



LIMERICK DEVELOPMENT PLAN 2022-2028

Background Paper People & Places

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1. 0 – Introduction

Ireland's population increased by 173,613 persons over the five years since April 2011, to reach 4,761,865 persons recorded in the Census, carried out in 2016. This represents a total increase of 3.8% over the 5 years, or 0.8% on an annual average basis. This compares with an annual average increase of 1.6% over the previous inter-censal period 2006 to 2011. Limerick City and County has experienced some population growth between 2011 and 2016. However, the City and County shares in the national slowdown in growth, which has been occurring since the years of peak growth in the late 1990s and years leading up to 2008. Between the 2011 and the 2016 Census periods, Limerick's population grew by 3,090 people.

The settlement structure of Limerick has traditionally been dominated by Limerick City, located at the lowest bridging point of the River Shannon. There is a rich network of towns and villages, throughout County Limerick, but the settlements are for the most part quite small and the settlement pattern has remained quite dispersed. The open rural area, which includes 34 non-census settlements, accounts for 30% of the entire Council area's population, including the City. Since 1996 of the 21-zoned settlements in County Limerick, only six exceeded the average growth rate for the settlements on aggregate. The City itself is an important industrial and commercial centre for the Mid-West region, the location of a university, a teaching hospital, and two third level institutes and a large employment base. The population in Limerick City and Suburbs includes a small part of Co Clare, as defined by the Central Statistics Office, was recorded as 94,192, in 2016.

For areas outside of the City, it is clear that there has been a considerable slow-down in population growth between 2011 and 2016, and population decline in some instances. Out-migration is a common response of rural communities to lack of local employment opportunities. It is clear that one of the principal challenges for the rural economy as a whole is to compensate for the losses of employment in farming, a long term trend that preceded the recent economic crash.

The proposed Limerick Development Plan 2022 – 2028 is required to set out a strategy for the growth and development of the city and county, which is consistent with national and regional policy. Since the adoption of the existing Development Plans in 2010, there has been significant change in the policy and regulatory environment for land use planning in Ireland. The adoption of Project Ireland 2040 National Planning Framework (NPF) in 2018 and the Regional Spatial and Economic Strategy for the Southern Region (RSES) in 2020,) set out the population targets for the country. These statutory plans are aligned in setting out unprecedented and ambitious growth targets for Limerick, which seek to harness its potential to achieve balanced regional development that counter balances the growth the east of the Country.

This background paper explores issues in relation to people and places in Limerick. It sets out the historical trends in population, households and housing growth in Limerick up to the last Census in 2016. In addition, it also sets out the future population for Limerick, following on from the targets set out in the National Planning Framework (NPF) and Regional Spatial and Economic Strategy (RSES) looking to the horizon years of 2026, 2031 and ultimately to 2040. Finally, the paper considers development trends in rural housing in Limerick and the impact of this on the overall population growth of the City and County.

2.0 – Population, Population Distribution and Housing Densities

2.1 – Introduction

In the last seventy years, Limerick City and County, taken in aggregate, has grown in population in every inter-censal period since 1961, reversing a previous long-term trend of decline, and this growth continued, with the exception of the 1986-91 period, as shown in the table and graph below. The overall growth is 27% from 1951; this is below the rate of growth of population in the State, which is 37.8% of the 1951 base. Quite a lot of growth has taken place since 1991, when the overall growth in the population of Limerick City and County has been 20%, translating to 0.8% annual average growth. The 2016 Census, recorded a population of 194,899 in Limerick City and County.

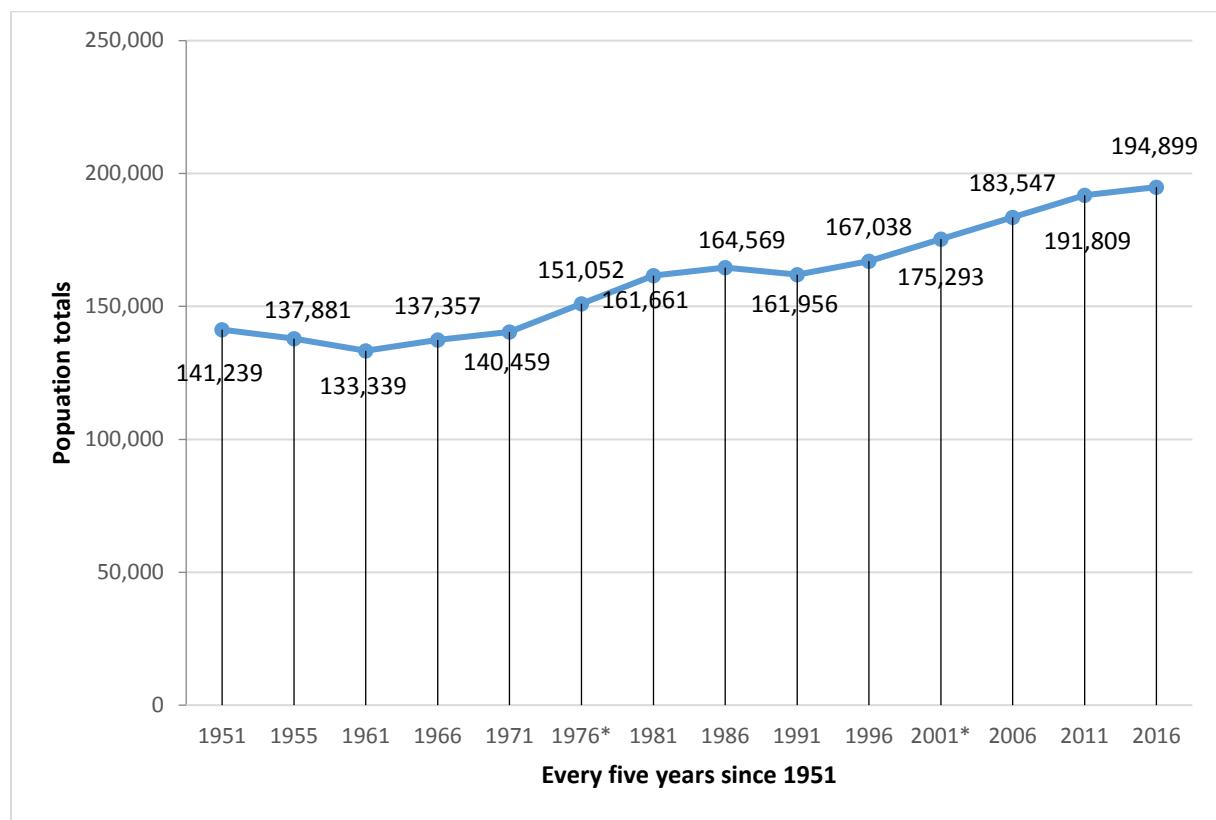


Figure 1 – Population Trends Limerick City and County 1951 – 2016 – Source: CSO, Census records, all years are census years except years with asterisks, which are estimated pro-rata from nearest census years of 1979 and 2002 to yield even 5 - year periods of change

There has been a long-term trend of increased urbanisation of the city and county council area, and concentration of development in and around the city. In these respects, Limerick is like a mirror of wider national trends. The trend towards both urbanisation and concentration into larger settlements can be seen in the following chart, Limerick City and Suburbs have seen continuous growth over the period since 1951, with a current population of almost 95,000. The current national and regional policy seeks to build on this growth and seeks to ensure that 50% of all new development is located within the existing built up footprint of the City, ensuring compact growth is at the heart of the Development Plan policy.

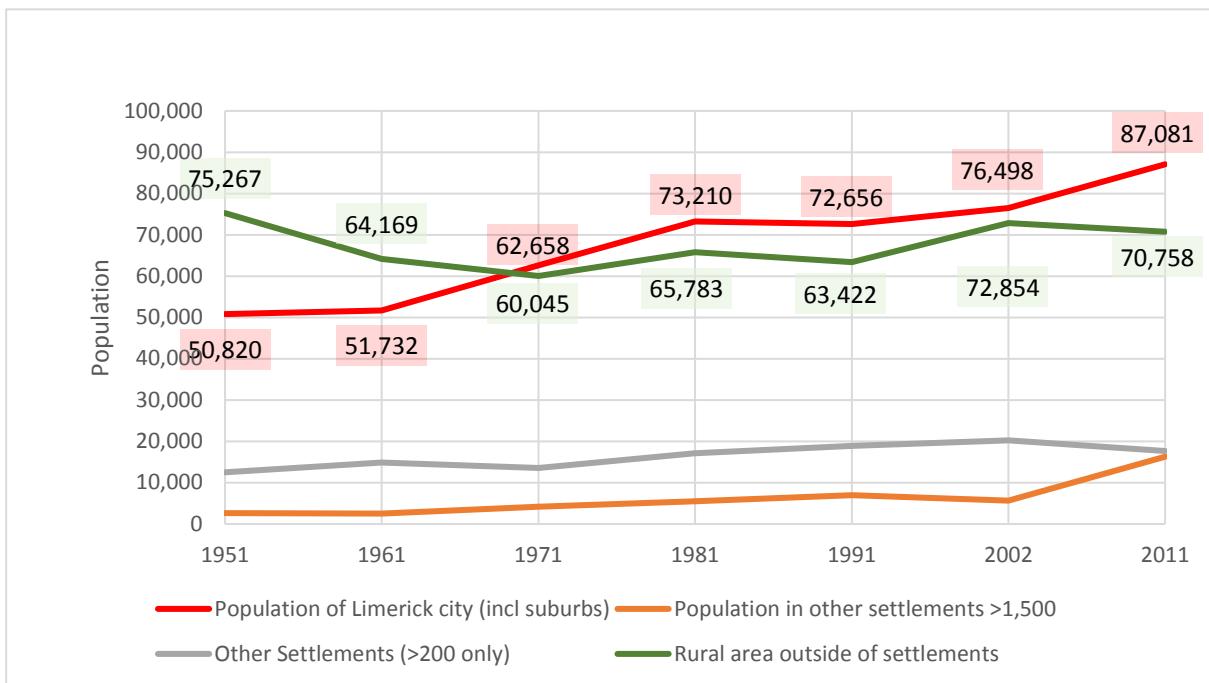


Figure 2 – Limerick City and County population trends Census every 10 years 1951 – 2011 per broad settlement category

Limerick is a low density city. Its overall population density is over the entire land area of the city is 1,600 persons per km² (or c16 people per hectare). This places it close to the norm for Irish cities outside of Dublin, Dublin City being an outlier with a population density of 3,700 persons per km². These low densities are associated with high car usage for daily journeys to work, school or college: in 2016, only 32.6% of journeys to work, school or college were by sustainable modes of transport. In Dublin city the equivalent percentage is 47.9%.

The city centre is an important centre for retail, offices and a range of support services, and is an extensive area which is also focal with respect to public transport routes and services. Key features of the city centre are high levels of vacancy (at 17% in 2016 Census, though a marked improvement from 2011 when the rate was 24%), low household size, the importance of the private rented sector and of in-migrants. There are large ‘transformation’ sites in and around city centre; and many of the city centre’s Georgian blocks offer opportunities to rehabilitate the existing building stock, or as the case may be to develop new residential units through sensitive infill.

Limerick County has many nucleated settlements, generally small in size, and most of which are in the fertile lowlands in the east and centre of the county. The county, outside the city environs, has lagged behind the city in terms of growth. Limerick’s settlement structure is such that the next largest town after the city is only 7% of the city’s population. This settlement network and dispersed settlement pattern have their roots in the county’s important, mainly pastoral agricultural economy, landownership structures, and at a time where people travelled less.

