Climate Action, Flood Risk and Transition to Low Carbon Economy

Amendment No.	Proposed Alteration	Submission No.
6	Insert the following Part (f) and Part (g) into Objective CAF O21 Identified Flood Risk as follows: Objective CAF O21 Identified Flood Risk It is an objective of the Council to: a) Ensure that no development shall commence on the lands identified as being at flood risk adjacent to the Raheen Business Park in the townlands of Ballycummin/ Rootiagh, zoned for High Tech/ Manufacturing, until a Site-specific Flood Risk Assessment, including hydraulic model has been prepared for the lands, which demonstrates that the flood risk for the lands can be mitigated or that a less vulnerable use can be accommodated on site.	1,2

	b) Ensure that on the Enterprise and Employment lands located to the northwest of the M20/M7/N18 junction to the south of Toppin's field, that no encroachment onto, or loss of the flood plain occurs at this location and that only water compatible development should be permitted for the lands that are identified as being at risk of flooding. c) Ensure any planning application, including proposals for water compatible uses, on the lands in Flood Zones A and B adjacent to the Coonagh TUS campus, zoned for Education and Community, shall include a comprehensive Site-Specific Flood Risk Assessment, incorporating a drainage assessment for the lands, which demonstrates that the flood risk can be mitigated and that water compatible uses can be accommodated without adversely impacting on the flood risk of neighbouring residential properties. d) No works including the undertaking of ground level changes shall commence on the lands in the National Technology Park subject to flood risk, until all flood mitigation measures proposed on the site to facilitate future development of the IDA lands have been put in place. These measures shall form part of a project-specific flood risk assessment being completed as part of any planning application. e) Any planning application on the lands zoned Data Centre at Rosbrien shall include a comprehensive Site Specific Flood Risk Assessment, which demonstrates that the flood risk can be mitigated and that access/egress, roads and water compatible uses can be accommodated without adversely impacting on the flood risk off site. f) e) Implement the flood mitigation measures included under the Justification Test including to ensure that vulnerable uses, including that of a residential nature, shall not be permitted at ground floor level on the District Centre zoned lands at Jetland/Ennis Road/ Ennis Road Retail Park, at Caherdavin/Moyross. (f) New or more intensive permissible uses on Variation No. 3 lands that overlap with Flood Zones A or B or with Future Climate Scenario Flood Risk Areas (as identified in Appendix I of the accompanying SFRA Addendum) shall be limited to water compatible uses. This limitation shall take primacy over any other related land use zoning	
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	provision. Proposals for developments within these areas shall be accompanied by a site specific flood risk. (g) Extensions of existing uses or minor development on Proposed Variation No. 3 lands that overlap with Flood Zones A or B or with Future Climate Scenario Flood Risk Areas (as identified in Appendix I of the accompanying SFRA Addendum) shall comply with requirements of the Planning System and Flood Risk Assessment Guidelines, and associated circular, including providing detailed design specifications as may be required to facilitate the impact of development. Extensions of existing uses or minor development within flood risk areas shall not: obstruct important flow paths; introduce a number of people into flood risk areas; entail the storage of hazardous substances; have adverse impacts or impede access to a watercourse, floodplain or flood protection and management facilities; or increase the risk of flooding elsewhere.	
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Volume 1: Chapter 12 – Land Use Zoning Strategy

Amendment No.	Proposed Alteration	Submission No.
7	(Footnote) 6. under Table 12.4 Except at Milford Care Centre, St.Gabriel's Foundation and Little Company of Mary Milford, where Nursing Homes/ Residential Care or Institution/ Retirement Village are Open for Consideration	25

Volume 6: Building Heights Strategy – Chapter 6

Amendment No.	Proposed Alteration	Submission No.
8	Policy TB2: Tall Buildings outside the City Centre Limerick City and County Council will aim to protect the character and characteristics of the City by limiting the location of tall buildings outside the City Centre (inner and outer areas). Generally tall buildings will only be permitted outside of the City Centre at designated District Centres, at Local Centres, where justified on infill and brownfield sites identified in the Settlement Capacity Audit, at Strategic Employment Locations, at appropriate locations within the Regeneration Areas and or in	1

	accordance with the locations and 'Tall Building Classifications' shown on Map 6.8 of this Building Height Strategy for Limerick City.	
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Amendment No.
No.1 of Strategic Flood Risk Assessment (SFRA) Addendum Report

