

# Development Plan Submission

*Serviced lands, Cappamore*

**Client:** William O'Brien

**Our Ref:** 21106

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## Introduction

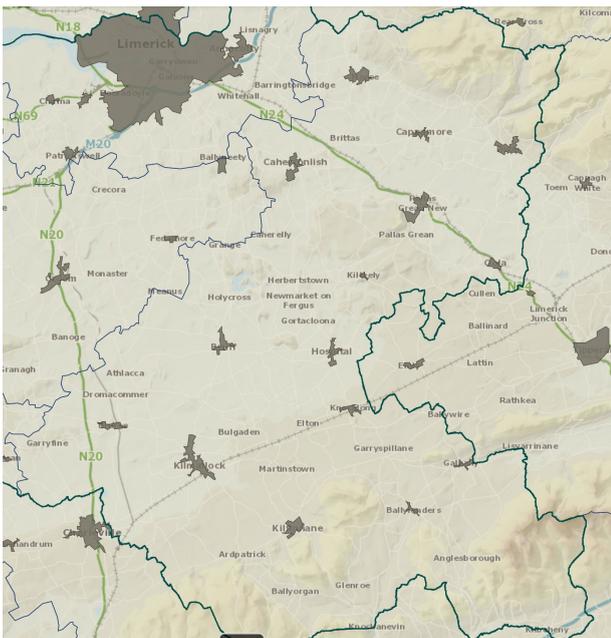
We, Hutch O'Malley Consulting Ltd have been asked to review the Limerick County Council Draft Development Plan 2023-2028 and specifically zoning provision in Cappamore. The review is high level and touches on the implementation of the policy and reviews the actual zoning outcomes for the rural village. We have also been instructed to provide a potential layout for lands in the ownership of our client based on the needs identified in the review.

## LCCC draft development plan 2023-2028

The challenge rightly outlined in the draft development plan is how to grow urban centres along with enforcing and strengthening towns and villages. The discussion in the development plan focuses on historic population growth statistics for settlements alone. This largely ignores the population fluctuations in rural areas, increased one parent household and how this should translate to village or town population growth.

Across the city and county between 51,000 and 61,500 population growth is what is expected, but it should be the ambition of the Local Authority to exceed this where possible. This represents a 31.5% growth across the local authority.

The previous decade-long development plan strategy to promote commuter and satellite feeder towns and villages has led to the growth of villages like Murroe, Caherconlish, Clarina etc. Unfortunately, villages over 15 mins drive from the city have suffered and experienced minimal growth. Furthermore villages restricted by sewerage capacity issues have sat in limbo due to the introduction of Irish Water and their prioritization of larger settlements.



KPMG analysis is primarily based upon income and census data from 2016/2017, this is based upon recession times and will be a decade out of date by the end of the plan. They have only considered planning applications since 2016 and some recent policy. However, their conclusion on one off housing demand was stark and must be viewed in the context of growing likelihood of future national restriction on one off housing;

*There are many drivers of rural one-off housing. **Affordability is a key consideration**, with large average floor areas generally reflecting low land costs for households that do construct rural one-off homes. Increases in remote working and rural development initiatives such as rural co-working hubs and rural broadband improvements may entail rural one-off homes remain economically viable, although this would also support delivery of attractive housing options in rural towns and villages which could also enable more sustainable settlement-focused rural development. Rural one-off housing development also reflects broader market conditions, becoming a more attractive housing option when there is a lack of attractive and affordable housing delivery in towns and villages. This is reflected in the fact that one-off housing delivery was proportionally very high during recession years, when overall housing delivery was low. Furthermore, there is now a clear impetus in planning policy through the NPF to direct more housing delivery towards existing settlements, with a target of delivering at least 30% of all new homes in Limerick outside the City and Suburbs within the built-up footprint of existing settlements. It therefore will be appropriate for the Limerick Development Plan 2022-2028 to balance potential demand for single rural dwellings (as informed by historic trends) against broader planning goals in allocating new housing for rural areas through the Core Strategy.*

The steady 200 unit per annum demand for one off housing must be accounted for in the lifetime of this plan. Most villages have experienced a sharp increase in social housing provision during the past decade, notable exceptions are Adare and Ballyneety. As very few private housing schemes or serviced sites have been delivered;, purchases and development by the LA or AHBs have primarily been through the purchase of houses in the settlements. Generally speaking, social housing acquisitions totally exclude one off housing. This means that population growth in a lot of the settlements has been artificially inflated by the local authority and AHB input in the market.

