



Limerick Chamber Submission on
Material Alterations to Draft Limerick
Development Plan 2022 - 2028

April 2022



**Limerick
Chamber**
Advancing business together



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1. Chamber Introduction

Limerick Chamber would like to thank Limerick City and County Council for the opportunity to submit our views throughout the Limerick Development Plan (LDP) process and we commend the challenging work undertaken so far in the first development plan for the amalgamated Limerick City and County.

Limerick Chamber is the largest business representative body in the Mid-West, with over 400 member organisations who support over 50,000 jobs across the region. The finalised LDP provides a vision and framework for the growth of Limerick to 2028 and the opportunity to provide input to this process on behalf of the business community is welcomed.

The decline in footfall and investment in the city centre over the past decade has had a detrimental effect on businesses in Limerick City and the impact of Brexit followed by the COVID-19 pandemic has only exacerbated these effects. While the ambitions of the material alterations of the LDP are welcome, included in this submission are key recommendations and asks which Limerick Chamber feel are essential to include in the final report.

Limerick Chamber is confident that the recognition of the high-level points included in this submission from our own independent assessment and through collaboration with Indecon on 'The Future Development of Limerick City Report' will support the successful delivery of a sustainable agenda for Limerick's future economic and social development. Each section of this submission contains responses to certain chapters of the current LDP draft.

2. Submission Points

Chapter 1: Introduction, Vision and Strategic Overview

- While the strategic objectives are welcome, Limerick Chamber feels that Strategic Objective No 1 should include language around mandating and encouraging densification and compact sustainable development in the city centre / Central Business District (CBD). This could be reflected with the addition of promoting the 'Limerick Brand' by promoting Limerick City as an energetic compact city centre. Such a focus on compact growth will not only adhere to the National Planning Framework (NPF) but will also help to revitalise the city centre with more people living close to amenities, businesses and sustainable transport and thus combat urban sprawl.

Limerick Chamber welcomes the focus on sustainable housing and communities in Strategic Objective No 3. However, Limerick Chamber recommends that this should also include a focus on financial stability through affordable housing.

Chapter 2: Core Strategy

- While Limerick Chamber commends the ambitious household projections under Table 2.3: Household Projections for Limerick 2022-2028, we note the absence of figures for those on the social housing waiting list as a criterion in determining housing demand. The Housing Agency provides the number of people on the social housing waiting list through their "Summary of Social Housing Assessments" report. It is critical that those on the list that require housing are included, failure to do so will enforce the State's reliance on rental subsidy schemes such as the Housing Assistance Payment (HAP) and the Rental Accommodation Scheme (RAS). The reliance on such schemes to deliver public housing creates more competition in the market for private renters and this pressure on supply and demand may, in turn, drive prices up.

- Limerick Chamber welcomes the upward revision of population growth, however, Table 2.2 Population growth Q3 2016-Q2 2028, with estimated growth up to Q2 2022 and future growth to be facilitated by end of 2022-2028 Development Plan period should be broken down into key areas within Limerick. Currently the language is vague and does not outline the growth targeted for Limerick city centre / CBD as distinct from the suburban locations of Mungret and/or Annacotty by way of example. While we note this has been completed to some extent in later sections, Limerick City / CBD must be a standalone throughout the LDP. In theory all population growth could be allocated to these suburban locations and still adhere to the overall LDP which will copper-fasten the existing suburban donut effect and will not contribute to the revitalization of the city centre / CBD through increased residential occupancy. To ensure compact growth and adherence to the NPF, as well as transparency around development, this should be rectified. This is also the case for any tables or figures that outline population or housing growth such as Table 2.5 Projected population and household growth per settlement hierarchy. Similarly, regarding, 2.9 Core Strategy Table, Limerick Chamber welcomes the disaggregation of Mungret and Annacotty from Limerick City figures. However, Limerick Chamber feels that the Central Statistics Office (CSO) definition of the city as used by the Census is too broad and takes in many areas that would be considered suburban such as Rhebogoe and Raheen.

We would recommend further disaggregating these figures to outline population growth, housing and land in the city centre / CBD. Furthermore, Limerick Chamber recommends the insertion of an additional column in Table 2.9 that outlines the number of inhabitants per dwelling. This is important because average household size is key to the understanding of the need for a diverse range of typology for smaller households such as single people and smaller family sizes. In keeping with such points, we recommend that Limerick city centre / CBD is a standalone hierarchy 1 target with other districts / suburban areas following.

- Limerick Chamber would also like to take this opportunity to highlight that the Economic and Social Research Institute (ESRI) publication, 'Regional Demographics and Structural Housing Demand at a County Level', used in the calculation of household projections in the LDP, does not take into account any likely pent-up demand and the hidden homelessness of adult children living within familial homes as a result of a decade of under delivery of housing and thus the LDP runs the risk of underestimating housing demand. Limerick Chamber recommends that this is rectified, with an analysis of pent-up demand in Limerick city centre and CBD as well as Limerick's suburban areas to be included in housing targets.

