



Comhairle Cathrach
& Contae Luimnigh

Limerick City
& County Council

Pleanáil, Oidhreacht agus Corn Ryder
Ceanncheathrú Chorpáraideach
Comhairle Cathrach agus Contae Luimnigh
Cé na gCeannaithe
Luimneach, V94 EH90

Planning, Heritage and Ryder Cup
Corporate Headquarters
Limerick City and County Council
Merchant Quay
Limerick, V94 EH90

16th September 2026

To: The Mayor, Príomh Chomhairleoir and Each Member of Limerick City and County Council.

**Consideration of Mayor's Report on Proposed Material Alterations to Proposed Variation No. 3
of the Limerick Development Plan 2022-2028 (as varied).**

A Chomhairleoir, a chara,

Members are requested to consider the modification and the Report of the Mayor on the Material Alterations to Proposed Variation No. 3 to the Limerick Development Plan 2022-2028 (as varied) submitted to the Members of the planning authority on 9th September 2026 and decide, by resolution in accordance with Section 58(17) to:

- make the variation as originally proposed by the planning authority
- make the variation with the material alterations that was subject to the notice under subsection (13) or
- refuse to make the variation

Where the members of a planning authority decide to make the variation with the material alterations that was the subject of the notice under subsection (13), they may do so subject to any further minor modifications to the alteration that they consider appropriate.

Is mise le meas,

Maria Woods
Senior Planner,
Planning, Heritage & Urban Development

Limerick Development Plan 2022-2028 (as varied)

Proposed Material Alterations to Proposed Variation No. 3

Section 58(15) Mayor's Report on Proposed Material
Alterations to Proposed Variation No.3 to the Limerick
Development Plan 2022-2028 (as varied)

9th September 2026



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Section 1 – Introduction

1.1 Overview

Proposed Variation No. 3 to the Limerick Development Plan 2022-2028 (as varied) was placed on public display from 18th April 2026 to 18th May 2026, inclusive. During that period a total of 35 submissions were received, following which a Mayor's Report was prepared and submitted to the Elected Members for their consideration. At a meeting of Limerick City and County Council on 13th July 2026, the Elected Members proposed to modify Proposed Variation No. 3 to the Limerick Development Plan 2022-2028 (as varied). The Proposed Material Alterations and associated documents were placed on public display for a period of four weeks from Saturday 25th July 2026 to Monday 24th August 2026, inclusive. During that period a further 15 submissions were received. This report relates to the issues raised in those submissions, insofar as they relate to the Proposed Material Alterations.

1.2 Purpose of the Mayor's Report

This Mayor's Report forms part of the statutory procedure for the Proposed Material Alterations to Proposed Variation No.3, as set out under Section 58(13) of the Planning and Development Act, 2024 (as amended) (hereafter referred to as 'the Act') which states:

"that written submissions with respect to the modification that constitutes a material alteration of the proposed variation or an assessment referred to in *paragraph (b)* or *(c)* and made to the planning authority within the period specified in the notice shall be taken into account by the authority before the variation of the development plan is made."

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

This report presents the submissions and observations made following the publication of the Proposed Material Alterations to the 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.

In line with the legislation only submissions / observations in relation to a Proposed Material Alteration to Proposed Variation No. 3, including alterations to mapping and associated Environmental Reports are addressed in this report. Where a submission comments on both the proposed material alterations and other aspects of the variation that are not subject to material alteration, or seeks clarification on such

aspects, only the comments relating to the proposed material alterations will be addressed.

1.3 Public Display

The Proposed Material Alterations to the Proposed Variation were placed on public display for a period of not less than 4 weeks from Saturday 25th July until Monday August 24th 2026, inclusive. Written submissions and/or observations but only with respect to the Proposed Material Alterations were invited during this public consultation period.

The Notice was placed in the Limerick Leader dated Saturday 25th July 2026 and the Council website advising that that the Proposed Material Alterations, together with its associated environmental reports were on public display and how these could be accessed and invited submissions / observations up to and including the closing date of Monday 24th August 2026.

The notice was also circulated to Prescribed Authorities and other relevant infrastructure providers and stakeholders inviting submissions during the consultation period.

The Proposed Material Alterations together with its associated environmental reports were on public display for the duration of the consultation period at the following locations:

- Limerick City and County Council Corporate Headquarters, Merchants Quay, Limerick;
- Limerick City and County Council, County Hall, Dooradoyle, Limerick;
- Limerick City and County Council Municipal District Offices in Newcastle West, Kilmallock and Rathkeale;
- Limerick City Library, Barrow House, Michael Street, Limerick
- Dooradoyle Library, Dooradoyle, Limerick;
- Watch House Cross Community Library, Watch House Cross Shopping Centre, Moyross, Limerick.

The Proposed Material Alterations, associated environmental reports (including SEA and AA determinations) and mapping were available to view or download from the Council's dedicated consultation platform: <https://mypoint.limerick.ie>

A total of fifteen (15) written submissions were received within the statutory time frame in response to the public display period.

1.4 Next Steps

Following consideration of the Proposed Material Alterations to Proposed Variation No. 3 and the Mayor's Report, the Elected Members may make Proposed Variation No. 3 with or without the Proposed Material Alterations.

As set out under Section 58(17) of the Act, Elected Members may:

(a)

- (i) make the variation as originally proposed by the planning authority,
- (ii) make the variation with the material alteration that was the subject of the notice under subsection (13), or
- (iii) refuse to make the variation.

(b) Where the members of a planning authority decide to make the variation with the material alteration that was the subject of the notice under subsection (13), they may do so subject to any further minor modifications to the alteration that they consider appropriate.

(c) For the purposes of paragraph (b), a modification to the material alteration shall be deemed to be minor where it—

(i) does not substantially or materially alter the material alteration,

(ii) is not likely to have significant effects on the environment or on any European site, and

(iii) does not relate to—

- (I) an increase in the area of land zoned for any purpose, or
- (II) an addition to or deletion from the record of protected structures.

In accordance with Section 58(16)(b) of the Planning and Development Act 2024 (as amended), the consideration of the proposed Material Alterations and proposed Minor Modifications, together with the Mayor's Report, shall be completed not later than four weeks from the date of submission of the Mayor's Report to the members of the Planning Authority.

The proposed Material Alterations and any Minor Modifications will be considered by the Elected Members at the Full Council Meeting in September 2026.

Following consideration of the Mayor's Report, the elected members may resolve to make the Proposed Variation No. 3 to the Limerick Development Plan 2022-2028 (as varied), with or without the recommended modifications.

A variation to a development plan shall take effect from the day that the variation is made.

1.5 Structure of the Report

Section 1 (this section) contains an overview of the Proposed Material Alterations to 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 Material Alterations to the Proposed Variation, including any submissions on the Strategic Environmental Assessment (SEA) Screening Determination and Screening for SEA Report and Appropriate Assessment (AA) Screening Determination and AA Screening Report. 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 Material Alterations to the Proposed Variation.

Section 3 includes any minor modifications arising from the submissions received.

Section 4 sets out the recommended changes.

