

CUNNANE STRATTON REYNOLDS

Submission on the Draft Limerick City and County Development Plan
2022-2028

On behalf of
**Kieran Wallace Receiver of KPMG over certain assets of Gail
Murphy, Michael Murphy (Jnr), Michael Murphy, Thomas Murphy
and Margaret Murphy**

For land at:
Old Cratloe Road, Clonconane, Limerick City

by
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1.0 Introduction

We make this submission to Limerick City and County Council on behalf of Kieran Wallace, Receiver, of KPMG, 85 South Mall, Cork City in respect of certain land assets of Gail Murphy, Michael Murphy (Jnr), Michael Murphy, Thomas Murphy and Margaret Murphy.

Our client is making this submission in respect of the Draft Limerick City and County Development Plan in accordance with Sections 9, 10, 11 and 12 of the Planning and Development Act 2000 (as amended).

This submission relates specifically to our client's land on the Old Cratloe Road in Clonconane, Limerick City. There are 6 no. parcels of land upon which submissions are made, hereafter referred to as sites, of which the emerging zoning of 4 no. are supported by our client and a further 2 no. which our client seeks to have alternatively zoned.

2.0 Executive Summary

This submission is made on behalf of Kieran Wallace, Receiver, at KPMG, 85 South Mall, Cork City, in relation to lands/assets of Gail Murphy, Michael Murphy (Jnr), Michael Murphy, Thomas Murphy and Margaret Murphy. These lands are located on or adjacent to the Old Cratloe Road, Clonconane, Limerick City. The key points from our submission are as follows:

Overview

- This submission relates to 6 no. parcels of development land, identified here as sites A through F.
- Our client supports the emerging land use zoning objective of residential and/or mixed use incorporating residential on 4 no. sites. These are identified below as Sites A, B, C and E. Our client supports not just the zoning of each of these sites but acknowledges their inclusion within Tier 2 zoned sites.
- Site D is zoned as Employment and Enterprise in the Draft City and County Development Plan and our client believes a compelling case has been presented to justify the rezoning of this site to Residential.
- Site D is wholly inappropriate for an employment and enterprise zoning for the following reasons:
 - The majority of permitted in principle uses within the employment and enterprise zoning are incompatible with this established residential area. There is such a number of incompatible uses within this zoning as to render the employment use meaningless and unworkable in this location.
 - There are likely to be issues of noise, fumes, road safety and potentially odour from a range of normally permissible employment uses in this location.
 - There is no access that can be provided directly from the distributor road as per the detailed design of that road. There is unlikely to be direct access from the proposed Moyross Link Road to Site D, leaving no alternative but to go through the well established housing estates east of the distributor road.
 - Access to Site D in the absence of direct access from either of the proposed roads will mean that the only access to this site will be through an established residential estate and Galtee Avenue. Access through Galtee Avenue by the type and level of traffic generated and vehicles used by employment use will be at the expense of great inconvenience of users of Galtee Avenue including not only those driving vehicles but also pedestrians and cyclists who include schoolchildren. Pictorial evidence shows parking roadside on both sides of Galtee Avenue.

- There is sufficient land remaining within Employment Area no. 2 to meet all the Council's aspirations for a dynamic and revitalising employment and investment cluster in this location with the Northside Business Campus in no way compromised by our clients requested rezoning from employment to residential.
- The desired arrangement of potential employment lands to attract international businesses and FDI of the type that the City and County Council and other agencies are trying to encourage should not be through a housing estate as indicated in the Draft Plan.
- There is insufficient land available between the LNDR and existing housing estates east of the distributor road to accommodate any meaningful amount of business and employment even if it were not to cause disturbance to existing residents.
- Site D is appropriate for residential infill for the following reasons:
 - This site is zoned residential in the adopted City Plan 2010-2016 City Development Plan as extended. There are no material reasons presented by the local authority to justify taking it from that established residential zoning.
 - There is a planning history to this site that proves its ability to accommodate development determined by the Planning authority to be in the best interests of the sustainable development of that site and in accordance with the development objectives of that authority. Planning permission was granted just before the economic crash in 2008 for 45 no. residential units.
 - This site represents a precious residential infill opportunity that meets the definition of infill by residential development already established on three sides and the further fourth side to be occupied by the forthcoming Northern Distributors Road (LNDR). The development of this site for residential uses constitutes a compact urban form in this location. In short, the maintenance of this site's existing residential zoning is supported in planning policy and guidance at the national, regional and local levels. A whole chapter (Ch. 10) of the emerging Plan is devoted to compact growth as in this instance. Section 3.7.5 and HOO3 advocate consideration of retaining existing residential amenity and the proposed reversion to employment and enterprise zoning in this location is therefore contrary to the Council's own policies in the same emerging City and County Plan.
 - Residential and support services permitted under the Residential land use zoning will provide regenerative benefits in a manner that would never be achieved by a waste disposal unit, logistics centre and a range of other totally inappropriate and potentially nuisance creating uses identified as normally permissible under the employment and enterprise land use zoning.
- Site F currently zoned residential and proposed as Agricultural is appropriate for Enterprise and Employment land use zoning for the following reasons:
 - The land unit is not an operational agricultural unit in its own right. At 5.5 ha. and located within the City limits, Site F does not provide a commercial agricultural prospect, being surrounded by development zonings and prospects.
 - In relation to the strategic location of Site F, within the City limits and adjacent to the LNDR, it is submitted that the use of the land parcel F for anything but built development is irrational and presents an underutilisation of the carrying capacity of the infrastructural setting of the site and is contrary to the proper planning and sustainable development of the area.
 - Enterprise and Employment land use zoning is less vulnerable to flood risks than the current residential land use zoning, and for that matter, the education and community land use zoning proposed on neighbouring lands also within flood zone B.

- The Draft plan proposes lands to the north of the Site F for residential use and those to the south and west for education and community uses. The lands to the east of the site are demarcated by the LNDR (phase 1). Enterprise and employment land use for Site F has the potential of positive interaction with, and reinforcement of the residential land uses to the north and educational land uses to the south.
- Our client holds Site D which is already submitted to be best utilised for its existing adopted land residential land use zoning, and not the Enterprise and Employment land use proposed under the Draft Plan. It is submitted that Site F can accommodate the proposed Enterprise and Employment yield that will be lost at Site D and to the area to north of it up to the Moyross Link Road, which is indicated elsewhere in this document as being wholly impractical, inaccessible and unsustainable.
- Rezoning as employment and enterprise for Site F means that the core strategy intended development yield proportions of various land use typologies over the plan period is met, the potential of the area for employment is enhanced and finally that the LNDR is utilised to its full potential.
-

The context of the Draft Plan

The 6 no. sites the subject of this submission are a set of recognised development sites that are assets over which a Receiver has been appointed. The development ambition for the lands is illustrated by their land use zoning objectives as they exist in the current/adopted City Plan focusing on residential development with supporting mixed use and employment designations.

The land use zoning objectives of the lands exist in the current Plan and are therefore established and as in the interests of the proper planning and sustainable development of the City Plan. It is submitted that the established development intentions should be maintained for these lands, particularly as their development intention as set out in the current plan matches the intention of the statutorily appointed Receiver.

A receiver is not a developer but is relying on development companies to take over the development land assets that they hold. Naturally since recession, when construction industry momentum failed due to severely constricted financial and human resources, the focus of renewed development energies serving latent demand for mainly housing has been iterative; the completion of part complete development and then the development of sites located in those areas where there is the greatest demand around the capital city have pre-empted the development of sites like those the subject of this submission. Construction industry plant, human and financial capacity had grown, the ambitions of Rebuilding Ireland were being realised and Irish consumer confidence generally had returned when the global pandemic hit. The suspension of all but necessary construction projects has delayed the human and physical resourcing of the development of the sites the subject of this submission.

3.0 Our Client's Sites

3.1 Overview of Our Client's Sites

Our client has 6 no sites, four of which are located on the northern side of Old Cratloe Road. Three of these are accessed off that road. The fourth of this cluster of sites, north of the road, is site D which is accessed off Galtee Avenue which is a residential estate standard road accessing the Thomond village housing estate further north and the Cratloe Road wider housing estate. There is a further southern cluster of 2 no. sites, on the southern side of the Old Cratloe Road, the most northerly of which has access directly off the Cratloe Road. The most southerly site of the 6, labelled F, is accessed through Site E off the Old Cratloe Road. The sites are therefore within easy reach of each other.

Each site is greenfield in nature formerly or currently being used as agriculture.

There is an established pattern of ribbon development at this part of Old Cratloe Road (R445) and there are some commercial activities located on the road.

3.2 City Context

This cluster of sites are located to the north west of Limerick City in an area known as Clonconane. The strategic location of this cluster of sites is shown in Figure 1 below. Limerick City Centre is located some 4km to the south east and Limerick Bus and Rail Station are located a further kilometre away.

Figure 1: Strategic Location of this Cluster of Sites



3.3 The Sites

The key features and characteristics of each site are set out in brief form below.

Site A

Site A is located to the north of the Old Cratloe Road. This site measures some 9.2ha. There are two points of access to Site A. One is from the old Cratloe Road. The other is from Pass Road. Site A does not flood and is not within an area of flood risk.

Site B

Site B is located to the north of 'The Country Club' on the western side of the Pass Road, adjacent to Site A. Site B measures 0.3ha and is by some measurement the smallest site. There is one point of access to Site B from Pass Road. Site B does not flood and is not within an area of flood risk.

Site C

Site C is located to east of Pass Road. This site is measured at 1.8ha. There is one point of access to Site C from Pass Road. Site C does not flood and is not within an area of flood risk.

Site D

Site D is located to the east and is accessed off Galtee Avenue. It is surrounded on three sides by existing residential development. This site is measured at 1.7ha (approx.). It does not flood and is not within an area of flood risk.

Site E

Site E is located to the south of Old Cratloe Road. This site is measured at 2.3ha (approx.). There is one point of access off the Cratloe Road. This site does not flood and is not within an area of flood risk.

Site F

Site F is located south of Site E. It measures 5.5ha and is only capable of being accessed through Site E. Site F is located within Flood Zone B (see below).

Phase 1 (Coonagh to Knockalisheen Link Road) of the proposed Limerick Northern Distributor Road abuts the eastern boundary of Parcels E and F and the western boundary of Parcel D.

There are no recorded monuments on any of the sites other than Site A where there is a graveyard under RMP Ref. No. LI005-007. This is approximates to an area of land identified in both adopted and emerging development plans as being the site of an old graveyard and is consequently set aside as open space in both plans. There are no protected structures on any of the sites nor any designations of note.

4.0 Planning History

4.1 Planning Applications/ Decisions

There is a relatively small history of planning applications on the 6 no. sites. This planning history as it relates to applications and appeals is set out below.

Sites A, B, C and E

No record of any planning applications.

Site D

The most recent planning application on this site was lodged in 2007 and granted planning permission on 11/01/2008 for demolition of 3 no. residential units and 1 no. maintenance workshop and the construction of 45 no. dwelling units and ancillary works. The planning history of Site D is summarised in Table 1 below.

