

Draft Limerick Development Plan 2022-2028

Submission to Limerick City and County Council

by

UGP Castletroy SC Ltd



6 September 2021

1. INTRODUCTION

This submission to Limerick City and County Council is made by UGP Castletroy SC Ltd (UGP) in relation to the Draft Limerick Development Plan 2022-2028 (Draft Plan) that was released for Public Consultation on 26 June 2021. The submission relates to Castletroy Town Centre, which is owned and operated by UGP.

UGP welcomes the opportunity to make this submission and would be very happy to meet with the Elected Members or officials of Limerick City and County Council in the event that clarification is required on any part of this document.



Castletroy Town Centre is a modern District Centre in the heart of Castletroy, which is one of the largest suburbs in Munster with a population of nearly 15,000 in 2016.¹ It has four primary schools and one secondary school, with an additional second secondary school due to be completed shortly. Figure 1 below sets out the extent of Castletroy Town Centre.

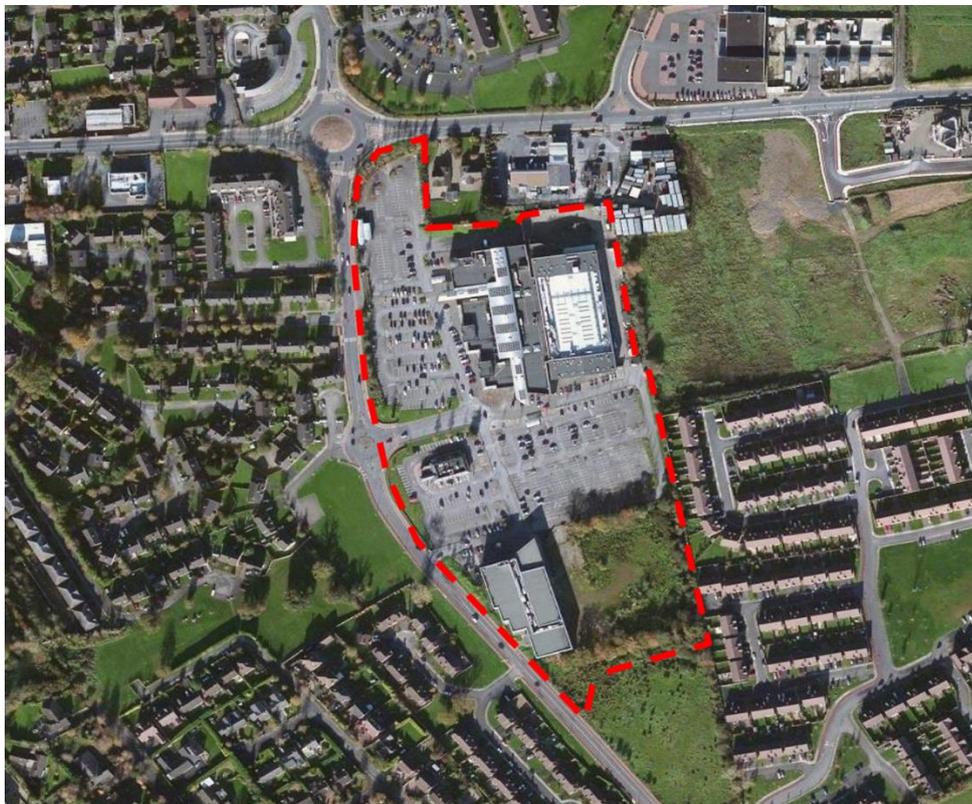


Figure 1 Castletroy Town Centre

¹ Castletroy Local Area Plan 2019-2025 Table 2 p 14

Castletroy Town Centre is adjacent to the University of Limerick, which has over 16,500 students and approximately 1,700 staff.² The University of Limerick is surrounded by the National Technology Park at Plassey which accommodates over 80 companies employing more than 3,000 people.³

Currently, Castletroy Town Centre has a net area floorspace of 7,800m² with 6,200m² of retail including food (79%); 850m² of fitness uses (11%); 560m² of services (7%) and 215m² of offices (3%).