Section 2 – Submissions Received

Sub No.	Submission Received	MyPoint Submission Ref. No.
1	Office of the Planning Regulator (OPR)	LCC-C524-PMAV3-12
2	Office of Public Works (OPW)	LCC-C524-PMAV3-6
3	National Transport Authority (NTA)	LCC-C524-PMAV3-5
4	Transport Infrastructure Ireland (TII)	LCC-C524-PMAV3-4
5	Marine Area Regulatory Authority (MARA)	LCC-C524-PMAV3-1
6	Uisce Éireann	LCC-C524-PMAV3-8
7	ESB	LCC-C524-PMAV3-9
8	Environmental Protection Agency (EPA)	LCC-C524-PMAV3-10
9	Department of Education and Youth	LCC-C524-PMAV3-11
10	Land Development Agency (LDA)	LCC-C524-PMAV3-13
11	Health Service Executive (HSE)	LCC-C524-PMAV3-14
12	Coakley O'Neill on behalf of GLR Property Ltd.	LCC-C524-PMAV3-7
13	Tom Phillips + Associates on behalf of Arrowdale Limited	LCC-C524-PMAV3-15
14	David Barton	LCC-C524-PMAV3-2
15	David Barton	LCC-C524-PMAV3-3

2.1 Summaries and Mayor's Recommendations for Submissions relating to the Proposed Material Alterations

1.	Name/Group: Office of the Planning Regulator (OPR) – Ref: LCC-C524-PMAV3-12	
	Submission summary:	Mayor's Response
	The OPR thanks the Planning Authority for their work in preparing the Material Alterations to the Proposed Variation No. 3 of the Limerick Development Plan. The OPR states that following the adoption of the Variation, the OPR will carry out a further assessment of the Variation under Section 63 of the Planning and Development Act 2024. Response to the Office's submission on the Proposed Variation The OPR welcomes and commends the significant work that has been undertaken by the Planning Authority to address the recommendations and observations raised in its submission at draft stage. The OPR acknowledges the response to Recommendation 1 regarding lands at Rosbrien, where Objective RN 01 has been amended through Proposed Material Alteration (PMA) No. 4 of Volume 1 to require the preparation of a Masterplan informed by Local Transport Framework / Area Based Transport Assessment in consultation with the Planning Authority and relevant stakeholders including the NTA and Irish Rail. While the lands are not currently served by existing or proposed public transport, the area adjacent to Dooradoyle presents a significant opportunity for the	The OPR is thanked for its submission and the contents of it are noted. Noted. Response to the Office's submission on the Proposed Variation Noted.

sequential consolidation and growth of the city. The OPR supports the proposed plan-led approach and welcomes the strengthened requirements for stakeholder engagement and transport assessment together with the inclusion of Objective TF O1 under Proposed Material Alteration No. 5 of Volume 1 which provides for pedestrian and cycle connectivity through the Rosbrien area and across the railway line to Dooradoyle. With regard to Flood Risk Management, the OPR welcomes the positive response to Recommendation No. 2 and the inclusion of additional text within Objective CAF O21 at PMA No. 7 of Volume 1 incorporating key findings of the Strategic Flood Risk Assessment relating to both current and future flood risks. The OPR commends the review of the Justification Test and the consequent rezoning of Site U8 from Community and Education to Open Space and Recreation (PMA No 2 of Volume 2a) and Site Z9 from New Residential to Open Space and Recreation (PMA No. 3 of Volume 2a) avoiding vulnerable development within identified flood zones. The OPR has identified a small number of opportunities to provide further clarification and to update the SFRA as set out in the OPR's Material Alterations Observation 1. The OPR welcomes the Planning Authority's review of the Core Strategy including additional figures on low/medium/high density residential yields across settlements.	Noted. Noted, a portion of U8 and Z9 have been rezoned to reflect the lands that overlap with flood risk thereby avoiding vulnerable development within identified flood zones. Noted. Noted.
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The OPR also welcomes amendments to Objective CA O1 for the Crossagalla masterplan (PMA No. 3 of Volume 1), together with additional clarification provided under Policy TB2 regarding appropriate locations for tall buildings (PMA No. 1 of Volume 6). Overview of Submission on Proposed Material Alterations. The OPR has included an Observation in relation to Flood Risk Management which is intended to assist the Planning Authority in finalising the Proposed Variation and ensuring its effective implementation. Observation 1 Flood Risk Management The OPR welcomes the Planning Authority's response to flood risk concerns, including additional Justification Tests in the SFRA Addendum and the rezoning of Site Z9 from New Residential to Open Space and Recreation. While no zoning changes are proposed for sites Z10 and Z11, the OPR supports the inclusion of new flood risk mitigation measures under paragraphs (f) and (g) of Objective CAF O21 and recommends that these sites be clearly cross-referenced on the zoning map for transparency. The OPR also notes the rezoning of part of Site Z17 to Open Space and Recreation to address flood risk associated with an unmapped watercourse.	Noted. Overview of Submission on Proposed Material Alterations. Noted. Observation 1 Flood Risk Management Noted. Noted. A minor modification is proposed to cross-reference sites Z10 and Z11 in CAF021, thereby illustrating the applicability of Objective CAF O21 to these sites. Noted.
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	It welcomes the review of Sites Z23 and U24, which confirmed that no watercourses exist on those lands and that no further action is required. The OPR advises that these findings should be incorporated into the SFRA to ensure the evidence base is fully reflected. Finally, the OPR recommends that the Planning Authority consider opportunities for integrated, area-based Sustainable Urban Drainage Systems (SuDS) and green infrastructure, particularly in light of the large residential zonings proposed under Variation No. 3. In this respect it recommends an update to the SFRA, in order to avoid reliance on individual site-by-site solutions.	Noted. The final consolidated SFRA report prepared following the making of the Variation shall reflect this. Noted, relevant provisions have already been integrated into the existing Limerick Development Plan 2022-2028.
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Mayor's Recommendation:

To make Proposed Material Alteration (PMA) No. 7 of Volume 1 with the following minor modification to parts (f) and (g) of Objective CAF O21:

(f) New or more intensive permissible uses on Variation No. 3 lands including Sites Z10 and Z11 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 including the City Centre zoning applicable to Sites Z10 and Z11. Proposals for developments within these areas shall be accompanied by a Site-Specific Flood Risk Assessment.

(g) Extensions of existing uses or minor development on Proposed Variation No. 3 lands including Sites Z10 and Z11 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.