- Furthermore, Limerick Chamber recommends using the ESRI scenario which takes account of NPF required growth, using any other figure may run the risk of an under supply of housing which is not reflective of the spirit of the NPF.

- With regard to the settlement hierarchy, in keeping with the spirit and goals of the NPF, Limerick city centre / CBD should be top priority with other suburban locations following. As per the Determining the Quantum of Zoned Land Required to Accommodate Proposed Growth section, Limerick Chamber feels that Limerick City and its CBD should be prioritised ahead of Mungret and Annacotty given the need to create a compact urban environment close to sustainable transport options, employment and social amenities.

- As per Table 2.6: Density Assumptions per Settlement Hierarchy the LDP should strive to deliver more dense and compact housing options in villages and towns to account for the wide array of accommodation required. With the increase of working from home and the hybrid model the empirical evidence suggests that more people are returning to these areas and as such will need to be accommodated, especially single people and those with smaller families.

- Limerick Chamber notes from Figure 2.2 Limerick City and Environs, including Mungret and Annacotty Density Zones, that large parts of the Dock Road, along the River Shannon and in proximity to Mary Immaculate College are zoned for just 45+ dwellings per hectare and in some adjacent areas just 35+. It is inappropriate for such a central and strategic part of the city to have such extraordinarily low levels of density zoning. Density zoning should reflect the proximity to the city centre / CBD and should be revised upwards to bring it more in line with the city centre (c. 100+ homes per hectare) especially along the River Shannon. Furthermore, there is a large sudden difference between the 100+ dwellings per hectare and 45+. A prudent mitigation of such a sudden decrease by introducing another density guideline with a blend of these two figures in the area surrounding the city centre is recommended in line with urban planning best practice.

- While Limerick Chamber welcomes the ambition of compact growth under Policy CP2 we would encourage language enforcing that Limerick city centre / CBD is the main priority when it comes to future development.

Chapter 3: Spatial Strategy

- Limerick Chamber welcomes the addition of text focusing on the NPF and its focus and strategy for Limerick city centre including the four key areas of prioritisation within the NPF.

- The inclusion of language around the Southern Region's three cities working together is most welcome, and with the inclusion of Galway in the west of Ireland, is something that Limerick Chamber supports.

- Under Policy CGR P1 Limerick Chamber welcomes the expansive approach to compact growth and consolidation, especially with a focus on higher densities and brownfield, infill and state-lands. However, we do feel a priority for development should remain within the city centre / CBD and it should be placed as a standalone in hierarchy 1. Policy CGR P1 identifies a focus on 'compact and consolidated growth' yet includes Annacotty and Mungret in its housing plans. Project Ireland 2040 identifies 50% of population growth in Ireland to be within the five urban areas of Ireland. Limerick city centre / CBD must remain a priority growth area ahead of suburban locations such as Annacotty and Mungret. To include these areas in population and ancillary housing and land zoning projecting, in conjunction with Limerick city centre / CBD, hinders the ability of Limerick City and County Council to monitor and progress Limerick city centre / CBD alone.

- While Limerick Chamber supports Objective CGR 01 and welcomes the inclusion of towns and villages, it is essential that this section should have a focus on decreasing urban sprawl from the city centre as well as towns and villages.

- Under Objective CGR 02 Limerick Chamber welcomes the inclusion of the Whole of Government National Disability Inclusion Strategy (NDIS) 2017-2022. Limerick Chamber supports better placemaking and housing options for all, and diversity in typology and facilities that caters for all of society is welcome.

- Objective CGR 03 targets 50% of new homes within the existing built-up footprint & suburbs. The inability to separate Limerick city centre / CBD from suburbs is a concern for Limerick Chamber. As stated previously, Limerick City is one of five urban areas in Ireland subject to a 50% growth in population by 2040. Along with ensuring that adequate and appropriate housing infrastructure is available for this projected growth, there is also a significant opportunity to revitalise the city centre / CBD through this increased level of residency in the city centre. People living in the city centre / CBD will boost the whole economy of the Mid-West region, which in turn can have multiple positive outcomes such as an increase in indigenous businesses and foreign business locating within the city centre / CBD, as well as achieving Project Ireland 2040's targets of compact growth within urban spaces. For target's to be achieved, the appropriate and correct measurements need to be set (i.e. the monitoring of Limerick City / CBD progression alone). Under Objective CGR 03 (e), Limerick Chamber welcomes the requirement of owners of urban sites to prepare masterplans. However, this would benefit from the introduction of timelines whereby the masterplan has to be started and completed by a certain time. Further, increased zoning of lands in the city centre / CBD, particularly along the Dock Road and adjacent lands, as well as lands in proximity to Mary Immaculate College could sustain a large population increase including especially with an emphasis on student accommodation.