UGP has a long-term commitment to Limerick and wishes to contribute to its sustainable development. As such, it will co-operate with Limerick City and County Council and other stakeholders on initiatives and projects that seek to achieve this end. The Draft Plan is being prepared as Limerick faces many challenges, not least from the aftermath of the Covid-19 pandemic, Brexit and climate change. However, there are also opportunities for Limerick as articulated in Project Ireland 2040, the Southern Regional Spatial and Economic Strategy and the Limerick Shannon Metropolitan Area Spatial Plan. Limerick can prosper, but only if its development is guided by clear, evidenced-based policies that deliver opportunities for sustainable living, business and learning, coupled with an excellent quality of life.

In assessing preparing this submission, UGP was guided by the professional advice of Patrick Ledwidge (MIPI) who has over 40 years' experience of urban development issues in local government primarily in policy, community development, economic development and development management. Mr. Ledwidge confirms that, in his professional opinion, UGP's requests to Limerick City and County Council:

- are in accordance with the proper planning and sustainable development of Limerick;
- do not conflict with the statutory obligations of Limerick City and County Council (or of any other local authority in the area);
- align with the wider policies and objectives of Government.

Limerick does not exist in isolation from the remainder of Ireland or from the wider world. It will compete with other small cities worldwide for talent and investment, which is increasingly mobile. Any new development plan must be ambitious and clearly set out how these ambitions will be realised. At the centre of the new plan there must be a clearly

² <https://www.ul.ie/presidents-office/university-profile>

³ <https://www.idaireland.com/invest-in/midwest/infrastructure-and-property/national-technology-park>

articulated vision based on equity, sustainable development and resilience. The new development plan must also set out in detail how its vision is to be realised.

2. CORE CONCERN

The core concern of UGP is the treatment of Castletroy Town Centre in the Draft Plan and the implications of this treatment for the future development of Castletroy Town Centre. In particular, UGP contends that:

- A. The Draft Plan and the Draft Retail Strategy do not give sufficient weight to the potential for growth in the catchment of Castletroy Town Centre;
- B. There are inconsistencies between the Draft Plan and the Draft Retail Strategy in the spatial delineation of Castletroy District Centre;
- C. The District Centres identified in Limerick City and Suburbs differ within the Draft Plan itself;
- D. There is insufficient detail in the Draft Retail Strategy to formulate a sustainable retail strategy for Limerick. Coupled with C. above, this calls into question the validity of the Draft Retail Strategy and those sections of the Draft Plan based on it.

Each of these issues is dealt with in the following sections. In each instance, UGP makes a specific request to Limerick City and County Council to amend the Draft Plan. A request to amend the Draft Plan is also, in effect, a request to amend the Draft Retail Strategy. It is noted that the Castletroy Local Area Plan will be revoked when the Draft Plan is adopted by the Elected Members and becomes the Limerick Development Plan 2022-2028.

3. POTENTIAL GROWTH IN CASTLETROY TOWN CENTRE CATCHMENT

Castletroy Town Centre is designated as a District Centre in the Draft Plan. It has a similar designation in the Draft Retail Strategy, which itself is incorporated into Vol. 6 of the Draft Plan, and in the Castletroy Local Area Plan.

According to *Objective ECON O3 District Centres* in Volume 1 of the Draft Plan:

It is an objective of the Council to:

- a) Protect and enhance the mix of services and facilities in existing District Centres, which provide for the day-to-day needs of local communities in accordance with the Draft Retail Strategy.*

- b) Enable development of the District Centres in accordance with the specific objectives and assessment criteria of the Draft Retail Strategy.*
- c) Require improvement to the quality of the public realm in any proposals for the Crescent Shopping Centre and the Castletroy Shopping Centre, including hard and soft landscaping.*
- d) Promote improved pedestrian accessibility, permeability and safety within any proposed redevelopment works.*
- e) Promote the redevelopment of the Roxboro Shopping Centre, enhance the overall appearance and public realm in line with the Draft Retail Strategy for the Limerick Shannon Metropolitan Area and County Limerick.*

As set out in 12.3 of Volume 1 of the Draft Plan, the zoning objective for District Centres is:

District Centre Objective: *To provide for a mixture of retail, residential, commercial, civic and other uses.*