Insert into Strategic Flood Risk Assessment (SFRA) Addendum Report

Land Use Zoning	Flood Zone	Justification Test (if one of the following fails; all must be passed for the test to be passed)							Overall Result (Fail or Pass)
		Settlement targeted for growth under the NPF, RSES and/or CDP?	Is the zoning of the lands required to achieve the proper planning and sustainable development of the settlement and in particular has the required sub-criteria been satisfied ¹ ?					Has flood risk assessment to an appropriate level of detail been carried out as part of the SEA as part of the plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impact elsewhere?	
			(i) – see footnote	(ii) – see footnote	(iii) – see footnote	(iv) – see footnote	(v) – see footnote		
Any lands zoned Existing Residential overlapping with Flood Zone A / B	A and B	Yes	No	No	No	No	No	A Stage 1 and 2 Flood Risk Assessment has been undertaken as part of the plan preparation process. This level of assessment is considered appropriate and has informed land use zoning and written provisions. The SFRA outlines the measures integrated into the existing Plan and the	Fail, however the text integrated into the Variation (parts f) & g) of written objective – CAF O21) will limit
Z10	A and B	Yes	Yes	Yes	Yes	No	No		

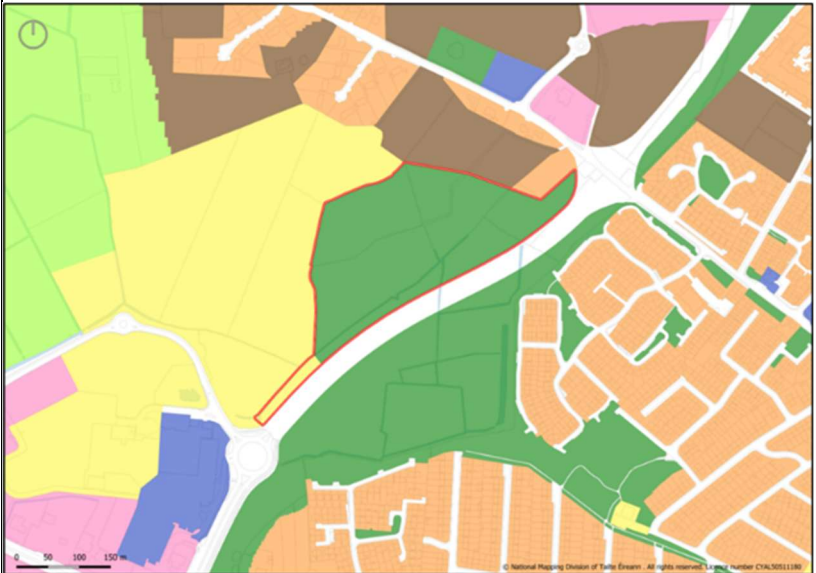
¹ (i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement; (ii) Comprises significant previously developed and/or under-utilised lands; (iii) Is within or adjoining the core of an established or designated urban settlement; (iv) Will be essential in achieving compact and sustainable urban growth; and (v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.

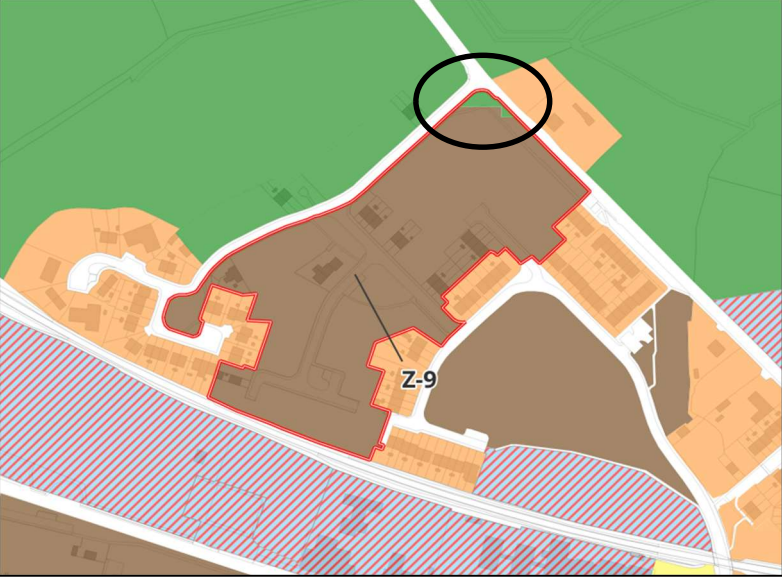
Z11	A and B	Yes	Yes	Yes	Yes	No	No	Proposed Variation to adequately manage flood risks. A precautionary approach has been applied to the zoning of undeveloped lands. Future development will: be subject to site-specific flood risk assessments; and comply with the flood risk management provisions of the Plan as varied, including structural and non-structural risk management measures. This is in order to ensure that flood hazard and risk to the area and to other adjoining locations will not be increased or, if practicable, will be reduced. Overlaps between Land Use Zoning and Flood Zones have been mapped to clearly indicate lands constrained by flood risk – these are subject to the Constrained Land Use Provisions. Development will be subject to the provisions of the Plan as varied that relate to flood risk and climate change.	development at these lands.
U2	A and B	Yes	No	Yes	No	No	No		
U3	A and B	Yes	No	Yes	No	No	No		
U37	A and B	Yes	No	Yes	No	Yes	No		
U42	A and B	Yes	No	Yes	No	Yes	No		
U43	A and B	Yes	No	Yes	No	Yes	No		

