**Labour Party Limerick**

**Limerick City & County Development Plan 2022-2028 Submission**

# [Chapter 1: Introduction Vision and Strategic Overview](https://www.limerick.ie/sites/default/files/media/documents/2021-06/02-chapter-1-introduction-vision-and-strategic-overivew.pdf)

We welcome the strategic vision for Limerick especially the **4 key ambitions** (a Green Region / embracing the River Shannon / Resilient Communities / Sustainable Economy) however we believe that as the Limerick Development Plan is underpinned by the Climate Change Adaptation Strategy (2019-2024) the Green Region ambition should **be re-drafted to include a reduction in transport emissions as a key part of this ambition**. As transport is the fastest growing contributor to our carbon emissions and contributes to 20% of our total carbon emissions, it should be included as a key metric for reduction within this key ambition. Not to include it within this key ambition would undermine any realistic attempt to tackle this during the timeframe of the development plan.

Resilient, Connected and Inclusive Communities is an excellent ambition that the Labour Party fully backs. We would ask that it be amended to include a specific reference to the **inclusion of heretofore excluded and ‘cut-off communities’, i.e., those areas in receipt of Regeneration and Leader funding.**

In terms of the Strategic Objectives, we feel that Objective 6 be amended to the following:

**Reduce car dependency and facilitate sustainable modes of transport through the delivery of walking, cycling and public transport infrastructure. Provide an appropriate level of road reallocation away from the private car to support existing and future development of active modes and to enhance connectivity.**

We welcome that the **UN Sustainable Development Goals** are front and centre in the current draft and we would ask that in advance of the next draft that Limerick Council formulates a set of KPIs to measure the projected progress within these goals and more tightly the goals within the larger document. We would particularly like to see measured progress on the vision for *cohesive and sustainable communities, where our cultural, natural and built environment is protected…embraces inclusiveness and a high quality of life for all, through healthy place-making and social justice, including the ongoing development of the Regeneration Areas and disadvantaged communities.*

It is important that there is a particular focus on the Regeneration areas as St. Mary’s Park in Limerick city is the most disadvantaged area in the country. The area has a male unemployment rate of almost 70% and a female unemployment rate of 40%, with just 2% of the population studying in third level. From 2006 to 2016, Limerick City also had the biggest drop in its absolute index score of any local authority area, following another decrease between 2011 to 2016. Therefore, we feel there needs to be clear and measurable interventions informed by the **UN** **Sustainable Development Goals** and in-line with the **National Planning Framework**, to ensure these under-served communities are appropriately supported to receive equitable access to education, employment, housing, transport and quality of life.

# [Chapter 3: Settlement and Housing Strategy](https://www.limerick.ie/sites/default/files/media/documents/2021-06/04-chapter-3-settlement-and-housing-strategy.pdf)

While there are many elements of this plan to be welcomed, it is unfortunate that there are no measurable targets set out in the Plan, which undermines the credibility of its claims and stated objectives. Both the implementation and monitoring section is weak; the monitoring section is just two paragraphs. The absence of clear targets undermines the plan’s credibility and in Labour’s view, would be regarded as unacceptable in the strategic planning of other public sector institutions. For example, how is the Development Plan linked back to the current Regeneration plan or the Design and Public Realm Code for Regeneration Areas (PRCRA). **The PRCRA identified St. Mary’s Park, Moyross, Southill and Ballinacurra-Weston as physically, socially and economically isolated, without adequate transport links and cut-off from the city.**

Where the objectives are stated, they are not linked back to **UN Sustainable Development Goals**. As a result, it is difficult to grasp the existence of any underlying or overarching vision for the city and the region. Essentially, the plan is drowned in detail and yet lacks specific targets.

**Recommendation 1**

The Council must set clear targets that identify how placemaking and making environments more attractive and liveable is going to be achieved. There is no mention of the urgency of affordable housing delivery as a stand-alone objective or the objective of redesigning the regeneration areas, readily identified as inaccessible and cut-off from the city. We need to consider the abandoned unused space through the city and county and provide potential solutions for reimagining these spaces.

**The Development Plan must be underpinned by a commitment by the local authority that public land will be made available for social and affordable housing, including schemes of affordable home ownership. Public land will not be sold outside public ownership / the LDA or the OPW for social or affordable homes.**

### Placemaking

The emphasis on place-making, compact growth, active land management and the impact of climate change are all welcome. However, there is no attempt to sketch what these commitments actually mean in practice. In the research on place-making, we know that the public are asking for sustainable communities which people feel they can embed, open green spaces, community and sporting facilities, transport infrastructure and active travel options. Again, the relatively weak track record of LCCC of delivering on this type of place-making is not acknowledged.

**Recommendation 2**

The Council must outline how current trends in city development which do not reflect the placemaking objective currently, will be reversed.

**Settlement Strategy and Hierarchy of Settlement**

The focus on sustainability in the plan is to be welcomed. References to sustainability are scattered liberally throughout the document. The plan envisages a 30% increase in population up to 2028, concentrated on the city, towns and villages in a hierarchy of settlement as is usual. They have stated objectives of promoting compact development and preventing urban sprawl in the city and county.

However, the majority of the development in the metro area (11,200 households) is planned for Mungret and Annacotty (surely contributing to urban sprawl) and there is no focus on regenerating the City Centre as a place for people to live. A number of tensions around this issue were evident in the recent People’s Park controversy where the city is viewed as a place for commerce and tourism and not a site for place-making and community building. Paradoxically, there are numerous examples of city and towns internationally, particularly those with a strong heritage core where the city is attractive to tourists and retail precisely because the place-making process has been so successful and the local residential community is so vibrant and embedded. As quoted in the plan;

*‘There are a number of districts within the Limerick City Metropolitan Area, which provide important opportunities for the sustainable development of residential, educational, recreation and amenity, employment and commercial uses. These include the Ennis Road, Caherdavin, Thomondgate, Corbally, Rhebogue, Garryowen, South Circular Road /Ballinacurra, Castletroy, Raheen/ Dooradoyle and Mungret. The National Planning Framework also recognises the importance of sustainable development of new greenfield areas and specifically refers to Mungret as a key future growth enabler for Limerick in terms of ‘progressing the sustainable development of new greenfield areas for housing and the development of supporting public transport and infrastructure’.*

**Recommendation 3**

There is no consideration given to tackling dereliction and vacancy in the city centre to meet housing need and depopulation. However, this approach is mentioned in relation to county towns. This is deeply problematic, given the huge demand for housing in the city and the extent of dereliction and vacancy across Limerick city. Labour urges the Council to develop a plan for housing delivery in the City Centre.

Objective SS 01 Compact Growth needs far more detail. Thus far, the track record of LCCC in developing infill/ underutilized building and derelict sites has been very poor, both in city and even more so in the county. The opportunity to use these types of sites to further develop county towns and villages cannot be underestimated. Again, this objective needs to be more explicitly linked to transport and the digital strategy.