Purpose: *To facilitate a district level centre consisting of a compatible mix of uses complimentary to the City Centre, having regard to the principles of compact growth, consolidation and densification. A diversity of uses for both day and evening may be considered. These areas require high levels of accessibility, including pedestrian, cyclists and public transport (where feasible). Retail proposals which would undermine the vitality and viability of Limerick City Centre will not be permitted. The sequential approach to retail development set out in the Retail Planning Guidelines for Planning Authorities, 2012 will be strictly enforced. Any development shall comply with the Draft Retail Strategy for the Limerick Shannon Metropolitan Area and County Limerick.*

Both objectives state that any future development must comply with the Draft Retail Strategy. In Table 6.2, the Draft Retail Strategy estimates that, in the Limerick Catchment, an additional 21,879m² of floorspace will be required for Convenience Goods and an additional 44,079m² of floorspace for Comparison Goods (Non-Bulky). It also estimates that there will be no requirement for Comparison Goods (Bulky). However, the Draft Retail Strategy does not attempt to allocate the floorspace to individual locations within the Limerick Catchment.

Section 7.3 of the Draft Retail Strategy sets out the Planning Policies, Objectives and Criteria for Assessment of Retail Development. Again, as noted above in relation to Table

6.2, there is no effort made to use these policies, objectives or criteria to allocate the additional required retail floorspace to specific locations in the Limerick Catchment.

The fourth paragraph of Section 3.4 of the Retail Planning Guidelines from 2012 states that:

“The need for additional retail development in particular district centres to serve future population growth or for any significant extension to an existing district centre should be identified in the development plan and be based on a significant growth in population in the intended location or on a demonstrable level of under-provision of retailing or other services to meet the regular convenience and lower order comparison shopping needs of new communities as provided for and quantified by the relevant core strategy.”⁴

This exercise has not been carried out in the Draft Retail Strategy. Therefore, UGP considers that the Draft Retail Strategy is not compliant with the Retail Planning Guidelines 2012.

UGP considers this to be a significant systemic shortcoming in the Draft Plan and Draft Retail Strategy. It requests the Limerick City and County rectify this shortcoming in the final versions of both documents. Planning policies in statutory plans must give enough detail for individuals or companies, operating in the area to which a plan relates, to have sufficient information to organise their activities.

In Section 7.3.1.3 of the Draft Retail Strategy, Objectives 1 to 7 of its Limerick Shannon MASP Area Strategy are set out. The purpose of this section is unclear, although given its location in Section 7, its purpose must be to influence retail policy and the assessment of development proposals. This view is supported by Objective MASP01 and Objective MASP02, which both commence with the phrase *“It is an objective of the Council to”*. However, this phrase is not included in relation to the other objectives listed in this section.

The main concern of UGP relates to *Objective MASP04: District Centres (Tier 2, Level 2)* and particularly the following elements of the objective:

- *Reinvestment and regeneration of existing District Centres will be supported, but only provided where it does not change their role and scale.*

⁴ Department of the Environment, Community and Local Government *“Retail Planning – Guidelines for Planning Authorities”* April 2012 p 22

- *District Centres should not be allowed to expand significantly above the 10,000 sqm (net) size threshold set out in the Retail Planning Guidelines for Planning Authorities.*

UGP contends that the former places a restriction on Castletroy Town Centre. The scale of Castletroy Town Centre must change order to serve the expanded demand that will arise in its catchment over the period to 2028. At a conservative estimate, this demand will be driven by the 2,600 – 3,100 housing units planned for its catchment in the Draft Plan (see Appendix I below); the proposed 25% increase (4,000 students) in student registrations at UL between 2020 and 2023⁵; and the further development of the National Technology Park at Plassey which at a conservative estimate has the capacity to add a further 600 jobs (based on 15% remaining capacity at present).

The additional housing units planned for Castletroy should yield an additional population of 7,020 to 8,370 persons (given the average household size of Limerick city was 2.7 persons in the Census of Population 2016). This equates to between 23% and 28% of the population increase of 30,106 that the Draft Plan forecasts for Limerick City and Environs.⁶ If one housing unit is taken to represent one household (possible an underestimation), the range remains at 23% and 28% of the additional 11,274 households forecast for Limerick City in the period 2022-2028.⁷

The Draft Plan should identify the growth potential of Castletroy District Centre by aligning these proportions of population/household growth targets with the area of additional required convenience floorspace as set out in Table 6.2 of the Draft Retail Strategy.

