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First

SUBMISSION to LIMERICK CITY and COUNTY COUNCIL

ON PROPOSED

ABBEYFEALE LOCAL AREA PLAN 2022 - 2028.

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1.0. INTRODUCTION

The purpose of this submission to Limerick City and County Council is to make observational comments about the Draft Abbeyfeale Local Area Plan, 2023 - 2029, the context of which is: consistency with the National Planning Framework, the Regional Spatial and Economic Strategy for the Southern Region and the Limerick Development Plan, 2022 - 2028. This submission is the result of ad hoc conversations, observations, ideas and opinions from people who have a genuine interest in and concerns about the town they live and work in.

The Local Area Plan 2023 - 2029 being drawn up presently will, when passed by the Local Authority, govern the development within the LAP boundaries of the town over the coming 6 years. It is important that the end result is amenable to those who live and work within the LAP area.

Market towns like Abbeyfeale can be found everywhere - they all have small, static or decreasing populations, a mix of commercial and residential buildings, infrastructure/services, recreation and educational areas - combined with all the problems associated with town centres i.e. dereliction, vacant commercial and residential properties, high rates, parking, congestion and anti social behaviour.

Therefore it is very important that the voices of the people be listened to so that Abbeyfeale will have a standard of living in pleasant surroundings and a carefully thought out programme of development that is amenable to the local people.

2.0. PLACE MAKING

Placemaking is the method by which shaping, improving and creating high quality public places is achieved. "Placemaking involves the planning, urban design and management of public spaces in order to achieve an **inclusive high quality of life** and create a strong character, **sense of place and belonging**' and a sense of pride in one's home town. (P.45, Limerick Development Plan, 2022-2028).

Abbeyfeale is a town with a traceable history back to the 12th century with the founding of the Cistercian Abbey in the centre of the present town. Combined with Port Castle, it has proved to be the nucleus for that sense of place that placemaking is all about. However, the people of Abbeyfeale want to also identify with the 21st. century, while acknowledging their links to the past.

Fortunately, there is much happening on the Community Infrastructure front in Abbeyfeale to enrich the place making aspect. They include a Traffic Management Plan and the concept of Centre Town First which aims to identify and address projects in the centre of town, some of which will hopefully be of an artistic/cultural interest. These measures, when completed, should enhance the placemaking aspect of public areas being available for the people to enjoy and adding to the attractiveness of Abbeyfeale as a desirable place for people to live, shop, work and play.

Placemaking is also about connectivity in terms of linking the different recreational and residential areas with pedestrian and bike paths as well as easy access to public transport.

Placemaking can be employed to influence and encourage proper designs and finishes in the residential areas so that the overall look is visually pleasing, whether it is one single or multiple buildings or a streetscape.

2.1 CENTRE TOWN FIRST

This government policy aims to address the decline in Irish towns in terms of dereliction and regeneration with emphasis on housing, reducing vacancy and projects for the centre of town. It is also to promote high quality place-making and public realm. The policy is supported by multi billion investment spread across major government schemes.

The plan is a parallel plan to the Abbeyfeale Local Area Plan, 2023 - 2029 — it mirrors the aims and aspirations of the LAP in terms of housing, regeneration of derelict buildings and encouraging new businesses.

Business people and other stakeholders have been brought together to identify projects in the town that they would like to see happening.

Whereas it reads very well and everyone would like to see things happening, it is difficult to see how retail development in Abbeyfeale can be brought back to the levels enjoyed years ago, given the restrictions on traffic and also the massive effect that online shopping has had on retail sales globally.

The Traffic Management Plan will reduce Main Street to a priority thoroughfare for vehicular traffic to traverse the town as quickly and as efficiently as is possible and despite new parking areas and wider pavements, it is difficult to visualise the concept in reality as described in the Local Area Plan.

Opportunity Sites have been identified in the town for the Centre Town First. Several (the Convent, The Cinema, Murphy's Yard etc) have proved to be non viable for various reasons as discussed during meetings of the interested parties with LCCC officials.

There is a huge amount of confusion as people grapple with The Traffic Management Plan, The Draft Local Area Plan and now the Centre Town First Proposals.

Some of those with very good ideas felt they were not being listened to and more people thought it was a golden opportunity to put dramatic pieces of statuary in the Square - ideas for which were discussed under the Traffic Management Plan and not the Centre Town First!!

However, as of now, a list of suitable projects has been compiled - after much discussion ranging from moving the statue of Fr. Casey to covering the Square with a roof.

Projects identified include a Family Resource Centre and a government subsidised Creche - both of which are lacking in the town. Also mentioned was an Archive Centre as there has been great disappointment at the temporary loss of the Bank of Ireland as a future museum, suitably placed in the centre of the town and into which one hopes these can be moved some day.