**Recommendation 4**

In terms of supporting the development of additional housing and reducing the impact this will have on carbon emissions – using derelict and vacant buildings as well as repurposing buildings that were once used for retail but no longer in use for that purpose, is an obvious solution, omitted in the plan.

As per the draft;

*At least 30% of all new homes shall be located within the existing built-up footprint of the (key town) settlements.*

**Recommendation 5**

This is a too low and should be more, i.e., 50% same as the city to be consistent with emphasising development within town footprint. Applies to Level 3 towns also.

As per the draft;

*It is an objective of the Council to review existing and prepare new Local Area Plans for Adare, Askeaton, Croom and Patrickswell.*

**Recommendation 6**

Large neighbourhoods within the city like Corbally, King’s Island, Garryowen should get their own LAP that considers such issues as housing and transport, schools and regeneration.

**One-off Housing Development**

The local authority state the desire to reduce urban sprawl, which is to be commended. At the same time, the claims here lack credibility given the performance of LCCC on this issue thus far and the lack of detail provided. The Council must clearly indicate a commitment to reducing urban sprawl and the incidence of one-off housing that is not directly related to rural based need.

There are many reasons why the stated position on one-off housing is to be welcomed. One-off housing or dispersed settlement patterns have significant economic, environmental and social costs. This is not anti-rural or urban elitism as this point is often framed as. One-off housing is hollowing out our towns and villages, stripping them of their commercial and social functions. One-off housing is as much an urban problem as it is a rural one and all efforts should be taken to reduce the trend of permitting the building of one-off housing to ensure the reversal of acute depopulation of our towns and villages. As this plan outlines, the Council are making strides to reduce one-off housing and this needs to be reinformed in the document where possible and as quoted below;

*Outside of the city, the policy intention is to focus on supporting sustainable and vibrant rural communities by supporting and regenerating towns and villages. This will be facilitated through a number of measures including active land management measures, effective use of funding streams for town/village and public realm improvement (including the Rural Regeneration Development Fund (RRDF), LEADER etc.), working with community groups and utilising available statutory powers such as derelict site and compulsory purchase powers. The promotion of an alternative to one off rural housing in the open countryside, through initiatives like serviced sites and redevelopment of vacant units in town, villages and rural areas, will be encouraged. This will support the regeneration of these settlements*.

**Recommendation 7**

LCCC must clearly identify that permissions will be favourably regarded for those wishing to build in a village/town context (or even a rural cluster context – type 6 settlement) and will not be granted for rural one-off housing that does not meet clear agricultural interest criteria as set out at 3.6. The criteria currently listed in the draft are too broad for exemptions and in reality, allow for most scenarios where a person is applying for one-off housing.

**Regeneration**

Given the history of the city and the continued concentration of acute urban disadvantage in areas such as St. Mary’s Park, Southill, Moyross, and Ballinacurra – Weston, it is astonishing that Regeneration receives such little coverage in the draft plan;

*The integration of the designated Regeneration Areas, including Moyross, Southill, Ballinacurra Weston and St. Mary’s Park into the wider City area is also an important focus of the Draft Plan. Pg13 Chap 3*

**Recommendation 8**

The Regeneration plan is almost completely invisible in this document.  Labour strongly recommends that the regeneration areas and their unique challenges are highlighted and addressed in the housing section as well as in transport, climate and zoning.

**The Living Limerick City Centre Initiative**

As per the draft;

*It is an objective of the Council to support the Living Limerick City Centre Initiative for the delivery of community housing across the City and rural towns and villages.*

What is community housing? The draft does not identify what this means and how it differs from other forms and how it is particularly suited to the City Centre and towns/villages renewal. Are there supports/encouragements for stabilisation/renovation and restoration/conservation of the historic Georgian core?

**Student Accommodation and Co-Living**

Given the shortage of student accommodation across Limerick City and County and the growing nature of the student population, it is disappointing that there is no mention of other types of student accommodation apart from purpose-built accommodation. This form of accommodation tends to be very expensive and is not a viable option for many, less affluent students. There is no discussion of the potential to use heritage sites as accommodation options in this category.

**Recommendation 9**

The Labour party supports the clarity that student housing will not be permitted for use as any other type of tenure. However, the Council should consider repurposing existing buildings to support students that cannot afford to rent new purpose-built accommodation. Student accommodation is not suitable for families, children or homeless adults.

**Homelessness**

In terms of homelessness, again there are no targets, even though at the time of writing there are 134 individuals and 16 families including 22 children homeless (2,300 on the housing waiting list).

The local authority is the statutory arm of the state with responsibility for large-scale house provision. The response to the majority of people who find themselves homeless is the provision of housing. Therefore, an escalation of house-building across the city and county will assist a reduction in numbers of homeless. The continued funding of programmes such as Housing First, own-door accommodation is vital to address those with complex needs and long-term homeless. Unfortunately, in this draft, there is no reference or strategy for preventing people falling into homelessness or helping them to moving out of homelessness. Given this scale of the current housing crisis, this is shocking.

**Recommendation 12**

Clear commitments to reducing youth homelessness through prevention services, eliminating the need for people with disabilities and complex needs entering homeless services, support for the development of additional drug treatment facilities in Limerick city and county in partnership with the HSE should be clearly stated and ongoing service development for vulnerable groups.

**Recommendation 11**

The Council should make a clear commitment that a local connection is not required for persons seeking emergency homeless accommodation.

**Recommendation 10**

A clear commitment to Housing First should be made within the development plan. Equally a commitment to the removal of emergency night-by-night homeless provision should be made over the lifespan of the plan.

**Traveller Accommodation**

The development and delivery of Traveller accommodation continues to come up against proponents of the ‘not in my back yard’ syndrome, therefore the delivery of Traveller accommodation remains at a critical juncture, with Travellers in need of good quality, affordable and secure accommodation, including social housing provided by local authorities.

**Recommendation 15**

The local authority will prioritise the provision of Traveller and Roma accommodation and the annual departmental budget secured for Traveller housing provision is planned for and spent appropriately, ensuring accommodation needs are met. Development of Roma specific accommodation units and support services where a need is identified.

**Recommendation 13**

All Traveller specific accommodation be built to the highest standards of development including health, safety, building standards, disability planning and the provision of green and recreational which should include play areas for children. Full consultation should take place with Travellers regarding the suitability of their accommodation during the design phase of the development in question.

**Accommodation for Refugees and Asylum Seekers**

**Recommendation 14**

A detailed census should take place to establish the true need for Traveller accommodation and that this be fully incorporated into the settlement Strategy. Running alongside this census must be a Health Impact Assessment to determine the suitability of the current accommodation the Traveller community are residing in.