UGP requests that the growth potential of Castletroy should be specifically referenced in the Core Strategy of the Draft Plan and in amendments to the Draft Retail Strategy. These omissions are currently systemic shortcomings in the Draft Plan and Draft Retail Strategy which invalidate both. UGP requests Limerick City and County rectify these shortcomings in the final versions of both documents.

The second element of Objective MASP04: District Centres (Tier 2, Level 2) is simply baffling for a number of reasons:

- a) It does state which Retail Planning Guidelines for Planning Authorities it is referencing:

⁵ University of Limerick “Strategic Plan 2019-2024” p 26

⁶ Draft Limerick Development Plan Table 2.2 p 20

⁷ *Ibid.* Table 2.5 p 24

- b) The current Guidelines were issued in 2012 and do not contain any threshold of 10,000m² for District Centres;⁸
- c) It is not clear whether the 10,000m² threshold refers to all floorspace within the District Centre or just to retail space;
- d) It is not clear whether the 10,000m² threshold refers to all net floorspace within the District Centre or gross floorspace.

UGP requests that this element of Objective MASP04: District Centres (Tier 2, Level 2) be removed.

Furthermore, the 2012 Retail Planning Guidelines state that:

- *“Retail development may also be appropriate within District Centres identified in the settlement hierarchy at a scale appropriate to the needs of the area”.*⁹ As demonstrated above, Castletroy is a rapidly expanding area that requires an enlarged District Centre.
- *“The need for additional retail development in particular district centres to serve future population growth or for any significant extension to an existing district centre should be identified in the development plan and be based on a significant growth in population in the intended location or on a demonstrable level of under-provision of retailing or other services to meet the regular convenience and lower order comparison shopping needs of new communities as provided for and quantified by the relevant core strategy”.*¹⁰

Again, Castletroy’s current and future growth potential justifies expanded floorspace based on the criteria set out in this section.

- *“Large convenience goods stores should be located in city or town centres or in district centres or on the edge of these centres and be of a size which accords with the general floorspace requirements set out in the development plan/retail strategy to support and add variety and vitality to existing shopping areas and also to facilitate access by public transport for shoppers”.*¹¹

In line with this criterion and based on the expected growth in local demand, Castletroy Town Centre should be designated as a location for large convenience goods stores. To accommodate them, it needs to expand.

⁸ Department of the Environment, Community and Local Government *op. cit.*

⁹ *ibid.* 2.5.2 p 15

¹⁰ *ibid.* 3.4 p 16

¹¹ *ibid.* 4.11.1 p 35

5. LISTING OF DISTRICT CENTRES IN THE DRAFT PLAN AND DRAFT RETAIL STRATEGY

There are major inconsistencies in the Draft Plan in the listing of Tier 2 Level 2 District Centres in the Limerick Catchment. These are summarised in Table 1 below with comparison to the Draft Retail Strategy.

<u>DRAFT PLAN</u>		<u>DRAFT RETAIL STRATEGY</u>		
<u>Table 4.1b</u>	<u>Paragraph 4.6.4</u>	<u>Table 2.4</u>	<u>Figure 2.2</u>	<u>Table 7.2</u>
Caherdavin ¹²	Jetland	Caherdavin	Caherdavin	Caherdavin
Castletroy	Castletroy	Castletroy	Castletroy	Castletroy
Parkway	Parkway	Parkway	Parkway	Parkway
Roxboro	Roxboro	Roxboro	Roxboro	Roxboro
Moyross		Moyross	Moyross	Moyross
	Coonagh			
	Childers Road			

This inconsistencies, allied to the concerns set out in Section 3 above, suggests that neither the Draft Retail Strategy nor the Draft Plan have been prepared with the degree of rigour that one would expect for such important documents.

UGP requests that the Draft Plan and Draft Retail Strategy be consistent in their designation of District Centres.