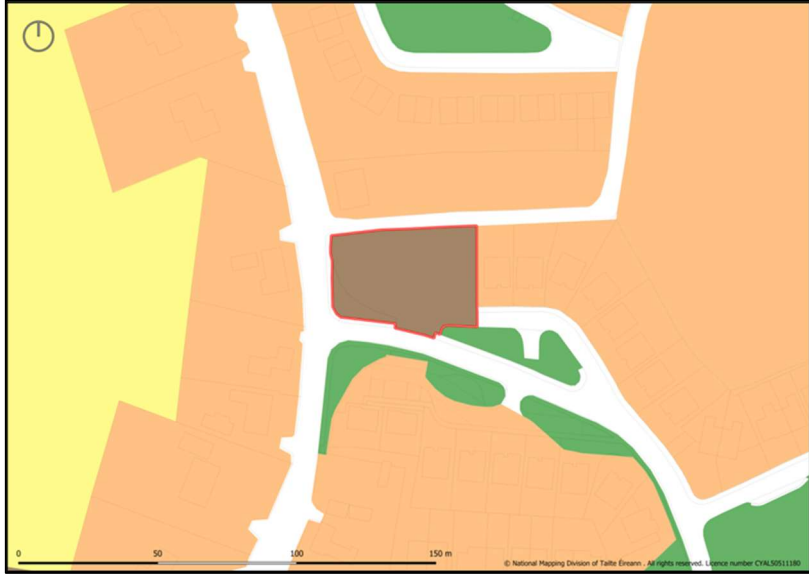
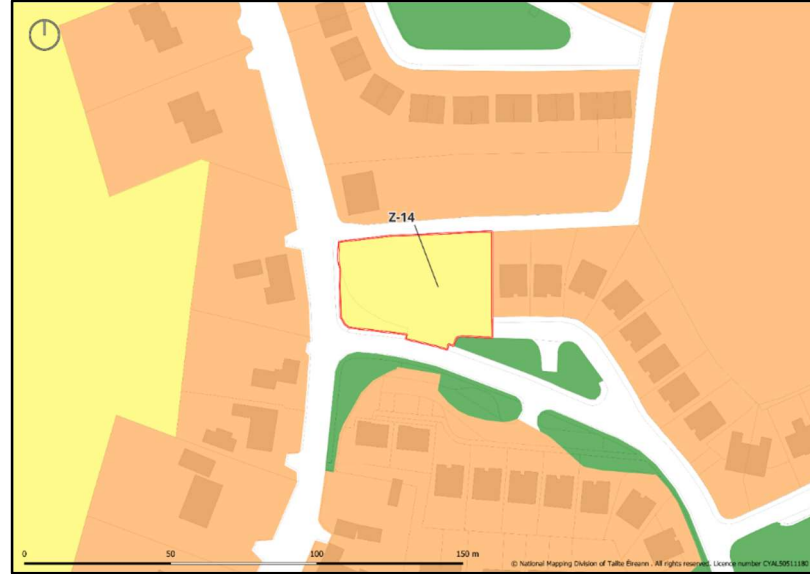
3.2. Material Alterations to Settlement Capacity Audit