A clear commitment must be given in the Development Plan to the establishment of own-door accommodation for those currently residing in Direct Provision (DP) as per government commitments and in conjunction with the newly established international protection support service.

**Recommendation 16**

The local authority must act alongside the Housing Agency and other approved housing bodies to support the development of housing units specifically for immigrants seeking protection. Limerick City and County Council should look beyond government policy and have a clear mission to support the end of Direct Provision within the county, emphasising the local authority’s solidarity with those temporarily housed in DP, for some over many years and having raised their families in these centres.

**Conclusion**

* Additionally, the Labour Party seeks a commitment from the local authority that the Development Plan and its associated Local Area Plans, with their democratic underpinning, should be adhered to in all planning applications and planning applications should not be allowed to bypass and disregard the County Development Plan.
* The Council must also argue for the maximum possible social and affordable units to be incorporated into each development where planning is permitted.
* The Council must use all appropriate public land available to them to build public and affordable housing to rent and buy. This includes the Colbert Quarter site which the Land Development Agency (LDA) are currently developing.
* We believe the LDA model must deliver 100% social and affordable housing in Limerick (as is the case in Dublin and Galway).
* We believe that there should be an additional strategy for ‘houses in multiple occupation’ (HMO’S) and that the Council should consider HMO’s and student accommodation as a zoning category within residential development. The LP recommend that the Council measure the impact on residential community and their quality of life and well-being with a view to identifying and implementing measures that reduce and preferably negate the negative aspects of this and that promote a socially integrated, healthy and safe Limerick
* Finally, we ask the Council to ensure that the development of Build-to-Rent accommodation should be carefully scrutinised to ensure that there is not an over-representation of studio or 1-bed apartments and that liveability and regulatory standards are maintained in all instances. We cannot permit Build-to-Rent to replace Co-living schemes.

# [Chapter 4: A Strong Economy](https://www.limerick.ie/sites/default/files/media/documents/2021-06/05-chapter-4-a-strong-economy.pdf)

Overview comments

* Overall, this section of the plan lacks ambition. The introduction of this section states:

***As the largest urban centre in the Mid-West, the NPF supports ambitious growth targets to enable Limerick City to grow by at least 50% to 2040***

However, in Objective ECON O17 Education and Skills, the plan talks about ‘sustaining’ high levels of Education and Skills. Should the plan not be more ambitious? Grow Education and Training (E&T) opportunities by 50% to 2040? Enhance equality of access to E&T by ensuring and developing a range of skills development options from third level to apprenticeships and all in between.

* It talks about increasing residents in the city but does not indicate HOW this will happen.
* The plan pays lip service to areas of climate change and environmental concerns without any real plan for improvements in this area. The Green economy is mentioned but no real emphasis on this growth area. More emphasis should be placed on how the plan will allow the economy to grow by 50% without negative environmental impact. The CityXChange initiative needs to be highlighted here. The plan MUST commit to supporting initiatives and businesses that reduce emissions, reduce energy use and enhance the natural environment.
* The plan almost totally ignores the cultural and creative industries as key partners in the revitalisation of the city and county and does not consider the decimation of these industries and the need for additional supports. This industry will be pivotal in enhancing our city and towns and making them attractive places to live work and visit.
* The development plan must engage with the city centre arts community and consultation with them to enhance the public realm. The Belltable, Fidget Feet etc. Urban art. Compare with Waterford city festival of urban art etc.
* The site currently being developed at Cleeves is a perfect location as a multi-purpose space that can be used by the creative industries and would bring vibrancy and life to the city.
* The development plan needs to incorporate extended use of city spaces, indoor and outdoor in the holiday periods and extending the use of the Milk Market. The city has many public spaces that are underused.

The riverfront is a natural and beautiful amenity that people flock to, especially in the holiday periods (summer, easter, Halloween, Christmas). This is the ideal location for arts and cultural events, food trucks and craft businesses, and by supporting this development the plan will enhance the vibrancy of the riverfront, at the heart of the city while supporting local businesses and the creative industries.

The Milk Market is a vibrant spot in Limerick on a Saturday, less so on a Sunday. The expansion of its opening hours and its uses through the summer will add a further destination for visitors and will bring residents into the city during holidays (Summer as well as Christmas).

The Potato Market is also a venue, mainly used for car parking. This venue should be used to enhance the vibrancy of this historic area and link into the plan for the beautiful riverfront, rather than be used for car storage! This is also part of the Three Bridges walk and has walking traffic daily. Re-imagining of a new major Civic space incorporating Civic Offices, Courthouse and Potato Market linking to the Cathedral, the Hunt Museum and a revitalised Nicholas St. and King John’s Castle should form part of the priorities for the Public Realm.

* The recent pandemic showed us that we need to rethink what constitutes retail. Traditional bricks and mortar shops and outlets are only part of this sector. Casual trading as well as online trading need to be accounted for in this section.

Allowing mobile food units to trade outside of ‘designated areas’ can add to the vibrancy of an area/city /town. An example of this can be seen in Cork County Council where any food business that is a registered business can trade on public beaches and close to amenities building the vibrancy of the location. Coffee carts/ horse boxes proved popular in Cork during the summer months and at weekends.

Food trucks and the development of food-based tourism encourage visitors to a city, town, location and encouraging and supporting food trucks in the city and in visitor spots will create a destination. For example The Misunderstood Heron foodtruck in Leenane in Co Galway is world renowned and in 2019 made the Lonely planet ‘coolest in the world list’.

<https://www.irishtimes.com/life-and-style/food-and-drink/killary-food-truck-makes-lonely-planet-coolest-in-the-world-list-1.3821657> Publicity like this is invaluable to a region. The council and its development plan for the city has a vital role is supporting and encouraging this type of food entrepreneurship throughout the county , along the Limerick Greenway, in key towns and throughout the city. This should be looked at for the summer/holiday periods and not just for 1 off events.

* The plan does not seem to reflect the changes in society brought about by the recent pandemic, including the importance of green space, increased home working, quality of life etc.

The new way of working with a major trend towards working from home and hybrid model of working (part in office, part time from home) is not adequately addressed in the plan. There is a need for neighbourhood hubs for home workers as well as SME start-ups. This plan needs to reflect this new reality.

Enhance enterprise hubs to include home working hubs? Not limited to SMEs only. Use out of commission post offices/garda stations and other disused publicly owned buildings as hubs.