The summary of the KPMG advice on social housing provision is as follows;

**Table 5.4: Summary of social and affordable housing requirements 2022-2028**

Area	No. of Additional Anticipated Households	Social (and affordable) housing requirement	Housing Shortfall (%)
Limerick City and Suburbs	11,274	2,300	<b>20.4%</b>
Limerick MD (Remainder)	582	119	<b>20.4%</b>
Adare-Rathkeale MD	1,019	199	<b>19.5%</b>
Newcastle West MD	1,382	226	<b>16.4%</b>
Cappamore-Kilmallock MD	1,334	263	<b>19.7%</b>
<b>Limerick City and County Total</b>	<b>15,591</b>	<b>3,107</b>	<b>19.9%</b>

Source: KPMG Future Analytics.

This indicates 27.7% of housing units outside the city with a larger proportion of social housing to be provided inside the City MD. While the % difference is small it is logical and potentially could be larger as there is logic in providing these units in areas with better public transport.

The % of social housing proposed for Cappamore-Kilmallock MD is 7.3%. Of this, 36 units or 13.6% of the total is due to be granted in Cappamore in the coming weeks.

### Property Price Register local review

In order to get a feel for the actual housing market in Limerick East a review of the property price register was undertaken.

The property price register was established in 2010, the past 6 years have been reviewed to provide context since the 2016 census. The villages of Cappamore, Murroe, Caherconlish, Doon and Pallasgreen were geo-coded and mapped to establish the relative pattern of actual house purchases in the area. Overall, it was found that there was a relatively consistent 50-50 split between rural and settlement purchases.

The register however does not include one off houses but should include any in town development house sales. Unfortunately spatially mapped commencement notice data is not available to establish the distribution of one off houses, however on the basis of 50% commencement of the planning permissions and 25% of these in the specific east Limerick parishes listed; circa 25 units per annum is a reasonable estimate for one off housing. With an average of 73 houses per year listed on the PPR one off units may account for 25% of the units provided, this would skew the spending on housing to 36% within the settlements. Of this it is expected that a good proportion of this spend was by state agencies.

While the above geolocation and estimations are not perfect it's abundantly clear that the citizens of communities in east Limerick have a very strong preference for housing outside of the settlements. This is totally at odds with the national government preference and by extension the aims of the development plan. It is thus imperative that the development plan encourages development in villages of a nature that actually appeals to the market.

### CSO population distribution

The breakdown of small area populations was looked at and attributed to each of the 5 settlements in the northern part of the Cappamore-Kilmallock MD. Again based on the address or accepted parish used on the PPR. The results are categorised as follows;

Parish	Settlement Area (ha)	2016 Small Area (pop)	Plan Settlement (pop)	%urban
Cappamore	39.7	2405	620	20.50%
Doon	105.5	1159	516	30.81%
Murroe	122.9	3063	1377	31.01%
Caherconlish	93.7	3457	1665	32.51%
Pallasgreen	145.1	2887	568	16.44%

Taking the area as a whole this is a population of 12,971, 31.5% growth to 2031 would be an increase of 4,085 people, or about 1,350 homes, taking 3 persons per unit. Between 2016 & 2021 there has been very little development in these settlements, maybe only one scheme in Caherconlish beyond individual renovations, say 200 between 2016 and 2022. If it's assumed that the one off house numbers remain constricted to 200 as per KPMG and of these 25 are in the parish around these settlements, then the settlements need to be providing about 800 units in the lifetime of the plan. Assuming 150 units in the caherconlish LA plan only 437 units are zoned for across these settlements, this is before checking the viability of any of the zoned lands.