6. DESIGNATION OF DISTRICT CENTRES IN THE DRAFT PLAN AND DRAFT RETAIL STRATEGY

In addition to the discrepancies listed in 5. above, neither the Draft Plan nor the Draft Retail Strategy detail the floorspace of the District Centres identified as such, so that their scale can be understood. The Draft Retail Strategy lists six District Centres within Limerick City and Environs which had a population of 93,000 in 2016. In contrast, the Metropolitan Cork Joint Retail Strategy 2015 listed only five existing District Centres serving Cork City and Environs, which had a population of 208,000 in 2016.¹³

This suggests that the Draft Retail Strategy is listing some District Centres that do not merit the designation, given their scale. In contrast to Limerick, the Metropolitan Cork Joint Retail Strategy 2015 listed the existing floorspace of all retail areas (see Appendix

¹² Caherdavin is also known as Jetland

¹³ Metropolitan Cork Joint Retail Strategy 2015 Table 2 p 4 – Blackpool, Douglas, Wilton, Mahon Point and Ballincollig

II). In addition, three of the Cork District Centres had floorspace in excess of 20,000m² and one in excess of 15,000m². This suggests that the Draft Limerick lacks ambition in relation to the future development of its District Centres.

The designation of excess District Centres in Limerick is hampering the growth of these locations that have the scale of true District Centres. Without detailed floorspace figures, it is not possible to form a definitive opinion on this issue. Some of the District Centres designated in the Draft Plan should be more appropriately redesignated as Neighbourhood Centres.

UGP requests that the Draft Plan and Draft Retail Strategy be explicit on the criteria used in their designation of District Centres. Furthermore, designated District Centres should have the requisite scale and growth potential in the period to 2028.

