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A Chara,

I wish to make the following submission to the draft Limerick Development Plan 2022-2028.

In general, I wish to welcome the publication of the Draft Plan and there are many elements of the Plan, which I believe, will lead positively to the future development of the County and City. I would like to use the opportunity of this submission to make some suggestions, which I believe could strengthen the plan.

Kind regards

Patrick O'Donovan T.D.

Aire Oifige na n-Oibreacha Poiblí.

Minister for the Office of Public Works. (OPW)



Chapter 3

Table 3.1 of the Plan refers for the Settlement Hierarchy of Limerick. This table being read with table 2.7 shows a major disparity in what the Council is allowing for in its projections in growth in population for rural Co. Limerick during the lifetime of the plan and is something that I believe needs to be re-examined.

The Council are for instance planning for an almost 37% increase in the population in the Metropolitan area of the City, a 30% increase in Newcastle West and an average of approximately 28% across all the rest of the county with the exception of Patrickswell which is to see its population rise by almost double to 97%.

In the same period the Level 7 area, which refers to Open Countryside, an area that accounts for the bulk of landmass of County will get just an increase of just 7.5% increase in its total population.

In terms of what is being proposed of units forecast by the Council, the Council are forecasting just over 870 houses for the entire Open Countryside area for the duration of the Plan. This is in a six-year period representing an average of 145 per annum of the total of the rural area of Co. Limerick.

This is something that I believe needs to be revised in advance of final adoption.

Based on my experience as a Public Representative, I believe that this number is under-estimated, particularly now as we enter into a post-COVID environment as more people want to leave urban-Ireland and return to live in a rural setting and work from their place of origin.

Recent statements from the Minister of State with responsibility for this area reminds us that self-builds accounts for approximately 25% of all houses in the state, so the number here for the Open Countryside in Limerick needs to be relooked at.

- The Plan's Settlement Strategy should reflect trends that are emerging as a result of COVID trends as people seek to leave urban area's and return to live in rural locations and it needs to reflect the reality of housing patterns in a post-COVID Ireland.
- The 7.5% increase provided for in table 2.7 of the draft needs to be increased to reflect actual rural demand.
- The draft needs to be amended to reflect the 25% national average of self-build in the Open Countryside.



Objective SS04 Prevention of Urban Sprawl

Objective SS04 as it is currently presented is I believe unnecessarily negative. It seeks to present, linear housing in towns and villages as something negative, and something, which in some way has taken from the character of our towns, and villages. It adds to an undertone that one off houses, whether they are in our Open Countryside or at the verge of our towns and villages are something to be avoided, something I fundamentally disagree with.

I believe that the Objective needs to be rewritten because for many towns and villages survives as if water and sewage are available, so the continuation of housing is something that the Council should consider. Blanket negativity in the form “...prevent linear roadside frontage...” I believe is not the type of language we want to see in a modern progressive plan. Every town is different, as is every approach road, and infill site. It is for that reason that this Objective, and its negative tone needs to be amended.

3.4.2/3 Level 2: Key Town

I welcome incorporation into the plan of specific designation for our County Towns and to identify the planned growth figures for the various different ones across the County. I would encourage the Council to continue with the work that it has recently started under various headings funded by the Government around the area of tackling dereliction to free up opportunity sites in our towns and villages. I would also ask the Council to look at what other Councils are doing in other small urban areas across the Country to maximise funding opportunities that area available while also using existing statutory powers that are available to them.

Objective SS013

b) I would be concerned that the use of this could be used negatively against applicants who are seeking to carry out developments in villages where there are no sites and where sites are being hoarded and not being released to the market and as a result, the village is not being allowed to develop. This cannot be interpreted as a means to refuse permission and it needs to be re-worded to take into account those circumstances where sites are not being released.

I recognise that it is important that toy be aspirational that the town centre should be developed in a sequential manner, however it is important that the plan does not in any way prevent opportunity sites in other parts of towns and villages from being developed in the future because of hoarding and it is for that reason that I believe this needs to be examined.



3.5 Serviced Sites

I welcome the commitment of the Council to go ahead with the concept of serviced sites and I would propose the following to the plan

That the Council propose for adoption, within an agreed timeframe after the adoption of this Plan a clean Multi-Annual Strategy and Policy for the Delivery of Serviced Sites in Co. Limerick. This should have clear targets matched with resources from the Council, reported annually to the Council. This would help provide clear guidelines for those communities and others who may be interested in developing properties in towns and villages across the County during the lifetime of the Plan.

3.6 Rural Housing

I want to welcome the inclusion of many of the suggestions that I made through my engagement through my Fine Gael colleague members of the Council as policy statements when identifying qualifying criteria for people who wish to construct a rural house. I particularly welcome commitments around the areas of returning emigrants and ways in which the Council can sensitively deal with people who have gone through marital breakdown, coupled with the statements around social and economic qualifying criteria for the construction of houses.

Rural Settlement Strategy Map

In the Draft Plan District Electoral Division designation for Rural Housing there appears to be an inconsistency in the designation of the Electoral Divisions of Rooskagh and Particles. In the Plan, these are designated as Areas of Strong Urban Influence, yet all of the adjoining DED's to both of them are designated as Rural/Structurally Weak.

Similarly the DED's of Castletown and Ballyagran are also both designated as areas under Strong Urban Influence but both DED's to the east and west in Feenagh and Colmanswell are both designated as Rural/Structurally Weak.



CLÁR Comparison

The Department of Rural and Community Development have designated the following District Electoral Divisions in the County, together with those that are the Council have designated in the Draft as Structurally Weak in the Plan for inclusion in their program.