### Cappamore Review

The draft development plan states;

*The population of Cappamore was 620 in 2016. Central Statistics Office figures identify that the population of the village declined by 8% between 2011 and 2016 and 17.4% of the population are over the age of 65 years, which is above the state average of 13%. Year Population 2006 669 2011 675 2016 620 The core strategy provides a housing allocation of 65 units to the village over the plan period. A review of extant planning permissions within the village has determined that permission exists for a 39-bedroom nursing home, 10 independent elderly units at the site of the former creamery in the village and a committed Local Authority housing development within the*

*settlement boundary. On this basis the split for New Residential Zoning and Serviced Sites is 90/10 in Cappamore which differs from the standard split of 80/20 in the other settlements.*

The potential provision of a nursing home (at 39 bedrooms, this would generally be accepted to be an unviable size) and long delayed independent living units should not have any influence on the serviced sites provision. The logic here is that as community and health care developments are occupying some of the residential lands so there should be less zoning for serviced site, where as the lands that have chosen to establish themselves and primarily for other purposes should be zoned as such.

Under the current proposal the “serviced sites” provision is two infill in a ghost estate rather than sustainable development of high end residential units to attract middle class re-population of the village.

“Serviced site” 6;



“Serviced site” 5;



#### Objective **SS O11**

##### Requirements for Developments within Level 4 Settlements

b) The development of these centres shall provide for serviced sites and a variety of other house types and densities as appropriate.

Serviced sites refer to a number of individual residential plots of not less than **0.1ha**. with access to services such as utility connections, footpaths, lighting and within walking distance of the town or village core. The density shall generally be 10 housing units per hectare. Larger sites may be required for a dwelling unit in excess of 250m<sup>2</sup> floor area, to allow sufficient space for private amenity, parking and landscaping.

#### Objective **SS O16**

##### Serviced Sites in Towns and Villages without adequate Water Services Infrastructure

It is an objective of the Council to permit serviced sites in towns and villages across Limerick to offer an **alternative to rural one off housing**, where individuals can build their house on a Serviced Site, in the case where each house is served by an individual on-site wastewater treatment system, in settlements where there is insufficient wastewater treatment capacity, the existing municipal wastewater treatment plant is not scheduled for upgrade by Irish Water in its current investment plan and there is no risk of nuisance or pollution. (Refer to Chapter 11: Development Management Standards for further information).

## Residential zoning review

Below each site in the draft plan ear marked for zoning is reviewed.

Total Housing Units Required 2022 to Q2 2028	Housing Units required on Residential zoned land	Total Residential Zoned land required (ha)	Housing Units required on Serviced Sites zoned land	Total Serviced Sites zoned land (ha)	Proposed residential units within Village centre zoned lands
65	50	2.27	6	.6	15% = 10

### Site 1

Currently, planning lodged and at FI stage for more social housing in the village, a village that has consistently dropped in the pobal index and has seen a significant % of purchasing of units for social housing. (unconfirmed, as the housing department cannot readily provide statistics). 15 social housing units.

### Site 2

Backland development to the rear of established housing. One on street unit and about 100 linear meters of new road frontage is only likely to create 10 units once an entrance road and turning circle is taken into account, and 15% open space deducted.



### Site 3

Repeated planning permissions sought for nursing home development over the last 22 years but no signs of commencement or progression, community facility zoning may be more appropriate, even though the track record on the site would indicate that it would be foolish to count on the progression of this development, a significant part of the site area is unusable access road and shouldn't count towards density figures.

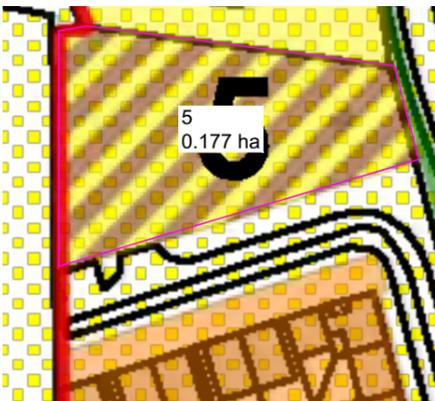
<sup>1</sup> Site 2 masterplan

#### Site 4

Similar to Site 3 this has been a “potential” development for two decades and has not made any significant progress on site to being completed. 10 elderly units

#### Site 5

Totally impractical to think that a serviced site as envisaged by SS O16 would be constructed at this location, across from a long line of duplex units. With the 0.1ha min guideline, this plot would only provide 1 dwelling.