Table 1: Planning History of Site D

File Number	Description	Decision
07/2196	demolition of 3 no. residential units and 1 no. maintenance workshop and the construction of 45 no. dwelling units and ancillary works. Entrance to the development will be from Galtee Avenue which is entered from the Old Cratloe Road	GRANTED
91/1007	Erection of dwelling house and entrance	GRANTED
91/1079	Erection of house, entrance, septic tank and relocation of septic tank at	GRANTED
89/159	Conversion of part of dwelling house to restaurant and erection of refuse store	REFUSED

Site F

A planning application lodged by Custom Construction under reg. ref. 08/770345 was lodged on 26/08/2008 and was subsequently withdrawn on 19/01/2010. That application ultimately withdrawn was for raising the level of low lying lands that had been prone to flooding. That application is consistent with the flooding history of this site.

4.2 Zoning History

The adopted zonings for each of the 6 parcels is set out below with the vast majority of the area covered over all 6 sites being in residential land use objective ZO.2 (A) residential as set out in the adopted Limerick City Development Plan 2010-2016 (as extended). The recent zoning prior to publication of the emerging plan for each parcel is as follows:

Site A

This site is zoned Residential, Neighbourhood Centre and Public Open Space in the adopted City Plan, as extended.

Sites B, C, D, E and F

These sites are all zoned Residential in the Limerick City Council Development Plan 2010-2016 (as extended).

In summary all sites within this portfolio are zoned as residential or capable in zoning terms of accommodating residential in the adopted City Development Plan, as extended.

5.0 Planning Policy Context

The requirement for land to be zoned and the location of such zonings is determined by a number of factors including national, regional and local planning policy, both adopted and emerging.

5.1 Development Plan Guidelines for Planning Authorities

Adopted Development Plan Guidelines for Planning Authorities (2007)

These Guidelines on Development Plans are the adopted guidelines that are currently in place until such time as the current guidelines which are in draft form are adopted following public consultation which runs until October this year.

These Guidelines advise that development plans should anticipate future needs on an objective basis (Overview on page 3) with needs driven assessments of future development requirements including the amount of land that needs to be zoned for particular purposes. It is stated that zoning that is not responsive to or justifiable by reference to reasonable needs, or that substantially exceeds such needs, is not consistent with established principles of proper planning and sustainable development.

Para 4.4 refers to the mandatory objective of zoning land. It is stated in Section 10(2)(a) of the 2000 Act, as amended, mandates a development plan to include objectives for:

'the zoning of land for the use solely or primarily of particular areas for particular purposes (whether residential, commercial, industrial, agricultural, recreational, as open space or otherwise, or a mixture of these uses) and to such extent as the proper planning and sustainable development of the area, in the opinion of the planning authority, requires the uses to be indicated.'

Section 4.4 also states that development plans perform an important task in setting out the framework within which the development needs of the economy, and society in general, can be responded to while maintaining, and where possible, improving the environment.

It is further stated in section 4.5 that *'following the approach set out, a development plan should ensure that enough land will be available to meet anticipated development requirements and will be developed in a sequential and co-ordinated manner. This will avoid, for example, a situation where housing estates are built beyond the outer edges of existing built-up areas while intervening lands lie undeveloped resulting in deficiencies in terms of footpaths, lighting, drainage or adequate roads infrastructure.'* The suitability of these lands and the availability of infrastructure is identified and assessed below.

Crucially in the context of this submission, in addition to the above, when considering the suitability of specific land for development, within the process of preparing zoning objectives in making a development plan, the members are restricted to considering the proper planning and sustainable development of the area to which the development plan relates, statutory obligations and Government policy. Matters typically relevant to 'the proper planning and sustainable development' of an area, inter alia, include:

- Need
- Policy Context
- Capacity of Water, Drainage and Roads Infrastructure
- Supporting Infrastructure and Facilities
- Physical Suitability
- Sequential Approach

- Environmental and Heritage policy, including conservation of habitats and other sensitive areas.

It is also recognised in para 4.53 that the need for regeneration is inherent in the proper planning and sustainable development of areas within cities such as Limerick.

Draft Ministerial Guidelines on Development Plans for Planning Authorities (2021)

These Draft Development Plan Guidelines for Planning Authorities are currently on public display until 8th October 2021. They take forward many of the principles of the adopted Guidelines referred to above.

Section 1.5 (The Development Plan and Investment) states that the development plan is now at the heart of a plan-led system whereby public capital investment programmes and priorities are aligned to support the adopted development strategy. The reverse is also set out later in the draft guidelines. This principle has been established through Project Ireland 2040 comprising both the National Planning Framework (NPF) as the State's national spatial development strategy and the National Development Plan (NDP) as the capital investment programme to support delivery at all levels of the planning hierarchy. The importance of aligning zoning for development against investment of infrastructure is highlighted.

This alignment of spatial planning and capital investment is intended to ensure a coordinated approach to investment in public infrastructure in a way that ties in with national and local spatial priorities. The development plan must therefore reflect and respond to programmed significant national infrastructural investment by the State.

Section 1.7 identifies Guiding Principles for the production of development plans include the following:

1. A vision for the area;
2. Stakeholder engagement;
3. A strategic balanced approach;
4. The integration of sustainable development and climate change priorities;
5. The structured management of change;
6. Renewal: Regeneration of existing communities and places;
7. Protection: Environmental and Heritage Assets;
8. Alignment of phased investment; and,
9. Delivery and Monitoring.

From the above the following are particularly relevant with the draft guidelines key considerations set out under each:

'1) A Vision for the Area - the development plan affords an opportunity for the planning authority to strategically examine and consider the economic, social and environmental context of the area and to formulate policy objectives for future growth, renewal and protection. At the heart of a development plan should be a concise and accessible core development strategy to achieve quality planning outcomes and which enjoys broad community support.

3) A Strategic, Balanced Approach - The development plan has a relationship with multiple and complex public policy areas such as housing, climate change, employment and enterprise, transport, water services, social infrastructure, conservation, heritage and environmental protection. The wider national and regional policy context must therefore be assimilated into the local spatial framework of the development plan in a strategic and balanced manner. In seeking to address local considerations, the plan preparation process must formulate policy to achieve objectives without fundamentally departing from wider strategic public policy objectives.

5) The Structured Management of Change - Projected economic and population growth trends

must be supported by significant new infrastructural development across all sectors. The development plan can ensure that new development is promoted and spatially structured to achieve a high standard of benefit to citizens and quality in design together with an enhanced sense of place, that is a key advantage in attracting talent and investment.

8) Alignment of Place and Investment - For planned development objectives to be realised, they need to be supported through public capital investment in infrastructure and services. The development plan is the key spatial framework in which local authority spatial development and investment priorities are identified and aligned.'

The approach to be adopted by local planning authorities in respect of lands and sites to be zoned is set out in Section 4.4.2. It is identified that an assessment of whether the amount of land already zoned is adequate to meet the housing needs of an area has to be undertaken. It is also recognised that the rate of take-up and build rate over a preceding period of 6-10 years are also important considerations.

On residential zoning, Section 4.4.3 seeks to ensure that there is sufficient provision of housing lands and sites. In providing for housing sites for development within settlements the emerging guidelines state that it *'may be necessary to zone more serviced land and sites for residential (or a mixture of residential and other uses), than would equate to meeting precisely the projected housing demand for that settlement. This approach recognises that a degree of choice in development sites to be provided locally is desirable to avoid restricting the supply of new housing development through inactivity on a particular landholding or site.'*

On employment zoning, Section 4.5 also states that in regard to employment. an uncoordinated approach in providing greenfield employment zonings in all settlements, irrespective of servicing, scale or strategy, on the basis that this may provide a more favourable jobs ratio, is discouraged. It is important to have regard to the National Policy Objectives of the NPF, which require local authorities to identify and quantify locations for strategic employment development in suitable areas.' National Planning Objectives 10A and 10B are particularly relevant.

With regard to zoning of land the emerging guidelines carry forward the concept of the 'sequential approach'. In Section 6.2.3 there is reference to the sequential approach to zoning for residential development specifically. It is recognised that there is a requirement within the sequential approach to achieve 'compact growth', 'utilisation of existing infrastructure' and 'regeneration.' These are concepts referred to later when discussing the merits of a rezoning for 2 of our clients 6 sites.

Section 6.4.1 (Planning for Compact Growth) is also relevant to this submission. This section within the draft guidelines seeks to ensure that a significant portion of new development reflects the compact growth and town centres first agenda which is also a key dynamic in addressing climate change, through reducing dependence on car-based transport, the extent of green-field land consumption and costly and inefficient infrastructure provision and use. Additionally, it is recognised that there should be a close correlation between the identification of land and sites for development with infrastructural capacity and spatially focused investment, while ensuring that a substantial element of future growth contributes to the regeneration of cities, towns and villages. This is particularly important in the context of the Limerick Northern Distributor Road (LNDR) as set out below.

The draft guidelines when discussing the suitability of land use zoning largely ignores the issue of protection of existing (residential) amenity and the compatibility of adjoining land uses which is a fundamental tenet of sound planning decision making for applications, appeals and zonings. This is discussed later in Section 7.0.

The *Planning System and Flood Risk Management - Guidelines for Planning Authorities (2009)* are also relevant and the implications of these guidelines for the future zoning of Site F is considered later in this submission.

5.2 National Planning Framework

The National Planning Framework (NPF) is a key national planning policy document, providing a broad planning framework for development and population growth in Ireland. It sets out urban and rural policies to outline future development. The NPF provides a series of high-level planning objectives, taking into account the future long-term population growth and development needs of Ireland to 2040.

Residential Development

The following National Policy Objectives (NPOs) identify the strategic focus for future zonings in relation to residential development specifically. 3a

National Policy Objective 3a: Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements¹⁷.

National Policy Objective 3b: Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints¹⁸.

National Policy Objective 3c: Deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints.

National Policy Objective 4: Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.

Specific NPOs that are relevant to consideration of residential land use zonings are set out below.

National Policy Objective 10a: To assist Regional and Local Authorities to identify and quantify locations for strategic employment development in the cities identified in Table 4.1.

National Policy Objective 10b: To assist Regional and Local Authorities to identify and quantify locations for strategic employment development, where suitable, in urban and rural areas generally.

Nationally, the high level policy priorities in the housing sector to 2040 are identified as follows:

- Location of Homes - Addressing the long term spatial distribution of housing.
- Building Resilience - Re-use, adaptability and accessibility in our housing stock, ensuring integration to deliver vibrant sustainable communities.
- Need and Demand Profile – Charting national housing pressures to 2040.
- Reconciling Future Housing Requirements.
- Effectively - Establishment of a comprehensive evidence base to support and inform housing policies and implementation measures.

The NPF sets out national core principles to guide the delivery of future housing at every level of governance. These are:

- Ensure a high standard quality of life to future residents as well as environmentally and socially sustainable housing and placemaking through integrated planning and consistently excellent design.
- Allow for choice in housing location, type, tenure and accommodation in responding to need.
- Prioritise the location of new housing provision in existing settlements as a means to maximising a better quality of life for people through accessing services, ensuring a more efficient use of land and allowing for greater integration with existing infrastructure.
- Tailor the scale and nature of future housing provision to the size and type of settlement where it is planned to be located.

- Integrate housing strategies where settlements straddle boundaries (county and/ or regional).
- Utilise existing housing stock as a means to meeting future demand.