- Limerick Chamber welcomes the addition of Policy CGR P2 which focuses on the monitoring of brownfield and infill sites. This policy would benefit from an online portal where interested parties could see the latest updates on these sites which should be updated on a quarterly basis with a timeline of delivery to be included in the LDP.

Under Objective CGR 04, Limerick Chamber welcomes the active land management approach of Limerick City and County Council to establish a database of strategic brownfield and infill sites in the city centre. However, this section could benefit from the inclusion of a definition around what falls under “strategic” and what does not. The database would also benefit from being updated on a more regular basis, perhaps quarterly, rather than yearly.

Limerick Chamber welcomes the addition of Limerick City and County Council owned lands within objective CGR 05; however, this objective could be expanded further, and vacant sites should be included in the database / online portal of strategic brownfield and infill sites outlined under CGR 04. Objective CGR 06 for derelict sites should also be included on this database / online portal as well as any updates relating to the sites.

Limerick Chamber welcomes the addition of a SWOT type analysis within Table 3.4.1 Strengths, Constraints, Opportunities and Threats. However, there are some items that should be changed / added:

- World class infrastructure should be moved from the “Strengths” column and added to the constraints column and renamed “infrastructure”. Three key related infrastructure points are already noted within constraints and threats columns. Lack of housing supply is included under threats, lack of investment in public transport and lack of centrally located high density developments are included in constraints. These three items are not cohesive with world class infrastructure
- Limerick Chamber welcomes the addition of housing under the threat's column, however, this should be expanded further to include affordable housing and appropriate housing i.e. housing for smaller families and single people as well as those with different requirements
- While some graduates choose to remain in Limerick, brain drain of graduates to other parts of Ireland should be included as a threat
- High quality lifestyle is vague and does not fit with the infrastructural gaps highlighted previously and should be removed or clarified
- Highest disposable income outside Dublin should be included in the strengths category
- Large concentration of state-owned lands in the city centre / CBD should be included in the opportunities section
- Decreased footfall, lack of an all-day economy and inappropriate levels of public and private investment in the city centre should also be included in the threats section

- Under 3.4.2.1 Developing a Spatial Strategy, Limerick Chamber recommends the inclusion of a disaggregation of population growth of Limerick city centre / CBD from the environs including Annacotty and Mungret as highlighted previously. Following this Section 3.4.3.11, the Mungret Framework identifies developing a new neighborhood for Mungret, with the potential for c. 1,950 housing units. Developing a neighborhood in a suburban location with housing potential of this scale may harm the city centre / CBD, this should be reflected as a risk in the LDP with potential mitigation measures put forward.
- Regarding the Settlement Capacity Audit and Flood Risk Assessment, Limerick Chamber recommends that infrastructure be put in place to mitigate any potential flood risk so areas can be unlocked and consolidated for much needed housing. Much of Limerick city centre / CBD is included in flood zone A or B (including what appears to be a segment Colbert Station) it is important that the correct measures are taken to fully utilise land and decrease urban sprawl.
- Regarding both Limerick Twenty Thirty Strategic Development DAC and the Land Development Agency (LDA) facilitating developments in the “city and suburbs”, Limerick Chamber recommends the inclusion of language that puts a development prioritisation on the city centre / CBD and not on an equal footing with the suburbs.
- Focusing on Map 3.2: Limerick Opportunities and Destinations there is a lack of housing provision projects earmarked for the city centre / CBD falling under the “Housing Opportunities” heading, Limerick Chamber recommends that this should be amended with strategic sites identified for housing. While we are mindful that housing in the city centre / CBD will comprise of mixed-use developments under the “Mixed-Use Opportunities” heading, the projects outlined for the city centre / CBD are to be delivered over the long term rather than short term; specifically, Cleaves Riverside Quarter and Colbert Quarter (Map 3.3 City Spatial Opportunities, outlines Colbert Quarter is 10+ years). An area of concern for Limerick Chamber is that of the five specific ‘Housing Opportunities’, only two of these are located within the 2.5km radius of the city centre. The remaining three are situated in Annacotty and Mungret. To pursue city center / CBD revitalisation, focus must be prioritised within the urban space that is Limerick City CBD.
- The opportunity to phase the development of Cleaves Riverside Quarter and Colbert Quarter so that it can be delivered quicker, this should be reflected in the map. For all projects, this map would benefit from an anticipated timeline for delivery. Limerick Chamber recommends the inclusion of Cleaves Riverside Quarter in Map 3.3 City Spatial Opportunities with the inclusion of a timeline.
- The objectives laid out for the redevelopment of the Cleaves Riverside Quarter are welcomed. Limerick Chamber recommends that this development is fast-tracked with a sufficient allocation of resources to deliver a masterplan. Delivering the masterplan of this project will show potential investors in the region that Limerick is taking the right steps to revitalise their city centre / CBD. The provision of information regarding the ‘World Class Waterfront’ is also sought. Significant funding has been secured for this project which has the potential to reintroduce the River Shannon as a focal point of Limerick City / CBD. The provision of clear and concise regular updates to both businesses and the public will be important to highlight Limerick as a city which is regenerating. The third development along the proposed ‘World Class Waterfront’ is the University of Limerick City Centre campus. An area of concern for Limerick Chamber is the recent announcement of the Clare County Development Plan (CCDP), which incorporates a Strategic Development Zone (SDZ) to the North of the University’s existing campus. Within this proposed SDZ is a planned University Town, an expansion of the University of Limerick’s current campus further into South Clare. Should the application of this SDZ be successful, it could significantly impact the delivery, timeframe, and resource allocation of the city centre campus for the University of Limerick at the old Dunnes Stores site.
- Limerick Chamber welcomes the revitalisation objectives set down under CGR 010, however it would be appropriate to include language around engaging in strategic partnerships for delivery given the private sector’s access to finance and delivery capabilities.
- Under 3.4.3.4 Limerick 2030, Limerick Chamber recommends the inclusion of the last paragraph which proposed to be removed. As part of Limerick 20230 – An Economic and Spatial Plan, it is vital that there is a focus on brownfield sites and tackling vacancy and dereliction for the rejuvenation of the city centre.
- With regards to 3.4.3.9 Arthur’s Quay, it is important that Arthurs Quay Park, given its significance as a public realm and meeting space, is protected and its footprint is possibly expanded as part of the consolidation efforts. Arthur’s Quay Park is one of a limited number of options for public meeting space in the city centre / CBD and its proximity to the River Shannon ensures it is a unique proposition for tourists and residents alike.