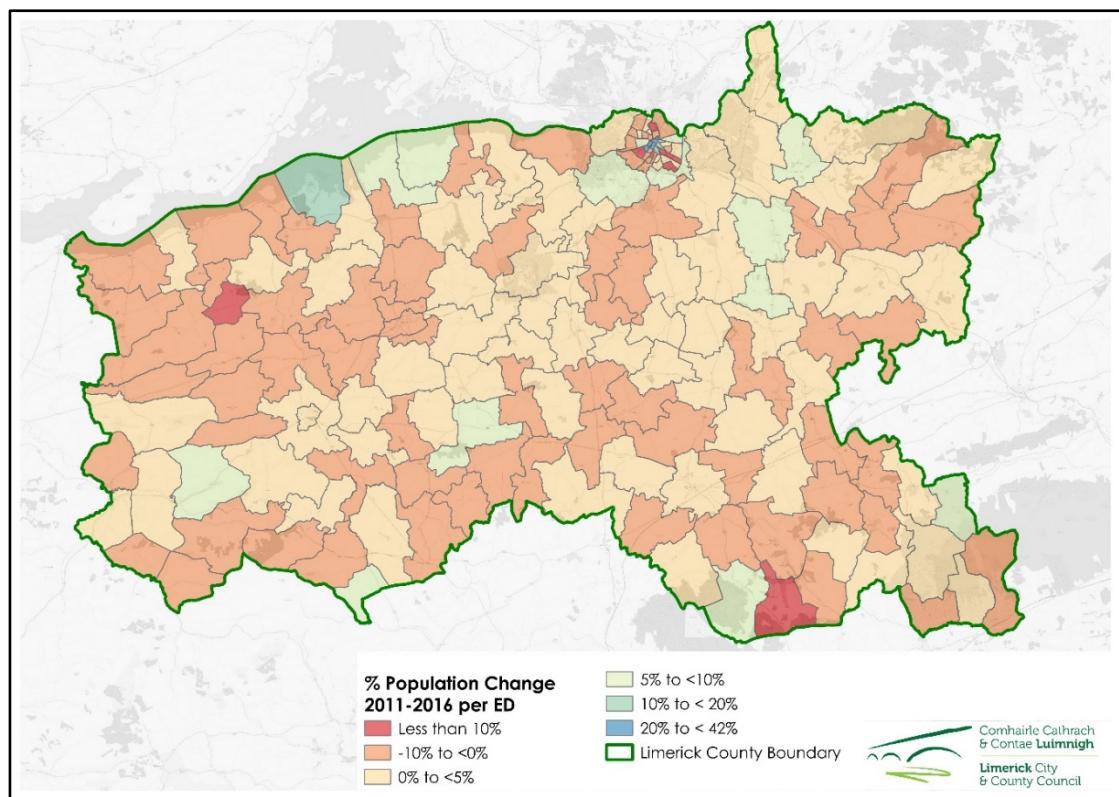


Figure 3 – Percentage Population Change 2011 – 2016 per Electoral District Limerick City and County

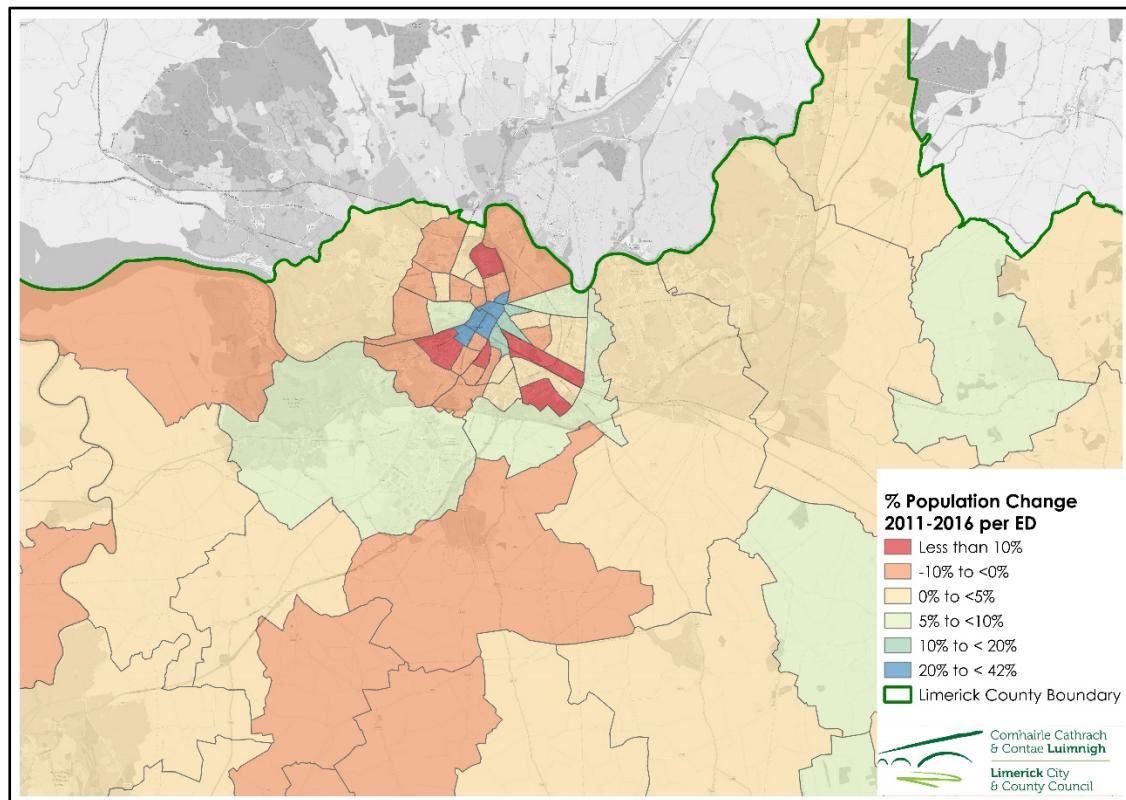


Figure 4 – Percentage Population Change 2011 – 2016 per Electoral District – Limerick City and Environs

Rural out-migration has left its mark on some communities by reducing the number of younger adults that might stay and establish households, often making it harder for these communities to sustain themselves into the future. However, this depends on the area's proximity or remoteness from big towns and cities or transport corridors. The likelihood of net out-migration depends on how the local rural economy is structured and how it rates in terms of its diversity, openness and dynamism. It also depends on its demographic structure and population density, where in Limerick at least the rural areas of lowest population density tend to be the most prone to population stagnation and decline. Not just open rural areas, but many towns and villages too are vulnerable to the effects of economic changes, which have rendered many of their traditional functions economically marginal or redundant, and hence narrowed the range of local employment opportunities, and increased their reliance on jobs further away.

Limerick shares in the national trend towards increased urbanisation of the population, but it also has been the case that the development of towns and villages has been very uneven in Limerick, not helped by their great number, generally small size, and their economic obsolescence in a transformed rural economy. Over the last twenty year there has been growth of satellite settlements within the commuting belt of Limerick. There has been considerable development in attractive villages and towns such as Adare, Castleconnell, Clarina and Ballyneety. The development of towns and villages has been uneven, and hampered in many cases by the difficulty of securing the development of adequate capacity in infrastructure and supply of wastewater and water supplies. This is an issue in Hospital, Askeaton and Dromcollogher. Patrickswell illustrates very well the crucial importance having an adequate public sewerage system can make to a town. This village should have benefitted from its proximity to the city, however lack in wastewater facilities, resulted in very limited development, until 2017, when facilities became available.

Economic decline, property dereliction and vacancy are inter-related issues in many towns and villages, issues which are well established but made worse in recent years from the 2008 banking crisis. In general there seems to be an inverse correlation between housing in the open countryside and in the outskirts of towns and villages that occur somewhat randomly, and how poorly towns and villages fare. National and regional policy shifts the dial in terms of towns and village and places a strong focus on revitalising towns and villages, so become desirable places to live and work, with economic development and associated services.

The Map identified in Figure 5 highlights the population increase or decrease in settlements identified by the Central Statistics Office, as having a settlement boundary, between the Census periods 2011 – 2016. Some of the towns and villages in Limerick have seen substantial growth, while others have declined.

There is a need to prioritise and promote the development of Limerick's existing network of towns and villages, both as service centres and as places people wish to live, work and visit.

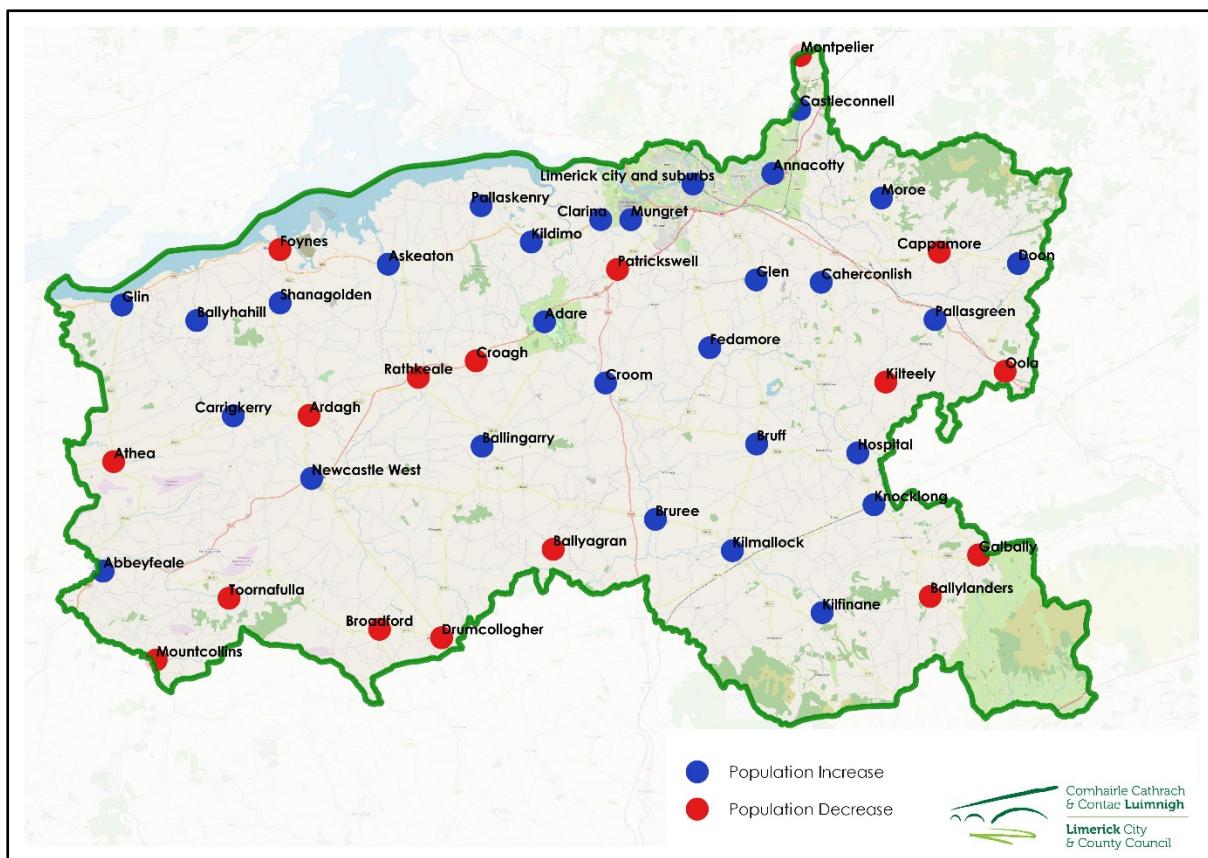


Figure 5 – Population increase/decrease in all Settlements identified with a Central Statistics Office Settlement Boundary in Limerick

2.2 – Age structure and dependency

The age structure is important to examine as it affects the prospects for future natural increase through family formation; it affects the requirements for a range of services and facilities, and impacts on employment demand, purchasing power and on household formation. An age pyramid showing the age structure for the city and county in 2016 is shown below, then comparing the county and the city area separately. Secondly, age dependency rates are compared by area and area type, starting with the broadest level of the city versus the county. Age dependency is a measure of the proportion of people not of working age population to those of working age population (those aged 15-64). Youth age dependency is the proportion of those under 15 years to the population of working age; old age dependency is the proportion of those aged 65 years and over to the population of working age.