National Policy Objective 33: Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.

National Policy Objective 72a: Planning authorities will be required to apply a standardised, tiered approach to differentiate between i) zoned land that is serviced and ii) zoned land that is serviceable within the life of the plan.

On page 137 it is recognised in the NPF that there is to be a focus on significant infill/brownfield growth, especially in cities and large towns. This means that city and county development plans will need to relate these targets to the levels and location of future land-use zoning. Effective implementation will require substantially better linkage between zoning of land and the availability of infrastructure.

Also on page 137 a new, standardised methodology is now put in place for core strategies and will also address issues such as the differentiation between zoned land that is available for development and zoned land that requires significant further investment in services for infrastructure for development to be realised.

Employment Development

Page 64 under 'Planning for Urban Employment Growth' recognises that potential relocation of enterprises should be considered for alternative locations where such a move, if facilitated, would release urban land for more efficient purposes that would be of benefit to the regeneration and development of the urban area as a whole, particularly in metropolitan areas and large towns.

The Tiered System of Zoning

A tiered system of zoning is now firmly in place where Tier 1 sites that are already serviced are to be zoned for development as a priority with Tier 2 sites, being those capable of being serviced infrastructure and service provisions.

National Policy Objective 72a: Planning authorities will be required to apply a standardised, tiered approach to differentiate between i) zoned land that is serviced and ii) zoned land that is serviceable within the life of the plan.

Strategic Flood Risk Assessment (SFRA)

Increased flood risk as a result of land use planning has, above all else, been one of the most costly (environmental, social and economic) legacy issues of previous national, regional and local land use decisions. The policy objectives and outcomes identified in the NPF will both assist the legacy issue and future proof future plans such as the Regional Spatial and Economic Strategies and County Development Plans developed under the NPF.

The objective of SFRA is to ensure planning policy takes account of flood risk in catering for future growth and can address planning and infrastructural needs required to facilitate projected growth. The Flood Risk Guidelines are core to the development of the SFRA. This key guidance document introduces comprehensive mechanisms for the integration of land use and infrastructure planning with flood risk management best practice.

The Guidelines introduce the concept of the 'sequential approach' whereby, at all levels of the planning process, the principle of avoiding areas of high flood risk is the first consideration, and should this not be practical, then the consideration of an alternative, less vulnerable land use should be proposed.

Where avoidance or substitution is not possible, then a robust justification must be made, accompanied by sustainable mitigation measures, to ensure proposed development will not increase flood risk.

Limerick Objectives

Limerick is a well-located regional centre situated mid-way between Cork and Galway on Ireland's Atlantic Economic Corridor and with good connectivity to Dublin, Limerick has the potential to generate and be the focus of significant employment and housing growth.

Limerick Regeneration, the amalgamation of Limerick City and County and most recently, the Limerick 2030 initiative, have all contributed to enhancing Limerick's growth potential. Working together with the City's third level institutions, Shannon Airport and bodies such as Shannon Development and the Shannon-Foynes Port Company, there is capacity to build on recent successes and add to the ambitious vision for Limerick.

This requires growing and diversifying the City's employment base and attracting more people to live in the City, both within the City Centre and in new, accessible green-field development areas. This means improving housing choice, supported by facilities and infrastructure.

5.3 Regional Spatial and Economic Strategy for the Southern Region

The Regional Spatial and Economic Strategies (RSES) provides a long-term regional level strategic planning and economic framework in support of the implementation of the National Planning Framework.

The RSES Vision for the southern region within which Limerick City and County are located is to:

- Nurture all the regions places to realise their full potential;
- Protect and enhance the region's environment;
- Successfully combat climate change;
- Achieve economic prosperity and improved quality of life for all the region's citizens;
- Accommodate expanded growth and development in suitable locations; and
- Make the Southern Region one of Europe's most creative, innovative, greenest and liveable regions.

Regional Policy Objective 35 supports compact growth through (a) identify rejuvenation priorities within the Region's settlements; (b) Development Plans shall set out a transitional minimum requirement to deliver at least half (50%) of all new homes that are targeted in the Region's three Cities and suburbs of Cork, Limerick and Waterford, within their existing built up footprints in accordance with NPF National Policy Objective 3b. This will be evidence based on availability and deliverability of lands within the existing built up footprints; (c) Development Plans shall set out a transitional minimum requirement to deliver at least 30% of all new homes that are targeted in settlements other than the cities and suburbs, within their existing built-up footprints in accordance with NPF National Policy Objective 3c. This will be evidence based on availability and deliverability linking Shannon International Airport, the SFZ and Shannon town with UL and Limerick City. The provision of this road will benefit regional interconnectivity which will result in social, economic and educational gains to this Region. The fast-track delivery of the Limerick Northern Distributor Road (LNDR) is a strategic investment and infrastructure priority for the MASP.

The preparation of the Limerick-Shannon Metropolitan Transport Strategy and associated implementation plan identifies the future needs of Limerick in the context of providing for compact growth.

Section 6.3.6.4 identifies the requirement for the enhancement of regional and local roads network for improved connectivity within the Limerick Metropolitan Area through the following projects subject to required appraisal, planning and environmental assessment processes: Priorities for the Limerick Shannon Metropolitan Area Transport Strategy includes Limerick Northern Distributor Route (LNDR) regional road project.

As part of the RSES for the Southern Region an Integrated Land-use and Transportation, known as the Metropolitan Area Strategic Plan (MASP) for the Shannon and Limerick, has been undertaken.

The principles underpinning the MASP include the effective integration of transport planning with spatial planning policies and the alignment of infrastructure investment. The Limerick-Shannon Metropolitan Area Transport Strategy is recognised as being instrumental in the regeneration and transformation of Limerick City and the wider Limerick-Shannon Metropolitan Area. It will deliver a high-quality, accessible, integrated and more sustainable transport network. A key priority of the MASP is the development of strategic residential areas and the provision of the Limerick Northern Distributor Route (LNDR).

Key policies from the Limerick-Shannon MASP include the following:

Limerick-Shannon Policy Objective 2 a. Support the regeneration and continued investment into Limerick City through initiatives such as Limerick 2030 and Limerick Regeneration and to further enhance Limerick City as a primary economic driver for the Southern Region.

Table 1 of the MASP for Limerick/Shannon identifies the city and suburbs 2026 Projected Population as 112,089; and 2031 population projection at 123,289

Chapter 6 (Integrated Land Use and Transport) identifies that the LNDR will improve access to the University of Limerick and the IDA National Technology Park and will reduce City Centre traffic. It will provide a direct link between Shannon International Airport, the businesses and industries in the Shannon area and the university campus. Furthermore, the delivery of the LNDR will improve transport links to the regeneration area of Moyross, across east and north County Limerick, south County Clare and onto the national road network and will open significant areas of land for potential development.

Limerick-Shannon MASP Policy Objective 8 - Strategic Road Infrastructure - It is an objective to maintain and deliver the sustainable development of strategic road infrastructure for the Limerick-Shannon Metropolitan Area and improve transport connectivity to the wider Region. This will include the delivery of the LNDR.

The MASP supports a sequential approach to development with a primary focus on the consolidation of sites within or contiguous to the existing built up and zoned area of Limerick City and Suburbs, supported by Shannon.

Limerick-Shannon MASP Policy Objective 11 Economic Resilience and Clusters It is an objective to develop, deepen and enhance the economic resilience of the Limerick-Shannon Metropolitan Area through creating a vibrant and diversified enterprise base, with strong, healthy, connected Clusters drawing on Eolas Comhroinnta Obair le cheile / Shared Knowledge Working Together (ECOLC / SKWT) to assist in bringing disruptive technologies and innovations to national and global markets.

The Limerick-Shannon MASP in Section 8.4 (Employment Distribution) identifies strategic employment locations within the Metropolitan Area. However, achieving NPF growth targets will require consideration of new locations and initiatives by each local authority. Additional locations may become available and this MASP recognises the need for flexibility to accommodate future growth opportunities that may emerge during the lifetime of the MASP. In particular, it is recognised that a new Northside Business Campus could be identified and developed. Future growth proposals should be consistent

and integrate with the Limerick-Shannon MASPs aim of revitalising and reinvigorating Limerick City for higher-density living and high-density, high-value jobs.

Future growth in employment will place additional resource demands on the local economy. As an open market economy at the innovation edge, where new technologies and business models continuously evolve at a rapid pace, it is difficult to specify jobs targets for every type of economic activity and location in the Limerick-Shannon MASP.

Limerick-Shannon MASP Policy Objective 12 seeks to encourage a Smart Metropolitan Area and seeks to capitalise on the Strengths in Attracting Foreign Direct Investment.

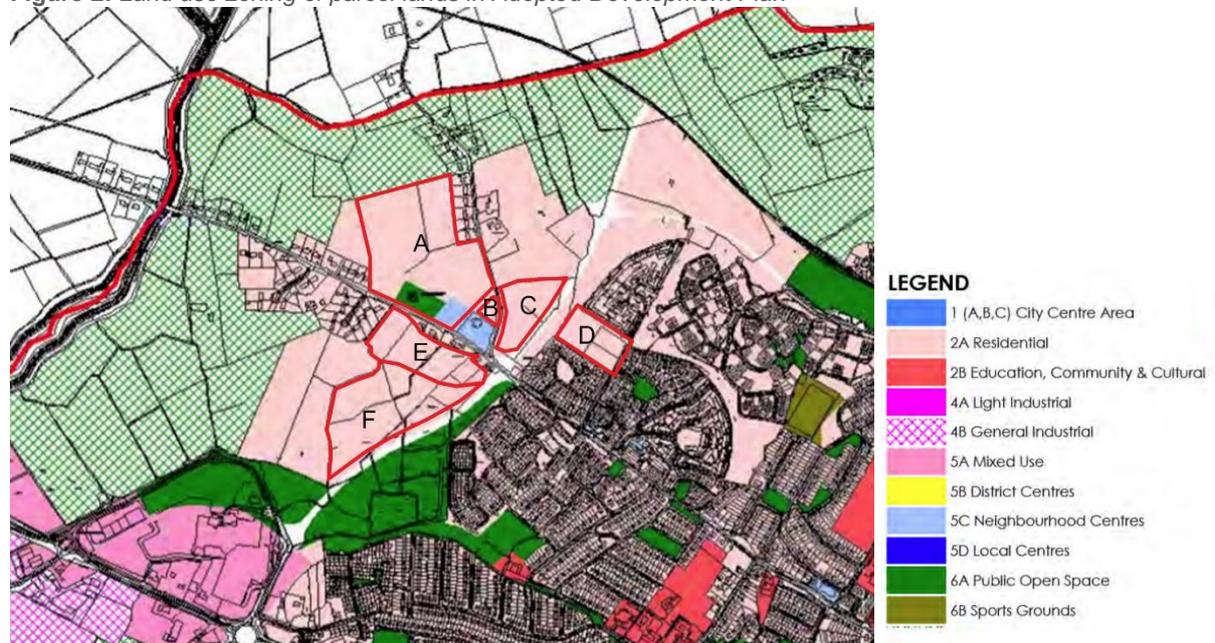
Limerick-Shannon MASP Policy Objective 13 (Strategic Employment Locations) indicates that it is an objective to support the sustainable development of identified and future Strategic Employment Locations and to ensure the delivery of associated infrastructural requirements subject to the outcome of environmental assessments and the planning process.