- Focusing on Opera Square, Limerick Laneways, World class Waterfront, Cleaves Riverside Quarter, UL City Campus, Arthur's Quay and Ellen Street, Limerick Chamber recommends that timelines and key delivery point dates should be included in the LDP.
- Limerick Chamber questions the removal of masterplan language in relation to Mungret. Under Objective CGR 03 (e) the council requires landowners to prepare masterplans and we recommend further clarification be provided on the difference between a masterplan and framework.
- The emphasis on the expansion of Mungret under Objective MF 01 represents a cause of concern for Limerick Chamber and its potential detractor from Limerick city centre / CBD. Given the level of facilities to be provided and its proximity to the Crescent Shopping Centre, it has the potential to detract population and businesses from the city centre / CBD. While Limerick Chamber applauds the ambition of the project, it would be more appropriate focusing such efforts and resources on the Cleaves Riverside Quarter. Limerick Chamber also recommends the inclusion of language promoting active and public transport options linking Mungret with the city centre.
- While Limerick Chamber welcomes the collaboration of Limerick City and County Council and the LDA, the LDP should include all potential lands to be inherited by the LDA under the site transfer portion of Housing for All. Furthermore, whilst welcoming SQ 01b we recommend the inclusion of a timeline and phasing for each potential district within the Colbert Quarter plan.
- Under Map 3.9: City and Environs, Mungret and Annacotty Consolidation and Opportunity Sites we note a lack of inclusion of sites along the Dock Road and adjacent lands which could potentially provide a considerable number of homes. We would recommend that Limerick City and County Council work with public and private landowners to establish housing opportunities near the city centre.
- Limerick Chamber welcomes the plans for Thomond Park given its potential to provide an economic uplift and more opportunities to the surrounding areas as well as an increased tourism offering.
- Limerick Chamber welcomes the social, economic and physical infrastructure plans for regeneration areas in Limerick and we commend the ambitious plans outlined in this section.
- Limerick Chamber expresses support for the proposed material amendment number 147, which proposes the change of zoning of "14.71ha. From Enterprise and Employment and Open Space and Recreation to New Residential" at Greenpark (former racecourse) lands. It is Limerick Chamber's understanding that as per the current LDP 2010-2016, the proposed material alteration 147 in the current plan reflects the retention of the existing quantum of new residential zoned land as provided for in the previous LDP. This is most welcome given the ongoing national housing crisis, a crisis that is markedly evident in Limerick. This proposed amendment could facilitate the delivery of c. 900 new homes. Limerick Chamber members have been vocal in their support for greater provision of housing in Limerick closer to the city centre / CBD for the county to become attractive to future employers and employees and to retain our current level of knowledge capital. Difficulty sourcing suitable homes is a prime issue when speaking to members and citizens. The location of the Greenpark lands is ideal in terms of both meeting this demand and in further energising Limerick. As it stands, the lack of available new homes within walking distance of the city centre / CBD is having an adverse effect on the potential of the city and the ability of businesses based therein to thrive. As stated in "The Future Development of Limerick City" as produced by Indecon Research Economists and published by Limerick Chamber in June 2021 "Increasing the population density in Limerick city is a critically important challenge for the future development of the city". The same report recommends that "Strategic development areas should be identified in the city to facilitate new quality affordable residential developments". While we acknowledge and welcome the work done to date in identifying and promoting several sites within or proximate to the city centre/ CBD such as Colbert Quarter, Cleaves, etc., which in time will deliver much needed homes, we are concerned that there simply is not enough land zoned or developments underway within or proximate to the city centre to deliver the required critical mass of population density to ensure the healthy future development of the city. The city needs more people living within walking distance of the city centre / CBD to promote an all-day economy of the city which at present is underdeveloped. The continued prioritisation of suburban areas such as Annacotty and Mungret, at the expense of other more proximate lands such as Greenpark, is in not aligned with the main national planning principles of "Compact, Smart, Sustainable Growth", the 15-minute city principle, prevention of urban sprawl, promotion of decreasing reliance on the private car as the primary mode of transport.