* The tourism strategy needs to ensure joined-up thinking. The Limerick Greenway is an excellent asset in the county and will link to Co Clare and Co Kerry in the future. Linking the cycleway to areas of interest, heritage sites, viewing points that may not be directly on the route are also important to enhance the interest of the route. The Cycleway itself is not enough. It should act as a thread to link together other sites and points of interest, developing the economies of towns and villages along the route.
* **It is regrettable that there is no mention of the Circular Economy in the economic plan for the county over the next 7 years, especially when the European Green Deal is based on a move to a more efficient use of resources via a circular economy restoring biodiversity, reducing carbon emissions and cutting pollution.** Promoting resilience and recovery from Covid 19, will require the city and county management to look at economic models differently. Resilient cities across the world have adopted or are moving ever closer to adopting the principles of a circular economy. If Covid has taught us anything it is that locally grown produce and product is a priority and that overuse of plastics and non-renewable energies creates toxic waste that is quickly destroying our planet. We must support industry that produces quality and long-lasting products and resources on a public and private scale, promoting competition between and development of industries and organisations that support a circular economic model.

**The Report: Introduction**

The Southern Region RSES economic vision is ‘to enable sustainable, competitive, inclusive and resilient growth’

***As the largest urban centre in the Mid-West, the NPF supports ambitious growth targets to enable Limerick City to grow by at least 50% to 2040***

The Limerick 2030 Economic and Spatial Plan for Limerick has the **ambition to create a City Centre that can attract new inward business investment and encourage the formation of new local business by providing high quality, flexible space.**

The Draft Plan focuses on a range of sectors which will contribute to the future economic growth of Limerick, including professional services, ICT, advanced manufacturing, life sciences and logistics **among others**.

**What other industries should be included?**

* **What about the creative and cultural industries? Look at how Galway uses its cultural industries to attract people to live, work and visit the city and county and build its vibrancy.**
* **Green industries and those that will focus on halting climate change?**
* **What about Social enterprises?**

**Section 1: Retail**

**City Centre: ECON 01**

Enhance the vitality of the City Centre through a mixture of uses, **reuse of vacant units**, increased residential population and revitalisation.

Development shall be designed so as to **enhance the public realm and creation of a sense of place**

* How will this plan increase the residential population in the city?
* What about access and getting to the city centre? Alternatives to cars??? Shuttle buses etc
* What about engaging with the city centre arts community and consultation with them to enhance the public realm. The Belltable, Fidget Feet etc. Urban art. Compare with Waterford city festival of urban art etc.

**Objective ECON O4 Local/Neighbourhood Centres Objectives**

* What about hubs for home workers in neighbourhoods?Use vacant buildings in neighbourhoods and towns e.g., Old Mayorstone Garda station**.**

**4.6.9 County Towns and Villages**

* Enhance enterprise hubs to include home working hubs? Not limited to SMEs only. Use out of commission post offices/garda stations as hubs.

**4.6.11 Casual Trading**

**Objective ECON O10 Casual Trading Areas**

It is an objective of the Council to designate sites as Casual Trading Areas in suitable locations where deemed appropriate.

* What are these suitable locations?
* Allowing mobile food units to trade outside of ‘designated areas’ can add to the vibrancy of an area/city /town. An example of this can be seen in Cork County Council where any food business that is a registered business can trade on public beaches and close to amenities building the vibrancy of the location. Coffee carts/ horse boxes proved popular in Cork during the summer months and at weekends. **In Limerick the use of food trucks and coffee trucks along the river was prohibited over the summer months which was detrimental to the small business trade and innovative catering businesses and Labour suggest that the Council reconsider their approach in this regard as is the case in many other urban AND rural areas.**

**Objective ECON O12 Night-time Economy**

It is an objective of the Council to support the development of the night-time economy throughout Limerick and to prepare a night-time strategy and ensure the implementation of this strategy on completion.

* This strategy needs to be developed in partnership with Arts and Cultural organisations in the city and county.

**Section 2: Enterprise and Employment**

**4.7.2 Strategic Employment Locations Limerick City and Environs**

**Objective ECON O13 Strategic Employment Locations City and Environs**

Facilitate and support Limerick City Centre, University Hospital Limerick, Raheen Business Park, the National Technology Park, Higher Education Institutes, Public Hospitals, Dock Road, Northside Business Campus, Opera Centre and Cleeves Site as Strategic Employment Locations, identified in accordance with the Limerick Shannon Metropolitan Area Strategic Plan.

* While Raheen has a focus on high tech/manufacturing and Plassey is focused on Science/Tech and Pharma, will there be a focus on types of business targeted for the North side business campus?
* How will this directly link in with the employment needs of Moyross, King’s Island (Regeneration area?) residents?

**4.7.4 Knowledge Economy**

Objective ECON O16 Knowledge Economy

It is an objective of the Council to promote the development of knowledge-based enterprise.

* What about the new way of remote working, the move towards 4 day working week? These work especially well within the knowledge economy. What provisions can be included in this plan to reflect this new way of working.
* Knowledge workers can be sourced worldwide and will expect to be able to work in a flexible way. Is there a provision for working from home hubs? Other supports for remote workers. Multinationals are moving away from expensive city centre office space and looking at more flexible models. Should this aspect of the development plan reflect this societal change that has accelerated through the pandemic.

**4.7.5 Education and Skills**

Objective ECON O17 Education and Skills

 It is an objective of the Council to sustain the existing high levels of educational attainment and skilled workforce, to encourage employment generation to maintain this resource within Limerick and to promote the availability of education opportunities to all residents in Limerick City and County.

* This objective lacks ambition and is about ‘sustaining existing levels’. We have a huge opportunity with a variety of E&T options from universities to Technological University to PLC and Apprenticeships. Working with industry and identifying future needs to be at the cutting edge of E&T development is where this plan should be pitching.
* How will LCCC build access to training options for all of society to ensure equality in Education and training?

Objective ECON O18 Further and Higher Education Institutions

 It is an objective of the Council to: a) Work in conjunction with Further and Higher Education Institutions in the creation and fostering of enterprise through research, innovation and development activities and the commercialisation of such activities. b) Support the development of sites where high-tech and high potential start-ups can thrive, in conjunction with Institutes of Technology and Universities, to create collaborative and innovative growth.

* LIT is now the Technological University of the Shannon - Midlands and Midwest and the Development Plan should reflect this enhancement.

## 4.7.6 Clustering and Innovation

## Objective ECON O19 Clustering and Innovation

##  It is an objective of the Council to encourage and facilitate the sustainable development and clustering of knowledge-based and high-tech industries/businesses at appropriate locations in Limerick.

* This section starts by talking about the creative industries and the potential to develop them in Limerick. The section mentions specifically:

*They have been defined as industries which have their origin in individual creativity, skill and talent and which have a potential for wealth and job creation through the generation and exploitation of intellectual property - including areas such as advertising, software, publishing, architecture, music and the visual and performing arts, film, video and photography.*

* However, the objective highlights knowledge-based and high -tech businesses. This or an additional objective should specify the creative industries and identify how they will be supported and nurtured.