Erosion was also discussed. As were other issues not relevant to the Centre Town First.

3.0. HOUSING AND POPULATION

Abbeyfeale is identified as a Level 3 settlement in the Limerick Development Plan, 2022 - 2028. (P.37 and P.15 of the Draft Local Area Plan). This Plan projects an increase in the population of Abbeyfeale from the present 2023 to 2589 by the year 2028.

The problem with these figures is that they are aspirational given that between 2006 and 2016, the figure rose by just 16 persons - which is negligible. In fact, the projected population growth referenced in the Abbeyfeale Local Area Plan 2014 - 2020 (amended) did not materialise at all. In that, the target for the year 2022 was 2912, almost 900 short of the 2016 Census figure.

These statistics have repercussions when discussing housing and the need for same.

Census 1991 -1500,

- “ 1996 - same.
- “ 2002 - just above 1500
- “ 2006 - just under 2000
- “ 2011 - 2007. A 3.5% increase
- “ 2016 - 2023

(The statistics from the Census of 2022 may show an upward trend but unfortunately they are not to hand).

Population and household projections are allocated to each settlement hierarchy but they can be quite aspirational in nature, particularly in respect to Abbeyfeale which has had negligible population growth this century and unmet population targets.

Therefore, it is difficult to justify 211 housing units being needed in Abbeyfeale for 2028. There are presently approximately 100 on the Abbeyfeale Housing List. Where are the remaining occupants going to come from? The people of Abbeyfeale have made it known publicly to council officials and to elected representatives that they would like local people from the area who are on the housing list to be prioritised - and rightly so. They want to see local young people being housed by the local authority, or in a position to purchase affordable housing or, indeed, to acquire a reasonably priced site and put the home of their choice there.

Why would LAP promote the building of 211 housing units when on P.11 of the Draft Local Area Plan (2023 - 2029) for Abbeyfeale, concern is raised regarding a limited capacity in water services for projected population increase? This is reiterated on Pps. 84 and 85 of the Draft Plan (2023-2029) where “ an upgrade is not included in Uisce Eireann’s investment Plan, 2022 - 2024’.

There are existing problems in areas of Abbeyfeale with Uisce Eireann’s delivery of water, despite their assurances (false) that the issues are being resolved. Or have been resolved.

Therefore, the Objectives IU 01, a), b), c), and d) of Uisce Eireann as outlined in the Local Area Plan (P. 85) lack credibility and are premature.

4.0 PLANNING DESIGN AND DENSITY

It is not enough just to build houses. Not only should they be **homes** - of high quality urban designs - places where families can be brought up, extensions can be added and roots put down but also the entire area of the development should have a pleasant aspect as per the many statements in the Draft Local Area Plan. There should be a mix of housing developments - social, affordable and private and these should be in the centre as well as the outskirts of towns and villages. Small settlements such as Abbeyfeale should not be treated like big cities with many large housing estates creating “ghettos” in the suburbs.

In the last 23 years there have been several housing estates built in Abbeyfeale but only 1 x private development. Situated on St. Ita's Road, on a site not much bigger than an acre, 3 very attractive houses were built - of good quality design. This development has a positive impact on the architectural character of the area as the units fit in with the existing housing mix of private and formerly Local Authority housing. They tick all the boxes as outlined in the housing statements in the Limerick Development Plan and the Abbeyfeale Local Area Plan - on paper and in reality and are an outstanding example of what is possible - with good design.

The proposed new development on St. Ita's Road in the Old Coursing Field, mentioned on P.17 of the Local Area Plan, 2023 - 2029 is in close proximity to existing dwellings but is **totally** out of character with them despite Objective HO 03 in the Limerick Development Plan 2022-2028 (P. 110) claiming that "it is an objective of the Council to ensure a balance between the protection of existing residential amenities and the established character of the area." One has only got to look at the nice row of houses at St. Ita's Terrace and imagine an ugly 2 storey block of apartments in their "front garden", as it were. It is very difficult to reconcile the rhetoric in the objectives and the reality on the ground. Even the Planning Guidelines (2009), Chap.6.3.(e) states that the "scale of new residential schemes for development should be in proportion to the pattern and grain of existing development" (P.49). The design/scale of this development is of exceptionally low quality and the overall impression is that of a barracks or jail which goes totally against the assertion that "This LAP seeks to balance the provision of **good quality housing** that.....makes Abbeyfeale an attractive and inviting place to live in" (P.18, The Draft LAP 2023 - 2029).

Quality of housing should never be compromised with sub standard design - as it has in this instance and also with the apartment block out the Killarney Road.