- In relation to lands at Courtbrack area of Limerick City, adjacent to Alandale residential area and the Dock Road (3 sites accounting for a total of 2.8ha) Limerick Chamber recommends that the current zoning for these lands is amended to provide for residential uses to reflect the current market demand for housing within proximity to the city centre. This combined land represents a strategic opportunity to deliver housing within active travel distance to the city centre and other public transport nodes. Failing to zone these, and other, lands for residential use will increase urban sprawl and feasibility of suburban locations which is not in keeping with the goals outlined in the NPF. Given that the combination of these sites falls within the requirements of tier 1 serviced zoned lands, it would be appropriate that they accommodate residential development.

- Limerick Chamber ask that Limerick City and County Council work with landowners to identify appropriate lands for housing within walking distance to the city centre / CBD and to collaborate with these landowners to put facilities in place to ensure the viability of housing. Specifically, there is significant greenfield land near Greenpark / Alandale / Courtbrack areas which could be used for housing. Not often are such greenfield options available in such proximity to a city centre. Limerick Chamber asks that Limerick City and County Council note these strategic landbanks and work with landowners to bring much needed housing forward on these lands, this will bring much needed homes to the city centre while combating urban sprawl and adhering to the compact growth objectives under the NPF. Regarding any potential flood risk, the LDP (or Limerick City and County Council) should work with stakeholders to bring forward suggestions or proposals to unlock these, and other, lands to bring much needed homes forward - this may include the need to rezone to respond to current market demand. Failing to consider these lands for residential use results in increased necessity for urban sprawl and reinforces reliance on suburban locations where private car use will be higher which goes against national policy set down by the NPF. It is necessary that the LDP consider what framework needs to be implemented to bring much needed housing forward on lands like this. We ask that Limerick City and County Council work with landowners in relation to this. As already stated, much of Limerick City is within flood zone A or B and the LDP needs to put plans in place to utilise this land rather than relying on suburban locations.

Within Policy CGR P2 it is stated that brownfield / infill sites will be monitored. Limerick Chamber recommend that frequent and detailed monitoring along with the collection of data must be a factor that the LDP addresses moving forward. Noting that brownfield sites will be monitored is welcome, but there must be language included as to the reporting schedule, data to be collected and dissemination service to the public.

Chapter 4: Housing

- Limerick Chamber welcomes the addition of language to ensure that a portion of all new dwellings will be designed to the National Disability Authority's UD ++ standard. Limerick Chamber recommends that this target be a floor rather than a ceiling with flexibility built in to adapt and increase over time depending on the needs of residents.

- While we commend the retrofitting of social housing and welcome the introduction of a home loan. It is important that the LDP encourages value for money as part of its re-use strategy for social housing and as such, language should be included to highlight this point. Furthermore, there is a cohort of private households that fall outside the social housing bracket and would not have enough income for retrofitting or to facilitate the home loan - we recommend that this cohort be catered for, and that the council should liaise with the relevant authorities as part of the LDP to put the correct initiatives in place to support this cohort. This may be especially true for those of pensionable age.

- Limerick Chamber welcomes the addition of text to support the provision of student accommodation, however, we recommend that Limerick City and Council work with building providers to identify land in appropriate city centre / CBD locations and facilitate the building of purpose-built student accommodation on the identified land.