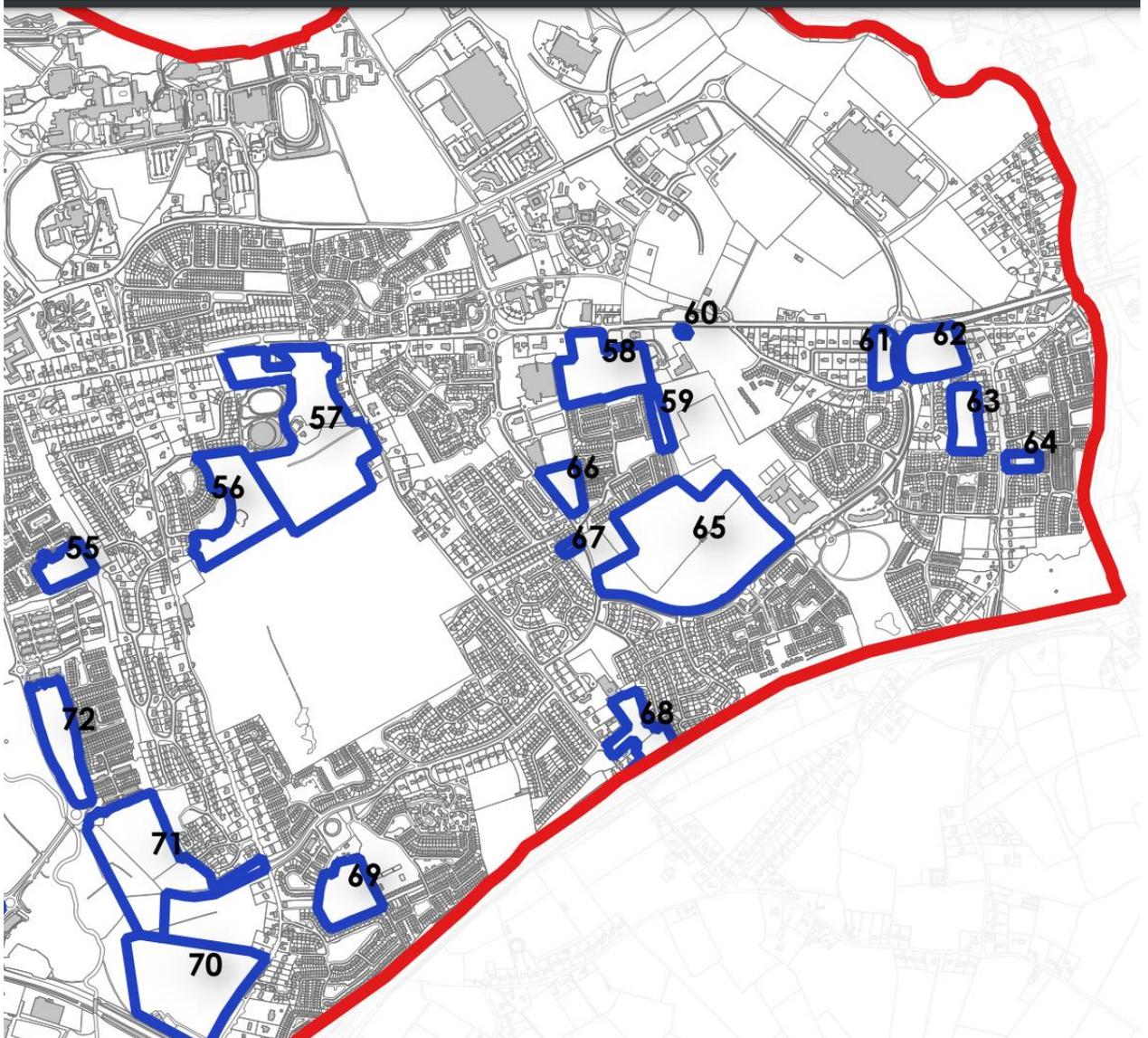
6. CONCLUSION

The Limerick Development Plan will communicate, nationally and internationally, the ambition of stakeholders for Limerick's future, as well as being a statutory planning document. The information in the plan will resonate well beyond the city's boundaries.

As has been set out above, the analyses and presentation of findings in both the Draft Plan and the Draft Retail Strategy lacks consistency and rigour. In addition, they do not meet the criteria set out in the statutory guidelines governing their preparation. These absences do not inspire confidence in foundations underpinning the vision for Limerick in 2028 contained in the Draft Plan.

Appendix I - Additional Housing Units in Castletroy to 2028

Volume 2 of the Draft Plan includes a map showing “*Tiered Approach to Zoning Residential Availability*”. The extract from this map, shown below, shows the lands that UGP estimate to be in the Castletroy District Centre catchment.



This estimate incorporates sites 55 to 72 inclusive. The area and density rate for each site was then extrapolated to the table below and provided an estimated yield of housing units in the range 2,062 to 3,100.

<u>Site No.</u>	<u>Area (ha.)</u>	<u>Density (units per ha.)</u>	<u>Max Units</u>	<u>Min Units</u>
55	1.435	35+	50	50
56	4.644	35+	163	163
57	12.360	45+/35+	556	433
58	4.146	45+	187	187
59	0.668	45+	30	30
60	0.720	45+	32	32
61	1.133	45+	51	51
62	2.467	45+	110	110
63	1.582	45+	71	71
64	0.467	45+	21	21
65	14.590	45+/35+	657	511
66	1.180	45+	53	53
67	0.191	35+	7	7
68	2.104	35+	74	74
69	2.638	35+	92	92
70	8.746	45+/35+	394	306
71	8.560	45+/35+	385	300
72	<u>3.167</u>	45+/35+	<u>143</u>	<u>111</u>
Total	70.798	N/A	3,076	2,602

Appendix II Metropolitan Cork Joint Retail Strategy 2015 – Existing Retail Floorspace

Table 1. Existing Retail Floorspace (sq.m.net)

Location	Convenience	Comparison	Retail Warehousing / Bulky Goods
Cork City Centre	16,201	88,407	6,860
Mahon District Centre & Retail Park	2,969	16,808	13,384
Blackpool DC & Retail Park	4,011	11,198	3,408
Wilton DC	4,022	7,272	0
Ballyvolane DC	4,001	2,011	924
Douglas DC	8,274	11,694	2,141
Cork City Suburban Neighbourhood Centres	16,893	5,477	0
Cork City & Suburbs Retail Warehouse Floorspace	0	79	44,506
Cork City Local Centres	4,471	1,333	1,013
Residual Floorspace within Cork City Administrative boundary	5,686	3,154	1,495
Passage West and Monkstown	1,399	145	0
Blarney	954	3,452	764
Glanmire	2,707	813	175
Carrigtwohill	1,962	1,678	5,029
Carrigaline	6,881	5,352	6,154
Midleton	8,529	9,423	7,407
Cobh	5,408	3,248	1,533
Ballincollig	9,728	11,445	2,784
Little Island	1,167	162	8,917
Other Rural	3,729	824	3,783
Total	108,992	183,975	110,277