

Forward Planning,
Economic Development and Enterprise Directorate,
Limerick City and County Council,
Merchants Quay,
Limerick.

8th April, 2022

RE: SUBMISSION TO THE PROPOSED MATERIAL ALTERATIONS TO THE DRAFT LIMERICK DEVELOPMENT PLAN 2022-2028

Dear Sir / Madam,

We, Coakley O'Neill Town Planning Ltd, NSC Campus, Mahon, Cork, are instructed by our client, Dairygold Agri Business Limited, to make this submission in respect of the Proposed Material Alterations to the draft Limerick Development Plan, 2022-2028, hereafter referred to as the draft CDP, published by Limerick City and County Council on 12th March 2022.

We acknowledge Section 7 of the Planning and Development Act 2000, as amended, which states that submissions can only be made in relation to specific amendments.

In this respect, this submission relates to Proposed Material Alterations **161, 162, 163, and 164** to the draft CDP in respect of the village of Cappamore.

1.0 INTRODUCTION

- 1.1 Cappamore is a large village, population 620 persons (2016) which sits beneath the Slieve Felim hills in an agricultural hinterland dominated by dairy farming. The Bilboa River flows to the east of the village and is joined by a stream flowing north – south through the village and thereafter is known as the Mulkear River. The village is concentrated along Main Street, which forms the historical core. At either end of the Main Street, a number of roads converge serving the surrounding rural area and linking with other settlements, such as Doon, Pallasgreen and Murroe. The village is 22 kilometres from Limerick City
- 1.2 Our client is in ownership of the site of the former Co-Op and Creamery, Moore Street, Turagh, Cappamore. The subject site measures c. 0.43ha. The subject lands consist of the former Dairygold Co-Op Superstore to the front, part two-storey grain drying shed to the rear, a single storey store and extensive enclosed yard area to the side. There is customer parking to the front of the site. The site is no longer in use as a Co-Op store.
- 1.3 This submission relates to the Proposed Material Alterations to a number of other sites within the development boundary of Cappamore, specifically:

- **161 – Amend Cappamore Zoning Map**
Removed Site No. 2 (0.152ha) and realign the boundary to reflect existing residential on the ground

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- **162 – Amend Cappamore Zoning Map**
Change the zoning of sites No. 5 and 6 from Serviced Sites to New Residential
- **163 – Amend Cappamore Zoning Map**
Include an area of 0.65ha for Enterprise and Employment
- **164 – Amend Cappamore Zoning Map**
Include an area of 0.66ha for Serviced Sites

1.4 In the context of these Material Alterations to the zoning map, this submission seeks a minor modification to the zoning matrix for Enterprise and Employment uses to include residential use as a permitted in principle use, particularly in relation to underutilised, brownfield, centrally located sites within the existing built-up area, such as the subject site in Cappamore. This is consistent with national, regional and local planning policy which encourages compact growth, the reuse of brownfield sites, and intensification of population in urban areas.

2.0 EXISTING PLANNING POLICY PROVISIONS

2.1 NATIONAL PLANNING FRAMEWORK (2018)

2.1.1 The NPF advocates compact growth of urban areas, and Table 2.1 sets out a target that 30% of all new housing outside of cities will be within existing urban footprints. This is underpinned by National Policy Objective 6, which seeks to:

Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.

2.1.2 National Policy Objective 3c requires 30% of all new homes to be located within the existing built-up footprint of towns and villages.

2.1.3 In addition, National Policy Objective 11 states:

There will be a presumption in favour of development that encourages more people, jobs and activity within existing urban areas, subject to development meeting appropriate planning standards and achieving targeted growth.

2.2 SUSTAINABLE RESIDENTIAL DEVELOPMENT GUIDELINES 2009

2.2.1 The 2009 Guidelines defines small towns and villages as those within a population range of 400-5,000 persons, and encourages higher densities, subject to considerations with respect to local characteristics.

2.3 ACTION PLAN FOR RURAL DEVELOPMENT 2017

- 2.3.1 Pillar 1 of the Action Plan is focused on creating sustainable communities with a key objective to make rural Ireland a better place in which to live and work by revitalising our town and village centres. It states:

Our towns and villages are at the heart of rural communities and should be places where people can live, work, access services and raise their families in a high-quality environment. The effects of the recession have been severe in many of our rural towns and villages, with the loss of small businesses and the migration of people to bigger towns and cities. It is important therefore, that we implement measures to help breath life back into our rural towns and villages and enable them to become vibrant places where people socialise, live and work.