#### Site 6

Again, there is little or no chance that a one off house will be build at the end of an existing terrace of units on one site and 36 proposed AHB units on the other. With the 0.1ha min guideline, this plot would only provide 1 dwelling.



No.	Zoning	Area (ha)	Density units /ha	Comment	Actual units	unit/ha	Type	%
1	New Residential	1.327	22	LA Dev	36	27.1	Social	37%

<b>2</b>	New Residential	0.512	22		10	19.5	Private	10%
<b>3</b>	New Residential	1.012	22	16/254	39	38.5	Elderly	40%
<b>4</b>	New Residential	0.289	22	19/872	10	34.6	Elderly	10%
<b>5</b>	Residential Serviced Sites	0.18	10		1	5.6	Private	1%
<b>6</b>	Residential Serviced Sites	0.116	10		1	8.6	Private	1%
<b>Total</b>					<b>97</b>			

The vision for Cappamore for 2028 is 12 private families, 50% elderly accommodation development and nearly 40% social housing development. If the elderly accommodation lands are excluded

### Other zoning critique

Significant areas have been de-zoned to the west of the village, potentially due to water pressure or lack of access to separated surface water infrastructure.

### Neighboring Village Comparison

#### Murroe

The neighbouring village of Murroe has become a hollow commuter and has been afforded 2.2ha of serviced sites and 4ha of residential land

Total Housing Units Required 2022 to Q2 2028	Housing Units required on Residential zoned land	Total Residential Zoned land required (ha)	Housing Units required on Serviced Sites zoned land	Total Serviced Sites zoned land (ha)	Proposed residential units within village centre zoned lands
117	88	4 ha	22	2.2ha	7

This provision of private housing is 10times that of Cappamore for a settlement with double the population, one pub, no butcher and overall less amenities and services. Primarily due to the lack of market sentiment in the village given the strong urban influence.

### Castleconnell

Similar to Murroe this settlement has become a primarily commuter village with limited access to local services compared with Cappamore, Kilmallock or Hospital for example. Yet again the plan appear to encourage the commuter settlement ahead of the rural settlements by proposing significantly more zoned lands in this village.

### National Policy

For a rural village such as Cappamore growth must be focused on job creation along with housing. The NDP encourages a focus on ICT job provision;

#### *National Policy Objective 21*

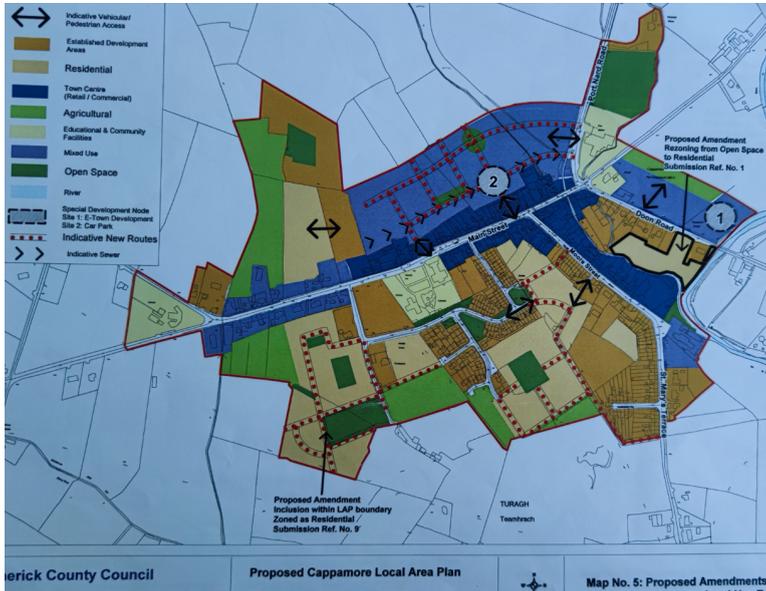
*Enhance the competitiveness of rural areas by supporting innovation in rural economic development and enterprise through the diversification of the rural economy into new sectors and services, including ICT-based industries and those addressing climate change and sustainability.*

To promote information and communications technologies, in development context, means high end manufacturing or high quality office space. The reality of Covid and the past year has also reinforced the need to have flexible modern well ventilated local work spaces in villages. The shining example for this type of development has long been Fexco in Kilcolgan, where IDA offices were utilised and then a major high-tech company grew.