	2016 Limerick City and County		2016 City and Suburbs within council area		Former City council area 2016		County outside of city and environs 2016	
Age group	Total numbers	%	Total Number	%	Total Number	%	Total Number	%
0-4 years	13,135	6.74	6,050	6.75	3,610	6.20	7,085	6.73
5-14 years	26,459	13.58	10,916	12.18	6,789	11.66	15,543	14.76
15-24 years	25,834	13.26	14,078	15.71	8,331	14.31	11,756	11.16
25-49 years	68,250	35.02	33,522	37.42	21,169	36.36	34,728	32.98
50-64 years	33,803	17.34	13,875	15.49	9,972	17.13	19,928	18.92
65-79 years	21,405	10.98	8,685	9.69	6,520	11.20	12,720	12.08
80 years+	6,013	3.09	2,462	2.75	1,829	3.14	3,551	3.37
TOTAL	194,899		89,588		58,220		105,311	

Table 1 – Limerick City and County, Age structure groups, distinguishing between City and County

The data in this above table can be used to show that the proportion of those of working age, ie those aged between 15 and 64 years, is higher in the city and suburbs than in the rest of the county. The percentage of those of working age in the city and suburbs is 68.62%, whereas it is 63.06% in the rest of the county, derived by summing up the returns for these areas in the relevant age categories.

The following age dependency table shows the differences between the city and the rest of the council area, with the total age dependency ratio being 13% greater outside of the city and environs than inside the city. Age dependency is a measure of the proportion of people not of working age to those of working age.

Limerick City and County Council	City and suburbs within Council	Former city Council area	Council area outside of city and environs
Youth dependency ratios (age 0-14 as % of aged 15-64)	30.96%	27.60%	26.35%
Old age dependency ratios (age 65+ as % of aged 15-64)	21.44%	18.13%	21.15%
Total age dependency ratios	52.40%	45.73%	47.50%

Table 2 – Age dependency ratios Limerick City and County Council distinguishing between City and County

Examining age dependency and distribution across the City and County by Small Area of Population, the following map show the young age dependency ratios in bands per Small Area, highlights the population distribution and the specific needs that certain areas may have.

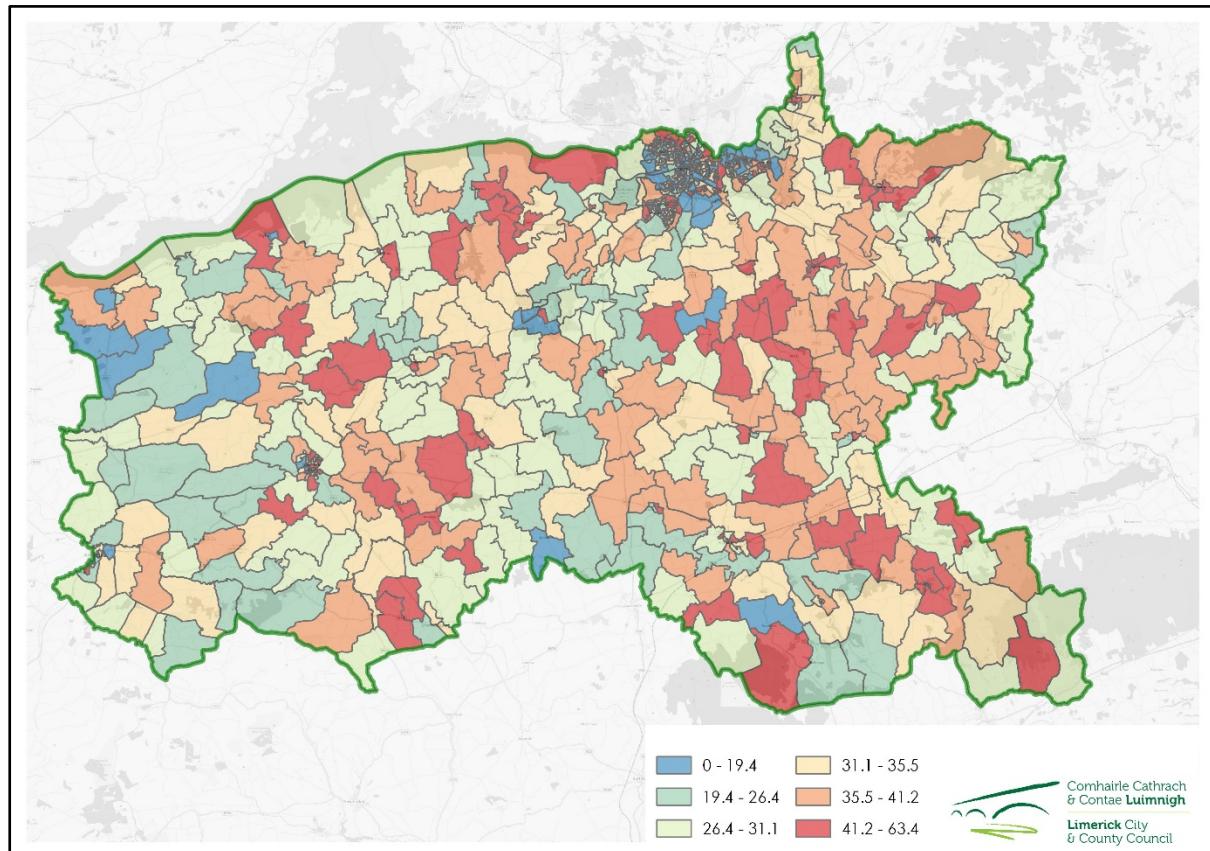


Figure 6 – Youth Dependency Ratio by Small Area of Population – Limerick 2016

The map identified in Figure 6, identifies young age dependency ratios per Small Area of Population, showing that there is clustering of Small Area together in the same or adjacent bands of ratios. The areas with particularly low young age dependency ratios tend to be in the hilly fringes of the county, where there also are few settlements and a low population density.

Within the City and also comparing Small Areas immediately adjacent to city, the lowest age dependency ratios are found in the city centre, where many young adults choose to live often in rented accommodation close to work. In the suburbs, the variation in age dependency ratios is significant, but there are clear patterns. The regeneration areas of Moyross, Southill and St Mary's Park have high young age dependency ratios. Some of the newer suburbs in the outer periphery of the city in the south-west also have high levels of dependency. A significant exception to the newer suburbs having a high young age dependency is Ballysimon ED. This is largely accounted for by third level students living in Castletroy and enrolled in University of Limerick, in this area. The older inner suburbs of the city are characterised by low young age dependency ratios principally due to an older age profile and to a lesser extent, by houses occupied by third level students.

2.3 – Headship rates and household size

The demand for new housing is related to the number of people setting up new households, which in turn is driven by demographic factors, cultural patterns, and economic capacity. The overall trend in Ireland has been for a decline in household size as family units are becoming smaller. The average household size in the Republic of Ireland in 2016 was 2.75, which compares with 3.34 in 1991. The household size in Limerick in 2016 was 2.7 (rounded up); this compares to 3.37 in 1991.

This trend was interrupted in the 2011 – 2016 Census period, a consequence of the delays in new household formation amongst younger adult age categories due to the uncertain economic climate, the sharp reduction in in-migration, and the shortages of affordable accommodation. The average household size in Limerick in 2011 was 2.693, so that the household size in 2016, which was actually 2.698 is slightly larger.

Another measure commonly used in assessing housing demand is the headship rate. The age specific ‘headship rate’ is the term given to the proportion of heads of household per 100 population in that age group. Where the headship rate is high and increasing, this means that the average household size is low and decreasing. Nationally headship rates have been increasing over the long term. In 1991, the overall headship rate was 28.9 in the State, but it has increased every census year since then to reach 35.9 by 2016.

There are broadly two approaches that can be used to assess the future need for housing, bearing in mind that this need is not only a function of population changes and future household formation, but also of current need as yet un-met, such as would be reflected in social housing waiting lists.

2.4 – Labour Market

The demand for jobs is related to the number of people aged 15 years or over who are available for work and this in turn is as one might expect contingent on the overall population size, its sex and age structure and the impact of natural change and migration on the population. The labour force participation rate is the percentage of people of all aged 15 and over who are available for work. Low labour force participation rates are often associated with problems with access to or disengagement from the labour market. It should also be borne in mind that many people are not available for work due to commitments to care at home or voluntary work. In addition, the base population from which the labour force is derived includes people of age 65 or over, many of whom will be retired.

The CSO produce ‘Population and Labour Force projections’ every few years, to provide a reference framework and guidance for Government at all levels, and other development agencies. In making projections as to labour force participation, the CSO disaggregates the population of working age into different segments, each defined by different specific participation rates. These segments are based on gender, age, marital status or participation in third level education.

It is important that a distinction is made between the employment of residents of Limerick and the number of jobs based in Limerick, and also a further distinction between where the jobs are located and where the workers reside for Limerick city. These distinctions are important to gauge the significance of challenges and opportunities for employment

generation in the local and regional context and to define commuter zones and travel to work catchments.

The number of jobs in Limerick in 2016 was 67,986, according to Powscar returns; this is a 7.8% increase over the 2011 total, which was 63,054. It should be noted that these figures exclude those who failed to provide information on their workplace and those who indicated that they had no fixed place of work. According to calculations made in the ESRI report ‘Prospects for Our Regions’ (2018) based on Powscar 2011¹, 76,500 jobs were based in Limerick City and County, and 149,200 in the Mid-West region as a whole (comprising of Limerick, Clare and North Tipperary). The jobs figures were total figures and were not confined to jobs in fixed places of work, they also allowed for those responses to the Census that were not coded.

2.5 – Ethnicity, Nationality, Language and Religion

The Census has questions on ethnicity and nationality, language and religious affiliation. It is important to identify the patterns and trends of population categorised according to different ethnicities, or/and where their birthplaces are outside the State. It is important for various reasons, including as an indicator of migration trends. It is also important to help define the size, characteristics and distribution of people in distinctive minority ethnic groups, which might have specific set of needs that are strongly associated with their identity and with special challenges faced by these groups.

Language and faith are two important markers of identity, giving people a sense of community, purpose and belonging. They are also useful barometers of change in social attitudes, and may reflect the introduction of new cultures through migration. There are two distinct themes in relation to language, firstly in respect of the Irish language the frequency with which this is spoken and whether or not within or outside the education system; secondly in relation to migrants, what are the main languages spoken other than English, and levels of ability to speak English.

In respect of religious affiliation, the proportion of the population of Limerick that stated that they were Roman Catholic has declined from 92.3% in 2002 to 82.7% in 2016, a decline that principally reflects increasing secularisation. In respect of language, the influx of immigrants whose first language is not English has resulted in a more diverse tapestry of languages spoken, although most non-English speaking immigrants state that they can speak English either well or very well.

In respect of the Irish language, Limerick does not have any areas where Irish is spoken as a community language. The high percentage of people who claim that they can speak it and the stark contrast between that high percentage and the low number of people who speak it on a daily basis outside of the education system is a noteworthy feature in Limerick as it in most areas outside of the official Gaeltachtaí.

In Limerick, there are two patterns of particular importance to note in relation to ethnicity and international migration.

¹ Edgar Morgenroth ‘Prospects for Irish Regions and Counties: Scenarios and Implications’ ESRI, January 2018, p31. The 2016 results of powscar were not available at the time of writing of this report.