The people in Abbeyfeale, for whatever reasons, are vociferous in their objections to blocks of apartments. There is some justification for their opinions in that the first apartment block, out the Killarney Road is a triumph in Bad Taste and there is no way it could be described as good quality housing. To make the situation worse, there is no maintenance system evident at the site so the building is a shabby blight, visible to all, at the entrance to our town and right next door to the Town Park.

5.0 SERVICED SITES

In February, 2008, Limerick County Council issued an Information Leaflet on "Serviced Residential Sites in Towns and Villages"

Can the fact that these sites are rare at best and non existent at worst be attributed to lack of interest on the part of a developer or lack of involvement on the part of the Local Authority????

It is extraordinary that in both policy documents, i.e. the Limerick Development Plan, 2022 - 2028 and the Draft Abbeyfeale Local Area Plan, 2023 - 2029 there is hardly a mention of the most unsustainable feature in Irish Planning - one off houses in rural Ireland. In the 21st century, it can no longer be underestimated as we face fuel shortages and climate change while attempting to move to a low carbon society.

Building in the countryside continues to be very contentious - the right to build everywhere versus the retention of the natural environment as a common goal.

Even when those who **need** to live, or who are entitled to live in the countryside are excluded, there are still thousands of people living on every single road, large and small, in every direction outside Abbeyfeale, each with a car, a suburbanised boundary treatment and one or more cars. It is planning at its worst, with all the consequences too numerous to list here.

Needless to remark, it is the town that has suffered. No private development in over 20 years, no area with an

architectural mix of designs and sizes - all of which would have contributed to the fabric of the town and to the concept of placemaking in Abbeyfeale.

With all the ongoing discussion of making Abbeyfeale an attractive place to live, why not make it attractive for a young couple to build “the house of their dreams” in the town?? Allowing a lower density of 4/5 to the acre, as per the Planning Guidelines for sustainable Residential Development in Urban Areas (2009) which states that “up to 20% of proposed housing units should be allocated to serviced sites at a density of 10 per hectare” would probably go a long way towards the avoidance of rural housing continuing.

Pps.26 and P. 29 of the Limerick Development Plan (2022-2028) state that allowance will be made for the development of serviced site/cluster sites which will act as an alternative to one off rural housing but When? Where? How?

While allowing for the pressure brought on Local Authorities from those who seek planning permissions, from their perspective, they perceive that it is their only choice.

It might be interesting to do a Survey of those in rural one off housing to ascertain if they would have preferred to live in town or not. Anecdotal evidence suggests the lack of serviced and/or affordable sites and the freedom to put their own stamp on their own house in a town setting, is the main, of many reasons.

In the Land Use Zoning maps contained in the Draft Local Area Plan for Abbeyfeale (2023-2029), there are 2 areas marked “Serviced Sites” of 2.4 ha. They most certainly are NOT serviced sites. The reality is different - overgrown, neglected areas some distance from the centre of town. Serviced Sites are the ideal way to stem one off rural development and, if one subscribes to the notion that everyone is entitled to a home, then the provision of at least one serviced sites area near the centre of town should be a priority. Adequate infrastructural measures should be provided so that everyone who wishes to, can live in a house on a serviced site near the centre. All aspirations of providing mixed housing are useless when no attempts are made to allow those who wish to live in town, to do so. Had the Local Authority given permission for 45+ serviced sites in the Old Coursing Field which was always zoned “open” , “green” “recreational” (and which would have been a homage to its former use) some years ago, there would be 45 + less houses strung out along every road out of Abbeyfeale and would have reduced unsustainable travel patterns.

Serviced sites with it's variety of housing designs would offset the appalling design plans that are being imposed on the public nowadays.

Serviced sites would also perform a valuable function, i.e they would bridge the “gap” between existing low/medium density older residential areas and the high density new residential development. The stark contrast between the two would be softened by the serviced sites - in keeping with the Local Authority's policy of “infill development will be encouraged while still protecting the existing residential amenity” which means the established character of the area. That protection of old existing residential areas is vital for well being and visual aesthetics - placemaking!

The Limerick Development Plan (2022- 2028) promotes “higher densities at appropriate locations” but what is an appropriate location? How can infill high density development protect existing residential amenities? In some locations, serviced sites would fill the gap between existing low density residential and high density infill. Compact settlement should and can absorb a mix of densities in certain locations without compromising the goals and objectives of the Plan.

P.25 of the same Plan states that the density rate depends on the location of the site and the settlement in question. So it can be achieved.

While higher densities in certain locations are understandable/necessary, there should be room for some flexibility. As part of the Core Strategy, Chap. 2 of the Limerick Development Plan, 2022 - 2028, (P.25) with regard to densities, claims that it can be interpreted as being subject to a certain amount of flexibility. It states that density can depend on the location of that site along with other criteria.