5.4 Limerick City Development Plan 2011-2017

As indicated above, the lifetime of the adopted City Plan was extended following local government reform and the amalgamation of Limerick City and Limerick County Council, and that Plan remains the statutory development plan for the 6 no. sites, until such time as the emerging City and County Development plan is adopted.

Figure 2 below shows the existing statutory zoning for the 6 sites. All five parcels are clearly shown as exclusively residential with Parcel A being a combination of Residential, Neighbourhood Centre and Open Space zonings.

Figure 2: Land use zoning of parcel lands in Adopted Development Plan



The zoning objectives illustrated above are set out below.

- Objective ZO.2 (A) – Residential
“To provide for residential and associated uses”.
- Objective ZO.5 (C) – Neighbourhood Centres

“To protect, provide for and/or improve the retail function of neighbourhood centres and provide a focus for local services.

The primary purposes of these centres is to fulfil a local shopping function, providing a mix of convenience shopping, lower order comparison shopping, and local services to residential and employment areas.”

- Objective ZO.6 (A) – Public Open Space
“To retain all land dedicated for public open space.”

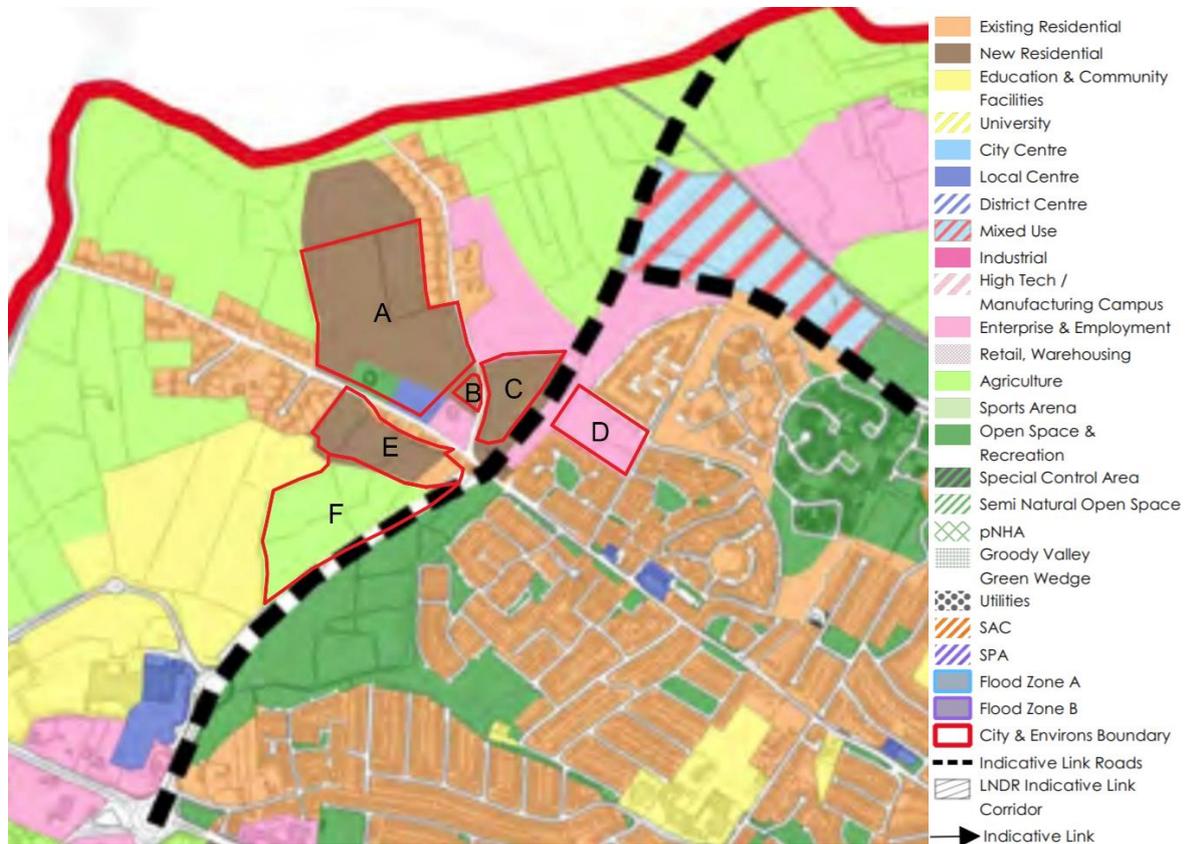
6.0 Limerick Draft City and County Development Plan 2022-2028

The Draft City and County Development Plan is on public display from the 26th June to the 6th September 2021.

Zoning Objectives

Four of the 6 sites (namely A, B, C and E) retain their residential use from the adopted extended City Development Plan. Site D has been rezoned from ‘Residential’ to ‘Enterprise and Employment’. Site F has been taken from the residential zoning and now placed under ‘Agriculture’.

Figure 3: Land use zoning of parcel lands in Draft Development Plan



Emerging Zoning Objectives and Permissible Uses

The following are the emerging zoning objectives covering our client's 6 sites.

New Residential

Objective: *"To provide for new residential development in tandem with the provision of social and physical infrastructure".*

Permissible Uses: *Allotments, Bed & Breakfast/ Guesthouse, Bring Banks / Bring Centres, Childcare Facilities, Car Park, Community/ Cultural/Tourism Facility, Education/ Training Facility, Health Centre, Health Practitioner, Nursing Home/ Residential Care or Institution/ Retirement Village, Residential, Sports Facility*

Open for Consideration: *Funeral Home, Halting Site, Park & Ride Facilities, Place of Worship, Renewable Energy Installation*

Enterprise and Employment

Objective: *"To provide for and improve general enterprise, employment, business and commercial activities".*

Permissible Uses: *Advertising and Advertising Structures, Agricultural Supplies/ Machinery Sales, Boarding Kennels, Builders Providers/Yard, Car Park, Civic Recycling/ Waste Facility, Education/ Training Facility, Enterprise Centre, Food and Drink Processing/ Manufacturing, Fuel Depot/ Storage, Funeral Home, Garden Centre, Industry – Light, Logistics, Offices, Plant Storage/ Hire, Professional Services*, Renewable Energy Installation, Telecommunications Structures, Vehicle Sales Outlet, Vehicle Sales Outlet, Warehousing, Waste Disposal and Recover Facility, Wholesale - Cash and Carry*

Open for Consideration: *Bring Banks / Bring Centres, Childcare Facilities, Conference Centre, General Public Administration, Health Centre, Health Practitioner, High Technology Manufacturing, Hospital, Hotel, Leisure/ Recreation Facility, Park and Ride Facilities, Petrol Station, Place of Worship, Research and Dev./Science and Technology, Retail – Warehouse, Scrap Yard, Sports Facility, Veterinary Clinic*

Local / Neighbourhood Centre

Objective: *"To protect and provide local centre facilities to serve the needs of new/ existing neighbourhoods and residential areas".*

Permissible Uses: *Advertising and Advertising Structures, Bank / Credit Union, Bed & Breakfast/ Guesthouse Bring Banks / Bring Centres, Childcare Facilities, Car Park, Betting Office, Community/ Cultural/Tourism Facility, Education/ Training Facility, Fast Food Outlet/TakeAway, Funeral Home, Garden Centre, Hair and Beauty Salons, Health Centre, Health Practitioner, Nursing Home/ Residential Care or Institution/ Retirement Village, Offices, Park and Ride Facilities, Petrol Station, Place of Worship, Professional Services*, Public House, Research and Dev./Science and Technology, Residential, Restaurant/Café, Retail - <150sqm nfa, Telecommunications Structures, Veterinary Clinic*

Open for Consideration: *Conference Centre, General Public Administration, Health Centre, Health Practitioner, High Technology Manufacturing, Hospital, Hotel, Leisure/ Recreation Facility, Renewable Energy Installation, Retail Convenience <1,800 sqm nfa, Sports Facility.*

Agriculture

Objective: *"To protect and improve rural amenity and provide for the development of agricultural uses".*

Permissible Uses: *Agricultural Buildings, Bed & Breakfast/ Guesthouse, Boarding Kennels, Burial Grounds, Food and Drink Processing/ Manufacturing, Research and Dev./Science and Technology, Residential, Telecommunications Structures, Veterinary Clinic*

Open for Consideration: *Abattoir, Aerodrome/ Airfield, Allotments, Extractive Industry/Quarry, Garden Centre, Renewable Energy Installation.*

The Core Strategy

The central focus of the Core Strategy is to ensure there is an acceptable equilibrium between the supply of zoned and serviced land for the projected demand for new housing, jobs, social and economic infrastructure.

The projected populations for Limerick are set out in the NPF Implementation Road Map and the Southern Region RSES. The NPF Implementation Roadmap populations are set out in Table 2 below.

Table 2: NPF Implementation Roadmap Populations for Limerick

Year	2016	2026	2031
Population Projections	195,000	229,0000-235,500	246,000-256,500

The Core Strategy identifies that, assuming even population population growth, the above population projection of circa 49,200 for the Draft Plan period (section 2.3.1) of which approximately 33,000 is allocated to Limerick City and Mungret and Annacotty (Table 2.2). These figures reflect the fact that Limerick City Metropolitan Area including Mungert and Annacotty is designated for significant growth under the NPF and RSES.

Determining the quantum of zoned land required to accommodate proposed growth is dealt with in Section 2.3.5 and states *‘a number of factors were considered in determining the quantity of zoned land required for each settlement on the hierarchy. This included the number of proposed housing units, density, tiered approach to zoning, potential of mixed use zoned land to accommodate housing units and national and regional objectives to significantly grow Limerick City and Environs.’*

A tiered approach to zoning is adopted and is set out in Section 2.3.5.3 (Tiered Approach to Zoning) and states *‘In accordance with the methodology set out in Appendix 3 of the NPF, a tiered approach to zoning was applied through the carrying out of an infrastructural assessment for each of the zoned settlements within the Draft Plan.’*

The core strategy statement states in Section 2.4 that *‘The approach in developing the Core Strategy is focused on developing and strengthening the role of Limerick City as an international city of scale. It is further stated that guidance throughout the Draft Plan on housing densities, building height and development layouts, are all aimed at ensuring the economic use of land for development, compact, quality neighbourhoods and integration with infrastructure and non-residential land uses that nurtures sustainable travel patterns and choices.’*

It is further stated that *‘The Draft Plan aims to facilitate the sustainable growth of Limerick City and Environs in line with the NPF and RSES, which supports ambitious growth targets to enable Limerick City and Environs to grow by at least 50% by 2040 and to achieve its potential to become a City of scale. This area forms part of the Limerick Shannon Metropolitan Area in the RSES, coming within the scope of the Limerick Shannon Metropolitan Area Strategic Plan (MASP) and as such is a priority growth area within the strategy’s policy framework. The MASP recognises that for the Metropolitan Area to prosper and develop in a sustainable manner, Limerick City must be the primary driver of economic and population growth in the Southern Region, so that it can compete effectively for investment and jobs.’*

Regarding employment it is stated within the employment element of the Core Strategy (Section 2.6.1) that *‘To complement the preparation of the Core Strategy, the Guidance Note on Core Strategies (2010) states that Planning Authorities should undertake an appropriate level of analysis to ensure that sufficient lands are identified for employment purposes at suitable locations, taking proper account of national planning policies. While the Guidance document does not provide a methodology for determining the appropriate quantum of employment zoned lands, the Draft Plan sets out objectives and zoning of land for employment uses that has regard to national policy, the Draft Limerick Shannon Metropolitan Area Transport Strategy (LSMATS) and the availability of infrastructure.’* It is also stated within 2.6.1 that *‘The employment strategy aims to develop Limerick’s enormous competitive advantages, including its central location on the Atlantic Economic Corridor, its national and international trade and tourism connectivity through Shannon Airport and Shannon Foynes Port Company and its third level complement, via the University of Limerick, Limerick Institute of Technology*

and Mary Immaculate College, that ensures constant supply of graduates. The NPF and NDP's support for the implementation of the Limerick 2030 Plan will also help realise the potential to generate and be the focus of significant employment growth. It is ideally positioned from a scale and capacity perspective, to accommodate significant population and economic growth as proposed in the NPF.'