**4.7.7 Tackling Unemployment**

Objective ECON O20 Tackling Unemployment

It is an objective of the Council to support the work undertaken by the Education and Training Boards, in relation to courses provided under SOLAS and the establishment of Community Training Centres, Local Training Initiatives and Specialist Training Provision in Limerick.

* This section on tackling unemployment is vague and lacks defined actions. What types of apprenticeships will be offered? Are these areas where there is demand? How can LCCC support and engage with those organisations and communities working with the unemployed?
* LCCC could be innovative in mentoring the setting up of a model format for apprenticeship as a cooperation between industry and the ETB. Waiting for Government to act in this sphere will not assist the tackling of unemployment.

**4.7.8 Smart City**

Objective ECON O21 Smart City

It is an objective of the Council to support the Smart Limerick Initiative, which will allow greater flexibility for Limerick to work with universities, citizens, entrepreneurs and companies, to co-innovate, test and deploy new urban solutions.

* While this is a good initiative it is important that access to high-speed broadband must be available across city and county to ensure equal opportunity.

**4.7.9 Office Development**

The Council will encourage the conversion of existing office stock, where appropriate, to be more receptive to the changing needs of employers and employees. In this regard, the establishment of high specification ‘fourth generation’ office accommodation will be especially encouraged. Furthermore, in recognition of changing workplace practices, the Council will support proposals for co-working office accommodation in accordance with the standards set out above and facilitate and promote the uptake of remote working and the development of hub facilities in the City and County.

* More detail on this and inclusion of specific co-working hubs in the objective is required. “Fourth Generation” offices are very high spec and expensive and impossible except in new build situations. We don’t need as much of this as we think and certainly it should not be used as justification for the ludicrous level of same in the Opera Centre development, especially given the pandemic’s effects on how we use the City Centre.

**4.7.11 Data Centres**

Objective ECON O24 Data Centres

 It is an objective of the Council to:

a) Facilitate the development of Data Centres on lands appropriately zoned for such purposes, subject to normal planning, development and environmental controls and the assessment of the potential impact on such development on adjacent land uses.

b) Promote co-location of data centres with renewable energy sources at appropriate locations subject to proper planning and sustainable development considerations

* There is a lot of controversy surrounding data centres, mainly that they are a drain on the energy resources and provide few employment opportunities. Part B of the ECON 024 Objective **is very light touch** with ‘Promote co-location of data-centres with renewable energy sources’ and needs to be a directive that all data centres generate their own energy from renewable resources, or at a minimum of 50-75%, of their own energy from renewables. **The Government have an obligation to ensure demand from Data Centres does not threaten overall capacity of the system to serve “ordinary” needs.**

**4.7.12 Cultural and Creative Industries**

Objective ECON O25 Cultural and Creative Industries

It is an objective of the Council to promote the development of cultural and creative enterprises.

* In light of the total decimation of the cultural industries during the pandemic this section needs much more focus and LCC must support the cultural industries, not merely ‘promote’.
* Cultural industries ‘as a subset of the knowledge industries’ are the key to making Limerick city and county a desirable destination to live work and visit. This is spoken about but not developed adequately in the plan. Events, developing & enhancing the public realm, the night-time economy, the tourism industry all hinge on building and supporting the cultural industries in the city and county.
* Looking at increasing outdoor venues for arts, culture, music, increasing investment in public art and enhancing the public realm, expanding the urban art programmes, free cultural events for the city, using the Milk Market (during the week during the holiday seasons), the potato market and other underused public spaces to bring vibrancy into the city. Encouraging street performances (similar to Barcelona where designated busking/performance spots are booked by performers weekly.)
* There should be significant investment in supporting LSAD on its current Campus and extending its activities into other city locations and to help revitalise towns and villages with suitable projects and ventures. This has the potential to make it a leading-edge Art School with European wide reputation and this is not an unrealistic ambition. This should also apply to UL’s activities such as locating the School of Architecture (SAUL) wholly within the City – a long sought investment and intention.
* Ironically, Limerick’s city Centre dereliction is an opportunity for creating relatively low cost but hugely attractive housing within the core which would appeal to just the cohort of “creatives” required to realise these ambitions.

**4.7.13 Incubator/Starter Units and Rural Hubs**

Objective ECON O26 Enterprise Incubator Units

It is an objective of the Council to facilitate the development and growth of incubator/innovation facilities in the City and County, to support the growth and development of SMEs and the creation of a sustainable start-up ecosystem. This will be achieved in conjunction with the Local Enterprise Office and Innovate Limerick, to ensure the long-term resilience of SMEs in Limerick.

Objective ECON O27 Rural Hubs

 It is an objective of the Council to facilitate the development of remote working/rural working hubs at appropriate locations across the County.

* This section is good and the LEOs in general do a good job in promoting and supporting SMEs and start-ups. In relation to Objective ECON O27 Rural Hubs this could also include neighbourhood hubs in the city that support home workers and home-based SMEs. Using vacant buildings (Old Mayorstone Garda Station is an example) as community hubs that can support this cohort of workers/start ups but also support the community and community groups.

**4.7.19 Home Working/E-Working**

Objective ECON O34 Home Working/E-Working

 It is an objective of the Council to facilitate home-based economic activities where, by virtue of their nature and scale, they can be accommodated without detriment to the amenities of residential areas.

* The changing nature and patterns of work indicate that many workers, especially in the knowledge economy will choose to work from home, at least a proportion of the week. This trend has been accelerated by the recent lockdowns and must be fully acknowledged and supported in this plan. Neighbourhood hubs for home based workers could provide additional services, networking etc and could be managed by the LEO.
* How exactly will the plan facilitate home workers?

**4.7.20 Limerick’s Food Sectors**

Objective ECON O35 Limerick Food Strategy

 It is an objective of the Council to support Limerick’s food and drink producers in accordance with the aims/gaols established under the Food Strategy for Limerick 2016–2018 and any update thereto.

* Co-operative marketing of Limerick food producers (similar to the phenomenal success of the Tipperary food producers network) should be established to elevate the quality produce in the county, creating an identity and food destination of the county. Limerick food trails, farm shops, collaboration between producers etc. This happens successfully in The Burren, West Clare, West Cork and adds to the attractiveness of the county to visit. Huge opportunity for the council to develop this aspect.

**Section 3: Tourism**

**4.8.1 Urban Tourism: City Centre and Environs**

Critical success factors for the development of Limerick as a WAW Gateway City are outlined.