- 1) In a relatively short space of time, Limerick has experienced a noticeable inflow of international migrants, at a scale and diversity that is unprecedented, and in this respect, it shares much in common with the changes experienced in the rest of Ireland in the last 20 to 25 years.
- 2) International migrants are not the only source of ethnic difference. In Limerick as in many other parts of Ireland, travellers form a small but distinct ethnic group.

The number of those resident in the city and county who were born outside of the State has more than trebled in size between 1996 to 2016, from 8,791 to 27,984, and as a proportion of the population increased from 5.46% in 1996 to 14.09% in 2016. The composition of migrants has changed as well, with the proportion of those born in Great Britain decreasing from 68.9% to 30%. Europe has overtaken Britain as the most important source of international migrants into Ireland; Britain is second ranked, with the remaining proportion, 25%, accounted for by a wide range of countries outside of Europe. The biggest expansion occurs of migrants coming from the European accession countries in central and Eastern Europe that joined from 2004 onwards. They account for 85% of the European increase. Within Limerick, most international migrants settle in the urban settlements (of population 1,500 or over), which of course is dominated by Limerick City. 85% of all European migrants live in the urban settlements of Limerick, and 87% of non-European migrants.

Travellers are a small but distinct ethnic group. Though only forming 0.8% of the population of Limerick according to the census, there is an important concentration of people of this ethnicity in Rathkeale, where 23% of its population state themselves as 'White Irish traveller'.

2. 6 – Demographic Factors for Change: Migration and Natural Changes

Population changes are based on natural change (births minus deaths), and net migration flows (i.e. those that are added to the population by in-migration minus those that are taken away through out-migration). Natural change reflect various factors, including fertility and mortality rates, age structure and demographic profile (affecting the numbers of women of child-bearing age for example). Migration is sensitive to national and regional economic, health and public policy, perceptions, and push and pull factors external to the country, and within the State. Migration tends to be age selective, with inwards migration favouring younger adults and households; and outwards migration often leaving a legacy of higher than expected population aged 65 or over, or empty nester households.

If we take as our starting point the beginnings of a national recovery in 1991, there are a few important trends to note in relation to these drivers of population change, and how they have operated across the State and amongst counties and regions. Most of the following trends are noted in the recent report by ESRI 'Prospects for Irish Regions and Counties: Scenarios and Implications' (2018)² except in relation to the specific point about international migration which is noted in CSO reports 'Labour Force and Population projections'.

- The population has been increasing nationally, with 1.1 million more people in the State in 2016 than in 1991, representing an average annual growth of 1.4%.

² Edgar Morgenroth 'Prospects for Irish Regions and Counties: Scenarios and Implications' ESRI, January 2018, p16-19 on 'Population'.

- As might be expected, the growth has not been spread evenly over time or amongst regions. The Mid-East region got a much greater share of the growth disproportionate to its share of the State's population, the Mid-West region, of which Limerick is a part, got a smaller share of the growth disproportionate to its share. The only regions to grow at a rate greater than the national average over this period were the Midlands and the Mid-East.
- The variation of changes amongst counties is even more marked than the variation amongst regions. As noted in this ESRI report (and as referred to above), Limerick city and county are amongst the Local Authorities to have the lowest rates of population growth in the State. Also, as noted in the ESRI report, Limerick city and county account for the second highest drop in the share of the national population between 1991 and 2016.
- To an extent unlike previous stages of growth, international migration accounted for a significant component of this increase up until 2006, together with a reduction in out-migration. This is illustrated in tables showing the factors of change in a 2008 report by CSO³. As noted in a subsequent report by CSO, estimated net in-migration peaked in 2007, and for the years 2010 to 2014 there was net out-migration, which was replaced by net in-migration in 2015 and 2016 but at lower levels than previously.
- Natural increase was also an important factor in population growth in this recent period. Natural increase peaked in 2011, reflecting the higher proportion of women of child-bearing age compared to other European countries.
- Since 2011 natural increase has been declining. On average natural increase has decreased by 25% since peaking. This is mainly due to the outcome of decline in fertility rates, already low, to a level where in 2016, it was at 1.81 children per female, which is below the replacement rate (the replacement rate is 2.1). The long term trend is of a decline in fertility rates in Ireland, and this trend follows a trend that is already well established in Europe. This trend is closely associated with the empowerment of women, the increasing costs of raising and educating children, and with changing social norms.
- The reduction in natural increase, together with a reduction in net in-migration, accounts for the slow-down in population increase after 2011 in comparison with previous inter-censal periods.
- Future population growth is likely to depend highly on inwards migration, as natural change of the existing population base on its own cannot be guaranteed to deliver population growth given the low fertility rates and ageing population. It is possible that with favourable circumstances the fertility rates may increase again, but it is difficult to gauge what would need to happen to change this trend and then to estimate where and by how much it would change.
- Both the volatility and importance of migration whether this is internal to the State or international, makes it difficult to make population projections.

³ CSO Population and Labour Force Projections 2011-2041, Central Statistics Office, Dublin, 2008, table A, p7. According to the figures in this table, estimated net migration accounts for 48,000 people annually between 2002 and 2006 and 26,000 between 1996 and 2002, whereas the natural increase for these periods in respective order were 33,000 and 23,000.

3.0 – National and Regional Policy

In reviewing the City and County Development Plans, Limerick City and County Council are obliged to work within a statutory planning policy framework set down at national level and as elaborated and refined by regional planning policy. The context within which these plans are being reviewed and replaced with a consolidated Development Plan for both the City and the County, is very different from the context in which both the City and County Development Plans were prepared in 2010, although with some common features.

3.1 – Core Strategy, what it means and its importance

The Planning and Development Act 2000 (as amended) outlines the various elements that a Core Strategy should contain, including the population targets for the Local Authority area, as a whole and for each settlement and settlement tier, the expected number of dwelling units required to meet these targets, where and how much land (in hectares) is proposed to be zoned, serviced and phased to meet these targets.

The purpose of the Core Strategy is to articulate a medium to longer term quantitatively based strategy for the spatial development of the area of the planning authority and in so doing to demonstrate that, the development plan and its objectives are consistent with national and regional development objectives.

The Core Strategy must provide a transparent evidence-based rationale for the amount of land proposed to be zoned for residential and allied mixed-use zonings in the development plan and associated compliance with relevant EU Directives. The Core Strategy should:

- identify the quantum, location and phasing of development for the plan period (allowing for market choice) linked back to regional population targets;
- demonstrate how future development supports public transport/existing services etc.;
- ensure that Councils and key stakeholders assess the needs and priorities for their area on a plan-led basis in their assessment of existing zoned/serviced land and new zonings; and
- provide the framework for deciding on the scale, phasing and location of new development, having regard to existing services and planned investment over the coming years.

3.2 National Planning Framework

The National Planning Framework (NPF) is the Government's high-level strategic plan for shaping the future growth and development of our country out to the year 2040. It is a framework to guide public and private investment, to create and promote opportunities for our people, and to protect and enhance our environment - from our villages to our cities, and everything around and in between. By 2040 there will be roughly an extra one million people living in our country. This population growth will require hundreds of thousands of new jobs and new homes. If we fail to plan for this growth and for the demands it will place on our built and natural environment, as well as on our social and economic fabric, then we will certainly fail in our responsibility to future generations of Irish men and Irish women.

The NPF sets out the governing principles behind its strategy and some of the key mechanisms of implementation that will be brought into play; and a broad framework of population scenarios for the regions and their key city hubs and their metropolitan spatial planning areas. The NPF lays out broad parameters for the distribution of growth that needs to happen by the horizon year of 2040, if growth is to be regionally balanced, economic and sustainable. These include accessible centres of scale in the regions to counter the dominance of the eastern and midlands region, and means that Limerick city should be allowed to grow by 60% by 2040. Another goal is that development of cities and towns should be compact, with 50% of ‘all new homes that are targeted for the cities’ to be within the footprint of the settlement in the case of the cities, including Limerick city, and 30% of all new homes targeted for other urban settlements to be within their footprints. The NPF envisage that the population of the State could grow by 1.1 million by 2040, but that allowance should be made for 550,000 new dwelling units. This reflects an assumption that the average household size will be 2.5 by the target year, and that extra provision should be made to allow for obsolescence and for the current deficit in housing supply.

The NPF also sets out a range of objectives to strengthen Local Authorities Core Strategies, including the introduction of a tiered approach to land use zoning, in which for example, land that is not serviceable during the lifetime of the Development Plan should not be zoned. The NPF sets out the framework which the Regional Assemblies should incorporate into their Regional Economic and Spatial Strategies, including ‘key future planning and place making policy priorities’ for their areas, specifically Metropolitan Area Strategic Plans (MASPs) for the cities and their surrounding areas, and key enablers for the sustainable development of these areas. The NPF then contains a range of National Planning Objectives arranged by theme that apply across the State and are not particular to any region or area.

In summary for Limerick the NPF seeks to grow Limerick City and Suburbs by an additional 56,000 people, with the overall Southern Region, growing to 2 million people, it seeks that 50% of the growth be located built up footprint of the existing city and 30% of the growth elsewhere, also be within the built up footprint.

The responsibilities of the Regional Assemblies and the Local Planning Authorities are to flesh out and realise the National Planning objectives and general principles of the National Planning Framework. The Regional Assemblies are statutorily obliged to prepare ‘Regional Spatial and Economic Strategies’ (RSES) as a framework for their constituent Local Authorities’ Development Plans, and consistency with these strategies should be clearly articulated in the ‘Core Strategies’ of these Development Plans. The RSES also informs the Local Authorities’ priorities and programmes in executing its various responsibilities, that complement and inform the Development Plan and which are vital in securing its development objectives. Local Authorities are statutorily obliged to prepare and keep up to date ‘Local Economic and Community Plans’ (under the Local Government Reform Act 2014) and ‘Housing Strategies’ (under Part V of the Planning and Development Act 2000). It is also recommended that Local Authorities have other strategies that are relevant and up to date, such as ‘Retail Strategies’ to help inform them and plan for what might be specially complex and contentious issues.

3.2.1 National Planning Framework ‘Implementation’ and Core Strategies

Chapter 10 concerns ‘Implementation’, and this contains objectives of key importance for consideration in the formulation of Core Strategies in Development Plans:

- The formation of a State led strategic Land Development Agency to manage and enhance the potential of the State’s own lands, to deliver on public policy (NPO66).
- The introduction of a ‘Metropolitan Strategic Area Plan’ (MASP) to be formulated in tandem with the Regional Spatial and Economic Strategies, for the cities and their surrounding hinterlands, to provide a 12 year planning and investment framework for high level and long term strategic development issues.
- In connection with the MASP, an allowance is made for up to 20% of the city’s phased growth to be accommodated in the Metropolitan area in addition to growth identified for the Metropolitan area.
- To ensure there is proper integration between spatial use and transport planning ‘statutory arrangements between spatial and transport planning in the Greater Dublin area will be extended to other cities’ (NPO 69).
- In connection with Development Plans, and directly concerning the Core Strategies themselves, and the linkages between zoning for development, proposed phasing and enabling infrastructure:
 - NPO71 states a commitment to further develop ‘Core Strategies’: ‘standardised methodologies introduced to ensure a co-ordinated and balanced approach to future population and housing requirements across urban and rural areas’.
 - Three National Policy Objectives (72a, b and c) require that Planning Authorities exercise a structured tiered approach to land use zoning. NPO72a: ‘to differentiate between zoned land that is serviced and zoned land that is serviceable during the lifetime of the Development Plan’. When considering lands that require investment in service infrastructure, the Planning Authority should provide a ‘reasonable estimate of the full cost of delivery’. When considering zoning of land, if the land is not serviceable within the lifetime of the Plan, that land should not be zoned for development.
 - Section 28 Guidelines will be issued to enable Local Authorities to apply an order of priority for development of lands, particularly in the case of interdependent landholdings (NPO73a). Planning Authorities will use compulsory purchase powers to facilitate the delivery of enabling infrastructure to prioritize zoned lands (NPO73b). ‘Planning authorities and infrastructure delivery agencies will focus on the timely delivery of enabling infrastructure to priority zoned lands’ (NPO73c).