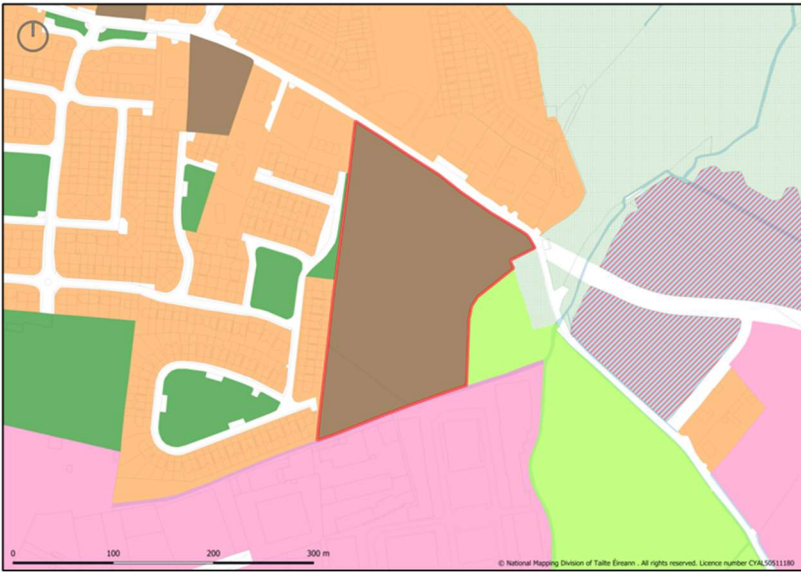
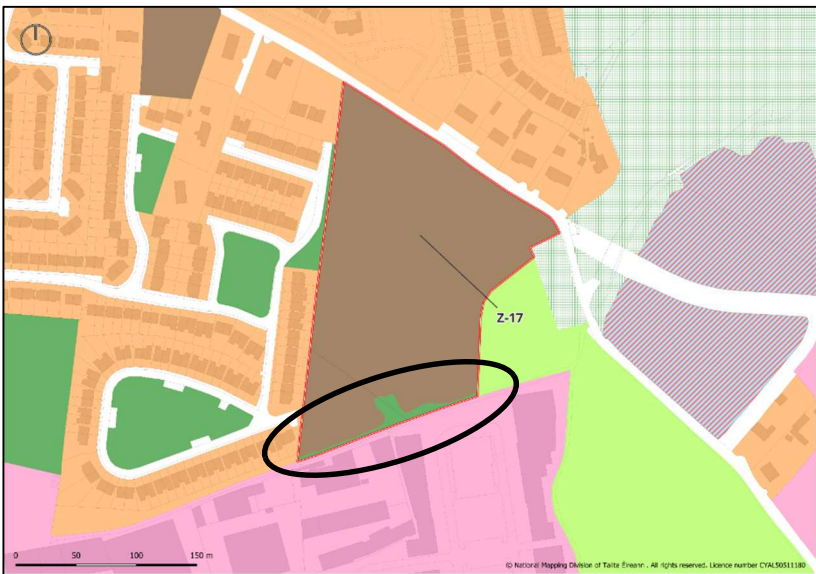
Amendment No.		Proposed Alteration														Submission No.	
No.1 of Volume 2 (a)		Remove Site No.61/Z14 from the Settlement Capacity audit and renumber accordingly														1 .	
Site No.	Zoning	Area (ha.)	Assumed Residential Density Range per ha.	Estimated Low/ Mid/ High Range Residential Yield	Lighting	Footpaths	Public Transport	Road Access	Water	Foul	Surface Water	Flood Risk	Infil/ Brown-field	Proximity to Schools	Time Line/ Cost	Planning History/ Comments if applicable	Service Status/ Tier
61/ Z14	New Residential	0.18	35-50	6/8/9													

3.3. Material Alterations to Maps

Amendment No.	Proposed Alteration	Sub No.
2 of Volume 2a	To rezone a portion of U8 from Community and Education to Open Space and Recreation.	1,2
	Proposed Variation  Proposed Material Alteration 	

Amendment No.	Proposed Alteration	Sub No.
3 of Volume 2a	To rezone a portion Z9 from New Residential to Open Space and Recreation Proposed Variation  Proposed Material Alteration 	1, 2

Amendment No.	Proposed Alteration	Sub No.
4 of Volume 2a	To rezone lands included in Variation Site. No Z14 from New Residential to Education and Community Proposed Variation  Proposed Material Alteration 	13, 18

Amendment No.	Proposed Alteration	Sub No.
5 of Volume 2a	To rezone a portion of Z17 from New Residential to Open Space and Recreation. Proposed Variation Proposed Material Alteration  	1, 2

Appendix 1. Site Specific Submissions