However **Labour would make the following suggestions;**

* **In this entire tourism section little of no reference is made to the creative and cultural industries. These industries are central to attracting tourism into a region as well as enhancing the lives of those living and working in the city and county. Collaboration with the cultural and creative organisations is vital to build a dynamic tourism product**.
* The Limerick Greenway is an excellent asset in the county and will link to Co Clare and Co Kerry in the future. Linking the cycleway to areas of interest, heritage sites, viewing point that may not be directly on the route are also important to enhance the interest of the route. The Cycleway itself is not enough. It should act as a thread to link together other sites and points of interest, developing the economies of towns and villages along the route.
* You cannot manufacture or market tourist appeal. Tourists will travel the ends of the Earth to experience what is rare and precious and that is nearly always a coherent and workable society/place that does not need tourists to function but which by being a good place to live and work for those who work and live there always attracts a cohort of people to experience it themselves - tourists.

If this is done for the benefit of the people who live in the area it will become attractive to visitors by this very virtue. Any perusal of generally recognised attractive cities bears this out – Barcelona, Paris, Prague, virtually any Italian city or French /English cathedral town, etc

Do it and they will come!!

**Section 4: Marine Economy**

* This section looks solely at industrial development and offshore energy. What about development of the tourism potential of Limericks estuary coastline? Is there scope for a coastal greenway that links to the Tarbert Ferry and the lucrative and world renowned WAW? This could link this part of West Limerick and enhance its tourism potential building on the Foynes Flying Museum etc. This has huge potential.

# [Chapter 5: Environment Heritage Landscape and Green Infrastructure](https://www.limerick.ie/sites/default/files/media/documents/2021-06/06-chapter-5-environment-heritage-landscape-and-green-infrastructure.pdf)

**Policies Generally**

While policies as set out are to be welcomed, in terms of the **National and Regional Policy Context, there is a vague enough commitment in the Plan to “respond” to an “evolving” situation rather than committing to adherence with what are after all national Acts and supra-national Directives binding on all Member States.**

**Recommendation 1**

The Council should state specifically how its policies will comply with adherence to and alignment with EU Directives, National and Regional Policy as set down by the EU, the Oireachtas and the Regional Assembly.

#### Natural Heritage and Biodiversity

* On the one hand*,* the Plan states that … *EU Biodiversity Strategy for 2030 is a comprehensive, ambitious, long-term plan for protecting nature and reversing the degradation of ecosystems. It aims to put Europe’s biodiversity on a path to recovery by 2030, with benefits for people, the climate and the planet…* (Labour agrees but it must be kept in mind that we only have 9 years to achieve this).
* But on the other hand, the Plan also states … *there is a need for policies which will conserve what is best in Limerick’s landscape, while at the same time successfully integrating suitable development*. **Who will decide “what is best”? This implies strongly that if it’s not convenient or against a certain view which is pro-development, elements of biodiversity are not going to win out.**
* It should be noted that in relation to Protected Sites and Species and Conservation outside Protected Sites, and the EU Habitats Directive, these are separately expressed but Labour cannot see how these can be separated from the issues in relation to Biodiversity above and must be treated similarly.

**Recommendation 2**

The Council should state that it will adopt an ecological/scientific basis for decision making in relation to the effect of development on biodiversity and the protection of the natural world.

**Trees:**

* Labour considers that the objectives stated here are very minimal and don’t specify any methodology for protection. Trees play an extremely vital role in mitigating Climate Change and enhancing the environment and there is no commitment contained in the draft to plant trees in existing urban areas and existing public realm areas. Trees produce oxygen, absorb CO2 and pollution, attenuate storm water (which helps alleviate flooding), stabilise soils, absorb noise, reduce urban heating through shade, encourage wildlife habitats, not to mention their aesthetic effects on our built and natural landscapes.
* Labour recognises that that best practice here is to have a **comprehensive Trees Policy and a full time and resourced Tree Officer, which all Local Authorities should have if we as a nation are serious about Climate Action.**

**Recommendation 3**

The Council should develop a comprehensive Trees Policy and appoint a full time Trees Officer.

**Blue Green Infrastructure (incl. Nature Based Solutions):**

* All of this section is interesting but it does seem confusing as to what is different between how the environment is protected in the preceding sections and this section, which gives some kind of hierarchical status to “blue/green” infrastructure as opposed to the rest of the natural environment. It might be defined in words *… a strategically planned network of high quality natural and semi-natural areas with other environmental features, which is designed and managed to deliver a wide range of ecosystem services and protect biodiversity*… but it certainly is not explained here.

**Recommendation 4**

The Document should explain more clearly the concept of **Blue/Green Infrastructure** and differentiate it from other aspects of environmental protection.

**Water Quality and Wetlands:**

* This is somewhat problematic as LCCC no longer controls the supply or treatment of water/waste so this section seems nebulous enough given that context – a vague promise to *… use ground water protection schemes as part of land use planning…* and various other protection objectives cited, naturally and which are laudable. Labour believes however that a detailed strategy is called for involving engagement with Irish Water.

**Recommendation 5**

Labour calls for a comprehensive strategy to engage with Irish Water around the alignment of its strategic plans with those of the State and the Regions and the requirements of Limerick’s growth and development.

## Landscape and Visual Amenity

* It should be noted that this section is mislabelled as 5.5.4 instead of 5.4.4
* An aspect of this section should not be separated from the issue of Built Heritage. Historic Gardens and Designed Landscapes should be considered and amalgamated within the Built Heritage section because that is what it is and has a context critical to the conservation and protection of historic buildings particularly.

#### **Archaeology and Built Heritage**

* Architectural Heritage: *…Planning Authority to include in their Development Plan objectives for the protection of structures, or parts of structures, which are of, special architectural, historical, archaeological, artistic, cultural, scientific, technical or social interest. These buildings and structures are compiled on a register referred to as the Record of Protected Structures (RPS)*.
* Generally Labour does not argue with what is said in this section but it is evident that what is needed in this area is expertise in the selection/assessment of the list, as an examination of it has what are poor examples included and outstanding buildings omitted, particularly those from the modern era.
* The RPS should include some description of the justification for each selection which is currently not part of it.

**Recommendation 6**

The Register of Protected Structures should be assessed and selected using expert, independent and professional consultation and when published should include a specific justification for selections.

**Green Roofs:**

**Green roofs are areas of living vegetation, installed on the top of building, for a range of reasons including visual benefit, ecological value, enhanced building performance, and the reduction of surface water run-off**. In Fingal county council a green roof proposal is required for all roof areas greater than 300m2 for the following types of development (unless otherwise exempted by the Planning and Strategic Infrastructure Department); apartments, employment, retail and ancillary, leisure and education. Exemptions may apply where the applicant can demonstrate that a significant suite of alternative green infrastructure proposals wholly address the interception, treatment and attenuation volumes across the site. The green roof shall cover a minimum of 60% of the roof area.