- Glenbrohane
- Emlygrennan
- Bulgaden
- Kiltteely
- Oola
- Templebredon
- Doon
- Doon South
- Doon West
- Bilboa
- Kilmeedy
- Ballynoe
- Cloncagh

The Department have designated the above District Electoral Divisions for inclusion in their program based on population data compiled by the CSO on Census data and deprivatization indices, so it would naturally follow that the Council, should align their rationale to structurally weak boundaries to the same DED's.

- Based on the criteria laid out by the Department for the assessment of DED's for inclusion in the CLÁR Program, I propose that the plan be amended, as a minimum, to change the above DED's to structurally weak.

The proposed Draft is a major departure from the existing Plan as it proposes to dramatically increase the Area under Strong Urban Influence, which encircled the City to an area, which now is proposed to reach the Tipperary, Cork and almost Kerry borders. It is for that reason that a re-examination of the proposals based on evidences including those available from the Department of Rural and Community Development must be included.

3.7.4 Residential Density. Objective HO02

b) I have a concern in relation to a blanket statement that lends itself to increased densities without having regard to the specific characteristic of the town, village or settlement in question. Each area needs to be looked at individually and it is for that reason, given the very rural nature of the County that I am concerned about that statement that it could lead to an over-concentrated type development in some villages.



Objective HO09

I welcome the statement around “downsizing” or “right sizing” however, I would like to see this matched with designation of sites, particularly in larger areas like the Metropolitan area and Newcastle West. If the policy is to work, it needs to be matched with practical designation, and to do this I believe the use of Council land in the first instance needs to be looked at.

- That the Council propose for adoption, within an agreed timeframe after the adoption of this Plan a Strategy for “Downsizing” and that the Council as part of that strategy will commit to the designation of sites at a number of agreed locations in the County and City.

Chapter 4 A Strong Economy.

In relation to this section of the Plan, I welcome the Council’s clear ambition to see economic development spread across the City and County. I would caution however that the bulk of the emphasis of Pages 76-84 appear to be on the City. I have previously raised my concerns to the Council that there is a danger that emphasising the City, which while undoubtedly important and the right thing to do, should not be done at the expense at the rest of the County.

It is for that reason that I believe that this Chapter must emphasise the importance of revitalising our towns and villages, the identification of schemes that have been put in place by Government to support Local Authorities, LEADER companies and local communities. I believe that the Council should also seek to put in place lists of key development sites in each of the local Electoral Areas, which over the lifetime of the Plan it would hope to develop with the assistances of the State and Local Agencies.

The incorporation of the goals of Limerick 2030 must I believe be central to the development of this plan, and parity of esteem between the County and the City in the spending of resources under the auspices of Limerick 2030 and/Limerick City and County Council must be established.

- I propose that the Council mandate Limerick 2030 to ensure the development of plans and a strategy to ensure equity of spending by the Special Purpose Vehicle between the County and the City over the lifetime of the Limerick Development Plan 2022-2028.

I also believe that this Chapter is an opportunity for the Council to show collaboration with Shannon Airport. While the Airport is outside of Local Authority area, I believe it should be referenced in a strategic way in this Chapter.



Objective ECON 024

I welcome the including of a clear statement on Data Centres. Again as above, I propose here

- That the Council propose for adoption, within an agreed timeframe after the adoption of this Plan a Strategy for Data Centres and that the Council as part of that strategy will commit to the designation of sites at a number of agreed locations in the County and will work with the State Agencies for the delivery of critical Data Centres during the lifetime of this plan.

Limerick is geographic ally very well positioned and is well connected in terms of FDI, indigenous industries, public bodies, education sectors and others to host large data centres in the area. Collaborating with others, we should be developing a clear Data Centre Strategy that we can attract inward investment for the County that can exploit key sites and utility connections.

4.8.4 Tourism Facilities and Accommodation

Reference is made in point number two here that developments and tourist attractions should “generally be located in settlements...”

I have a concern in relation to this statement that it could be used a means to refuse potential applications that are lodged in the future in the Open Countryside (Level 7) or in areas where there is no viable site. I believe that this should be re-written because in its current format it could potentially be used to refuse a potential applicant.

There is no provision as it currently stands in the draft for glamping and I would like to see this included, as it is an important part of tourism in Ireland at present and has the potential to play an important role in Limerick’s future. Again, this should not have to take place exclusively in a settlement.

Chapter 7 Objective IN05 d)

I welcome the inclusion of the commitment of the Council around the difficulties in the treatment of wastewater in Newcastle West. This is legacy problem from pre the establishment of Irish Water and its resolution will require support from Irish Water and the Council. Financial support from the Council under the development levy contribution scheme given the numbers of houses that are proposed to be constructed in the Town under the plan is one proposal that should be looked at by the Council with IW.



Chapter 8 Objective CAF O23

I welcome the statement in the Plan by the Council to work with the OPW and others to deliver Flood Relief Schemes during the lifetime of the plan. It is clear that the incorporation of robust defences for our communities must be part of any response that the National and Local Authorities must plan for into the future against flooding.

Chapter 9 Sustainable Communities and Social Infrastructure. Objective SCSi O30

It has been a long held view of mine that the Council should look to have a space for the visual and performing Arts in the County. Currently all of the principle space for the Arts are based in the City and this is an anomaly that needs to be addressed, particularly now a unitary Authority.

- That the Council propose for adoption, within an agreed timeframe after the adoption of this Plan a Strategy for the Arts and that the Council as part of that strategy will commit to the designation of a site in the County for the visual and performing Arts.

I would appreciate if you could acknowledge receipt of my submission at your convenience.