Volume 2: The Tiered Approach to Zoning

This document defines 2 tiers of zoned lands in accordance with Appendix 3 of the NPF. Those definitions are:

'Tier 1: Serviced Zoned Land - Lands that are able to connect to existing development services, i.e. road and footpath access including public lighting, foul sewer drainage, surface water drainage and water supply, for which there is service capacity available, and can therefore accommodate new development; and

Tier 2: Serviceable Zoned Land - Lands that are not currently sufficiently serviced to support new development but have the potential to become fully serviced within the life of the plan.'

Section 1.0 (Introduction) identifies that the tiered assessment focuses on the availability of infrastructure identified under the Tier 1 and Tier 2 definitions of the NPF, i.e. road and water services infrastructure, to determine whether lands zoned for residential development are adequately serviced (Tier 1) or serviceable (Tier 2) during the lifetime of the Development Plan. Sites requiring minor infrastructure works (extension of a footpath for example) have been identified as Tier 2 (Serviceable) in accordance with the NPF. Tier 2 designations highlight potential issues or constraints in infrastructure, which are required to be addressed prior to the development of lands. The assessment includes proximity details to public transport, schools and local centres for information purposes only and which does not affect the tiered ranking of the lands.

It is recognised that the delivery of infrastructure, including by Irish Water, the local authority and other state bodies can be often be a lengthy process. It is recognised that the delivery of infrastructure can therefore often extend beyond the lifetime of a Development Plan (6 years).

Some precautionary comments are included about the infrastructural requirements. The assessments provided do not provide an exhaustive list. Requirements for additional works may be identified during the process of preparing and assessing planning applications. The infrastructure tables should therefore not be relied upon for development management purposes. It should also be noted that the site areas do not relate to individual land folios and provide an estimate for calculation purposes only.

The Local Authority's Assessment of the Availability of Infrastructure

Some brief comments are contained in Volume 2 regarding the status of necessary infrastructure as follows:

Water Services Infrastructure

The key points are:

- At present, there is capacity in the public water supply and wastewater treatment plants to cater for additional demand created during the lifetime of this Development Plan.
- The Clareville Water Treatment Plant provides water supply to the City and Environs, which draws water from the River Shannon. The Treatment Plant is operating below its design capacity of 87 million gallons per day.
- The Limerick Main Drainage Scheme also has the capacity to cater for future population growth.
- Adequate storm water drainage and retention facilities are necessary to accommodate surface water runoff from existing and proposed developments. The use of natural drainage systems

at surface level through utilisation of existing drains, natural slopes and existing ponds and natural wetland areas should be considered in the first instance.

Transport Infrastructure

As set out under the Metropolitan Area Strategic Plan (MASP), the transport investment requirements in the Limerick Shannon Metropolitan Area will be identified and prioritised through the Limerick Shannon Metropolitan Area Strategic Transport Strategy (L-SMATS). The strategy contains a number of transport projects of strategic importance, which will improve public transport provision across the City and Environs, and support objectives for compact growth focussing on the integration of land use and transport. The Limerick Northern Distributor Road is identified as having the potential to unlock the potential of substantial tracks of land for development, while alleviating congestion and contributing to the ease of movements of goods and vehicles through the city.

Other Infrastructure

The City and Environs are served by a high-capacity electricity system, gas network and fibre broadband.

The Tiered Zoning Tables

The Tiered Approach to Zoning Tables identify sites in the first instance for residential and mixed use development including residential and in the second instance identify employments sites.

Residential/Mixed Use Sites

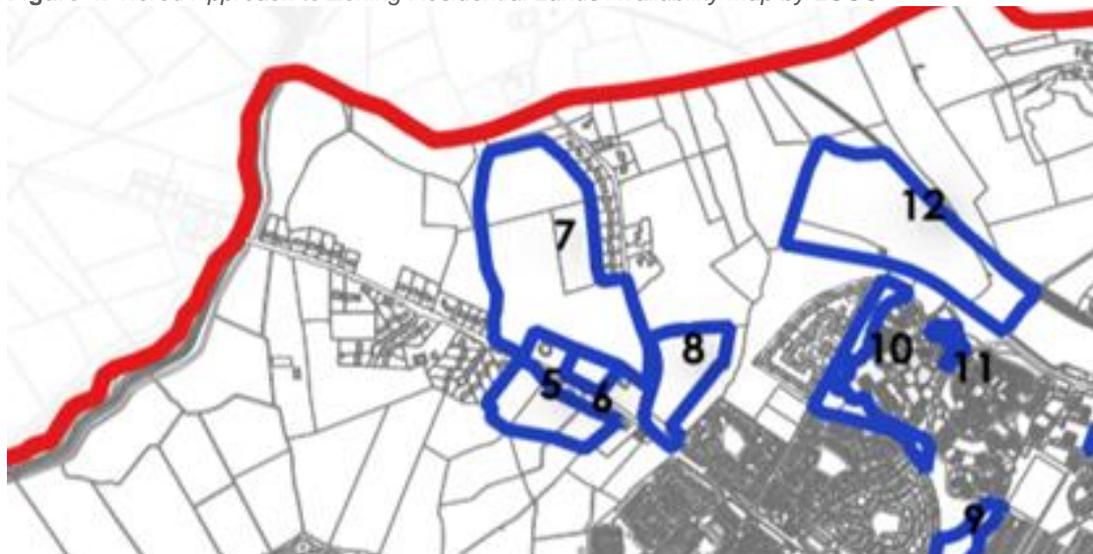
The following is the equivalency between the Council’s identification of sites contained in the Tiered Zoning Matrix and our client’s portfolio.

Table 3: Allocation of Tiered Zoned Sites Against Client Portfolio

Client Site No.	LCC Tiered Zoning Site No
Site A	6 & 7
Site B	7
Site C	8
Site D	See Figure 5 below
Site E	5
Site F	Unidentified/Unzoned

The location and extent of the Council’s identified sites are shown in Figure 4.

Figure 4: Tiered Approach to Zoning Residential Lands Availability Map by LCCC



An extract of the Tiered Zoned Sites Matrix is presented below where it is clear that A, B, C and E are identified within Tier 2 and within the definition of same presented above.

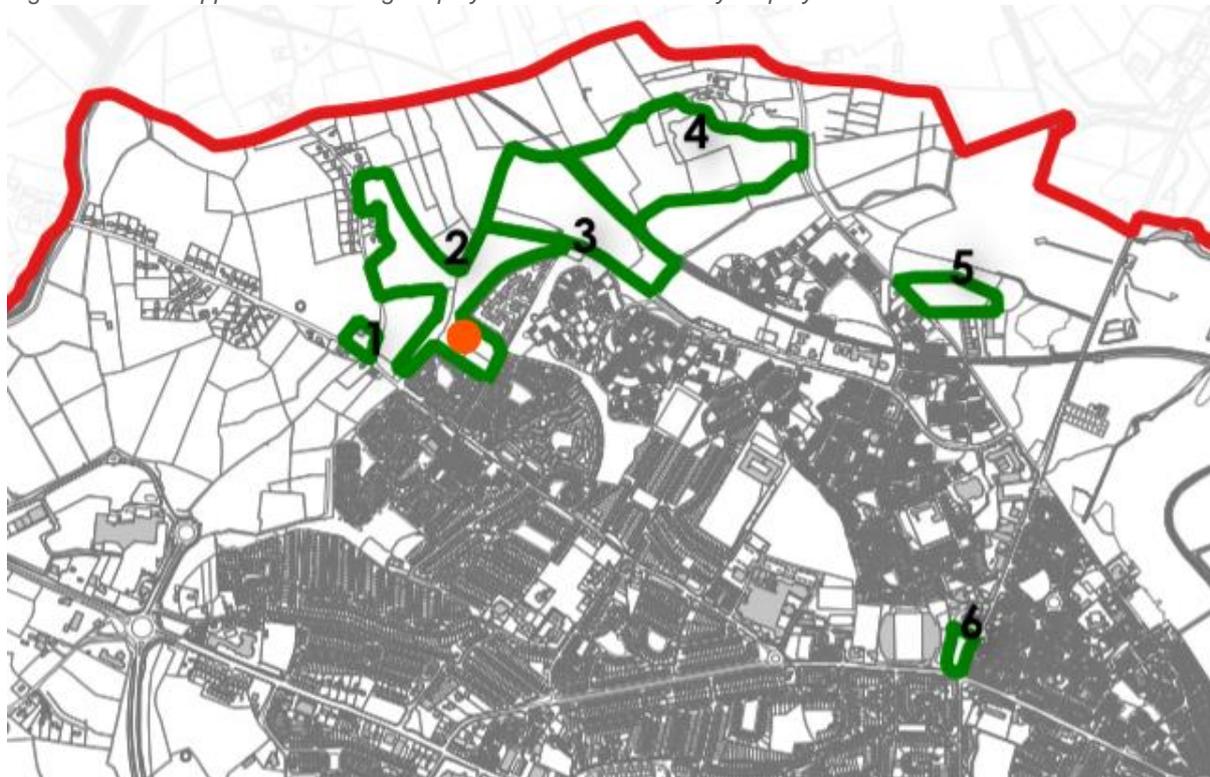
Figure 5: LCCC assessment of infrastructure and tiering of residential zoned sites

Site No.	Zoning	Area (ha.)	Density	Lighting	Footpaths	Public Transport	Road Access	Water	Foul	Surface Water	Flood Risk	Infill/Brown-field	Proximity to Schools	Time Line/ Cost	Comments if applicable	Tier
5	New Residential	2.72	35+	✓	✓	●	✓	!	!	!	✗	✗	●	M €150m	-Services will be provided with LNR/ Extension of services provided with development via existing	2
6	Local Centre ³	0.651	35+	✓	✓	●	✓	!	!	!	✗	✗	●	M €150m	-Services will be provided with LNR/ Extension of services provided with development via existing	2
7	New Residential	11.8	35+	✓	✓	●	✓	!	!	!	✗	✗	●	M €150m	-Services will be provided with LNR/ Extension of services provided with development via existing	2
8	New Residential	2.772	35+	✓	✓	●	✓	!	!	!	✗	✗	●	M €150m	-Services will be provided with LNR/ Extension of services provided with development via existing	2

Following the above it should be noted that our client’s Site F is not zoned for development and therefore is not included in the above and secondly that Site D is now zoned in the emerging plan as ‘Enterprise and Employment.’