- 2.3.2 Action 7 of Pillar 1 relates to facilitating an increase in housing within towns and villages. It is as follows:

Increase delivery of small housing schemes in towns and villages as an alternative to one-off housing.

2.4 REGIONAL SPATIAL AND ECONOMIC STRATEGY (RSES) FOR THE SOUTHERN REGION 2020

- 2.4.1 The RSES includes a key focus on strengthening and re-adapting smaller towns and villages as well as rural areas. It is also stated that *there is evidence of significant decline in smaller towns and villages in the Region. Investment and policy support is urgently needed to bolster and consolidate these vital settlements to arrest the decline and the consequent depletion of the physical fabric and provision of services in these areas* (page 14).
- 2.4.2 In this context, Section 2.1 of the RSES states *the provision of houses and stemming decline in our cities, towns and villages are key priorities of the RSES.*
- 2.3.3 Section 3.3 of the RSES also identifies the need for attractive, alternative options to rural housing within smaller towns and villages.

2.5 LIMERICK COUNTY DEVELOPMENT PLAN 2010-2016

- 2.5.1 In advance of the Limerick Development Plan 2022-2028, the Limerick County Development Plan 2010-2016 still stands. In the Plan, Cappamore is identified as a Tier 4 settlement. Tier 4 settlements generally have a population of over 400 people that cater for the daily and weekly needs of their inhabitants and the needs of the surrounding wider catchment area and provide a range of employment opportunities and services appropriate to their size and function.
- 2.5.2 According to Policy SS P 9 of the County Development Plan, it is the policy of the Council to support the sustainable development of tier 4 settlements.
- 2.5.3 Objective SS O12 sets out the policy requirements for developments within Tier 4 settlements, as follows:

Within these settlements the Council shall facilitate development subject to compliance with objectives SSO1- SSO6 and the following:

- a) *The scale of new residential schemes for development shall be in proportion to the pattern and grain of existing development. In this regard any development shall enhance the existing village character and create or strengthen a sense of identity and distinctiveness for the settlement*
- b) *The development of these centres shall provide for serviced sites and a variety of other house types and densities as appropriate*
- c) *New community and social facilities shall be provided in conjunction with residential development as required.*

2.6 CAPPAMORE LAP 2011-2017

- 2.6.1 In the current Cappamore LAP, the subject site is zoned Mixed Use, defined in section 11.3(h) of the Plan to reflect existing commercial uses on the edge of the town, outside the core area of the town. Section 5.5.2 of the LAP states as follows:

*This zoning is intended to facilitate renewal of these areas, which are on the edge of the town but which are on the main approach roads. They generally include large sites for which there are plans for change by the landowners. Sites are zoned mixed use to reflect their existing uses. These are: 1) On the south side of Main Street, a veterinary clinic, a printing works, vacant house and petrol filling station. 2) **On the east side of Moore Street, a co-operative hardware and general goods store and associated yard.** 3) On the east side of Moore Street, separated from Site (2) by a park, the old creamery site. There is outstanding planning permission for 12 sheltered housing units on this site. This site forms part of opportunity site 3 as outlined in chapter 10 of this Plan. It is important that any redevelopment of these sites should not result in undermining of the town centre's primacy as a retail centre.*

- 2.6.2 Under the current zoning objective for the site, the LAP identifies a 'dwelling' and an 'apartment' as being permitted in principle uses on lands zoned Mixed Use.

2.7 DRAFT LIMERICK DEVELOPMENT PLAN 2022-2028

- 2.7.1 In the draft Limerick Development Plan 2022, hereafter referred to as the draft CPD, Cappamore continues to form part of Level 4 – Large Villages. All settlements within this level have a population of >500 people.
- 2.7.2 There is considerable variation in the settlements from small towns and large villages, included in this level in terms of scale, character context and infrastructure. However, all have potential for appropriate levels of growth and consolidation. In line with National Policy Objective 3c, 30% of all new homes targeted within Level 4 settlements shall be within their existing built-up footprints.
- 2.7.3 The core strategy identifies 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.

