

Forward/ Strategic Planning,
Limerick City and County Council,
Merchant's Quay,
Limerick,
V94 EH90

11th April 2022

Re: Material Alterations to the Draft Limerick Development Plan 2022-2028

Dear Sir/Madam,

The National Transport Authority ('the NTA') has reviewed the Draft Limerick Development Plan 2022-28 and based on the policies and objectives of the *Draft Limerick Shannon Metropolitan Area Transport Strategy (LSMATS)*; the *Regional Spatial and Economic Strategy (including the Metropolitan Area Strategic Plan) for the Southern Assembly*; and on national policies and guidelines, submits the following observations and recommendations.

1. Overview

The NTA welcomes the overall approach that has been taken to amending the Draft County Development Plan, in particular the extent to which the recommendations of the NTA made at the previous stage, as they related to the LSMATS and transport planning generally, have been taken on board. The NTA are therefore of the view that the plan now provides a firm basis for the viable development of the LSMA within Limerick, and for the development of an economically, socially and environmentally sustainable transport culture and system, closely integrated with land use planning policy.

Recommendation

The NTA recommends that the material alterations which provide for the integration of the LSMATS into the Development Plan are approved, as a means of ensuring the LSMA can be developed in a sustainable manner.

2. Table 2.6: Density Assumptions per Settlement Hierarchy

The NTA note with some concern that it is proposed to reduce the density for development in Newcastle West to 22 units per hectare. This low density format would not be generally favoured in terms of promoting walking and cycling at the local level to destinations such as school or retail, as it would lead to an inefficient use of land and increase in the distances required to travel.

Recommendation

The NTA recommends that this alteration is rejected on the basis that it would lead to a low-density urban format which would promote car use for local trips.

3. Material Alterations 109, 140 and 149 – Data Centres

The NTA notes the intention to rezone 51.8Ha of land for data centres at Rosbrien and Ballysimon. It is acknowledged that there is an economic rationale for such zonings in the Mid-West, however the development of such sites, including their initial zoning, is required to be undertaken in a manner consistent with the DoECLG's "Spatial Planning and National Roads Guidelines for Planning Authorities" and should also consider the principles and measures of the LSMATS. In addition, the views of TII in this regard should be fully taken into account.

Recommendation

The NTA recommends that the Data Centre Land Use Zoning Objective and Purpose is amended to read as follows:

Objective: To accommodate the provision of a Data Centre according to the following principles:

- (a) That the development is consistent with the DoECLG's "Spatial Planning and National Roads Guidelines for Planning Authorities";
- (b) That car parking is provided at a rate below the maximum permitted;
- (c) That a public transport service plan is agreed with the NTA; and
- (d) That the operations of the development will be monitored.

Additionally, a reference to sustainable transport should be included in the purpose.

4. Material Alteration no. 142 and Material Alteration no. 153 – Additional Enterprise and Employment Zonings at N69 Dock Road / N18 Junction

The NTA notes that significant additional lands have been proposed to be rezoned on the periphery of the city, in the vicinity of the N69/N18 junction. These lands were not zoned for such uses in the adopted 2021 Southern Environs Local Area Plan (LAP) and the NTA is concerned that there now appears to be conflict between the Development Plan and the LAP.

Recommendation

Notwithstanding the lack of clarity around the status of the LAP, the NTA is concerned that these alterations comprise an incremental approach to the reinstatement of zonings made at the draft stage of the LAP and would reiterate our comments made at that point, as follows:

- While the removal of these zonings would be optimal in terms of consistency with the LSMATS, RSES and MASP, their maintenance may be considered acceptable, subject to the following conditions on their future development being incorporated into the final Development Plan:
 - The development of these site would be governed by a single Masterplan agreed between the landowners, Limerick City and County Council, Transport Infrastructure Ireland and the NTA;
 - Car parking will be provided at a rate below that provided for in the County Development Plan and provided on an area-wide basis rather than according to the requirements of individual developments;
 - Cycle parking will be provided in all developments to cater for 20% of all trips to be made by this mode;
 - All developments will include end-of-trip cycling facilities for employees such as showers and lockers;
 - All new roads would incorporate segregated cycle tracks designed in accordance with the National Cycle Manual;
 - All new roads will seek, in the first instance, to provide for filtered permeability, in order to avoid creating additional capacity for car traffic; and
 - The Masterplan, and all subsequent development proposals would include Mobility Management Plans, with clear targets and commitments to implementing measures to promote sustainable transport.

The NTA would also like to take the opportunity to reiterate our statement on the Enterprise and Employment zoning from the draft stage, as follows:

- The Enterprise and Employment zoning objective should exclude office development and shall be limited to low-intensity employment uses only. Only exceptional cases, where it has been demonstrated that the proposal could not be accommodated in the city centre and where there are imperative reasons for its development, may be permitted. This zoning objective should also state that development proposals shall be subject to a transport plan which demonstrates how the development will operate in a sustainable manner whereby public transport, walking and cycling are the principal modes, and in a manner which does not generate significant numbers of car trips on the local road network and does not impact materially on the carrying capacity of the national road network.

Furthermore, the NTA would recommend that clarity around the relationship between the LAP and the Development Plan should be provided.

5. The Limerick Northern Distributor Road

The NTA notes and welcomes the amendments related to the Limerick Northern Distributor Road in relation to development management along the route.

Recommendation

The NTA recommends that the amendments to the LNDR section are approved in the making of the final Development Plan.

I trust that the views of the NTA will be taken into consideration in the finalisation of the Limerick City and County Development Plan.

Yours sincerely,



Michael MacAree
Head of Strategic Planning