Another key requirement that should have an important bearing on the Core Strategy is the requirement to have a Housing Need Demand Assessment (HNDA) under National Policy Objective 37 (NPO 37), an Objective the details of which are elucidated further below in Section 2.2.3 ‘Housing’.

3.2.2 – National Planning Framework – Key parameters national population and employment distribution and other themes

The first set of National Policy Objectives (1 to 3) concern the distribution and composition of future population and employment growth and how it should be steered, or supported.

National Policy Objective NPO1a states ‘that population and employment growth in the Eastern and Midlands Regional Assembly area would be at least matched by population and employment growth in the other two regional assembly areas’. The NPF recognises that current trends which favour the eastern region at the expense of other important cities and towns is not sustainable and so planning in a manner in which ‘business as usual’ is the outcome is no longer good enough.

The NPF also recognises that there is a need for concentration of development in the larger centres that serve the different regions, and which are themselves connected to each other with high quality transport and communication corridors. Hence the National Policy Objectives to create ‘accessible centres of scale to build strong regions’.

The NPF has another series of National Policy Objectives to secure ‘compact and sustainable growth’. This is against the background of the tendency of towns and cities to expand along its fringes and peripheral areas in the form of low density urban sprawl , which increases car dependence and leads to the ‘gradual run-down’ of many of the older areas of towns and cities.

‘A preferred approach would be compact development that focuses on reusing previously developed, ‘brownfield’ land, building up infill sites, which may not have been built on before and either reusing or redeveloping existing sites’.

Hence the following objectives:

NPO 3b to ‘Deliver at least half (50%) of all new homes that are targeted in the five cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford within their existing built-up footprints’.

NPO 3c to ‘Deliver at least 30% of all new homes that are targeted in settlements other than the five cities and their suburbs within their existing built-up footprints’.

The NPF outlines the approaches towards ‘effective regional development’. This contains a geographical profile of the Regional Assembly areas, ‘key future planning and development and place making policy priorities’ for the Regional Assembly areas, and ‘key growth enablers’ focussing on their cities and their cities’ surrounding ‘Metropolitan Areas’. Key growth enablers can refer to any one of a variety of sectors, which singly or in combination contain the proven potential to enable the required growth of the area in question to occur, based on existing resources, commitments and programmes.

3.2.3 – Housing

Section 6.6 of the NPF under Chapter 6 ‘People, Homes and Communities’, deals with Objectives in relation to housing. The approach of the NPF in relation to the delivery of housing is clearly set out at the beginning of this section in the form of a set of ‘national core principles to guide the delivery of housing, at every level of governance’. The first

Objective (NPO32) in respect of housing is ‘To target the delivery of 550,000 homes by 2040’. This number would not be justified by the additional 1.1 million in population projected for 2040 if divided by household size (which by 2040 is projected to be 2.5), but it takes into account the current deficit in housing supply and future obsolescence. The importance of ensuring housing takes place to support ‘sustainable’ development in line with infrastructure delivery and to best contribute to place making informs NPO 33 ‘to prioritize the provision of new homes at locations that can support sustainable development and at an appropriate scale relative to location’.

Other objectives in relation to housing concern supporting the provision of life-time adaptable homes (NPO34); and to ‘increase residential density in settlements through a range of measures’ (NPO35).

Each Local Authority in turn is required to develop a ‘Housing Need Demand Assessment’ (HNDA), to form a robust methodology that will inform policies and funding initiatives around housing and associated land requirements for the Housing Strategy and for the Development Plan (NPO37). The required evidence inputs into the HNDA are in three parts. They include ‘demographic trends, affordability trends and wider economic trends’; ‘housing stock profile pressures and management issues’ and ‘estimated future housing need and demand’.

Housing affordability in Limerick is better than in Dublin, Cork and Galway. Median house prices in Limerick city and county have grown by almost 18% in the year to September 2019, but remain 18% lower than the national median. Likewise, rent levels are up 6% in Limerick city in the year to September 2019, but remain 15% below the national average. Rents in Limerick County, while also rising, are almost 35% below the national average. Meanwhile, the latest CSO data shows that Limerick is the only Irish city, apart from Dublin, where disposable incomes are greater than the national average. This means that first time buyers in Limerick are in a relatively stronger position to borrow to buy a house or apartment than their equivalents in Dublin. Housing affordability in Limerick impacts on demand and as many people either return to Limerick for family or work purposes, this impacts on the demand for housing.

3.3 – Implementation Roadmap for the National Planning Framework

The Department of Housing, Planning and Local Government as guidance for the Regional Assemblies in July 2018 published the Implementation Roadmap for the National Planning Framework. The Roadmap seeks to align the current Local Authority population projections with those of National Planning Framework, to outline governance mechanisms.

The Implementation Roadmap set out figure on a County basis and the following table sets out the projections for Limerick to 2031.

County	Population 2016	Projected Population 2026	Projected Population 2031
Limerick	195,000	229,000 – 235,500	246,000 – 256,500

Table 3 – Population Projections for Limerick from the Implementation Roadmap for the National Planning Framework

In relation to overall population growth, the Roadmap states what various allowances that can be made in respect of additional headroom, if any, depending on the circumstances of the Local Authority. Local authorities are divided into two categories. Some have current population projections in their Development Plans, which fall short of the baseline projections by the NPF. With those Local Authorities, the new NPF population projections are to apply and replace their current projections for the period of transition. The other Local Authorities have projections that substantially exceed the NPF projections. In these Local Authorities transitional projections are made which split the difference between their current projections and the NPF baseline projections. Limerick City and County Council is recognised in the Implementation Roadmap as one of the latter group.

For the purposes of how this headroom is incorporated, the Roadmap distinguishes between those Local Authorities where NPF projections would exceed their current projections and others, including Limerick, where the opposite is the case.

1. For Local Authorities in which the NPF projections exceed their current projections, the Roadmap states that there is no scope for further headroom to be applied by Local Authorities over the population projections to 2026 as the 50% headroom has already been incorporated in these population projections.
2. In the other Local Authorities where the opposite is the case, of which Limerick is one, the Implementation Roadmap states that ‘scope for headroom, not exceeding 25% can be considered to 2026’⁴, referred to here as an uplift.

3.4 – Regional Spatial and Economic Strategy for the Southern Region

The Regional Spatial and Economic Strategy (RSES) for the Southern Region was made by the Southern Assembly, and came into effect on 31st January 2020. It states in S27(1) of the Planning and Development Act 2000 (as amended) that ‘the planning authority shall ensure, when making a development plan or a local area plan, that the plan is consistent with any regional spatial and economic strategy in force for its area’. One of the chief functions of the Regional Assemblies is to make Regional Spatial and Economic Strategies, the purpose of which is to support the national planning framework and translate its broad policies into strategies applicable to their regions.

The RSES for the Southern Region is built on a vision of building a strong, resilient and sustainable region. The RSES is structured around Regional Planning Objectives (RPOs). The first RPO, in the introductory chapter, states a commitment to ensuring all Plans are properly assessed for Environmental effects in accordance with EU Directives (RPO 1 Environmental Assessment). The next four RPOs, contained in Chapter 3 ‘People and Places’ concern the approach that should be taken to ensure that in planning for growth, all elements necessary for growth to be workable and sustainable should have been properly considered and aligned.

- RPO 2 Planning for Diverse Places: that the planning framework should recognise the strategic role played by all areas in achieving the set regional and national targets and objectives (RPO 2 Planning for Diverse Areas);

⁴ Government of Ireland, Project Ireland 2040 Implementation Roadmap for the National Planning Framework, 2018, p5.

- RPO 3 ‘Local Authority Core Strategies’ ‘In preparing Core Strategies, local authorities shall determine a hierarchy of settlement and appropriate growth rates in accordance with the guiding principles (including environmental protection) and typology of settlement in the RSES’.
- RPO 4 ‘Infrastructure Investment’: ‘infrastructure investment shall be aligned with the spatial planning strategy of the RSES’.
- RPO 5 ‘Population growth and Environmental Criteria’: ‘Increased population growth should be planned with regard to environmental criteria including assimilative capacity of the receiving environment, proximity of Natura 2000 sites and potential for adverse effects on these sites and their conservation objectives, and areas with flood potential.’

Population projections are outlined for Limerick City and the Limerick - Shannon Metropolitan Area distinguishing between its different components, in Table 1, of Volume 2 (Metropolitan Area Plans), consistent with but elaborating on the broad parameters laid down for the cities and the criteria set down in the NPF and Implementation Roadmap. The population targets for Limerick City and Suburbs and the remainder of the Metropolitan Area in Limerick are set out in RSES in the below, breakdown for the remaining settlements in Limerick will occur in the Core Strategy of the proposed Limerick Development Plan 2022 – 2028

Area	Population 2016	Projected Population 2026	Projected Population 2031
Limerick City and Suburbs (Limerick)	89,671	112,089	123,289
Limerick City and Suburbs (Clare)	4,521	5,607	6,150
Subtotal	94,192	117,696	129,448
Remainder Metropolitan Area (Limerick)	15,281	19,453	21,611
Remainder Metropolitan Area (Clare)	22,947	25,414	26,463
Subtotal	38,228	44,867	48,074
Total Limerick – Shannon Metropolitan Area	132,420	162,563	177,552

Table 4 – Population Projections 2026 and 2031 for the Limerick – Shannon Metropolitan Area

Targets are not set for individual settlements outside of the cities. Instead a settlement typology was established: ‘It is a framework based on the pillars of our three cities, supported by a network of strategically located Key towns, towns and villages and rural areas’.

4.0 – Review of current Core Strategies as set out in the Limerick City Development Plan 2010 – 2016 (as extended) and the Limerick County Development Plan 2010 – 2016 (as extended)

The Core Strategies that currently apply in Limerick City and County Council pending their review in the new Development Plan were formulated separately, as part of the Development Plans of Limerick City and Limerick County, both adopted by Limerick City and County Councils in 2010 and both varied to include the Core Strategies.

Population changes that have actually occurred since 2006, did not follow the pattern projected in the Core Strategies, population growth, where it has occurred was much less than envisaged, and that in some instances there has been population decline instead of the growth envisaged. The most significant example of divergence between projection and reality is what has happened in Limerick City former council area, where despite a very generous projection, the same pro-rata than that which applied to the city's environs, the population declined, which can be attributed to an established trend in this direction and the economic downturn.