2.7.4 Of particular note in the context of this submission is that it is stated on page 35 of the draft Plan that ***having regard to the quantity of underutilised back land sites and the level of dereliction it is considered that there are opportunities for the development of residential units within the village centre.***

2.7.5 Objective SS O11 of the draft Plan states it is an objective of the Council:

- a) *To ensure that the scale of new housing developments both individually and cumulatively shall be in proportion to the pattern and grain of existing development. Generally, no one proposal for residential development shall increase the existing housing stock by more than 10 – 15% within the lifetime of the Draft Plan, unless the applicant can demonstrate that the settlement has adequate capacity in terms of both physical and social infrastructure to support additional growth.*
- b) *The development of these centres shall provide for serviced sites and a variety of other house types and densities as appropriate.*

3.0 SUBMISSION

3.1 This submission is made in the context of Proposed Material Alterations **No. 161, 162, 163 and 164** to the draft CDP with respect to the village of Cappamore. These propose a change in zoning to a number of land parcels within the development boundary of Cappamore, in addition to extending the development boundary further to the east. See Figure 1 for context.

3.2 In particular, Material Alteration 163 seeks to amend the zoning map to include an area of 0.65ha for Enterprise and Employment to the eastern edge of Cappamore, as well as an area for serviced sites. Unlike the subject site, this new Enterprise and Employment zone, as well as the other existing Enterprise and Employment zone in Cappamore, is located at the edge of the village, which will ensure that any future employment uses are located away from sensitive receptors and can be easily accessible by logistics.

3.3 Conversely, the subject site is more centrally located, and is adjacent to established residential uses, as well as a key amenity in the town.

3.3 A use that is more appropriate to, and compatible with, its context would be in the interests of the proper planning and sustainable development of Cappamore.

3.4 It is for these reasons that the current Cappamore LAP zones the subject site as Mixed Use. In this zone, residential use is permitted in principle.