### Site proposal

The lands are located to the North of the village, adjacent to the soccer pitch, library, community centre, fire station, small car garage and recently expanded. These lands previously had a master plan layout agreed with Shannon Development for an E-town business park and residential use.

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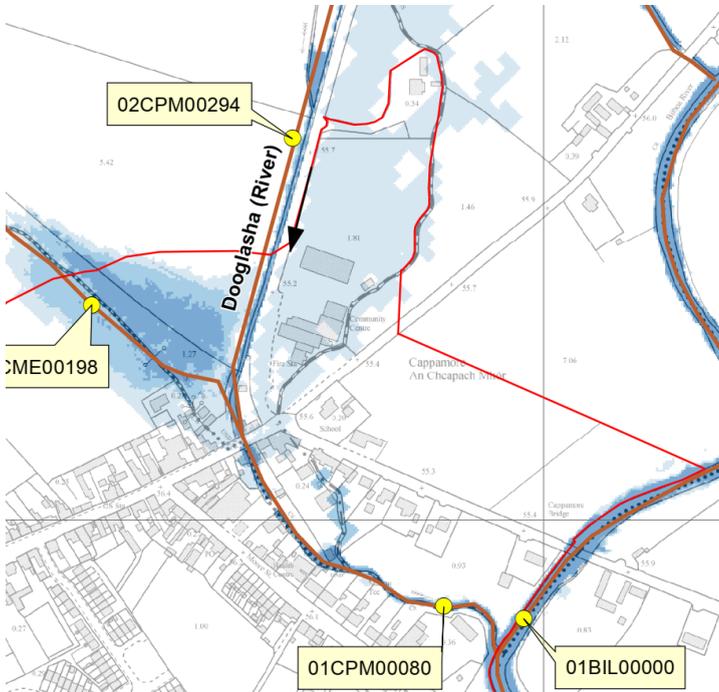


## History

The lands were previously part of the submitted in November 2005 as a variation to the 2005 plan. In 2011 there was a concern about flood risk and the lands were de-zoned presumably due to the inaccurate flood risk maps and/or incomplete OPW flood major flood works;



These have now been completed and these lands are clarified as not being at risk.



## Services

The proposed site has direct access to a viable overflow point for surface water and good quality drained lands for SUDS. The public foul sewer is accessible by gravity at the roadside. The potable water main is across the road from the site and the area does not suffer any water pressure issues. Many of the previously zoned lands did not have the benefit of existing road and pedestrian access, access to separated foul and sewer gravity connections. Even some of the proposed zoned parcels aren't clearly serviced for surface water and would likely have to discharge to the combined Irish Water system for surface water. No definitive surface water map is available for the village. See drawing C02.

## Summary

Cappamore has never been provided with a business park, innovation hub or any significant business focused development, the village has lost a secondary school and seen the primary schools amalgamate while the satellite schools of Bilbao and Tenaterriffe have grown. The level of house construction in the village has been limited and over the past 40yrs has been either council development or low quality housing. The surrounding rural area in contrast has seen stable populations and consistently score above average on the Pobal Index. The reality of the Parish is that the village has suffered from decades of poor planning implementation and low end residential development. The answer to this is not to solely pin the hope of the village survival on social



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housing, a small nursing home and a few elderly care units. Rural one off housing is nationally and internationally discouraged, one off housing on all approach roads to the village would be viewed as ribbon development (see ABP ). Cappamore does not need more disadvantaged residents and continues sliding on the pobal index.

The site proposed to be zoned would provide a high quality serviced sites as envisaged by the development plan, and the location would solidify the core of the village while providing a much-needed facelift to two approach roads.