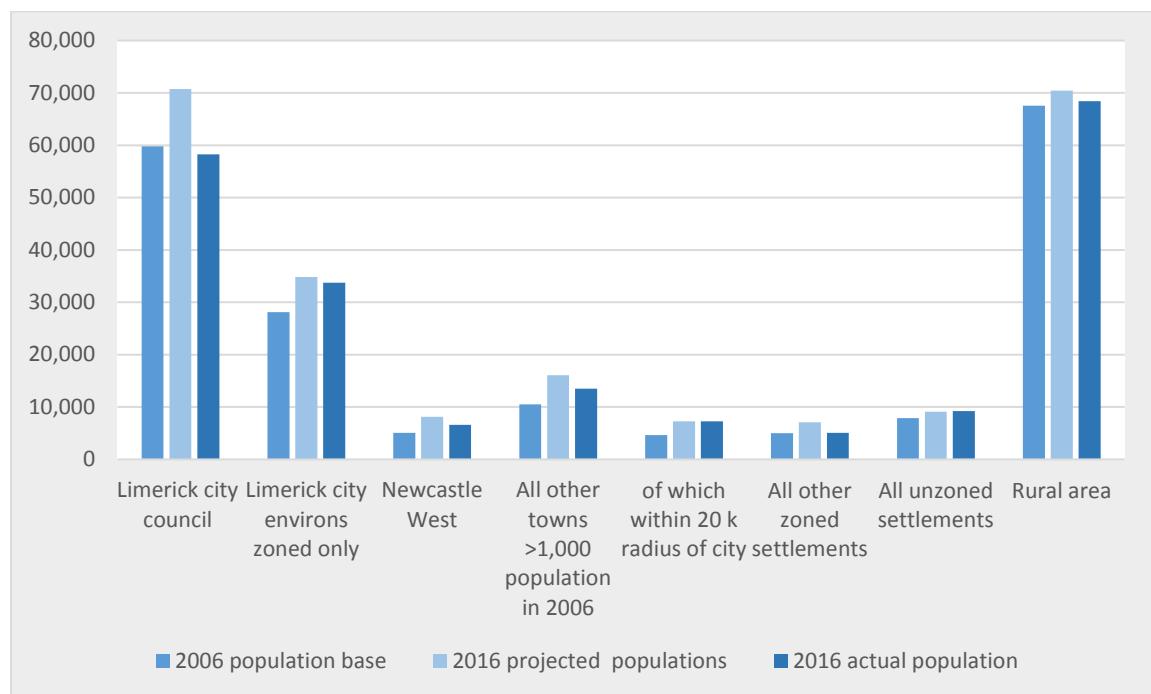


Figure 7 – Limerick City and County existing and projected populations 2006 – 2016

The difference between what was projected and what actually transpired might principally be due to an over-estimation of the prospects for growth even at the time the estimates of future prospects were being formulated, the banking crisis of 2008 had just occurred. The seeming lack of recognition of the possible implications of this crisis for future growth prospects could be taken as an indicator of how ingrained the inherent bias by policy makers and planning authorities at all levels of government is towards overestimating the prospects for growth.

Any fair evaluation of these Core Strategies, however, will have to take into account the following

- The inevitable uncertainty surrounding population projections, most especially as population change is determined so much by migration flows, which in turn depend much on the performance of the economy, and other push and pull factors.
- Local Authorities have only limited powers to effect overall population change and development especially if they act in isolation, hence the importance of local Authorities working with each other and with other public bodies and stakeholders in an agreed regional and national policy framework. This also means that there is a trade-off. The scope of Local Authorities to formulate or vary policy is constrained by frameworks set down or agreed at national or regional level.
- A misunderstanding as to what a Core Strategy can and cannot do. A ‘Core Strategy’ is not a blueprint for economic recovery, but instead is intended to inform the Planning Authority in the carrying out of its role as a regulator and facilitator of development. What it does is sets upper limits on the development that may occur, and what should be allowed for, in terms of growth, and sets out a framework by which if growth is to occur, that it would be as balanced as opportunity will allow. This is so as to enable Planning Authorities to at least anticipate changes in order to best assist developers and investors realise opportunities for sustainable growth where they do occur.

5.0 – Rural Housing

5.1 – Introduction

It is fair to say that outside of the city, Limerick has a highly dispersed rural settlement pattern. As is common with much of rural Ireland, particularly in those parts of rural Ireland within the commuting belts of important cities and towns, there is a well-established pattern of demand by new householders to have their own house built to specification either in the open countryside or the edge of settlements, usually on un-serviced sites and un-zoned land.

Individual houses planned in this way, with their own septic tank or effluent treatment systems, are labelled ‘one off houses’. One- off houses are defined by the CSO (Census 2016) as ‘occupied detached single houses, with individual sewerage systems’. It is important to note that the CSO published data on one off housing is not confined to houses outside the boundary of settlements and can include houses for which individual planning applications were made on serviced sites.

The challenge for the Planning Authority is how to manage the demand for housing in an transparent, inclusive, fair and sustainable manner, and in a way that is cognisant of the kind of challenges that rural areas typically face and any of which may be a salient in a given case or area. Insofar as planning for housing as a land use is concerned, an important phenomenon in rural areas is that the linkages between where people live and work have been loosened, while due to the car there is also increased mobility. People can and do choose to live and set up in rural areas often due to local community ties, or due to the attractions that the countryside is perceived to offer, even while their jobs usually lie well outside their localities. The new households can then in turn add their own presence and input into local community life, which is often welcomed and truly beneficial.

5.2 – National Planning Framework (NPF)

In the National Planning Framework itself, there are three key objectives of particular relevance to single rural housing:

National Policy Objective 10

Project the need for single housing in the countryside through the local authorities overall Housing Need Demand Assessment (HNDA) tool and county development plan core strategy processes.

The approach that all Local Planning Authorities should use in planning for single rural housing involves quantifying the need for single housing on an evidence basis.

National Policy Objective 15

Support the sustainable development of rural areas by encouraging and arresting decline in areas that have experienced low population growth or decline in recent decades and by managing the growth of areas that are under strong urban influence to avoid over-development, while sustaining vibrant rural communities.

National Policy Objective 19

Ensure in providing for the development of rural housing, that a distinction is made between areas under urban influence, i.e. within the commuter catchment of cities and large towns and centres of employment, and elsewhere:

- In rural areas under urban influence, facilitate the provision of single housing in the countryside based on the core consideration of demonstrable economic or social need to live in a rural area and siting and design criteria for rural housing in statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements.
- In rural areas elsewhere, facilitate the provision of single housing in the countryside based on siting and design criteria for rural housing in statutory guidelines and plan, having regard to the viability of smaller towns and rural settlements.

An area qualifies as being ‘under urban influence’ when it is within the ‘commuter catchment of cities and large towns’. The NPF state that in this regard the OECD definition of a commuter catchment should be used, i.e. when 15% or more of the workforce in the area go to the city to work.

The NPF outlines five important goals to strengthen Ireland’s rural fabric:

- Reversing town/village and rural population decline by encouraging new roles and functions for buildings, streets and sites;
- Supporting the sustainable growth of rural communities, to include development in rural areas;
- Implementing a properly planned local authority led approach to identifying, meeting and managing the real housing needs arising in countryside areas;
- Improving local connectivity to principal communication (broadband), energy, transport and water networks;

- Promoting new economic opportunities arising from digital connectivity and indigenous innovation and enterprise as well as more traditional natural and resource assets (e.g. food, energy, tourism) underpinned by the quality of life offering.

Two of these goals in particular are worth highlighting in respect of rural housing. Most pertinently, the third listed goal is about implementing a properly planned local authority led approach to identifying, meeting, and managing the real housing needs arising in countryside areas. The goal at the top of the above list, to reverse town/village and rural population decline, could be described as complementary to the need to implement a planned approach to managing real housing needs. Both these goals above the all else frames the general approach that the Local Authority should take to one off rural housing.

5.3 – Regional Spatial and Economic Strategy for the Southern Region

The Strategy under the theme of ‘People and Places’ sets out the overall approach to development of the region, which includes a tailored approach to ‘Planning for Diverse Areas’ (Regional Planning Objective RPO 2). This is an approach that will work in “parallel with a strategy to build on cities and their associated metropolitan areas”. It will “reposition the Region’s strong network of towns, villages and diverse rural areas in an economically resilient, imaginative and smart way to foster sustainable competitive advantage”⁵. This would involve the formulation of a ‘settlement typology’, based on certain guiding principles outlined in the Strategy. It states in Objective RPO 3 “Local Authorities shall determine a hierarchy of settlement and appropriate growth rates in accordance with the guiding principles (including environmental protection) and the typology of settlement in the RSES”.

The Strategy’s position on rural areas is set out in Section 3.7⁶, defined as per the CSO definition as all settlements with a population of less than 1,500. The RSES ‘reflects the position of the NPF, that our countryside “is and will continue to be, a living and lived-in landscape focussing on the requirements of rural economies and rural communities, based on agriculture, forestry, tourism and rural enterprise, while at the same time avoiding ribbon and over-spill development from urban areas and protecting environmental qualities” ’.

Regional Planning Objective RPO 27 in Section 3.7 follows from this understanding and rationale, and states that Local Authorities shall:

- RPO 27(a) ‘include policies for the protection of the viability of smaller towns and rural settlements as a key priority within Development Plans.
- RPO 27(b) ‘Have regard for the viability of smaller towns and settlements, Core Strategies shall identify areas under urban influence and set the appropriate sustainable rural housing policy response which facilitates the provision of single housing in the countryside based on the core consideration of demonstrable economic, social or local exceptional need to live in a rural area’.
- RPO 27 (c) ‘Have regard for the viability of smaller towns and settlements in rural areas elsewhere, facilitate the sustainable provision of single housing in the

⁵ Southern Regional Assembly (2020) op.cit, p32

⁶ Southern Regional Assembly (2020) op.cit, p90

- countryside based on siting and design criteria for rural housing in statutory guidelines and plans’
- RPO 27 (d) ‘Provide for flexibility in zoning and density requirements to ensure that rural villages provide attractive easily developed options for housing’.

Section 3.6 and RPO 26 precedes Section 3.7 on rural areas, and addresses the need for a sustainable infrastructure growth led approach to towns and villages based on their scale, function and potential, that are recognised as key local drivers, but in respect of which ‘decline and dereliction are key issues’. RPO 34 ‘Regeneration, Brownfield and Infill development’⁷ is intended to help address ‘decline and dereliction’ in towns and cities while also ensuring that the growth of towns and cities is compact. RPO 34 states that Development Plan Core Strategy of each Local Authority should be accompanied by specific objectives setting out the achievement of urban infill/brownfield development’. The Strategy outlines a list of possibilities for Local Authorities to consider when setting out requirements for brownfield site remediation as per RPO 34.

5.4 – Section 28 Guidelines

In preparing the 2010 County Development Plan, Limerick County Council was obliged to ensure the Development Plan was consistent with the national planning guidelines, which in accordance with Section 28 of the Planning and Development Act 2000 (as amended), Local Authorities are obliged to comply with in their Development Plans and the execution of planning policy. There are two documents of particular relevance to rural housing, that Limerick City and County Council are obliged to comply with in the review of the Development Plans, planning guidelines that were issued in 2005 in relation to rural housing; and guidelines that were issued in 2012 in relation to housing and other forms of development involving access onto national roads.

5.4.1: Sustainable Rural Housing – Guidelines for Local Authorities

Of particular relevance to its policy and objectives on rural housing in this regard are ‘Sustainable Rural housing; Planning Guidelines for Local Authorities’ a national guidance document issued in 2005. These guidelines take a lead from the National Spatial strategy 2002 in distinguishing between urban generated and rural generated housing; also in regard to the spectrum of rural area types. At one end of the rural area spectrum are those areas under urban influence; then there are those that have a stable network of towns and villages to sustain their populations; and at the other end are those areas ‘where the key challenge is to arrest sustained population and economic decline’. The single rural housing should be addressed differently depending on the rural area type. There are in total four rural area types listed in these Guidelines. The judgement as to how the rural area of a Local Authority should be characterised by reference to these four possible types, depends on their settlement pattern, population changes and age structure, and the importance in the area of commuting, an indicator of the prospects for ‘urban’ as distinct from ‘rural’ generated housing need.

- Rural areas under Strong Urban Influence
- Stronger rural areas
- Structurally weaker areas

⁷ Southern Regional Assembly (2020) op cit, p96

- Areas with clustered settlement patterns

All but the latter area type exists in Limerick, that area type generally characterising the western seaboard of many counties where there are comparatively fewer village or smaller town type settlements in comparison with other rural areas. In the former two rural area types the Guidelines are recommending that since there should be sufficient land and services available in the cities, towns or settlements to accommodate housing need, there is no need to accommodate ‘urban generated’ housing need also in these areas. The distinction between urban generated and rural generated housing is a very important tool to use in controlling single rural housing ‘particularly in those rural areas closer to large urban areas, in order to avoid ribbon and haphazard development in rural areas closest to these cities and towns.’ To establish whether the need for a proposed single rural house is ‘rural generated’ or not, certain criteria, known as “local housing needs residency criteria” were recommended in Section 3.2.3 of these Guidelines.