- The Housing chapter notes how its policies and objectives will evolve around the NPF and RSES, both of which place an emphasis on urban density regarding housing. The LDP references ‘Residential Density’ in section 4.2.4. It is important the LDP notes a distinction between residential and urban density. Urban density refers to improving and increasing the residential density of the city centre. Referring to the objective as ‘Residential Density’ is too broad and opens the door for policies to be catered towards increasing densification of suburban housing developments and further contribute to urban sprawl. It has already been emphasised in this submission that it is not appropriate to include suburban areas (Annacotty & Mungret) in any Limerick City / CBD projections going forward. Labelling the objective as “residential density” could only promote further urban sprawl and less focus on revitalising the city centre / CBD through residential developments. Therefore, we recommend language that distinguishes one from the other while prioritising urban density.

- Apartments are a crucial factor in delivering the compact growth outlined under the NPF while also providing smaller home options for single people and families. While there is currently a housing and accommodation shortage nationally, there is a specific shortage of 1-bed units in Limerick City. As referred to in the LDP, just under 10% of households live in apartments. Limerick Chamber performs a rolling rental analysis identifying the current state of the rental market in Limerick City and the adjoining suburban areas such as (Castletroy, Annacotty and Mungret). Since the start of this analysis in early February, there were just 7 1-bed units available for rent in Limerick City and environs (6-week period). This means that anyone looking to enter the rental market will either have massive competition for a 1-bed or else must pay the value of a 2-bed unit or higher, which currently stands at €1,526 per month. There are also options for shared housing. This is not an attractive proposition for professionals looking at moving to Limerick. The increase in supply may help to alleviate the swift increases in rental prices seen over the last number of years. To accommodate growth in the city centre / CBD, the appropriate homes (i.e. apartments) must be planned for and delivered. Like modal share targets in the LSMATS, Limerick Chamber recommends that the LDP should also set targets for the number of apartments to be built to 2028 relative to other housing types.

- There is significant potential to attract students to live in the city centre / CBD moving forward, both due to the planned University of Limerick City Centre Campus

and due to the expected improvements in accessibility between the University of Limerick main campus. Both active (cycling & walking) and sustainable (BusConnects & micro mobility) transport facilities and options are expected to be in place which will allow for better connectivity for students/workers commuting between the two areas. This LDP notes the increasing housing demand in Annacotty along with Limerick City and its environs. Delivering purpose-built student accommodation along with 1-bed apartment units throughout Limerick City (2.5km radius from the city centre) will serve this increase in demand for both student accommodation and single person / smaller family units. The University of Limerick (through its city centre campus), Technological University of the Shannon: Mid-West and Mary Immaculate College are all situated within 15 minutes of Limerick city centre. This further strengthens the case that student-appropriate accommodation has the potential to be very advantageous in terms of revitalising the city centre / CBD through this increased level of residency and this should be reflected in the LDP.

Chapter 5: A Strong Economy

- Limerick Chamber welcomes the focus on city centre retail in chapter 5. With regards to material amendment 15 and retail warehousing in Limerick, Limerick Chamber does not feel it is appropriate to remove language which aims to assess potential retail impact on Limerick City / CBD of future developments. We recommend that this language and actions are included, and any new retail warehousing be assessed for its potential impact on Limerick city centre / CBD. Revitalising the retail sector in the city centre / CBD will be crucial to the success of regenerating Limerick City. Section 4.6.2 point 2 identifies that a key action of this LDP is to ‘Maintain the vitality and viability of Limerick City Centre by consolidating the core retail area to ensure any future retail development is directed towards this area in the first instance’. While this action is welcomed and will be a major step in preventing outer-city shopping centers from expanding and further detracting retail and other commercial activity from the city centre / CBD. Limerick City and its commercial / retail sector have been in decline for the last decade, largely due to a lack of footfall and private investment in the city centre / CBD. ‘Maintaining the vitality and viability of Limerick City Centre’ would suggest Limerick City Centre has been performing sufficiently over the last number of years. Feedback from Limerick Chamber members as well as empirical evidence suggests that this is not the case. While it is important to note the city’s strengths, it is equally important to acknowledge the challenges that lie ahead for Limerick City, for instance improving a key sector such as retail in the city centre / CBD which has been performing poorly over the last number of years.

- Limerick Chamber welcomes the inclusion of MARA and marine planning for offshore wind. This must be a priority for both local and national policy makers.
- Limerick Chamber welcomes the Limerick City and County Council's objective around the Circular Economy (p.134). This will be a crucial factor in businesses going forward and to those who have already embraced the Circular Economy into practice, whether that be in day-to-day operations, supply chain adjustments or otherwise.
- While Limerick City does not have the largest tourism sector, it is important that innovative strategies are adopted to attract visitors to Limerick City and to the county. Limerick is a city of significant historical and cultural importance and Limerick Chamber supports empowering the tourism sector to capitalise on this. The Council's objective to promote digital innovation for the tourism industry has the potential to play an exciting role in promoting Limerick City's history and highlight Limerick City as an interesting and attractive place to visit. This in tandem with the proposed 'World Class Waterfront' has the potential to mitigate the disadvantage that Limerick has versus other Irish counties when it comes to natural attractions.