**As a similar approach had been taken in the draft plan but subsequently omitted before the public consultation process began, Labour asks that the Council reconsiders inputting green roofing** as demonstrated above in Fingal and takes note of a document prepared for South Dublin County Council that outlines the benefits of green roofing. <https://www.sdcc.ie/en/download-it/publications/living-design-green-roofs.pdf> and another document prepared for Dun Laoghaire County Council on green roofing guidance <https://www.dlrcoco.ie/sites/default/files/atoms/files/appendix16.pdf>

# Chapter 6: Sustainable Mobility and Transport

Labour welcomes the commitment to *reducing dependency on the private car and securing a shift towards sustainable modes of transport, including walking, cycling and public transport…The Council will strengthen the links between land use and transportation planning and will seek to promote sustainable transport, through the management of the road network in Limerick... transition Limerick to a low carbon and climate resilient society. Planning policy needs to look beyond catering for car dominated road space. It needs to utilise the ‘Avoid – Shift – Improve’ approach to integrating land use and transport planning.*

However, the inclusion of 6 road projects is contradictory to a plan that wants to transition the county to a low carbon society. As we know, more roads bring more carbon. **It is simply not plausible that increasing motorway capacity to the extent of the objectives listed will not lead to a significant increase of C02 output and increased car dependency in the region.**

This development plan should be looking at reducing road projects and planning for alternatives in terms of ensuring better rail infrastructure, better rail connections, more bus routes and prompt delivery of promised and planned active travel infrastructure. How can Limerick *achieve more sustainable travel patterns* when delivering 5 road projects (*critical to enabling growth* as per the draft plan) at the same time? One is completely contradictory to the other and the Council need to look more closely at commitments it has made in the Climate Action Charter.

Labour asks what growth are we planning to achieve?

The Draft Limerick Shannon Metropolitan Area Transport Strategy targets have been identified as unrealistic and therefore these targets will likely change in LSMATS version 2.

The Council identify that they will *continue to develop a network of high quality, continuous cycle routes throughout the City and County, improve the permeability of the road network for cyclists and create a more cycle friendly environment, through reducing the volume and speed of motorised traffic*. Labour would like consideration given to the speed limits in the city and the county as speed is a significant issue preventing people from using active travel means.

**It is imperative that the additional objectives below are included as priorities of the current list and given priority above those already listed:**

* Objective: Delivery of a comprehensive cycling and walking network for Limerick City Metropolitan Area.
* Objective: Delivery of the full BusConnects programme (inclusive of ticketing systems, bus corridors, additional capacity, new bus stops and bus shelters) for the Limerick City Metropolitan Area.
* Objective: Development of a Park and Ride programme for Limerick, linked with the BusConnects Programme.

**It is estimated that the M20 motorway project (TR01) will cost between €2-3 billion. Labour feels that the enormous financial resources required to deliver these projects will reduce the region's capacity to deliver sustainable alternatives such a fast speed intercity rail.**

The [induced demand](https://www.vtpi.org/gentraf.pdf) to private car transport created by these projects will also reduce the viability of alternative sustainable modes of transport and put our city and urban centres under severe pressure through downstream congestion, parking provision, pollution, and other environmental impacts.

It is essential that the viability of all infrastructure projects is measured by ability to reduce amassed carbon in production and generated carbon through use over time. To that end we are requesting the inclusion of the following objectives in TR01-TR06;

* Objective - It is an objective of the Council to only deliver large infrastructure projects that are compatible with a reduction of carbon emissions on a glidepath to reach a 50% reduction by 2030 and net zero by 2050 in line with most relevant national targets and with the councils commitments under the climate action charter as signed in 2019.
* Objective - It is an objective of the Council to only deliver large infrastructure projects that are compatible with compact development goals as set out in the national planning framework.

**Promoting Modal Shift**

Far too many short and unnecessary trips are taken by private car in Limerick. The focus on **education is an important one as it is the main cause of congestion within the Limerick metropolitan area**. There is an urgent need to prioritise the delivery of a safe and segregated cycle network as outlined in the ARUP Limerick Metropolitan Cycle Network Study and the initial draft of LSMATS if we are going to break this dependence on the private car for children to get to school. Promotion can only happen in the context of the delivery of appropriate safe and segregated cycling infrastructure.

**In addition to a quickly delivered cycle network we suggest that the following be included within this section directly targeted at both primary and secondary schools:**

* A 15kph limit on all streets which contain a school entrance or exit, with any traffic calming initiatives or infrastructure delivered within the first year of the development plan programme.
* The development of car-free school streets at all urban and suburban schools.
* The banning and removal of any existing “drive-thru” lanes within school grounds.
* The installation of covered bike parking that will facilitate a minimum of 20% of the school population to safely park their bikes.
* This bike parking must also be given priority space near the main entrance door of each school with the removal of on-site car parking facilities if necessary.
* Limerick Council commits to the development of a Bike Life report for Limerick in collaboration with the NTA. As an example, the Dublin Bike Life report can be found at the following link: <https://www.nationaltransport.ie/bike-life-2019-dublin-metropolitan-area/>

**Objective TR O15 Limerick Cycle Network**

We strongly welcome this statement:
*“The design of the pedestrian and cycle networks will be informed by the four core principles of the Design Manual for Urban Roads and Streets, which are connected networks, multifunctional streets, pedestrian focus and a multi-disciplinary approach.”*

**The development plan should be amended to include:**

* The completion of the main cycling arterial routes connecting each city ward suburb by the end of 2023.
* Prioritise the completion of the full Limerick Cycle Network as identified in both documents by 2028.
* It is an objective of the council to amend the identified barriers to cycling as identified in the Limerick Metropolitan Cycle Network Study (2016) such as roundabouts, river crossings and permeability blockages in the short term.

**Limerick Regeneration Areas**

**Objective TR O16 Limerick Regeneration Areas Sustainable Travel Infrastructure**

We strongly support all efforts to combat the transport exclusion and lack of connectivity our communities in regeneration areas currently face. With very low car ownership levels in many of these areas it is essential that adequate footpaths, cycle lanes and public transport options are prioritised. Unfortunately the initial LSMATS draft from the NTA did not adequately recognise the need for investment or inclusion of these communities. We are very encouraged to see Limerick Council bring their expertise to this area of transport exclusion and we hope to see infrastructure and permeability options introduced to these communities as a priority.

**Objective TR O17 Enhanced Public Transport**

We suggest this objective be amended to also include the following:

* **It is also an objective of the council to support the enhancement of Limerick’s public transport fleet to ensure adequate bike parking within all city services to encourage multi-modal trips through the use of bikes and other micro-mobility devices for “first mile/last mile” trips.**

**Objective TR O20 Transport Interchange**

* **We suggest this objective is amended to include the installation of safe and secure bike parking at all park and ride hubs.**

**Objective TR O30 Behavioural Change Measures**

This objective should be amended to include the following as its first lettered objective:

* **a) To encourage behavioural change the Council will deliver the Limerick Metropolitan Cycle Network in full by end of year 2025.**

##### Policy TR P7 Road Safety and Carrying Capacity of the Road Network

Enhancing the road carrying capacity of the road network is in direct conflict with the Council’s obligations to reduce transport emissions and reduce the modal share given to private cars.