2	Name/Group: Office of Public Works (OPW) – Ref: LCC-C524-PMAV3-6
	Submission summary: Mayor's Response
	The submission is made specifically concerning flooding and flood risk management. Further submissions on the Material Alterations may be made by the OPW concerning the estate portfolio, heritage and other areas of responsibility. The OPW has carried out a review of the documents and notes the continued commitment to adhere to the appropriate application of the Planning System and Flood Risk Management Guidelines (2009) and Circular PL02/2014. Flood Risk Management (FRM) - General Guidance The revision of the National Planning Framework (2025) sets out the National Policy Objective 78 to '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. Nature-based Solutions and SuDS The OPW had previously commented that 'The Guidelines recommend that Strategic The OPW is thanked for its submission, and its contents have been noted. Flood Risk Management (FRM) - General Guidance Noted. Noted. Nature-based Solutions and SuDS

Flood Risk Assessment provide guidance on the likely applicability of different SuDS techniques for managing surface water run-off at key development sites and identifies where integrated and area-based provision of SuDS and green infrastructure are appropriate to avoid reliance on individual site by site solutions". The OPW states that this comment has not been addressed as part of the Material Alterations and that there are a number of large zonings where integrated and area-based provisions of SuDS may be appropriate in this context. Justification Tests The OPW had previously identified a number of areas which overlapped with areas of identified flood risk which had been zoned for vulnerable uses inappropriate to the level of flood risk identified. For Sites Z9 (White Cross/ Sarsfield Gardens, Moyross) and U8 (Knockalisheen Road), the lands that overlap with flood risk are proposed to be rezoned as Open Space and Recreation and for Sites Z11 (King's Island) and U3 (Clonmacken Road) justification tests have been supplied, however the lands do not satisfy all criteria of the tests and development is to be limited by Objective CAF O21. The OPW welcomes the addition of flood risk provisions set out in the Variation into Objective CAF O21 – Identified Flood Risk, and these have also been referenced in the supplied justification tests. Consideration of Climate Targets Additional text is proposed to Objective CAF O21 that Future Climate Scenario	Noted, relevant provisions have already been integrated into the existing Limerick Development Plan 2022-2028 for example Section 11.3.11 SuDS (Sustainable Drainage Systems). Justification Tests Noted. See response to OPR submission above, whereby a minor modification will be added to CAF O21 to cross reference sites Z10 & Z11. Consideration of Climate Targets Noted.
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	Flood Risk Areas shall be limited to water compatible uses. Unmapped Watercourses The EPA flow network data indicates watercourses passing through or adjacent to lands at Sites Z17 (Ballysimon/Towlerton), Z23 (Rosbrien) and U24 (Newtown, Castletroy). Responses to this comment have been provided in the Mayor's Report. For Site Z17, flood zones have been identified and is proposed in Proposed Material Alteration No. 5 of Volume 2(a) to zone the lands overlapping with the flood zones as Open Space and Recreation. The Flood Zone map should be updated accordingly. For sites Z23 and U24 the watercourses are noted as being "no longer extant" and that "site analysis inclusive of onsite visits it is confirmed that there no watercourse" respectively. The SFRA should include these conclusions regarding the watercourses.	Unmapped Watercourses Noted. This will be reflected in the final, consolidated SFRA report prepared following the making of the Variation. Noted, as above.
Mayor's Recommendation:		
No further amendments/modifications proposed.		

3	Name/Group: National Transport Authority (NTA) – Ref: LCC-C524-PMAV3-5	
	Submission summary:	Mayor's Response
	The National Transport Authority (NTA) has reviewed the Material Alterations to Proposed Variation No. 3 of the Limerick Development Plan 2022–2028 and with reference to the Limerick Shannon Metropolitan Area Transport Strategy (LSMATS) 2040 makes the following observations:	The NTA is thanked for its submission and the contents of it are noted.

Proposed Material Alteration No. 3 of Volume 1 – Crossagalla The NTA welcomes the inclusion of a requirement to consult with the Authority regarding the future development of lands at Crossagalla in the interest of ensuring a plan-led approach to development. Proposed Material Alterations Nos. 4 & 5 of Volume 1 – Rosbrien The NTA reaffirms its previous concern that the proposed residential lands are not currently within walking distance of public transport services and are not proposed to be served under the current BusConnects Network Redesign. As a result, there is a risk that development of these lands could become overly dependent on private car use. The NTA welcomes the proposed alterations requiring the preparation of a Local Transport Framework to inform a Masterplan for the lands and the proposed consultation with the NTA and other relevant agencies during the preparation of same. The Authority states that any future public transport services to the area would be dependent on future funding and resource allocations and states that BusConnects Limerick has not yet been implemented and remains subject to funding as sources allow.	Proposed Material Alteration No. 3 of Volume 1 – Crossagalla Noted. Proposed Material Alteration Nos. 4 & 5 of Volume 1 – Rosbrien Noted, however as acknowledged in the OPR submission these lands present a significant opportunity for the sequential consolidation and growth of the city. Noted. Noted.
Mayor's Recommendation:	
No further amendments/modifications proposed.	

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4	Name/Group: Transport Infrastructure Ireland (TII) – Ref: LCC-C524-PMAV3-4	
	Submission summary:	Mayor's Response
	TII notes the publication of consultation in relation to Proposed Material Alterations to Proposed Variation No. 3 to the Limerick Development Plan 2022-2028 (as varied) TII welcomes the Proposed Material Alterations arising from the consideration of their initial submission on the Proposed Variation No. 3. In relation to other Proposed Material Alterations on display, TII has no specific observations.	TII is thanked for its submission and its contents are noted. Noted.
Mayor's Recommendation:		
No further amendments/modifications proposed.		

5	Name/Group: Maritime Area Regulatory Authority (MARA) – Ref: LCC-C524-PMAV3-1	
	Submission summary:	Mayor's Response
	The Maritime Area Regulatory Authority (MARA) notes that Limerick City and County Council has published Material Alterations to Proposed Variation No. 3 of the Limerick Development Plan 2022-2028. MARA states that none of the material alterations relate to zoned lands located within the Maritime Area or those lands directly adjoining the Maritime Area. MARA states that it has no additional comments beyond those already made in its submission of 28th April 2026.	MARA is thanked for its submission, and the contents of the submission are noted. Noted.

	MARA reiterates its previous advice that planning applications within and directly adjacent to the Maritime Area must be referred to MARA at validation stage for comment. It also reminds the Planning Authority of its obligation under Section 58(18)(c) of the Planning and Development Act 2024 to provide MARA with a copy of the adopted variation within one week of the making of the variation.	Noted.
Mayor's Recommendation:		
No further amendments/modifications proposed.		

6	Name/Group: Uisce Éireann – Ref: LCC-C524-PMAV3-8	
	Submission summary:	Mayor's Response
	Uisce Éireann (UÉ) welcomes the opportunity to comment on the Proposed Material Alterations (PMA) and states that they will continue to engage with Limerick City and County Council as the development plan progresses. PMA No. 1 of Volume 1 The additional clarifications included are welcome. However, additional clarification on how population estimates for the development plan period and beyond, are catered for, would be beneficial for future planning of capacity requirements. PMA Nos. 3, 4 and 5 of Volume 1	Uisce Éireann (UÉ) is thanked for its submission and its comments are noted. PMA No. 1 of Volume 1 Noted, the Core Strategy reflects Housing Growth Requirements i.e., the potential number of housing units in the relevant period rather than a population target. This is deemed appropriate and allows Uisce Éireann to make their own population predictions based on housing units. PMA Nos. 3, 4 and 5 of Volume 1 Noted.