The inclusion of our client’s Site D is shown with reference to a red dot below in Figure 6 which is an excerpt of the Council’s Employment Lands Availability Map. Site D is included within the relatively large Council Employment Site 2.

Figure 6: Tiered Approach to Zoning Employment Lands Availability Map by LCCC



The Council’s inclusion of our client’s Site D within LCCC Employment Site 2 is set out in more detail with regard to availability of infrastructure is shown below in Figure 7 which is an excerpt of the LCCC assessment matrix of infrastructure.

Figure 7: Excerpt from the LCCC assessment matrix of infrastructure and tiering of employment zoned sites

Site No.	Zoning	Area (ha.)	Density	Lighting	Footpaths	Public Transport	Road Access	Water	Foul	Surface Water	Flood Risk	Infill/Brown-field	Proximity to Schools	Time Line/ Cost	Comments if applicable	Tier
1	Enterprise & Employment	0.603	N/A	!	✓	●	✓	!	!	✓	✗	✗	●	M €150m	-Regeneration Area -MASP supported Northside Business Campus -Water main requires upgrading -Services to be provided with LNDR	2
2	Enterprise & Employment	10.8	N/A	!	!	●	!	!	!	!	✗	✗	●	M €150m	-Regeneration Area -MASP supported Northside Business Campus -Water main requires upgrading -Services to be provided with LNDR	2

Settlement and Housing Strategy

Chapter 3 (Settlement and Housing Strategy) of the emerging Plan is directly relevant to our client’s submission and states in Section 3.1 that:

‘Place-making, compact growth, active land management, as well as addressing the impact of climate change, are some of the key themes to be considered in terms of the growth strategy for Limerick. There is also the key objective, which is to create attractive and liveable environments, where more people will choose to live. In order to deliver compact growth, whilst ensuring a high quality of life for residents in Limerick, it is imperative that the Council protects and enhances residential amenities, through enabling the creation of vibrant, sustainable neighbourhoods.’

Within Section 3.1 the concept of ‘the 10 minute city’ is adopted where a compact city can provide a range of jobs, services and housing choice with a greater range of sustainable modes of transport.

Compact growth is encouraged through Objective SS O1

Objective SS O1 (Compact Growth) It is an objective of the Council to strengthen the core of settlements and encourage compact growth, through the development of infill sites, brownfield lands, under-utilised land/buildings, vacant sites and derelict sites, within the existing built-up footprint of the settlements and develop outwards from the centre in a sequential manner.

Section 3.7 (Housing Strategy and Housing Need Demand Assessment) identifies that *‘In tandem with a need to increase housing supply, is the need to facilitate improved housing choice to cater for evolving demographics across Limerick, as analysed in the HNDA. By providing good housing choice, existing residents can remain within their local communities and new residents to Limerick will have better housing options to choose from.’*

Crucially in the context of suitability of Site D for employment and enterprise Section 3.7.5 (Protecting Existing Residential Amenity) and Objective HO O3 (Protection of Existing Residential Amenity) apply.

Section 3.7.5 states:

‘Residential amenity is influenced by a range of factors, such as private outdoor amenity space, privacy and natural light. The relationship of buildings to each other and their individual design can have a significant impact on these factors and on residents’ comfort. In older residential areas, infill development will be encouraged, while still protecting the existing residential amenity of these areas.’

Objective HO O3 states:

‘Objective HO O3 Protection of Existing Residential Amenity It is an objective of the Council to ensure a balance between the protection of existing residential amenities, the established character of the area and the need to provide for sustainable residential development is achieved in all new developments.’

Employment Strategy

Section 4.3.2 (Identification of Sufficient Zoned Lands) states that:

'The Draft Plan seeks to protect and promote the strategic employment locations identified in the RSES. Chapter 10: Compact Growth and Revitalisation identifies opportunity sites for future development. In line with the Core Strategy, the Draft Plan considers how best to ensure that there are sufficient zoned lands available in appropriate locations, to support the range of future employment needs for Limerick.'

Policy ECON P3 (Urban Economy) states that:

'It is a policy of the Council to: a) Promote, facilitate and enable economic development and employment generating activities in Limerick City Centre, at Strategic Employment Locations and other appropriately zoned locations in a sustainable manner. b) Facilitate the future sustainable economic development of Limerick City and Environs to optimise the benefits of its strategic location in the Limerick Shannon Metropolitan Area, in accordance with the National Planning Framework and the Regional Spatial and Economic Strategy.'

Section 4.7.2 (Strategic Employment Locations Limerick City and Environs) states that *'In accordance with the Regional Spatial and Economic Strategy, the Limerick Shannon Metropolitan Area has capacity for economic growth of a significant scale at Strategic Employment Locations as briefly outlined in this section. The Local Authority is committed to the delivery of a vibrant and compact community where people live close to where they work in Limerick City Centre, which must be prioritised for investment. The strategic employment areas identified, support the objectives for compact growth of the settlement of Limerick City and Environs. These employment areas have potential for expansion and intensification and are linked to a critical mass of skilled workers, served by key infrastructure (water, wastewater, electricity, broadband etc.), with the potential for public and sustainable forms of transport to the City Centre. With an increase of critical mass in the City and Environs, it is envisaged that population and jobs growth will occur in a sustainable manner focusing on clusters and smart specialisation.'*

On page 77 it is stated that *'The Local Authority envisages that the delivery of the Northside Business Campus will be developed on the basis of strong links between and synergies with higher education institutes and various employment agencies. This Business Campus has significant potential for the creation of employment opportunities for the residents of the Regeneration Areas of Moyross, King's Island and the wider community and has the potential to make a significant contribution to the economic development of the north side of Limerick City.'*

Objective ECON O13 Strategic Employment Locations City and Environs states in part (d) that the Council will seek to *'Ensure the provision of a minimum 20m landscaped buffer zone between proposed development and adjoining development/lands in . . . Northside Business Park. . . .'*

7.0 Our Client's Case

7.1 Emerging Zonings Supported

Our client supports the emerging residential zoning of Sites A, B, C and E which is consistent with the proper planning and sustainable development of the area and also accords with national and regional planning policy and guidance.

Our client also supports the Tier 2 allocation against these sites and the Council's summary of the status of key infrastructure in the area needed to facilitate development.

7.2 Emerging Zonings Challenged

Our client requests the proposed rezoning of their Site D from Employment and Enterprise to Residential. They also request the proposed rezoning of Site F to be maintained as Residential or alternatively to Employment and Enterprise. Enterprise and Employment land use zoning objective is less vulnerable to flooding than the Residential land use and thus in accordance with the approach advocated in the Flood Risk Management Guidelines, 2009.

Our Client's Site D

Our case on why this site should be rezoned from employment and enterprise to residential is as follows:

- Planning history;
- This is an entirely unsuited location for employment and enterprise;
- There is a severe access constraint for employment and enterprise activities;
- Significant adverse impact on existing residential amenity from employment and enterprise activities;
- The loss of employment zoning in this location does not compromise the remainder of Employment Site 2 being developed and the employment objectives for the metropolitan area being achieved;
- Regeneration can be better achieved through residential development with supporting activities;
- Residential development can be served by the proposed local centre a short distance away.
- The current rezoning to employment and enterprise is contrary to emerging Section 3.7.5 (Protecting Existing Residential Amenity) and Objective HO O3 (Protection of Existing Residential Amenity).

The City and County Council has rezoned a rectangular area of land in our client's ownership and identified as Site D as employment and enterprise. That employment and enterprise zoning is part of a relatively large Employment Site 2 that covers large areas on both sides of the currently under construction LNDR. That employment zoning affecting Site D runs from our client's rectangular piece of land to the west of Thomond Village, through a relatively small gap between that estate the new distributor road, and proceeds northwards towards the proposed Moyross Link Road which at some point in the future will be linked to the LNDR.

Planning History

There are two elements to the planning history that weigh in favour of reinstating the residential zoning for this site. Firstly, there is a history of the zoning of this site as residential and the adopted City Plan zoned this site as residential. Secondly, there is a history of planning permission being granted on Site

D for residential development and the reasons for that permitted development not proceeding are set out in this submission.

We understand well that previous zoning of lands for a particular land use gives no guarantee of future zoning for same. It is our position, however, that the reasons for zoning the site as residential in the first place is a sound reason for reinstating the residential zoning on this occasion. We are not aware of any constraints that would prevent residential being developed on this site.

The provision of improved strategic roads access and the development of the zoned local centre a relatively short distance away would make this an attractive location for new residential development as evidenced through numerous other sites in this locality being zoned residential including our client's sites A, B, C and E.

Secondly, there is a planning history on this site for residential development where planning permission was granted under your reg. ref. 07/2196 for 45 no. dwellings. It should be noted that permission was granted before the economic crash in this country than lasted from approximately 2008 to 2012. The in-principle acceptability of residential development on this site has already been established on this site therefore and the residential zoning should be reinstated.

This is an entirely unsuited location for employment and enterprise

The employment and enterprise zoning contains a number of use and activities within its permitted uses that would be entirely unsuited to an established residential location such as this. This is a substantial list that indicates that the employment and enterprise zoning would be unworkable and entirely unsuitable.

Unsuited and inappropriate employment uses and activities normally permitted under the emerging zoning for this site include *Agricultural Supplies/ Machinery Sales* where large vehicles would be entering and exiting the site; *Boarding Kennels* where there is likely to be significant noise generated; *Builders Providers/Yard* where noise is likely to be generated and large delivery and construction vehicles are likely to enter and leave the site on a regular basis; *Civic Recycling/ Waste Facility* which is likely to generate loud noises, fumes and smells; *Enterprise Centre* which is likely to generate large numbers of vehicles during the day and at night; *Food and Drink Processing/ Manufacturing* which is also likely to generate large volumes of large vehicles potentially beyond normal business hours ie. late at night and early morning dispatch and delivery; *Fuel Depot/ Storage* which is also likely to require large tankers using a residential standard road. This is also likely to raise very substantial concern and unease amongst existing residents of the surrounding residential estate; *Garden Centre* where large volumes of traffic would be generated at weekends, on public holidays and generally at times of rest and there would likely be large delivery vehicles accessing the site outside normal business or customer hours; *Logistics* where a large number of vehicles are likely to access the site on a 24 hour basis; *Plant Storage/ Hire where large vehicles would be attracted to the site*; *Telecommunications Structures* which are likely to raise visual amenity and health concerns from existing residents; *Vehicle Sales Outlets* are likely to obviously generate a large number of vehicular movements; *Warehousing* which is likely to require large visually obtrusive structures; *Waste Disposal and Recover Facility* which is likely to generate early morning vehicular movements and potentially odour issues. In summary, there is a very large range of normally permissible uses which would be significantly negatively impactful upon existing residential amenity so as to render the employment and enterprise zoning inoperative in this location. There are a number of open for consideration uses, such as a scrap yard, that are also potentially problematic in terms of impact on residential amenity.