5.4.2 – Circular PL2/2017

This Circular was issued by the Department of Housing, Planning and Local Government, in response to the implications of the issuance by the European Commission of an infringement notice in 2007 against Ireland in respect of the local housing needs residency criteria on grounds that it breached terms of the EU treaty on freedom of movement. This notice was deferred pending the outcome of an infringement case taken against Belgium, now known as the ‘Flemish Decree case’. In this regard the Decree linked the transfer of property in certain Flemish communes to the condition that there should exist a “sufficient connection” between a property owner and the relevant commune. The European Court of Justice (ECJ) subsequently ruled in 2013 that the ‘Flemish Decree’ constituted an unjustified restriction on fundamental freedoms under the EU Treaty and in particular, that it breached Article 43 of the EU Treaty on freedom of movement. This judgement could have significant implications for the ‘local housing needs residency criteria’ as outlined in Section 3.2.3 of the 2005 Guidance. The Department acknowledged in the Circular that: “it is considered necessary to speedily revise the 2005 Guidelines to ensure that rural housing policies and objectives contained in Local Authority development plans comply with Article 43 of the EU Treaty on movement of citizens.”

The Department established a Working Group on this matter to review and, where necessary recommend changes to the 2005 Guidelines. The Circular states the commitment of the Department to engage with the European Commission on proposed changes following the conclusion of the Review and consultations with planning authorities, with a view to issuing replacement text on Section 3.2.3 of the Guidelines. The Circular also noted that the National Planning Framework, which was at the time of the Circular, as proposal stage, would further assist in the revision of the 2005 Guidelines. To date no formal amendments to the 2005 Guidelines have been agreed or issued to address this ambiguity.

5.4.3 – Spatial Planning and National Roads

The Department of Environment, Community and Local Government published this guidance in 2012, to guide decision making in relation to any development that might affect the safety and capacity of the national road network. It states, in Section 2.5 of the document:

"The policy of the planning authority will be to avoid the creation of any additional access point from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 60kph apply"⁸

5.5 – Planning Policy in Limerick City and County Council

The planning policies that have a direct bearing on rural settlement and single rural housing ('one-off housing') in Limerick are expressed in the County Development plan 2010; and in the City Development Plan 2010. The City Council area also includes rural areas principally in Coonagh and Clonmacken in the north side of the City. There is a difference in approach between the two former Councils in relation to rural housing. All of the city council area is covered by some land use zoning objectives whether these be for development of certain land use classes, or whether they are to protect agriculture or open space amenity. The approach towards single rural housing is dictated by the zoning objective for whatever area it pertains to, and is unequivocal that residential development will not be permissible in areas not zoned for residential or mixed-use development. In areas zoned for agriculture only an exception is made where the house would be needed for someone to farm the land in which it is situated.

Most of the former County Council area, in contrast to the city, comprises of extensive rural areas, including both the open countryside and a palimpsest of small settlements. A great proportion of the county's communities, therefore are already living in a variety of settlement configurations, from dispersed settlement in an open countryside setting to villages and towns. Generally all housing in the open countryside are on sites not served by public sewerage systems, and this is also the case for many of the smaller towns and villages. That there should be such a constant demand for single new houses in rural areas can be partly understood, in the context that many new households will emerge from these communities and wish to remain attached to their local area. To many it seems, the one off house is either the most attractive or feasible means of achieving this.

The County Council's policies in relation to rural housing in general and single rural housing in particular are set out in pages 3-17 and 3-18 of the County Development Plan (Ch3 Urban and Rural settlement strategy) as follows

The area classification is as outlined in the Sustainable Rural Housing Guidelines.

1. Areas of Strong Urban Influence -Part of the rural areas within commuting distance of Limerick City and Environs are experiencing pressure from the development of urban generated housing in the open countryside. Continued high levels of single rural houses in these locations would inhibit the growth of the County's urban areas which would result in a failure to achieve the growth targets, particularly of the City and Environs.
2. Strong Agricultural Base -The rural areas that traditionally have had a strong agricultural base, that are restructuring to cope with changes in the agricultural sector and have an extensive network of smaller rural towns, villages and other settlements. In these areas, the focus of urban generated housing should be in the

⁸ Department of Environment, Community and Local Government: Spatial Planning and National Roads (2012), Section 2.5 p12

network of settlements to support the development of services and infrastructure and to take pressure off development in the open countryside.

3. Structurally Weak Areas – The rural areas generally exhibit characteristics such as persistent and significant population decline as well as a weaker economic structure based on indices of income, employment and economic growth. These rural areas are more distant from the major urban areas and the associated pressure from urban generated housing.

Only in the latter area type is there no presumptive distinction made between ‘urban generated’ and ‘rural generated’ single rural housing. Areas of strong urban influence are defined as areas (Electoral Districts) which are growing in population and where there is evidence of significant pressure from single rural housing, which happen to be within a short commuting distance of the city. Areas of strong agricultural base are areas that are growing in population and which are generally characterised both by strong farms and a network of settlements.

The map below shows the implementation of the above policies in terms of the number of one off rural houses permitted in the period 2009 – 2019, which outlines the impact of implementation of this policy, however, when we contrast this with the previous 10 years, there is a remarkable decline in the rural houses permitted.

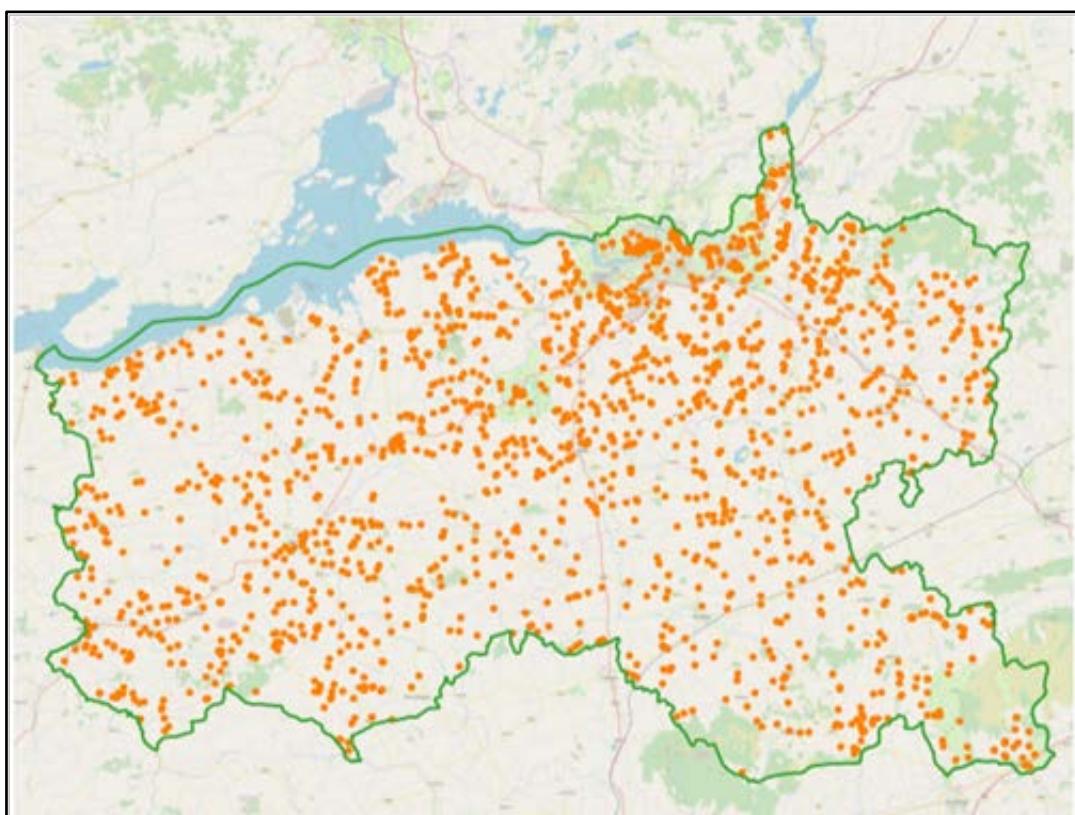


Figure 8 – One Off Dwelling Houses permitted 2009 – 2019 in Limerick

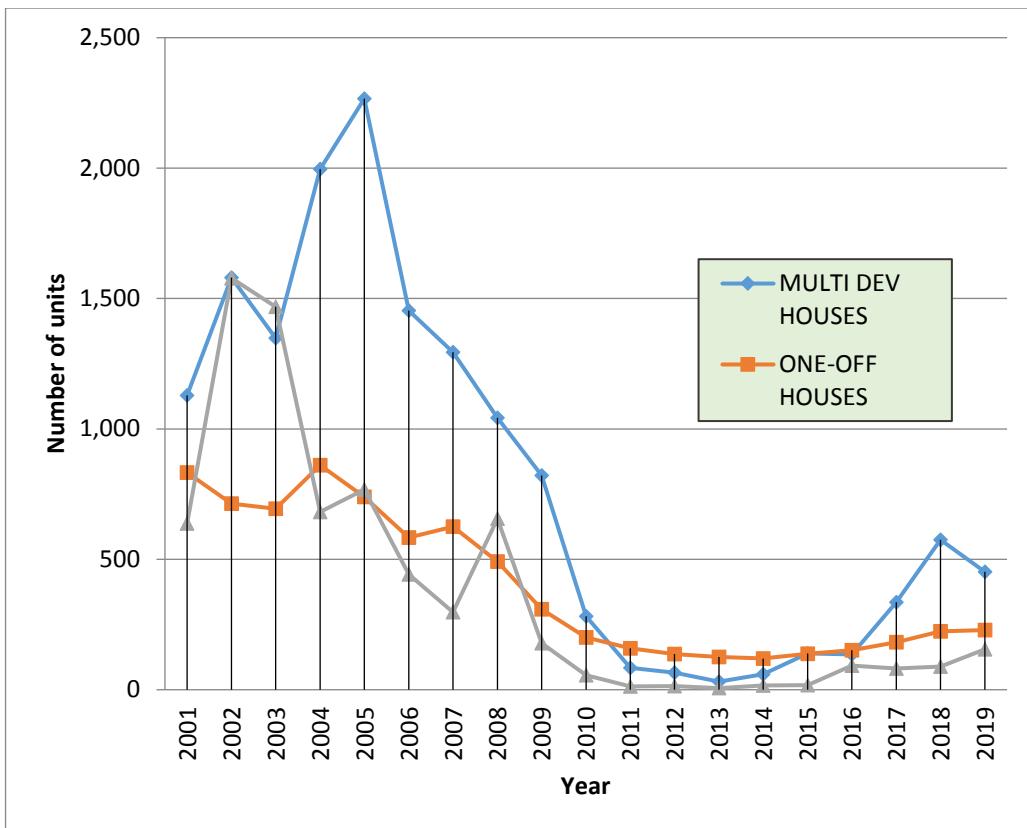


Figure 9 – Number of Dwelling Units permitted Limerick City and County Council – 2001 – 2019

5.6 – Rural Limerick Profile

Rural areas include both open countryside and settlements that fall into the CSO definition of ‘rural’ (being any settlement with a population of less than 1,500). By calculating the percentage that aggregate rural population was of the total population according to the 2016 census (see table one below) this shows that 46.1% of the population of Limerick City and County are rural; excluding Limerick city 85% of the county area was rural. Limerick has followed the national long-term trend in urbanisation (the proportion of all of Limerick that was rural in 1996 was 60%), but Limerick outside of the city remains predominantly rural in character and its settlement pattern.