	Early engagement with UÉ in relation to master planning and road/transport infrastructure projects are encouraged to support the appropriate sequencing of works on water and wastewater networks with projects planned or underway. PMA No. 6 of Volume 1 UÉ welcomes the inclusion of new paragraph f) in Objective IN O9 (Public Waste Water). In addition, it is recommended that public utilities should be included as a permissible use across all land use classes within the zoning matrix to facilitate the delivery, upgrading, and expansion of water services infrastructure required to support the planned population and development growth set out in the Core Strategy (as per UÉ submission to proposed Variation no. 3, 18th May 2026). PMA No. 2 of Volume 2(a) Comments on serviceability of lands provided in previous stages of the Development Plan making process should be noted.	PMA No. 6 of Volume 1 Noted. The request to include public services and public utilities as a permissible use across all land use classes is not considered warranted as such uses are not precluded by any zoning type. PMA No. 2 of Volume 2(a) Noted.
Mayor's Recommendation:		
No further amendments/modifications proposed.		

7	Name/Group: ESB – Ref: LCC-C524-PMAV3-9	
	Submission summary:	Mayor's Response
	The ESB welcomes the opportunity to make a submission to the Material Alterations of the Proposed Variation No.	The ESB is thanked for their submission and its contents are noted.

	3 of the Limerick County Development Plan 2022 – 2028. While this submission addresses solely the Proposed Material Alterations, it should be considered within the broader context of their prior submission to Proposed Variation No. 3 of the Limerick County Development Plan submitted on 18th May 2026 (Ref: LCC-C504-V3LDP-24). ESB having reviewed the Mayor’s Report response to the ESB’s submission and notes that no change to the proposed variation was recommended, however the ESB welcomes the recognition of the importance of upgrading and expanding the electricity network and the commitment for continued opportunities to collaborate with Limerick City and County Council to proactively ensure the timely delivery of essential electricity infrastructure. ESB remains committed to working collaboratively with Limerick City and County Council and other stakeholders to support the delivery of sustainable growth in the County and would welcome the opportunity to engage further in relation to infrastructure planning, network capacity and development sequencing as the Proposed Variation is implemented.	Noted. Noted. Noted.
Mayor’s Recommendation:		
No further amendments/modifications proposed.		

8	Name/Group: Environmental Protection Agency (EPA) – Ref: LCC-C524-PM3-10	
	Submission summary:	Mayor’s Response

The EPA in its role as SEA environmental authority under the SEA Regulations focuses on promoting the full and transparent integration of the findings of the Environmental Assessment into plans and programmes and advocating that the key environmental challenges for Ireland are addressed as relevant and appropriate to the plan or programme. Their functions do not include approving or enforcing SEAs or plans or programmes. Proposed SEA Determination The EPA notes the proposed determination regarding the need for SEA of the Alterations. The EPA prioritises reviewing key sector plans and supports local authority land-use planning through its guidance document, <i>SEA of Local Authority Land Use Plans – EPA Recommendations and Resources</i>. This regularly updated document outlines recommendations for incorporating environmental considerations into local plans and should be taken into account, where relevant, in assessing the Material Alterations. Sustainable Development Limerick City and County Council should ensure that the Variation supports proper planning and sustainable development, with adequate infrastructure available to serve future development. The Material Alterations should also align with national climate change mitigation and adaptation commitments, relevant climate adaptation plans, and other applicable higher-level plans and programmes.	The EPA is thanked for its submission, and the contents are noted in this response. Proposed SEA Determination Noted. Relevant EPA recommendations and guidance have been considered in the preparation and assessment of the Variation No.3. Sustainable Development Noted. Proposed Variation No. 3 has been prepared having regard to the principles of proper planning and sustainable development and is supported by the relevant statutory environmental assessments.
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Future Modifications to the Variation Where further changes to the Variation are proposed, these should be screened for likely significant effects in accordance with SEA Regulations. SEA Statement – “Information on the Decision” Once the Variation is adopted, the Council should prepare an SEA Statement that summarises the following: • How environmental considerations have been integrated into the Variation; • How the Environmental Report, submissions, observations and consultations have been considered during the preparation of the Variation; • The reasons for choosing the Variation adopted in the light of other reasonable alternatives dealt with; and • The measures decided upon to monitor the significant environmental effects of implementation of the Variation. A copy of the SEA Statement with the above information should be sent to any environmental authority consulted during the SEA process. Environmental Authorities Under the SEA Regulations, you should consult with: • Environmental Protection Agency; • Minister for Housing, Local Government and Heritage;	Future Modifications to the Variation Noted. SEA Statement – “Information on the Decision” Noted. Environmental Authorities Noted.
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	• Minister for Climate, Energy and the Environment; and, • Minister for Agriculture, Food, and the Marine. • any adjoining planning authority whose area is contiguous to the area of a planning authority which prepared a draft plan, proposed variation or local area plan.	
Mayor's Recommendation:		
No further amendments/modifications proposed.		

9	Name/Group: Department of Education and Youth – Ref: LCC-C524-PMAV3-11	
	Submission summary:	Mayor's Response
	The Department has considered the documentation and make the following comments in relation to the proposed material alterations. Proposed Material Alteration No. 1 of Volume 1 The department notes the proposed material alteration to the Core Strategy Table which contains changes for: • Zoned Land Provision (ha.) and Household Growth 1 - Potential Yield No. of Residential Units at Lowest Density in the Metropolitan Area. • Household Growth 2 - Potential No. of Residential Units at Medium Density which has a revised figure of 42,157 units for the overall City and County; and • Household Growth 3 - Potential No. of Residential Units at High Density which has a revised figure	The Department is thanked for its submission and the contents of it have been noted. Proposed Material Alteration No. 1 of Volume 1 The revised residential growth potential unit figures included within the amended Core Strategy table represent a potential capacity based on the application of low, medium and high-density scenarios to zoned lands. The actual delivery of housing units over the lifetime of the Development Plan will be influenced by a range of factors, including infrastructure capacity, market conditions, land availability and planning considerations.

	of 61,081 units for the overall City and County. Allowing for the Census 2022 average of 2.7 persons per household in County Limerick, these proposed 61,081 units (if delivered) could see a population increase of over 160,000 people within the City and County. If the above figures materialise, it would see the demand for school places increase substantially and put significant pressure on existing schools to cater for the extra place requirement. Given that the unit figures identified at Housing Growth 2 and Housing Growth 3 in the amended Core Strategy table are of such a significance, it will be essential and beneficial for the department to have further engagement with the Council in relation to the potential and significant additional school provision that may be required arising from the adoption of this variation as it is proposed. Proposed Material Alteration No. 2 of Volume 2(a) The department notes the proposed amendment to rezone a portion of U8 (Coonagh/Knockalisheen Road) from Community and Education to Open Space and Recreation. Proposed Material Alteration No. 4 of Volume 2(a) The department notes the proposed amendment to revise Proposed Amendment Z14 (Golf Links Road) to rezone lands included in Variation Site No	The Council acknowledges the importance of ensuring that social and community infrastructure, including educational facilities, is planned in tandem with population growth. Ongoing engagement with relevant infrastructure providers and Government departments, including the Department of Education, will continue to support the sustainable development of Limerick City and County. Proposed Material Alteration No. 2 of Volume 2(a) Noted. Proposed Material Alteration No. 4 of Volume 2(a) The proposed zoning will facilitate the delivery of educational and community infrastructure on the site,
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	Z14 from New Residential to Education and Community. The department acknowledges the crucial importance of the ongoing work of the Council in ensuring sufficient and appropriate land is zoned for educational needs and look forward to continuing engagement with the Local Authority.	including the potential provision of a crèche/childcare facility, which has been identified as a significant need within the local community. Noted.
Mayor's Recommendation:		
No further amendments/modifications proposed.		