When a 2m landscape buffer to employment development is provided as per Objective ECON O13 part (d) the available land to the east of, and between the LNDR, and the existing housing estates, is likely to be insufficient to be able to accommodate any reasonable or worthwhile amount of employment development of the footprint required by industry.

This rectangular area of land located within a housing estate is surely not an attractive location for the type of businesses and activities that is part of a larger employment centre at the Northern Business Park, with the potential and synergies that it has, and there is no valid reason why employment activities should be 'shoe horned' into this location with the significant impact it will cause to residents. It is bad planning. It is bad placemaking. It is also inhibiting the potential of Employment Areas 2 and 3 as indicated below undermining the strategic importance of Employment Area 2. Any employment development east of the LNDR and south of the Moyross Link Road is highly unlikely in our view.

This site represents an infill residential opportunity as perfectly envisaged in the NPF and RSES for the southern region. It is surrounded on three sides by existing residential development and represents an opportunity for infill residential development as envisaged in the adopted City Plan also. Infill opportunities such as in this case are never considered appropriate for employment and enterprise and as indicated above Page 64 of the NPF under 'Planning for Urban Employment Growth' recognises that potential relocation of enterprises should be considered for alternative locations where such a move, if facilitated, would release urban land for more efficient purposes that would be of benefit to the regeneration and development of the urban area as a whole, particularly in metropolitan areas and large towns. Where national planning policy is trying to take inappropriate employment uses out of unsuitable locations such as in residential estates the Council should not be trying to reverse this process in this instance especially with the potential issues raised above by employment activities under the Council's proposed zoning.

Residential development on this site would represent an infill opportunity advocated in Section 3.7.5 of the emerging plan and also emerging Objective HO O3. It would be highly irregular for a zoning to be so blatantly contrary to such guidance and policies/objectives in the same plan.

In summary on this issue this site and location are wholly unsuited to the vast majority of normally permissible enterprise and employment activities giving rise to a substantial range of issue to its neighbours.

There is a severe or prohibitive access constraint for employment and enterprise activities

Roads and access issues rise prominently in our assessment above on the incompatibility of employment use with the surround neighbourhood in this location.

Should this site be retained for employment purposes there will be no access capable of being provided directly off the LNDR when it is completed. This is clear below in Figure 8 where the approved drawings to design stage show no access directly off the northern distributor road. From Figure 8 below it is not at all clear how access could be provided to this rectangular site other than through the existing estate, and even then, the possibility of vehicular connection to the other employment zoned area to the east of the distributor road and further north looks slim to non-existent. There would appear to be no alternative but to access Site D other than through the existing housing estate. That is highly undesirable and given the nature and type of vehicles likely to be used would likely be wholly abhorrent to existing residents.

The closest bus stop to Site D is Ashwood Avenue (606891) on Old Cratloe Road. The bus stop is about 500m by walk from Site D. The bus stop is serviced by Route 302 – Caherdavin to City Centre that runs every 22 minutes on weekdays and Saturday and every 30mins on Sunday. This gives easy access to Limerick City Centre. This further accentuates the attractiveness of this site for residential.

Figure 8: Scheme Design for the Coonagh to Knockalisheen Link Road (Works to be delivered under Phase 1 of the LNDR) showing Site D for reference



From Figure 8 above it is clear therefore that there is no alternative but to bring traffic to Site D through the existing estate, as there no possibility of direct access to the site from the LNDR nor is there any possibility of providing access to this site from the Moyross Link Road.

Significant adverse impact on existing residential amenity from employment and enterprise activities

Figure 9 below shows the existing estate road through which employment and enterprise vehicular traffic, frequently large and articulated HGVs would likely have to travel to this site as there is no alternative access capable of being provided. These vehicles would present a significant traffic and road safety hazard, especially for children. The vehicles themselves are also likely to generate noise potentially often outside normal business hours especially those relating to logistics and other late night or early morning activities. Other activities such as refuse and waste collection and recycling on a commercial scale are likely to occur at weekends and very early morning periods.

Figure 9: Inadequacy of Existing Access Road through Galtee Avenue



Figure 9 above shows cars parked on the road providing further impediments to employment generated traffic and it is difficult to contemplate HGVs, as an example, example passing safely between two rows of cars parked on either side of Galtee Avenue. In this author's view (shown in Figure 9 above) this is not the type of entry or appearance that FDI for example would want to experience for their business especially if there is further less restrictive space located to the north.

Please note therefore that in this instance the proximity of the LNDR will have absolutely no benefit to employment lands east of the LNDR and south of the Moyross Link Road in terms of access even if employment and enterprise activities could be accommodated there, which we believe is not the case, given their likely spatial requirements.

As indicated above, there are likely to be significant issues relating to noise and odours from a great many of the activities and land uses normally permitted within the emerging employment and enterprise zoning.

The loss of employment zoning in this location does not compromise the remainder of Employment Site 2 being developed and the employment objectives for the metropolitan area being achieved

It appears to us that the zoning of lands for employment and enterprise to the east of the 'under construction' LNDR has failed to take account of the extent or width of this new road and the fact is that that there will be wholly insufficient width to land east of the distributor road to provide any meaningful or reasonable quantum of employment activities in this location between the existing Thomond Village estate and the eastern edge of the LNDR especially for what are likely to be large footprinted, stand alone buildings with significant storage areas, parking areas, turning areas etc. Further examination of Figure 8 would indicate that there is going to be a roundabout bypass lane off the LNDR onto the Moyross Link Road that will obviate the need to use the roundabout. That by pass lane shown clearly in Figure 9 just south of the roundabout effectively sterilises that triangular parcel of land north west of Thomond Village zoned employment. In essence there can be no employment based development to the west or north of Thomond Village. The whole principle of having any employment or enterprise lands zoned to the east of the LNDR must be seriously questioned in these circumstances. It is likely that a landscape or screening belt, advocated in the emerging plan, will also be required further reducing the net developable area and ultimately the prospects for employment use in this location east of the distributor road.

The removal of this employment zoning east of the LNDR will not however compromise the development of the remainder of what is a large Employment Site 2. Nor will it compromise the delivery of the MASP supported Northside Business Campus as more than enough lands remain to achieve that objective. As indicated above, the desired image to be portrayed to international businesses and FDI is not that through a housing estate as shown in Figure 9 above. There is sufficient land zoned to the north and to the other side of the LNDR where greater use can be made of that infrastructure asset consistent with aligning planning to infrastructural investment as set out above in national, regional and local planning policy and guidance.

Regeneration can be better achieved through residential development with supporting activities

It is considered that regeneration can be better achieved through reinstatement of the residential zoning which would facilitate the following normally permissible uses: *childcare facility, community centre, education/ training facility, health centre, health practitioner, nursing home, residential care facility, residential, or sports facility*. This is a full range of activities that could bring regenerative benefits to this immediate area along with residential development without the negative impacts identified for employment and enterprise activities above.

Residential development can be served by the proposed local centre a short distance away

Site D is eminently suitable for residential development or a range of supporting activities identified in the preceding paragraph. This infill opportunity would complement the other housing opportunities in

the area and would be served by the local centre zoned a short distance away. Shops, services and ultimately employment will be provided within a 10 minutes catchment of the sustainable city.

It is clearly the case that the removal of this site from employment and enterprise would have to be replaced with an alternative zoning of which residential is the most suitable and sustainable. The alternative is to have this rectangular piece of land unzoned and that would clearly not be consistent with the principles of **compact growth** advocated in the NPF, the RSES and Shannon Limerick MASP.

As a clear infill opportunity, surrounded on three sides by residential development, and shortly to be enclosed on its fourth unenclosed side by the distributor road this is a clear **residential infill opportunity** that must be availed of consistent with the **sequential approach** to zoning advocated in national and regional planning policy and guidance.

The Council's rezoning of this site to employment and enterprise is clearly contrary to emerging Section 3.7.5 (Protecting Existing Residential Amenity) and Objective HO O3 (Protection of Existing Residential Amenity) which both seek to ensure that the amenity of existing residents should be protected.

Section 3.7.5 states that *'in older residential areas, infill development will be encouraged, while still protecting the existing residential amenity of these areas'*. We believe that infill residential development should be encouraged in this instance in accordance with Section 3.7.5 therefore and that employment and enterprise zoned development and most of its normally permitted uses would be very clearly contrary to this section of the emerging plan. We believe that the retention of the employment zoning would be contrary to Objective HO3 O3 which although referencing new residential development should be amended to better protect residential amenity from a range of land uses.

Our Client's Site F

As stated above, In the current Limerick City Development Plan, our client's sites E and F and lands to the west and north hold land use zoning objective *'2A Residential'* and conceived of the LNDR that had recently been approved. Under An Bord Pleanála ref. 30 HA 0030 the *Coonagh to Knockalisheen Link Road* (LNDR, phase 1) scheme proposed by Limerick City Council was approved. In tandem under ref. 30 KA 0017 the CPO was approved. The Distributor road scheme and CPO applications were made in September 2010 and approved in September 2011, though construction was delayed until 2018 and then again on foot of National Development Plan (NDP) review as part of the Programme for Government.

Ahead of the announcement of the revised National Development Plan (NDP) priority projects, in February 2021, the Minister for Transport announced the immediate progression of this phase 1 of the LNDR which illustrates its national importance and demonstrating a common sense approach where compulsory purchase has been agreed and advance works had already taken place

Our client's site F is land locked, but accessible by means of our client's site E to its immediate north which connects to Old Cratloe Road whose capacity, safety and ability to accommodate sustainable transport modes will be improved by the *Coonagh to Knockalisheen Link Road* (LNDR, phase 1). In principle the lands would be accessible from the south, through lands currently also zoned *Residential*. Those lands to the south hold a proposed *'Education and Community'* land use zoning the Draft Plan.

The Draft plan indicates an *Agriculture* land use zoning objective for this land parcel F of 5.5. ha. In relation to the site's immediate land use setting, it is submitted that an agricultural land use zoning for this land parcel intends land uses functionally related to agricultural land use. Site F will find the generation of agricultural land uses impossible to sustain due to its limited size and the *Educational and Community* and *New Residential* land use zoning objectives proposed to the south and north in the Draft Plan which would preclude the expansion of an agricultural landholding to an economically viable size.

In relation to the strategic location of the site, within the City limits and adjacent to the LNDR, it is submitted that the use of the land parcel F for anything but built development is irrational and presents and underutilisation of the carrying capacity of the infrastructural setting of the site.

There is no specific statement of the rationale for the proposed rezoning of Site F whose development prospects are improved by the progression of phase 1 of LNDR. The only other strategic development parameter that has a delimiting impact on the development of the lands is their location within indicative Flood Zone B of the Draft Plan's Strategic Flood Risk Assessment (SFRA). Site F is located within Flood Zone B as indicated in Figure 10 below which is an extract of the Flooding Map contained within Volume 2 of the Draft Plan.

The Draft Plan holds a Draft Strategic Flood Risk Assessment (SFRA) at Volume 4. This is a detailed document and recognises the complexity of the management of flood risk for Limerick City and County. At table 5-1 of the Draft SFRA a summary of flood risks associated with each land use zoning objective is provided. For the purposes of comparison, the vulnerabilities and water compatibility advice is noted at Table 4 below for; New Residential (current land use zoning); Education and Community; Enterprise and Employment; and Agriculture.