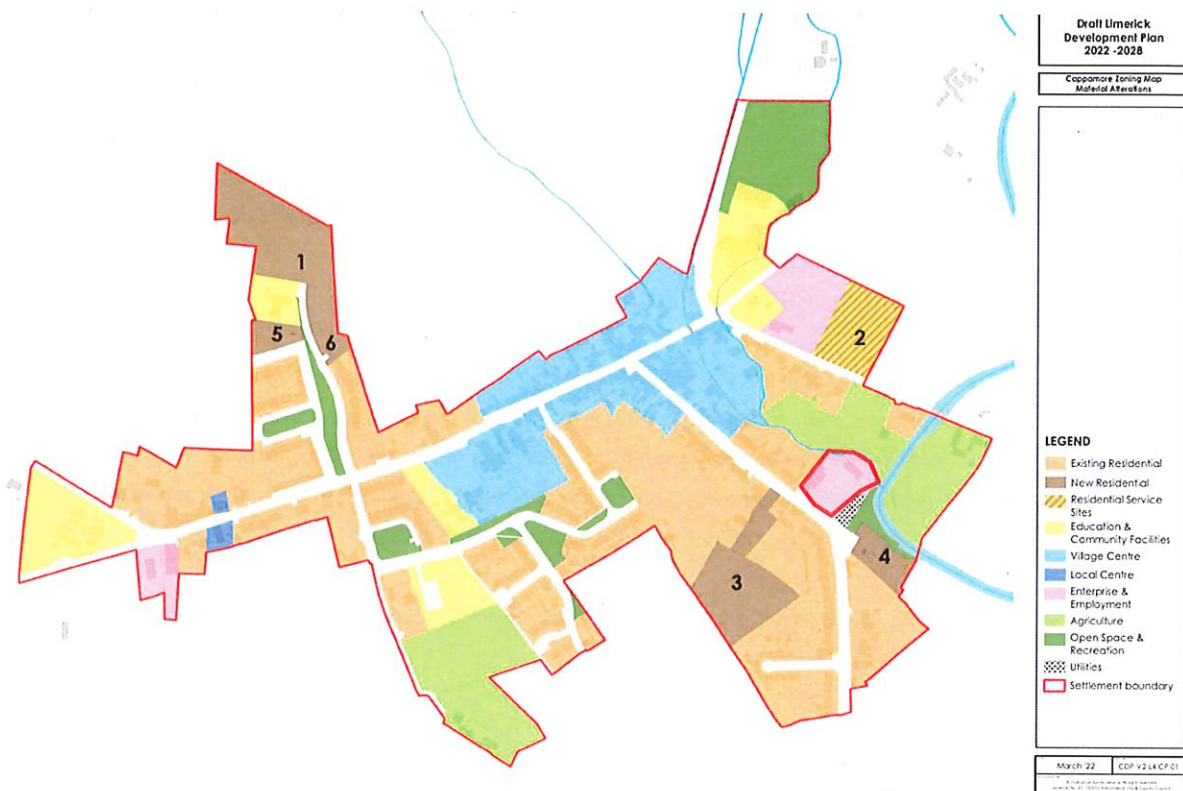


Figure 1: Zoning Map as per Proposed Amendments to Draft Plan, Dairygold site in red (source: Draft Limerick CDP)

3.5 In the context of national, regional and local planning policy which supports compact growth, an increase in delivery of small housing schemes in towns and villages as an alternative to one-off housing, and the reuse of brownfield lands in the existing built-up area of towns and villages, it is considered that a residential use should be permitted in principle at the subject site, and would represent good planning.

3.6 Evidence on the ground demonstrates the level of demand for housing in Cappamore. Of particular note are the following:

- Site 1 as outlined in Figure 1 is currently subject to a residential application consisting of 15no. houses under **Application Register Reference 21872** lodged on the 21st June 2021. The application is currently at Further Information Clarification Stage.
- Site 3 was subject to an application on the 29th March 2016 for the construction of a new single storey nursing home with 39 no. bedrooms and ancillary accommodation under **Application Register Reference 16254**. This was granted permission on the 23rd March 2017 by the Council and subsequently granted permission by An Bord Pleanála following a third party appeal on the 14th December 2017 (ABP Ref: 91.248334)
- Site 4 was subject to an application on the 2nd September 2019 for the part demolition of existing former creamery building and construction of 10 no. independent elderly persons accommodation units under **Application Register Reference 19872**. This was granted permission on the 22nd January 2020. On inspection of Site 4, works appeared to have commenced in relation to the above-mentioned planning application.

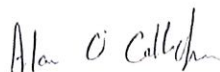
- 3.7 In addition, as a further measure of the demand for housing in the village, the Council has rezoned Sites 5 and 6 from 'Serviced Sites' to 'New Residential', in addition to the extension of the development boundary to the east.
- 3.8 It is evident from national, regional and local planning policy that to achieve the country's sustainable development goals, population growth and new residential development should be targeted within the existing built-up area, to combat continuous sprawl into the countryside. In this context, it is submitted that the more central location of the former Co-Op store and Creamery, a brownfield, serviced site, in an established primarily residential area, adjoining the village's primary amenity area, and within walking distance of village services, is more suitable for residential use. There are no planning constraints to the future redevelopment of the site for residential use.
- 3.9 We also note the provisions of page 35 of the draft Plan which endorses the propriety of the redevelopment of underutilised and/or derelict sites for residential uses in the village centre.
- 3.10 In the context of the Material Alterations to the zoning map for Cappamore, the purpose of this submission is to seek a minor modification to the zoning matrix as it applies to Enterprise and Employment to include residential use as a permitted in principle use, particularly in relation to underutilised, brownfield, centrally located sites within the existing built up area, such as the subject site in Cappamore, on the basis that this is consistent with national, regional and local planning policy which encourages compact growth, the reuse of brownfield sites, and intensification of population in urban areas.

Our client welcomes the opportunity to make this submission on the proposed Material Alterations to the draft Limerick Development Plan 2022-2028.

It is trusted that it will be seen as a constructive and productive contribution to the preparation of the final Plan, and, in this regard, we respectfully request that it is given favourable consideration.

Please direct all correspondence in this matter to me at Coakley O'Neill Town Planning Ltd, NSC Campus, Mahon, Cork.

Yours faithfully,



Alan O'Callaghan,
Coakley O'Neill Town Planning Ltd