10	Name/Group: Land Development Agency – Ref: LCC-C524-PMAV3-13	
	Submission summary:	Mayor's Response
	The LDA supports the proposed Material Alterations to Variation No. 3 of the Limerick Development Plan 2022-2028, noting its alignment with the revised National Planning Framework and current national planning guidelines on housing growth and sustainable residential development. Proposed Material Alteration No. 4 of Volume 1 The submission focuses on Proposed Material Alteration No. 4 of Volume 1 relating to Objective RN 01 (Rosbrien), covering a strategic landholding of approximately 23.12 hectares. The LDA reiterates its support for the proposed rezoning of these lands for residential, open space and recreation and agricultural uses.	The LDA is thanked for its submission and its contents are noted. Proposed Material Alteration No. 4 of Volume 1 Noted.

	The LDA welcomes the inclusion of a requirement for an integrated masterplan, recognising its role in guiding the delivery of high-quality open spaces, appropriate residential densities, placemaking, active travel infrastructure and stakeholder engagement. The LDA considers the lands to be of strategic importance for supporting compact growth and achieving housing delivery targets in Limerick and expresses its willingness to engage with the Council on the preparation of the masterplan.	Noted.
Mayor's Recommendation: No further amendments/modifications proposed.		

11	Name/Group: Health Service Executive (HSE) – Ref: LCC-C524-PMAV3-14	
	Submission summary:	Mayor's Response
	The HSE welcomes the recognition within the Proposed Material Alterations of the importance of community and social infrastructure in supporting sustainable development PMA No. 4 of Volume 1 The Rosbrien lands are described as being well located in relation to established social and community infrastructure, including health services. The HSE requests that HSE Mid-West and the National Ambulance Service be included as relevant stakeholders in the preparation of a masterplan for the Rosbrien lands. The HSE states that the masterplan should assess the capacity of existing health services to accommodate	The HSE is thanked for its submission and the contents of it are noted. PMA No. 4 of Volume 1 The Council will ensure that the HSE including the National Ambulance Service are consulted in the preparation of the masterplan for lands at Rosbrien.

planned growth and should protect the continued safe and uninterrupted operated of the HSE National Ambulance Service base and helipad at John Carew Park Link Road. PMA No. 5 of Volume 1 The HSE supports the preparation of a Local Transport Framework for the wider Rosbrien lands. HSE Mid-West and the National Ambulance Service should be consulted where proposals may affect access to health or emergency service facilities. The proposed pedestrian and cycle connections towards Dooradoyle should include access to healthcare facilities amongst other facilities. The Framework should safeguard emergency service access and connectivity to the road network. PMA No. 8 of Volume 1 The HSE supports the proposed site-specific provision whereby Nursing Homes/Residential Care uses are open to consideration at established healthcare campuses. To future proof these strategic health sites, the HSE requests that the wording expressly accommodates the wider range of healthcare and social-care uses that may arise over the lifetime of the Plan. PMA No. 4 of Volume 2(a)	PMA No. 5 of Volume 1 As stated above, the Council will consult with the HSE in the preparation of a Masterplan and Local Transport Framework for the lands at Rosbrien. PMA No. 8 of Volume 1 Noted. The proposed Material Alteration site-specific provision relates to the inclusion of St. Gabriel's Foundation where it is intended to facilitate Nursing Home/Residential Care or Institution/Retirement Village uses. Notwithstanding the above a broad range of additional healthcare-related uses, including health centres, health practitioners, hospitals and other community and healthcare facilities, are already 'generally permitted' on lands zoned for Education and Community purposes under the Land Use Zoning Matrix. Therefore, no further amendment is required. PMA No. 4 of Volume 2(a)
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	The HSE welcomes the provision of additional education and community zoned land where demonstrated service need arises. Consideration should be given to the suitability of such strategically located and serviced land for integrated primary, community or other health-service provision. PMA No. 2 of Volume 6 The HSE notes that the proposed tenure mix appropriately includes specialist provision within the maximum Social Rental component. However, the HSE recommends an explicit qualification to ensure that the tenure targets don't unintentionally restrict specialist or support housing. Such proposals should remain capable of case-by-case assessment having regard to demonstrated need and the nature of the service to be provided.	Noted. PMA No. 2 of Volume 6 Noted. The intent of Policy PO12 is to promote balanced and sustainable communities through the delivery of an appropriate mix of housing tenures within larger residential developments. The policy applies only to developments of more than 32 units seeking State support for social, cost rental and affordable housing. The Council acknowledges the HSE's comments regarding specialist and supported housing provision. It is considered that the policy does not preclude or restrict the delivery of specialist housing, including accommodation for older persons, people with disabilities, or those with particular care and support needs. Such provision can be accommodated within the Social Rental component of the tenure mix and will continue to be assessed having regard to identified needs, the nature of the proposed service, and relevant statutory and policy requirements. Furthermore, the policy establishes indicative tenure parameters for larger schemes and does not limit the Council's ability to secure or support appropriate specialist housing
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	More generally, the HSE recommends that Limerick City and County Council consider whether additional lands should be designated, rezoned, reserved or safeguarded for healthcare and community infrastructure.	solutions on a case-by-case basis where a demonstrated need arises. Therefore, no further amendment is required. Noted. Proposed Variation No.3 has proposed a change of zoning at Z34 Ballycummin, from “High Tech Manufacturing” to “Education and Community” to facilitate the proposed hospital development. The Development Plan review will assess further the need for additional lands for healthcare and community infrastructure.
Mayor’s Recommendation:		
No further amendments/modifications proposed.		

12	Name/Group:	Coakley O’Neill on behalf of GLR Property Ltd – Ref: LCC-C524-PMAV3-7
	Submission summary:	Mayor’s Response
	Coakley O’Neill on behalf of GLR Property Ltd makes a submission in relation to the Proposed Material Alteration No. 4 of Volume 2(a) where it is intended to rezone land from Open Space and Recreation, as zoned in the adopted Limerick Development Plan to ‘Education and Community’. It was initially proposed under Proposed Variation No. 3 to rezone the site as ‘New Residential’. The site is currently subject to a live planning application (Ref. 26/60675), with GLR Property seeking permission to develop a creche facility on same, with the capacity to accommodate 102 no. children. This application is a modification	Coakley O’Neill on behalf of GLR Property is thanked for their submission and the contents of it are noted. Noted.

	to the permitted Large Scale Residential Development (LRD) scheme on the adjacent lands, which was granted under Planning Application Ref. 23/60842 and Appeal Ref. ABP-319009-24, which is now in an advanced stage of construction. Coakley O'Neill on behalf of their clients now make this submission in support of the proposed rezoning of the subject site to 'Education and Community' as part of the Proposed Material Alterations. The rezoning of this site for Education and Community infrastructure is considered appropriate considering the site's location and context within the Limerick Metropolitan Area and would help support and protect local childcare and community needs as set out in the National Planning Framework, First Revision (2025). A crèche was previously granted on the subject site, forming part of the development of the adjacent Evanwood housing estate but was never developed. This has left a need for such a facility in the area, as set out in the submission made by the Evanwood Residents Association to the public consultation on the Proposed Variation No. 3 of the Limerick Development Plan 2022-2028. Coakley O'Neill state that their clients acknowledge the submission by the Evanwood Residents Association and are committed to the delivery of the crèche facility now proposed on this site in the short term in conjunction with an identified operator.	Noted. Noted. Noted. Noted.
Mayor's Recommendation:		

No further amendment/modification proposed.