Table 4: Extracts of relevant land use zonings with SFRA vulnerabilities

Land Use Zoning	Indicative Vulnerability	Primary	Water Compatibility
New Residential	Highly vulnerable		Justification Test to be passed for highly vulnerable development in Flood Zone A and B and less vulnerable development in Flood Zone A.
Education and Community Infrastructure	Highly / less vulnerable		Justification Test to be passed for highly vulnerable development in Flood Zone A and B and less vulnerable development in Flood Zone A.
Enterprise and Employment	Less vulnerable		Justification Test to be passed for highly vulnerable development in Flood Zone A and B and less vulnerable development in Flood Zone A.
Agriculture	Water compatible		Appropriate for all Flood Zones. Any ancillary developments to be assessed in accordance with the sequential approach.

The Draft SFRA emphasises the general nature of the land use zoning objective vulnerability and therefore the requirement to have regard to the detailed assessment of risks in Section 6 of the SFRA and a justification test. It is submitted that having regard to that justification test, the planning authority has seen fit to propose an *Education and Community Facilities* land use objective over the lands to the south and west of Site F, also in Draft SFRA Flood Zone B. Those neighbouring lands currently hold residential and open space land use zoning objectives.

It is submitted that our client recognises the vulnerability of the current residential land use zoning to flooding and the context of their lands as functional landbanks within this north western quadrant of the city. With this in mind, it is submitted that land parcel F should be proposed as *Enterprise and Employment* lands for the following reasons:

The proposed agricultural land use zoning objective is unsuitable for the lands which have an established and current residential land use zoning objective. The land unit is not an operational agricultural unit in its own right and as indicated above, as a now isolated land parcel surrounded by zonings permitting development, is unviable as an agricultural holding and would surely be bad planning for it to remain in agriculture in such circumstances. At 5.5 ha. and located within the City limits, Site F does not provide a commercial agricultural prospect on its own as is now the case.

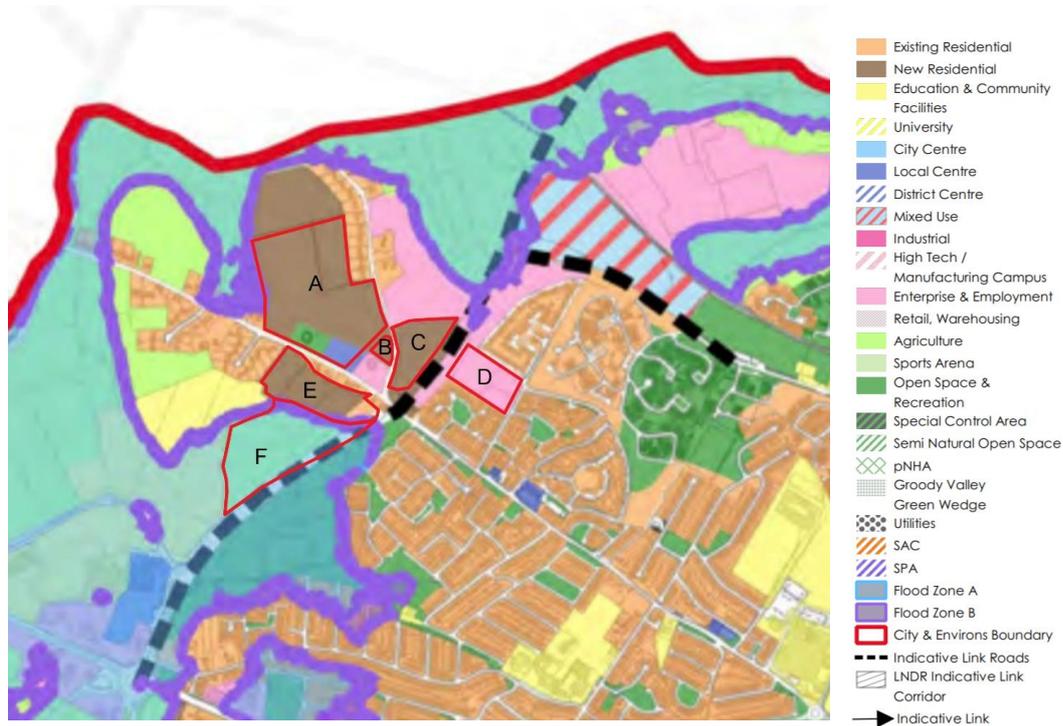
Enterprise and Employment land use zoning is less vulnerable to flood risks than the current residential land use zoning, and for that matter the education and community land use zoning proposed on neighbouring lands also within Draft SFRA flood zone B.

The Draft plan proposed lands to the north of the Site F for residential use and those to the south and west for education and community uses. The lands to the east of the site are demarcated by the LNDR (phase 1). An *Enterprise and Employment* land use zoning objective would represent a more rational

and sustainable land use on Site F than the proposed agricultural land use which would simply be unsustainable. Enterprise and employment land use has the potential of positive interaction with, and reinforcement of the residential land uses to the north and educational land uses to the south.

Our client holds Site D which is already submitted to be best utilised for its existing land use zoning residential objective, and not the Enterprise and Employment land use proposed under the Draft Plan. It is submitted that Site F can accommodate the proposed Enterprise and Employment yield that will be lost at Site D and to the north of that site thereby (1) maintaining the overall amount of such employment land; (2) also maintaining the core strategy intended development yield proportions of various land use typologies over the plan period; and (3) ensuring that the potential of this strategic location with the LNDR is further enhanced.

Figure 10: Extract of Flooding Map of Volume 2 Draft Limerick City and County Plan



7.3 Comments on the remainder of the Draft Plan

We request a number of changes to the emerging City and County Plan as follows:

Objective HO O3 currently states:

‘Objective HO O3 Protection of Existing Residential Amenity It is an objective of the Council to ensure a balance between the protection of existing residential amenities, the established character of the area and the need to provide for sustainable residential development is achieved in all new developments.’

We request that this objective give further protection to the amenity of existing residents from all proposed development and not just proposed residential development. We request the following rewording with deleted text in strike through format and new text shown in bold.

*‘Objective HO O3 Protection of Existing Residential Amenity It is an objective of the Council to ensure a balance between the protection of existing residential amenities, the established character of the area and the need to provide for sustainable **new residential** development.’ ~~is achieved in all new developments.~~*

Should the subject land at Site F be zoned for development our client will accept a requirement by way of a local objective to undertake a flood risk assessment within the emerging plan.

8.0 Conclusions

The lands the subject of this submission are development lands and are recognised assets over which a Receiver has been appointed.

Throughout the recession, despite emigration, natural increase gave rise to a matching increase in demand for residential development. This demand became critical by the middle of the last decade as the country had lost construction industry momentum and new residential development had all but ground to a halt. The first major government development policy statement and direction since the NPF was made under *Rebuilding Ireland, 2016* whose 5 pillars all focus on delivery of residential accommodation.

Analysis of Central Statistics Office (CSO) releases in September 2020¹ reported that the Irish construction industry expanded by 5.8% in real terms in 2019, driven by public and private sector investments in both building and civil engineering works and remained strong in Q1 2020 ahead of the Covid-19 crisis, with the seasonally adjusted construction production value index growing by 15.4% year-on-year and the construction production volume index growing by 14.9% year-on-year .

The Covid-19 related construction shutdowns disproportionately impacted private house building and non-essential construction. The Construction Industry Federation (CIF) presented a research report to government to support the reopening of construction in March 2021 that highlighted the depressive and reduced construction levels in Ireland in weekly terms; every week of this unnecessary shutdown; costs 800 homes, €427m in lost output, €156m per week in lost profit and wages, €32m in lost Exchequer revenues and almost 2,800 fewer persons employed. This report by Ernst Young detailed also that the level of new housing commencements declined by 23.5% in the first nine months of 2020 to 17,615 on the same period in 2019. This creates and impacts upon the supply pipeline in 2021 and 2022.

Ahead of the 2021 construction shutdown, the Irish Housebuilder Association (IHBA) had revised their projection for 2021 to 24,000 completions even before the latest 2021 lockdowns.

Despite these delays, the demand for residential accommodation continues and the government has shifted focus more recently to *Housing for All - a New Housing Plan for Ireland* with a bottom line annual delivery rate of new homes at 30,000 annually. Launched in September 2021 this plan's primary focus remains on the delivery of new residential units and gathers together other government initiatives since *Rebuilding Ireland* like the Land Development Agency and makes room for an uplift in proportion of social housing units in new developments. This focus reflects the fact that new housing (private and public) delivery has not been at the rate required by government and expands interventions to include subventions like local authority backed home loans.

The rebuilding of construction industry capacity, particularly by homegrown developers has taken some time and naturally activity intensity has emanated from major urban areas. The delay to the start of facilitating works for the *Coonagh to Knockalisheen Link Road* (LNDR, phase 1) approved in 2011 until 2018, and then again stalled until March of this year, reflects these circumstances. That momentum has stalled having been hit by construction delays caused by the Covid-19 pandemic. The delay impact derives from both domestic construction site suspensions (only fully lifted in May 2021) and domestic and global supply chain delays and suspensions. Further government intervention has been required in the form of the Planning and Development (Amendment) Act, 2021 just commenced in July that

¹ Construction in Ireland - Key Trends and Opportunities to 2024 Post Covid-19 - ResearchAndMarkets.com

provides for a further extension of up to 2 years for already extended permissions and 1 year for the making of Development Plans.

The construction site suspension of operations is amplified in the context of 'ready to go' sites like those the subject of this submission. Each is a development site with an established development intention reflected in the current/adopted City Development Plan in the form of the mostly residential or supporting mixed use and employment land use zonings.

It is incumbent on the Receiver to return best value for these development lands, which is only possible by arrangement for development via sale or other mechanisms that cannot be reasonably accessed in a wider environment where development funds, plant and human building resources are tied up on development that were scheduled to be completed or near completion in 2020.

It is submitted that the planning authority must be mindful of the unprecedented latent demand and construction cycle delay context in which the plan is being updated and that the maintenance of the development aspirations of the lands the subject of this submission into the next plan period remains in the interests of the proper planning and sustainable development of the City. Achieving critical mass of population with attendant employment opportunities is in the interests of the future resilience City and the Region. Any removal of the development potential of the lands in this submission will contribute to the frustration of Limerick City growth objectives given the lands are under the stewardship of a statutorily appointed Receiver who will not hold these lands but will seek, at the earliest reasonable opportunity, to have the development potential of the lands realised by moving the lands onto developers.

We trust the local authority will consider this submission which supports the emerging zoning for Sites A, B, C and E. We believe the case for rezoning Site D from employment and enterprise is convincing. The case has been presented for rezoning from agriculture to employment and enterprise to replace that area of land east of the LNDR and south of the proposed Moyross Link Road.

The provision of additional employment land will replace that lost to the east of the distributor road and relocate it where the significant infrastructural asset that is the LNDR can be utilised to its maximum and the maximum return from significant exchequer funding received.

Should there be any issues or points of clarification require w would be happy to liaise with the local authority further.

We look forward to receiving formal acknowledgement of this submission in due course.