Area	Year Urban/Rural	1996	1996- 2011 % yearly average change	2011	2011- 2016 % yearly average change	2016	% of total
State	Urban	2,107,991	2.02%	2,846,882	0.32%	2,985,781	
	Rural	1,518,096	0.92%	1,741,370	0.13%	1,776,084	37.3
Limerick	Urban	80,893	1.65%	103,399	0.11%	105,047	
	Rural	84,149	0.33%	88,410	0.11%	89,852	46.1

Table 5 – Irish State and Limerick City and County aggregate urban and rural populations 1996, 2011 and 2016, annualised average growth rates

5.7 – Settlement Pattern

Taking a closer look at the settlement patterns for rural Limerick, a number of marked features stand out. Firstly, Limerick has a dispersed pattern of small settlements, in various configurations, not just nucleated, and of various densities. The density of the rural population is lowest in the western uplands of the county and in other hilly areas and in floodplains. The density of rural population is highest in the commuter belt around the city, and in small pockets around some of the more important towns. In population terms, overall 68,546 people live in the lowest tier of Limerick's settlement network (that is the open countryside and 36 non-census settlements), accounting for two thirds of the total rural population of Limerick, and 30% of the entire population of Limerick, including the city.

Secondly and to a greater extent than most other counties, Limerick does not have many medium sized towns. The largest town outside of Limerick city is Newcastle west, which in 2016 was 6,619 in population. Except for Newcastle West itself, which has nearly doubled in size in the last 20 years (from 3,618 in 1996), most of this growth has occurred in settlements close to the city itself, including the third largest town in Limerick, Annacotty, which has effectively become a suburb of Limerick city in recent years. Thirdly most of the settlements in Limerick are quite small. Limerick outside of the city, contains 46 Census settlements and a further 36 non-census settlements. Omitting Annacotty, only four settlements can be qualified as 'urban' in the census definition (that is 1,500 in population or greater).

Vacancy in one off rural houses is also a key issue for rural areas and has a significant impact on the rural landscape, particularly in isolated areas, there is significant potential to reoccupy these rural houses to meet the demands for individuals, who wish to live in rural locations.

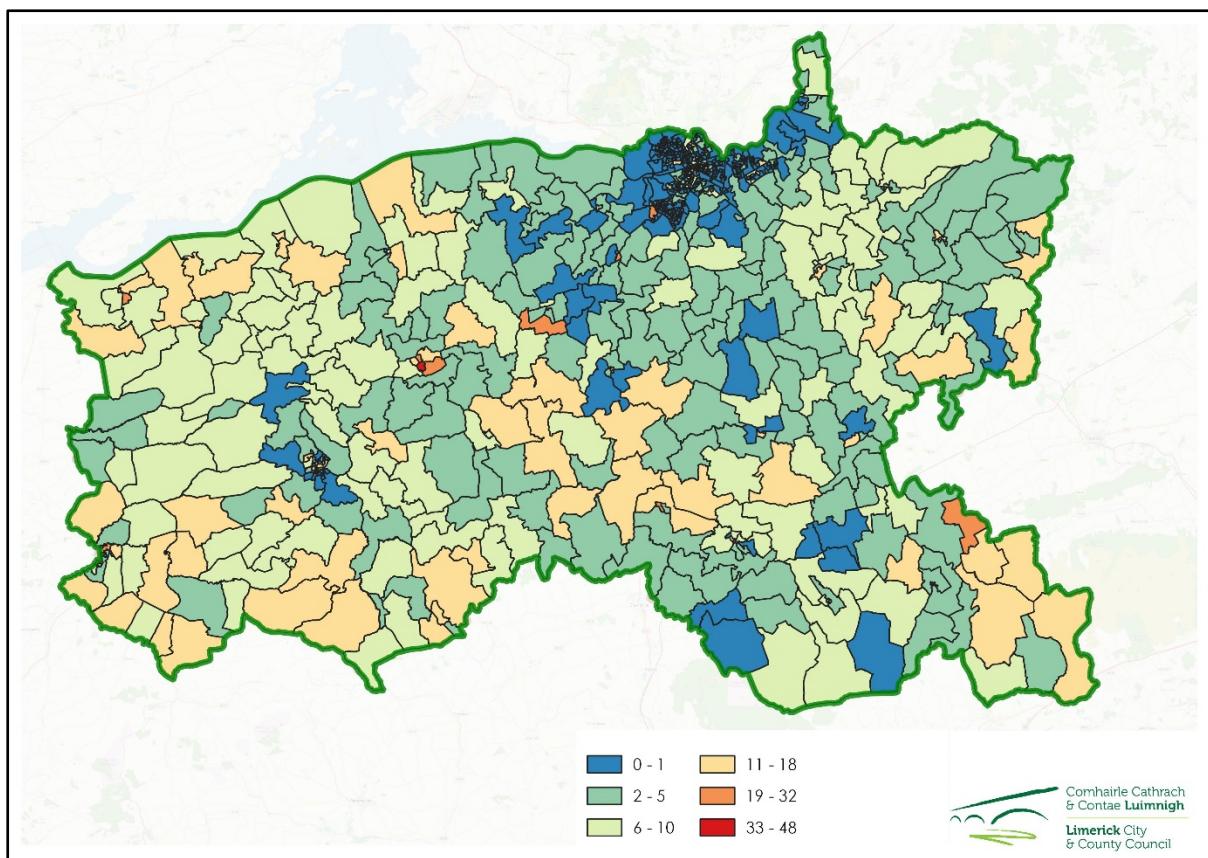


Figure 10 – Residential Vacancy by Geo Directory in Limerick City and County

5.8 – Age Structure

There are variety of community types and dynamics throughout rural Limerick. Age dependency is a good indicator of both the legacy of age selective migration on a community and its capacity to sustain and evolve into the future, without significant interventions.

Limerick City and County has an Old Age Dependency Ratio of 21.4% (2016) which is above the state average (20.4%).

The Old Age Dependency Ratio is lower in the Metropolitan Area (18.7%) compared with rural Limerick. This is connected to a younger age profile and a low Old Age Dependency Ratio in the sub-urban area (where the Old Age Dependency Ratio is 15.4% in the Electoral Divisions surrounding the former Limerick City Council area). Across rural Limerick (outside of the city on the map below), the pattern of Old Age Dependency is quite varied.

However, there are areas of concentration of older population (% 65 years and upwards), particularly in the west Limerick towns and villages and in the remote rural settlements along border areas with Co. Kerry to the west and south west of the County, as well as in towns in east Limerick especially, Kilmallock.

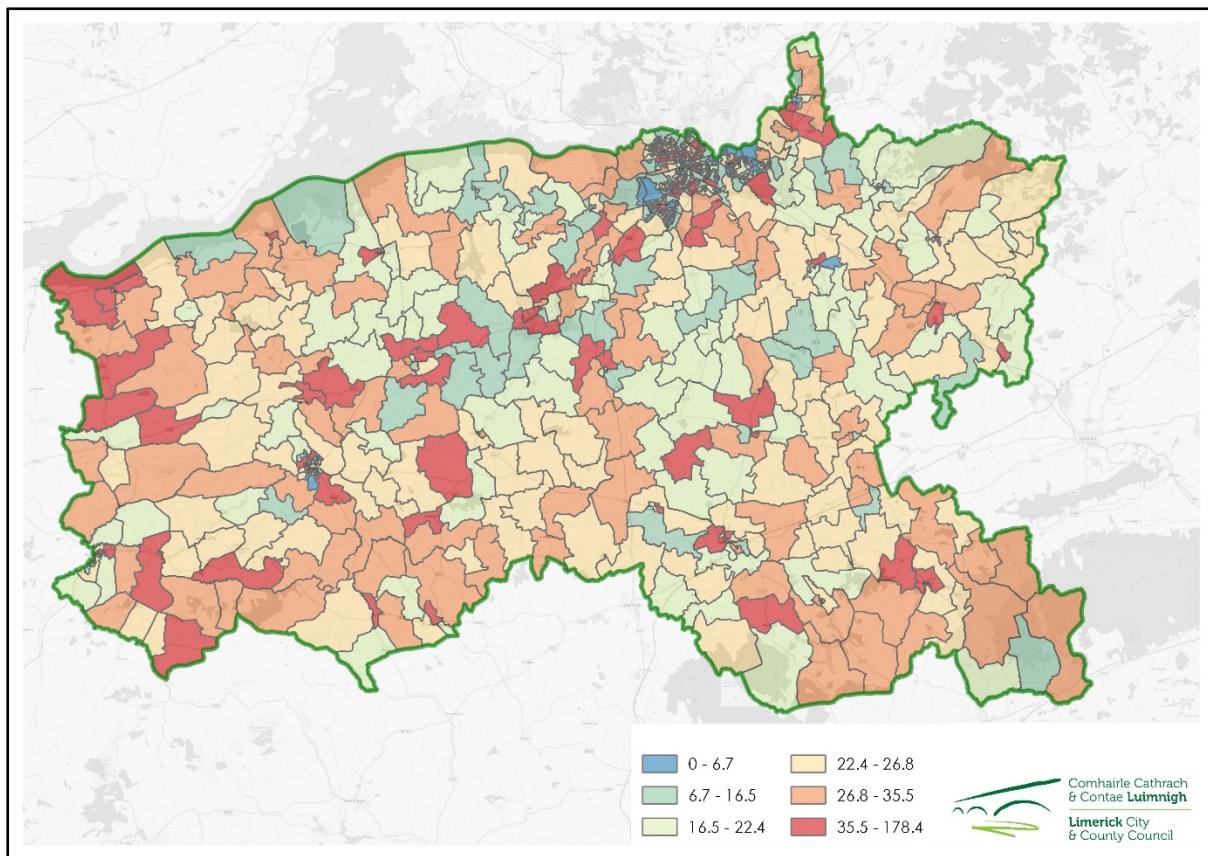


Figure 11 – Old Age Dependency by Small Area of Population – Limerick City and County 2016

In the former Limerick County Council administrative area, the Youth Dependency ratio is 33% which is higher than the state average. The former Limerick County Council area includes areas in the suburbs of Limerick City (now within Limerick Metropolitan Area).

However, the overall picture is that rural Limerick has a significant young population, highly dispersed across the county in some towns and villages, especially on the outskirts of towns and villages, and in the open countryside.

Effective planning policy for housing in rural areas is not the same as housing policy, but must be continuous with effective housing policy generally. In terms of how it has a bearing on the location, type and design of housing, planning policy on rural housing should reinforce the aims of a settlement policy and strategic planning framework aimed at ensuring the city and county can develop in a sustainable manner accountable to the public both of present and future generations.

6.0 – Conclusion

Limerick's population targets for the period to 2040 are set out in the National Planning Framework and Regional Spatial and Economic Strategy. The above information details the historical growth in Limerick and some of the challenges experienced. National and regional policies have ambitious plans for growth in Limerick, with a particular focus on the City. The preparation of the Core Strategy for Limerick will be informed by the preparation of Housing Strategy and Housing Need Demand Assessment, which will consider housing markets, housing demand and outline some of the key issues in housing supply. This Core Strategy will identify the locations for growth and the quantum of lands to be zoned in the various settlements.

There are a range of other issues that also need to be considered in the preparation of the Core Strategy, including for example, economic growth trends, the availability of infrastructure to support development, especially the availability of water services and sustainable travel opportunities, etc. All of these issues will be considered as part of the preparation of the proposed Limerick Development Plan.

Limerick City and County Council will consider provision of healthcare, education, community hubs, childcare services, public spaces, recreational facilities and green and blue spaces, in the areas, which are identified for growth. New policies and objectives are necessary to inform future requirements that match the needs in different neighbourhoods and the wide range of communities that live throughout the City and County