13	Name/Group: Tom Phillips + Associates on behalf of Arrowdale Limited – Ref: LCC-C524-PMAV3-15	
	Submission summary:	Mayor’s Response
	Tom Phillips + Associates (TPA) has been retained by Arrowdale to make this submission regarding Proposed Material Alterations to Proposed Variation No. 3 of the Limerick Development Plan 2022-2028 (as varied). Arrowdale is a sister company of Voyage Property Limited and owns land at Greenpark included as part of the Proposed Variation and Proposed Material Alterations as Site U37. NPF Requirements The submission raises concerns regarding amendments to Footnote 3 of Table 2.6 in the Proposed Material Amendments, which replace the previous reference to the National Planning Framework (NPF) housing targets with a new reference to the Revised National Planning Framework (RNPF). The submission queries the proposed amendment to Footnote 3 of Table 2.6, which replaces the previous reference to NPF compact growth targets (at least 50% for the City and 30% for all other settlements) with text stating that at least 40% of all new housing should be delivered within existing built-up areas. It is stated that while this 40% target is contained within the Revised NPF, NPOs 8 and 9 also retain the requirements that at least 50% of new homes in the five cities,	Tom Phillips + Associates (TPA) is thanked for their submission on behalf of Arrowdale Limited and the contents are noted. NPF Requirements Variation No.3 supports the National Policy Objective of 50% growth for Limerick. NPO 4, which states “A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs” is included as an amendment in Chapter 2 (see public display document dated 18th of April 2026). Footnote 3 of Table 2.7 (now Table 2.6), related to the column ‘Infill or brownfield as % of total zoned land’ in the Core Strategy table as identified by the ³ in the column heading. This column was removed as part of Proposed Variation No. 3 published in April 2026. The footnote (No.3) associated with this column was therefore deleted. Advisory Notes 1-3 were introduced as part of the revised presentation of the table.