The problem with the policy concerning serviced sites could lie in the fact that it is the developer who must do the Infrastructural work. Perhaps if the Local Authority undertook to do the work, there might be a more encouraging and better outcome??

6.0 ENVIRONMENT

With regard to Recreation and Open Spaces in Abbeyfeale, there is just one Park - the Town Park, but it is 2 km (1.2 miles) a 20 minute walk from the Square.

In order to enhance the environmental qualities of the area and to ensure connectivity, a link to the town centre in the form of a canal like towpath should be considered.

A smaller centre town park would be desirable as recommended in the Limerick Development Plan (2022 - 2028) that an alternative centre town site be found to compensate for infill development taking place. It would round off the connectivity between the Town Park and The Greenway, which has been a huge boost to the town but again, suffers from bad connectivity.

Imagine the Park, the river, the Square and The Greenway all being connected by paths and a small open space near the Square. That is Place Making!

"Connected green spaces provide the greatest benefit to biodiversity in an urban context" (P. 69 Draft LAP). Is the Local Authority prepared to give permission for such a space in the centre of the town?

Climate Change is a serious topic with repercussions for us but some of the measures outlined on P.67 of the draft Abbeyfeale Local Area Plan (2023-2029) in terms of mitigation are not realistic. In a town where tree removal is more the norm, it is difficult to

figure out how and where the provision of trees, hedgerows woodlands and ponds is going to happen.

During the Celtic Tiger years, 12 kilometres of hedgerow were mindlessly bulldozed every week in Ireland, not to mention the loss of trees. This criminal act resulted in permanent damage being perpetrated on our biodiversity, e.g.insects, bees, but particularly birds and has contributed to severe losses in numbers of many species.

The Limerick Development Plan, 2022-2028, P.176 and The Draft Abbeyfeale Local Area Plan 2023-2029, P.69 both commit to preserve trees, woodland and hedgerows as much as possible with regard to the significance of their role in ecology, climate change, air quality and the protection of birds. This is so important for well being but it also contributes to quality Place Making.

The problem with all the measures outlined in Chapter 8 of the Local Area Plan is not only execution but enforcement. However, the Limerick Development Plan, 2022-2028 does, on P. 328 commit to the financial security of trees - a welcome measure if rigorously monitored. The unfortunate thing is that the laudable measures re

saving trees are totally dependant on the developer playing his/her part as there is negligible enforcement in such matters

How many enforcement officers are there in Limerick City and County Council?

The continuing concreting of land is a factor in Climate Change with the increase in rainfall having an effect on drainage. Are there plans to examine, repair and upgrade where necessary, all the public drainage systems? With regard to new developments, are there measures to ensure that the drainage system is adequate for the new circumstances so that flooding will not occur?

With regard to the Abbeyfeale Strategic Flood Risk Assessment, much is written about the flood risk from the River Feale and the Glorach but erosion is not mentioned at all. There are 2 areas of serious erosion - one at the Town Park and the other at the rear of New Street where a house is perilously close to the river bank.

With Climate Change it is likely that the volumes of water will raise the levels of the river on occasions, further endangering the banks and worsening erosion at these spots yet there is no mention of any plans to repair the river bank.

7.0 CONCLUSION

A survey was conducted some years ago on the desirability of living in 325 named towns in Ireland. The results were published in the newspapers at the time. Abbeyfeale was ranked 323 with Rathkeale and Bunclody taking the last 2 places.

It is important for people to have a sense of pride in their hometown but this can only happen if that town is attractive visually, has all the modern amenities, good connectivity and a good commercial/residential mix incorporating design of good quality which blends (and not screams at) with existing built environment. That is Place Making.

The Local Area Plan 92023-2029) is supposed to be a strategy for proper planning and sustainable development. However, much of it is aspirational, with the same aspirations being reiterated in each successive Local Area Plan.

There is a disturbing dichotomy between the rhetoric used in the objectives and the reality on the ground. Credibility is stretched as any of the statements made are unrealistic or unattainable.

Quality housing design and their surroundings contribute to the health and well being and quality of life in any area.

The bottom line is that despite the Spatial Planning Hierarchy, this is about people, their homes and their immediate environment. Local government is supposed to be about people and what they want. Mutual respect and trust comes from listening and learning, resulting in well thought out plans to create a town where people will want to live and work and be proud of.

Recommendation : To examine in detail the plans of new developments to ensure that anomalies are discovered in time, such as the existence of a sewer pipe in a field etc etc

Attachments:

LCC-C213-ABB02-11-21092 - 11. Hilary Collins_Redacted.pdf

Teorainneacha Gafa ar an léarscáil: Níl