Chapter 7: Sustainable Mobility and Transport

- Limerick Chamber welcomes and commends the analysis undertaken in the LDP of the POWSCAR data. To that end, Limerick Chamber recommends that the correct public and active travel infrastructure must be put in place. As per the LDP, a considerable number of journeys within Limerick undertaken are within a short distance of workplaces. This should be investigated further by examining the reason private car journeys are covering these short distances; it could be that walking, cycling and other active travel modes are not safe due to lack of infrastructure. With regards to table 7.3 Target Mode Share, Limerick Chamber recommends the inclusion of what percentage these current mode shares have, as per most recent data. This table would also benefit from the inclusion of car usage targets and existing shares.
- Regarding the potential Limerick Northern Distributor Road (LNDR), Limerick Chamber recommends the inclusion of language that supports active and public transport routes on any potential road infrastructure in the future. There is a risk that without these measures in place, it will serve to increase private car usage. Limerick Chamber recommends that Limerick City and County Council analyse the potential mechanisms for land value capture that could be deployed in conjunction with the introduction of the LNDR. This could result in a wider public benefit to the introduction of the LNDR. Any monetary gain due to land value capture of the LNDR should be reinvested back into active and public transport that would support compact growth within the city centre / CBD as well as forming linkages with other strategic areas.
- As part of wider traffic mitigation measures, it would be appropriate that the LDP make a commitment to support the expansion of data collection points for congestion and other traffic monitoring purposes in the city and suburbs.
- Policy TR P7 regarding 'Sustainable Travel and Transport' targets achieving the '10-minute city/town' concept, promoting compact growth and reducing the need for long distance travel. These are welcome objectives, and it is encouraging to see Limerick City and County Council pursue these sustainable methods of transport.
- Limerick Chamber supports the Council's objective of introducing 'Park and Ride/Stride' points in Limerick City. These will be a key factor in reducing the dominance of private car usage throughout the city, where people regularly drive through Limerick City Centre /CBD on their commute. It is important that these locations are strategically located to cover the maximum catchment area to be an option for commuters going forward. This objective will play a crucial role in reducing the amount of 'last mile trips', another objective (Objective TR O3 a) of the Council. These facilities must have adequate infrastructure and facilities in place from their initial use to encourage as much usage as possible.
- The Council's ambitions to transition people away from the use of private cars for commuting are encouraging. However, the inclusion of suburban areas in Limerick City's projections (in this case transport) will inaccurately represent the performance of Limerick City over the coming years due to inability to disaggregate the city centre / CBD from city and suburbs data. To accurately measure progress, the city, city centre and CBD must be standalone data points. Limerick Chamber would like to re-emphasise the importance of having separate monitors for Limerick City and its city centre / CBD.

- It is important that the objective TR O46 – Limerick City Centre Traffic Management Plan, does not inform Limericks Placemaking Plan and that it be the other way around. We are transitioning to a time in which it is expected that private cars will not be at the forefront of transport options. Ensuring Limerick City has the appropriate placemaking and public amenities in place should be prioritised moving forward to accommodate the expected population growth and the transition toward more active and sustainable methods of transport.

Chapter 9: Climate Action, Flood Risk and Transition to Low Carbon Economy

- In terms of flood risk, there are significant land banks available in flood zones A and B which could be unlocked and consolidated if the correct measures are put in place. Limerick Chamber recommends that Limerick City and County Council commit to collaborating with landowners to unlock these lands for the provision of housing and, possibly other uses. To not utilise land which may or may not be a flood risk will encourage urban sprawl of the city towards the suburbs rather than encouraging a compact urban footprint. Limerick City and County Council should note the land reclamation measures undertaken in other European cities to provide infrastructure on lands which had been marked as flood risks.

Chapter 11: Development Management Standards

- Limerick Chamber recommends a user-friendly update to the table outlined at the start of this section. Currently, the table spans multiple pages with users needing to scroll forward and back in an attempt to analyse the information. Each project contained within this table should be its own dedicated section or page with all the information required and easily accessible. It could follow the approach of the table on page 226, where the information is all on one page and not spanning multiple pages or columns. Furthermore, this section, particularly when speaking of height limits, should be included in the spatial strategy section of the document.

Chapter 13: Implementation and Monitoring

- Limerick Chamber recommends the development and introduction of an online portal for the monitoring of the progress of the LDP. The list of indicators included under Table 13.1: Core Strategy Monitoring Indicators are cohesive to quarterly updating on the online portal from Limerick City and County Council. This portal will also increase transparency around the goals and targets of the plan. The monitoring of economic and spatial data with an online portal is commonplace in other European Cities.