including Limerick, and 30% of new homes in other settlements, be delivered within existing built-up footprints. The submission contends that the omission of the 50% and 30% targets from the proposed text may weaken alignment with the Revised NPF and seeks clarification as to why these requirements have been removed. It emphasises that the 50% target for Limerick City remains a key national planning objective supporting compact growth, sustainable development and the efficient use of existing infrastructure and services. TPA requests that the Council continue to apply the 50% target in assessing housing delivery to 2030 and expresses concern that failure to explicitly reference this requirement could undermine consistency with the Revised NPF and the principles of proper planning and sustainable development. Proposed Zoning of Lands at Crossagalla and Rosbrien TPA highlights that concerns were raised regarding the proposed residential zoning of the Rosbrien site in the previous submission of the OPR during the public display period for Proposed Variation No. 3. The OPR recommended that the Proposed Variation be made without Rosbrien, pending the preparation of a framework plan for the wider lands and a transport framework but Limerick City and County did not accept the recommendation and instead proposed the preparation of a masterplan with transport framework to guide the future development of this site.	Advisory Note 3 reflects NPO 07 from the Revised National Planning Framework to deliver at least 40% of new homes nationally, within the built-up footprint of existing settlements. This advisory note is intended solely to provide context on national policy. This does not impact the intent of NPO 08 and NPO 09 nor does it alter the statutory obligation to align with and implement the relevant National Planning Objectives. Proposed Zoning of Lands at Crossagalla and Rosbrien Noted. Notwithstanding the recommendation made by the OPR at the initial consultation stage, the OPR submission to the Material Alterations, dated 24 August 2026 clearly acknowledges the response to Recommendation 1 regarding lands at Rosbrien, where Objective RN 01 has been amended through Proposed Material Alteration (PMA) No. 4 of Volume 1 to require the preparation of a Masterplan informed by a Local Transport Framework in consultation with the Planning Authority and relevant stakeholders including the NTA and Iarnród Éireann. The OPR further acknowledges that while the
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TPA contends that the complexity of the Masterplan to be completed to guide future development will be a lengthy undertaking and will take several years to complete, thus delaying any delivery of housing on these lands. The submission argues that it is unrealistic to zone the Rosbrien lands for residential development at this stage. Significant uncertainty remains regarding the outcome of the surveys, studies and consultation needed to inform any future Masterplan, which will determine the lands' development potential and phasing. The delivery and funding of key infrastructure, including sustainable transport links and complex pedestrian and cycle connections across the rail line to Dooradoyle are also unresolved. As a result, the lands are unlikely to contribute to housing delivery during the 2026-2030 period, and their inclusion in the current residential zoning process risks undermining the objectives of the proposed Variation. TPA states that the zoning of these lands is rationalised on the basis that they comprise a 'strategic landbank' that presents a 'significant opportunity to consolidate development within close proximity to Limerick City Centre' however, they argue that there are other brownfield infill urban landbanks closer to the city centre than Rosbrien at Greenpark. Therefore, the proposal to rezone lands at Rosbrien for residential use is not in accordance with the sequential approach to land use zoning mandated by National Planning Guidance.	lands are not currently served by existing or proposed public transport, the area adjacent to Dooradoyle presents a significant opportunity for the sequential consolidation and growth of the city and supports the proposed plan-led approach and welcomes the strengthened requirements for stakeholder engagement and transport assessment. The preparation of a Masterplan and associated transport framework is intended to ensure that the future development of this large strategic landholding is planned in a comprehensive and integrated manner. It is therefore not deemed unrealistic to zone the Rosbrien lands. As stated above the lands at Rosbrien will be developed in a comprehensive and integrated manner.
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With regard to lands at Crossagalla, the OPR noted in its previous submission (LCC-C504-V3LDP-28 on 18th May 2026) that there is a requirement to deliver a co-ordinated developer-led road network linking R512 (Kilmallock Road) and the Old Ballysimon Road which would require crossing a railway line. TPA note that the provision of a significant piece of road infrastructure by way of a developer-led process is lengthy and complex in its own right. TPA contends in a similar manner to Rosbrien that the proposed zoning of the Crossagalla lands is unlikely to deliver residential development within the 2026-2030 Development Plan period. It argues that the requirement to prepare and agree a Masterplan with Limerick City and County Council, including extensive stakeholder consultation, will be a lengthy process. The submission states that the estimated capacity of approximately 1,570 residential units is unlikely to be realised during the lifetime of the Plan and considers it unrealistic to include these lands in the current zoning strategy. It further argues that the approach is not aligned with national compact growth objectives and may undermine compliance with the National Planning Framework and the principles of proper planning and sustainable development. Flood Risk Commentary TPA states there is an inherent contradiction in new text (part f) from	The OPR submission dated 24 August 2026 welcomes the amendments to the objective relating to the Crossagalla Masterplan. The Housing Growth Requirement as set out in the Core Strategy for Limerick City and Suburbs is 15,734 units from June 2025 – December 2026. Based on the zoned land in the City and Suburbs there is potential for 17,564 units at the lowest density, which is 1,830 units above the requirement. It should also be noted that the 15,734 includes 50% additional provision. Furthermore, it should be noted that in the OPR submission, dated the 18th of May (Observation 1) sought the expected density yields from the highest densities in Table 2.6 given the city status and the likelihood of achieving higher densities. There is potential for 35,903 units at a medium density and 54,243 units at the highest density. Therefore, the inclusion of the Rosbrien and Crossagalla lands does not undermine the objectives of the proposed variation. Flood Risk Commentary Lands that overlap with Flood Zones A or B or with Future Climate Scenario Flood Risk Areas are at elevated risk of flooding. Water-compatible
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Objective CAF O21 which was added as part of the Proposed Material Alterations. The new text suggests that regardless of the zoning of the land, where there is overlap with Flood Zones A or B, 'new' or 'more intensive uses' shall be limited to water compatible uses, whilst also simultaneously mandating that 'proposals for development within these areas shall be accompanied by a Site-Specific Flood Risk Assessment (SSFRA). TPA argues as to why an SSFRA would be required if the outcome of the zoning process has already been pre-determined. They add that Objective CAF O21 (f) is inconsistent with NPO 78. TPA argues that the proposed wording is inconsistent with the <i>Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)</i>, as it effectively predetermines development outcomes by restricting certain lands to water-compatible uses regardless of the findings of any future Site-Specific Flood Risk Assessment (SSFRA). It contends that this approach undermines the established flood risk assessment framework and imposes additional restrictions on lands already zoned for development through the Development Plan process. The submission also raises concerns regarding the lack of clarity around the meaning of "new" and "more intensive uses". The submission further states that restricting development within Future Climate Scenario Flood Risk Areas is not supported by the 2009 Guidelines, which	development in these areas (examples of which are included in the Flood Risk Management Guidelines) would have the potential to impact upon lands elsewhere and therefore require a site-specific flood risk assessment to assess potential displacement. "New" or "more intensive" uses are those which fall outside the remit of Section 5.28 of the Planning System and Flood Risk Management Guidelines 2009, which relates to assessment of minor proposals in areas of flood risk and is reflected in part (g) of the objective. In the interest of clarity additional text will be included in the objective. Regarding the consideration of Flood Zones and Future Climate Scenario Flood Risk Areas, this has been undertaken with reference to the
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define flood zones based on current flood risk assessments without incorporating climate change factors. It therefore considers that the proposed requirement to limit such areas to water-compatible uses lacks a policy basis and should be reconsidered. Development Plan Justification Test (DJPT) – Greenpark Lands (U37) The submission raises concerns regarding the revised Strategic Flood Risk Assessment (SFRA) Addendum and Development Plan Justification Test (DPJT) for the Greenpark lands (Site U37).	Flood Risk Management Guidelines and the First Revision of the National Planning Framework (2025), including National Policy Objective 78 to: “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 approach taken by the planning authority in this regard is one that takes account of the potential impacts of climate change on flooding and flood risk (and associated impacts on people and property), in line with national policy regarding climate adaptation. Furthermore, the Planning and Development Act 2024 requires the Development Plans to be Materially consistent with the National Planning Framework. Development Plan Justification Test (DJPT) – Greenpark Lands (U37) The site in question the subject of the DPJT was zoned New Residential in the Limerick Development Plan 2022-2028
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It argues that the 2026 DPJT relies on unexplained “Yes/No” responses, representing a significant departure from the more detailed assessment undertaken in 2022. The submission contends that several 2026 conclusions contradict the 2022 DPJT without any material change in circumstances and are therefore inconsistent with the Planning System and Flood Risk Management Guidelines (2009). The submission reviews the DPJT as follows: <u>Settlement targeted for growth</u> The submission notes that both the 2022 and 2026 assessments recognise Limerick as a key growth centre under the NPF and RSES. It considers this criterion to have been consistently assessed. <u>Essential to facilitate regeneration and/or expansion</u>	by way of Ministerial Direction dated the 4th of November 2002 as below; “MA no. 147 i.e. the subject land reverts to Enterprise and Employment/Open Space and Recreation from New Residential except in respect of the lands to be developed for housing under ABP SHD reference 311588”. The site has since been developed with housing in line with approved planning permission and the proposed change in zoning reflects the current use which is proposed as “Existing Residential”. Therefore, the variation DPJT reflects lands that are already developed. The 2022 DPJT relates to a large undeveloped land bank with a proposed zoning of Enterprise and Employment. The 2026 DPJT relates to a small area on the south of that land bank which is now developed with a proposed zoning of Existing Residential and therefore is materially different. <u>Settlement targeted for growth</u> Noted. <u>Essential to facilitate regeneration and/or expansion</u>
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The 2022 DPJT concluded that Greenpark was essential to the expansion and compact growth of Limerick City due to its strategic location and development potential. The 2026 DPJT reverses this conclusion without explanation. The submission argues that the site's strategic importance remains unchanged and is reinforced by its identification as a key residential opportunity site. It further notes that the High Court found a key element of the 2022 assessment to be factually incorrect, as the lands were not designated as DRSEL/MASP lands under the RSES, and requests that the DPJT be amended to reflect the Court's findings. <u>Previously developed and/or under-utilised lands</u> The submission notes that the 2022 and 2026 assessments are broadly consistent in recognising the lands as containing brownfield and under-utilised elements. <u>Within or adjoining the core of an urban settlement</u> The 2022 assessment concluded that the lands adjoin the core urban area, while the 2026 assessment states the opposite without supporting rationale. The submission argues that the site's location and context have not changed and that the differing conclusions are unjustified.	The 2022 assessment relates to lands for Enterprise and Employment on a significant land back capable of providing significant employment. The 2026 DPJT relates to a change of zoning to reflect the development of housing in accordance with an approved planning permission. <u>Previously developed and/or under-utilised lands</u> Noted. <u>Within or adjoining the core of an urban settlement</u> The Flood Guidelines defines the <i>Core of an Urban Settlement</i> as <i>the core area of a city, town or village which acts as a centre for a broad range of employment, retail, community, residential and transport functions</i>. In the context of Limerick City, this role is most closely associated with City Centre zoned lands, where these functions are concentrated. Although urban in character the subject site is significantly removed from the City Centre zoning located on the southern portion of that which was assessed in the 2022 DPJT and bound to the north (in the direction of the
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	<u><i>Essential to achieving compact and sustainable growth</i></u> While both assessments conclude that the lands are important for compact and sustainable urban growth, the submission questions how the site can be considered essential for this purpose while simultaneously being deemed non-essential for urban expansion and regeneration. <u><i>Availability of alternative lands</i></u> The 2022 assessment found no suitable alternative lands at lower flood risk for the proposed development. The 2026 assessment responds “No” without explanation. The submission argues that if alternative lands existed, they would have been identified and zoned through the Development Plan process, and therefore this criterion supports the proposed zoning. Further states that the “no” answer is ambiguous. <u><i>Flood risk management</i></u> The 2022 assessment identified flood risks arising primarily from residual breach risk and outlined mitigation measures. The 2026 assessment states that Stage 1 and Stage 2 SFRA informed the Variation and that future development will be subject to site-specific flood risk assessment and	City Centre) by undeveloped lands and cannot be considered as adjoining the core of the urban settlement. It must be reiterated that the 2026 DPJT is materially different to the 2022 assessment both in the size of the site and the proposed zoning. <u><i>Essential to achieving compact and sustainable growth</i></u> This question relates to urban growth while the former questions relate to regeneration/ expansion of the <i>centre</i> of the urban settlement and it has been established above that the site is neither in or adjoining the core of the urban area, but is part of the wider urban area. <u><i>Availability of alternative lands</i></u> In this instance the development is already completed and therefore the consideration of an alternative site is irrelevant. An alternative site is not available for this particular use or development as development has occurred and the use is established. <u><i>Flood risk management</i></u> The SFRA has been undertaken to the relevant level of detail, in compliance with the Flood Risk Management Guidelines.
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mitigation requirements. The submission argues that these assessments do not adequately demonstrate that flood risk can be managed without adverse impacts elsewhere. It contends that only a Site-Specific Flood Risk Assessment (SSFRA) with detailed modelling can provide this assurance. The submission notes that an SSFRA prepared by RPS has demonstrated that flood risk at Greenpark can be fully mitigated through land raising without impacting surrounding lands. Conclusion The submission argues that Arrowdale Limited's lands at Greenpark, Limerick were not included in Draft Variation No. 3 despite two submissions having been made during the Council's expression of interest for land suitable for residential zoning in November 2025. The submission also raises concerns regarding advice given to elected members on 13 July 2026, which the submission claims incorrectly stated that members could not propose additional residentially zoned lands as material alterations to the draft variation. It is argued that Section 58(12)(d) of the Planning and Development Act 2024 provides members with the authority to propose such amendments. Reference is made to a letter from Harrison O'Dowd LLP dated 10 July 2026 outlining these concerns. The submission concludes that the Council's site selection methodology is flawed and does not adequately reflect the requirements of the NPF Implementation: Housing Growth	Conclusion Noted, this does not refer to modification that constitutes a material alteration of the proposed variation. The inclusion of lands in Proposed Variation No. 3 was informed by a multi-criteria assessment process and the submission of land as part of the expression of interest does not confer an entitlement to zoning. Noted, this does not refer to modification that constitutes a material alteration of the proposed variation.
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	Requirements (July 2025). It argues that the Council has significantly underperformed against its housing delivery targets under the current Development Plan and that Proposed Variation No. 3 does not identify sufficient additional residential lands within the Limerick City area to support achievement of those targets. The submission calls on the Council to increase the number of sites proposed for residential zoning, including the Greenpark lands owned by Arrowdale Limited, and to take account of the issues raised in the correspondence of from Harrison O'Dowd dated 10th July 2026. The letter from Harrison O'Dowd is also attached to the submission.	
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Mayor's Recommendation:

To make Proposed Material Alteration (PMA) No. 7 of Volume 1 with the following minor modification to parts (f) and (g) of Objective CAF O21:

(f) New or more intensive permissible uses not covered by part (g) below 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 Assessment.

(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.

2.2 Submissions received not relating to Proposed Material Alterations

In accordance with Section 58(13)(f)(ii) of the Planning and Development Act 2024, submissions and observations received at this stage must relate to the Proposed Material Alterations to Proposed Variation No. 3 of the Limerick Development Plan 2022-2028 (as varied).

The submissions set out below were received during the statutory consultation period on the Proposed Material Alterations, however, the Planning Authority considers that they do not relate to the Proposed Material Alterations.

14	Name/Group: David Barton – Ref: LCC-C524-PMAV3-2	
	Submission summary:	Mayor's Response
	This submission promotes the widespread use of Traditional Architecture Design Codes in all aspects of planning and new development, arguing that it delivers significant economic, environmental, ecological and placemaking benefits. It calls for stronger protection of historic buildings, including an immediate ban on the demolition of buildings constructed before 1950, greater safeguards for non-designated heritage assets, and support for the authentic reconstruction, restoration and reuse of historic structures. The submission contends that traditional design approaches can help address housing needs while reducing environmental impacts, protecting biodiversity, enhancing local character, and supporting sustainable economic growth. It argues that this approach would benefit residents, local authorities, developers, businesses and future generations by creating distinctive, resilient and attractive places across the Limerick area.	As the submission does not relate to any Proposed Material Alteration to Proposed Variation No. 3, it falls outside the scope of this stage of the statutory process and cannot be considered. Accordingly, no Mayor's recommendation is provided in relation to this submission.

15	Name/Group:	David Barton – Ref: LCC-C524-PMAV3-3
	Submission summary:	Mayor's Response
	Duplicate submission of Ref: LCC-C254-PMAV3-2 above.	Please refer to Submission Ref: LCC-C254-PMAV3-2.
	Please refer to Submission Ref: LCC-C254-PMAV3-2	

2.3 Submissions Received Outside the Statutory Consultation Period

The following submission was received after the statutory deadline of 5pm on 24th August 2026 and, in accordance with Section 58(13)(f)(ii) of the Planning and Development Act 2024, were not considered as part of the formal assessment of the Proposed Material Alterations to Proposed Variation No. 3 of the Limerick Development Plan 2022-2028 (as varied):

Name/ Group	
1	Environmental Trust Ireland

3.0 Minor Modifications Recommended

Following consideration of the submissions received during the public display period, the following minor modifications are recommended as follows;

- Minor modifications are proposed in respect of Proposed Material Alteration No. 7 of Volume 1.

Proposed Minor Modification to Proposed Material Alteration No. 7 of Volume 1

To make Proposed Material Alteration (PMA) No. 7 of Volume 1 with the following minor modification to parts (f) and (g) of Objective CAF O21:

(f) New or more intensive permissible uses not covered by part (g) below on Variation No. 3 lands including Sites Z10 and Z11 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 including the City Centre zoning applicable to Sites Z10 and Z11. Proposals for developments within these areas shall be accompanied by a Site-Specific Flood Risk Assessment.

(g) Extensions of existing uses or minor development on Proposed Variation No. 3 lands including Sites Z10 and Z11 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.

4.0 Mayor's Recommendations

Having regard to all submissions received, in particular to the submission from the Office of the Planning Regulator and the recommendations contained therein, and to all other material considerations related to the proper planning and sustainable development of the plan area, including SEA, AA and SFRA, it is recommended that in accordance with Section 58 (17) of the Planning and Development Act 2024 (as amended)

Members of the Planning Authority make the variation with the material alteration that was the subject of the notice under subsection (13) and with further minor modifications to the material alterations as recommended in this report.