This objective should be removed and replaced with:

* **It is a policy of the Council, guided by our climate commitments, to seek improvements to road safety while reallocating the existing carrying capacity of the road network throughout Limerick from motor traffic to active modes and public transport.**

**Objective TR O43** **HGV Restrictions**

*“It is an objective of the Council to identify specific lorry routes and/or time restrictions, to reduce peak-time HGV movements through Limerick City and neighbourhoods.”*

A key goal of the Limerick Tunnel project was to eliminate HGV traffic through our city centre and family neighbourhoods. Any and all measures possible must be taken to divert this traffic to the underused tunnel. We suggest this objective be amended to read:

* **It is an objective of the Council to identify specific lorry routes to eliminate HGV movements through Limerick City and neighbourhoods.**

We also suggest the following objective be added after Objective TR 043:

* **It is an objective of the Council to limit deliveries to businesses in the city core to before 11am each day to further improve the safety of pedestrians and active mode users and to facilitate better use of street space for business and of liveability for citizens.**

**Objective TR O45 Car and Cycle Parking**

We suggest this Objective is omitted and replaced with the following:

* **It is an objective of the Council to support the provision of safe, secure and monitored bike parking in the city core.**
* **With the abundance of off-street car parking facilities it is an objective of the Council to reduce the existing on-street car parking spaces in order to reallocate space to improved pedestrian and cycle infrastructure within the city core, and also to provide space for improved public realm use.**

# [Chapter 8: Climate Action Flood Risk and Transition to Low Carbon Economy](https://www.limerick.ie/sites/default/files/media/documents/2021-06/09-chapter-8-climate-action-flood-risk-and-transition-to-low-carbon-economy.pdf)

Labour welcomes the recognition that the business-as-usual model, cannot continue and there is a need to reconsider the approach to the way we live our daily lives, in terms of reducing environmental impacts and our carbon footprint.

However, we remain concerned that the text is not backed up by specific actionable policy. For example, **Objective 3 - Sustainable Development references** *sustainable travel, energy efficient projects, provision of green spaces and open spaces and sustainable residential development projects, as a means of addressing climate change*. However, we consider that merely supporting these projects is not enough as a means of addressing climate change and consequently **preventing high carbon projects** from progressing.

It is not clear what **carbon intensive development** would be refused permission. While the Development Plan Environmental Report June 2021 (pg. 55) states that *the new plan allows the incorporation of relevant elements of this bill into planning policy… and without the adoption of the plan the opportunity to incorporate this, the latest and perhaps most ambitious of climate legislation, would be lost*, - it is not clear where or how the transformative decarbonisation targets will bite (i.e. what projects will no longer proceed as a result of this new decarbonising change in policy.

Chapter 13 Implementation and Monitoring states that *the policy and objectives (of the Development Plan) aim to be specific, measurable, achievable and realistic*. Therefore, we suggest that the climate mitigation objectives are more specific and **consistent with a quantifiable carbon budget approach**.

In the previous city development plan, the Council had already signed a climate action charter in 2019, signing up to a commitment to;

*ensure that policies and practices at local government level lead us towards low carbon pathways and put in place a process for carbon proofing major decisions, programmes and projects on a systematic basis, including investments in transport and energy infrastructure moving over time to a near zero carbon investment strategy.*

Labour propose that the Council adopt an additional objective in the new Development Plan which builds on commitments made in the previous plan;

***Climate emissions reduction - It is an objective of the Council to put in place a process for carbon proofing major decisions, programmes and projects on a systematic basis, including investments in transport and energy infrastructure moving over time to a near zero carbon investment strategy. Such carbon proofing will take account of the need to reduce emissions on a glidepath to reach a 50% reduction by 2030 and net zero by 2050.***

We welcome **Objective 18 – Energy and Emissions Balance,** but we continue to be concerned that the urgency needed to develop and implement a climate action plan is lacking. Any delay to implementing massive cuts can only result in larger harsher cuts later to meet the 2030 and 2050 targets.

We believe that building on floodplains is not a good idea. Climate change is very real and upon us right now. Flooding is a very real possibility and no longer a thing of the past or a unique or isolated event. Flood defences are not enough, we must also stop building houses and settlements on or near flood plains. **If an area is designated a flood plain, then flood risk assessments for housing developments should be phased out and be no longer used.**

# [Chapter 9: Sustainable Communities and Social Infrastructure](https://www.limerick.ie/sites/default/files/media/documents/2021-06/10-chapter-9-sustainable-communities-and-social-infrastructure.pdf)

Labour welcomes the Council’s ambition around healthy place-making and improving community infrastructure. Covid has identified the value of access to space and nature-based solutions to combat physical and mental health difficulties. Health impact assessments should be included in all infrastructure plans to assess how best to ensure that spaces are accessible and planned with best use of space and with people at the centre (as opposed to cars and other motorised vehicles).

We would argue that the following sentence; *in so far as opportunities allow, that barriers to pedestrian access to such social infrastructure* should be removed **as universal pedestrian access** should be a requirement of any new development / facility / infrastructure.

Objectives 9 and 10 call for the provision of more city centre schools *at accessible locations that...maximise opportunities for walking and cycling.* We welcome this new direction of locating schools in or close to, the city centre and ask that cycling and pedestrian access is considered at the outset rather than an after-thought at the end. We would also like to see consideration given to new schools that have been recently developed in the city and its environs (over the past 10 years) currently lacking in cycling infrastructure and a commitment given to remedy those via the roll-out of protected cycle paths by the end of this plan. It should be the ambition of the Council **that all schools across the county will be serviced with segregated cycling infrastructure by 2028**.

Objective 38 encourages the preservation of existing public rights of way and a good inventory and maps of public rights of way in the city is included. **However, we would also like to see the amenity value of the public rights of way enhanced as walkways and or cycleways.**

# [Chapter 12: Land Use Zoning Strategy](https://www.limerick.ie/sites/default/files/media/documents/2021-06/13-chapter-12-land-use-zoning-strategy.pdf)

Moyross is a key area of over 155 acres within the city. Residents and their PPN representative groups are calling on the Council to ensure that the zoning of Pineview Gardens as a green zone is reversed as it is unnecessary (there is ample green space provided for already) but more importantly disruptive to the neighbourhood and the community, as 71 families (205 individuals) continue to reside in houses in Pineview Gardens or 10% of the population of Moyross. Considering the current housing crisis, it is imperative that these homes be protected.

Moyross Residents Forum insist it is vital Pineview Gardens is zoned back to residential as it has been for over 30 years.