- Regarding section B1 Plan Objectives Monitoring, Limerick Chamber recommends the inclusion of language to facilitate the progress report being prepared and delivered by the Directly Elected Mayor (DEM) once that person takes office (or the CEO in the absence of a DEM). Limerick Chamber also recommends that a progress report be prepared every two years for the lifetime of the plan to be prepared and delivered by the DEM, or the CEO depending on if a DEM has assumed the role at that time. We understand that the language in Section 15 (2) of the Planning and Development Act 2000 (as amended) has not been changed to reflect the impending DEM, however, the LDP must prepare for this change, and it must be a priority item for the Government. We also understand that there is no requirement for the CEO / DEM to prepare further progress reports once the initial two-year update has been delivered. However, Limerick Chamber feels it is vital for a plan to be prepared and delivered so citizens can receive an update. Limerick City and County Council have a unique opportunity to increase transparency around the delivery of development plans and set a best-in-class example for other cities and counties.

- Limerick City and County Council could expand the above data portal to include other economic and spatial indicators, this should be done in consultation with the public and other stakeholders to examine what items should be monitored and reported on.

3. Conclusion

Limerick Chamber would like to thank Limerick City and County Council for the opportunity to submit our views on the draft LDP. While we commend the demanding work undertaken by Limerick City and County Council there are some areas of key concern that we feel must be addressed

Summary of Key Asks & Recommendations

- Throughout the LDP, suburban locations, such as Annacotty and Mungret, are given equal priority and hierarchical footing with the city centre / CBD. While Limerick Chamber notes the importance of these areas due to current housing pipelines concentrated in these locations, to give them equal priority out to 2028 could potentially negatively impact the city centre / CBD. Limerick Chamber ask that the city centre / CBD is a standalone priority 1 area.

- To accurately monitor the progress of the city centre / CBD, the boundary must be well defined. The definition of the city used in the LDP is too broad and encompasses suburban locations. This also holds true for the CSO definition of the city. Limerick Chamber asks that Limerick City and County Council works with stakeholders to provide an accurate boundary map for the city centre / CBD. Targets / goals / data for the city centre / CBD are often included with Annacotty, Mungret and other suburban locations. To accurately identify the progress of the city centre / CBD, Limerick Chamber asks that the city centre / CBD data and targets are disaggregated from other areas, especially suburban locations. In conjunction with this, when planning, setting targets and analysing demand, the city centre / CBD needs to be distinct from the wider suburban areas.

- Limerick Chamber ask that Limerick City and County Council work with landowners to identify appropriate lands for housing within walking distance to the city centre / CBD and to work with these landowners to put facilities in place to ensure the viability of housing. Much of Limerick City is within flood zone A or B and the LDP must adopt a framework to utilise these lands rather than relying on suburban development.

- Given the strategic placement of lands at Greenpark / Courtbrack / Alandale, Limerick Chamber asks that Limerick City and County Council work with landowners to bring much needed housing forward on these lands. This will bring homes to the city centre while combating urban sprawl and adhering to the compact growth objectives under the NPF.

- Limerick Chamber asks that relevant site registers, as outlined in this submission, are updated on a quarterly basis and opened to the public through an online portal.

- Limerick Chamber asks that, when assessing housing demand that ESRI NPF targets are used in conjunction with those on the social housing waiting list, which will give an accurate reflection of housing need.

- Limerick Chamber asks that language in the document be updated to reflect the need for affordable housing as well as homes of diverse types and sizes, especially smaller homes and apartments.

- Limerick Chamber asks that the possibility of the introduction of a land value capture mechanism be examined as part of the LNDR – with any monetary gain to be reinvested back into active and public transport as well as initiatives supporting compact urban growth.

- Limerick Chamber asks that key timelines and targets are included in the LDP when focusing on public delivery projects being brought forward by Limerick Twenty Thirty / Limerick City and County Council and other public providers. Limerick Chamber also recommends the prioritisation of the Cleaves Riverside Quarter and the urgent allocation of appropriate resources to bring its masterplan forward be reflected in the LDP.

- Limerick Chamber asks that, in relation to the introduction of a home loan for retrofitting, those people that fall outside the social housing bracket that may not be able to facilitate a loan or afford their retrofitting are also catered for in future initiatives (possible through means testing) and language in the LDP should reflect this.

- Limerick Chamber asks that density be increased in areas directly adjacent to the city centre location (100+ dwellings per hectare) to mitigate such a sudden drop off to the next level (45+ dwellings per hectare) .

- Limerick Chamber recommends the introduction of initiatives designed to decrease the usage of private car journeys and the increased investment in active and public transport infrastructure.

- Limerick Chamber asks that language in the implementation and monitoring section be updated to reflect the role of the impending DEM and once someone assumes the role. Limerick Chamber recommends that developing and delivering a progress report should be the responsibility of the DEM and should be delivered every two years.



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