

# Planning Submission

*In respect of*  
**Material Alterations Draft Limerick City & County  
Development Plan 2022-2028**

*Prepared by*

**John Spain Associates**

*On behalf of*

**Clancourt**

**April 2022**



39 Fitzwilliam Place, Dublin 2  
Telephone: (01) 662 5803  
Facsimile: (01) 676 6374  
E-mail [info@johnspainassociates.com](mailto:info@johnspainassociates.com)

## 1.0 INTRODUCTION

- 1.1. This submission has been prepared on behalf of our client Clancourt Group<sup>1</sup>, who are experienced and well funded developers who, in addition to a number of major commercial developments in Dublin, have a significant landholding (30.8 Hectares) in Dooradoyle, including the Crescent Shopping Centre.
- 1.2. Clancourt have owned and operated the Crescent Shopping Centre for the last 49 years, and this centre is the single largest rates payer in Limerick city and is a major employer for the city (c.1,500 employees on site).
- 1.3. Our client generally welcomes and supports the published Material Alterations which provide for Enterprise and Employment lands adjoining the Dooradoyle District Centre, in particular:

**MA13:** *ECON OXX Dooradoyle Urban Quarter - It is an objective of the Council to:*

- a) *Promote the continued development of lands around the Dooradoyle District Centre and adjoining lands as a Strategic Employment Location through the delivery of additional office based employment uses in a phased manner in conjunction with supporting infrastructure development.*
- b) *Promote improvements to connectivity, signage and permeability within the wider area including pedestrian and cycle facilities linking to Portland Park and provide for the link road from Dooradoyle Road to Rosbrien Road.*
- c) *Facilitate the early upgrading of the existing flood defence infrastructure, thus ensuring the long-term flood protection of the wider lands in Dooradoyle in a manner compatible with any future City Wide Flood Relief Scheme.*
- d) *Ensure any application on lands at risk of flooding is accompanied by a Site Specific Flood Risk Assessment which shall demonstrate that any development does not result in additional significant flood risk in the area and does not impede the future delivery of a wider flood relief scheme for Limerick.*
- e) *Require an overall framework plan/ masterplan to be prepared for the lands in advance of, or as part of, any application for a portion of the currently undeveloped lands.*

**MA148:** *Change the Zoning of 30ha. From Semi Natural Open Space to Enterprise and Employment at The Crescent, Dooradoyle (refer to end of this section for map).*

- 1.4. Additional policies and objectives which support the integration of land use planning and transport to promote a more sustainable modal shift, particularly **Policy CS P6 – LSMATS** is also welcomed, particularly having regard to submissions by Irish Rail with respect to the potential for future commuter rail along the existing rail lines, which would potentially service the subject lands with a station proximate. It is important that the planning framework recognises the importance of the delivery of development along such corridors to ensure such land is used efficiently and provides a basis for the viability of such proposals.
- 1.5. An integrated approach to land use and transport planning supports the delivery of development along such public transport corridors. Combined with the existing high quality public transport servicing the area, with the high quality bus corridor from Raheen-Dooradoyle-City Centre, any potential future uplift in public transport and infrastructure facilitating soft modes of transport would further justify the delivery of employment uses on these strategically located lands.

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<sup>1</sup> Two Park Place, Hatch Street Upper, Dublin 2

- 1.6. Additionally, it is critically important to attract inward investment to the County, that sufficient employment lands are provided under the City and County Development Plan. In the accompanying IDA Letter (Appendix 2 of this submission), the importance of providing sufficient employment zoned lands to attracting investment is set out in the context of the National Planning Framework targets and the IDA Strategy *Driving recovery & Sustainable Growth 2021-2024*. The letter notes:

*“In order to ensure a robust value proposition for clients and to achieve the NPF targets for population growth, Limerick’s future employment profile will rely heavily on its ability to capitalise on the success of its established activities and attract new investments.*

*Fundamental to achieving this will be the availability of sufficient zoned, serviced and accessible land in strategic locations that will ultimately provide a compelling location option for multinationals in the mobile FDI marketplace. The availability of land zoned for industrial and enterprise development in advance of demand is a key element of IDA’s strategy to attract foreign direct investment to Ireland and to facilitate employment growth in regional locations.*

*IDA’s strategy, Driving Recovery & Sustainable Growth 2021 - 2024 sets out ambitious employment and investment targets to be achieved in regional locations. In this regard, it is critical that regional urban centres such as Limerick, with its critical population mass, is well positioned to compete for and win mobile FDI investments.”*

- 1.7. The current lack of office space availability is highlighted in the Cushman & Wakefield Q1 2022 Office Marketbeat for the Limerick Market (Appendix 3 of this submission) stating:

*“Availability in the Limerick office market remains particularly tight, as further declines were recorded over the past twelve months. Availability sat at 30,885 sq m in Q1 2022, reflecting an annual decrease of 15%. The corresponding vacancy rate is 7.4%, the lowest vacancy rate in our +20 years detailed data series. Market churn, meaning the release of secondhand stock, decreased in 2020 and despite improving in 2021, it remains low. This trend, combined with limited development activity and continued take up, contributes to the decrease in availability. In terms of location, the majority of space is located in the Shannon Free Zone, 46%. Looking ahead, our market intelligence provides visibility on a number of larger units due to come to the market over the coming quarters. These units will improve vacancy levels somewhat however some of this space is under active negotiation.”*

- 1.8. Having regard to the current shortage of available office space in Limerick and the active negotiations on office space in the pipeline, the provision of sufficient lands for employment uses, would support the inclusion of the material alterations to change the zoning of the subject lands to Enterprise and Employment in the adopted plan.
- 1.9. The recognition of the serviceability of the lands in the material alterations through the extension of existing services is also welcomed, highlighting the suitability of the lands for development.
- 1.10. Our client welcomes the inclusion of the CSO boundary on the relevant maps, identifying the built up area to which growth is targeted under the Regional Strategy.
- 1.11. Our client wishes to comment on certain aspects of the Environmental Assessments undertaken as part of the Material Alterations process, in particular the Strategic Flood Risk Assessment (SFRA) and Strategic Environmental Assessment (SEA)

**2.0 COMMENTARY ON ENVIRONMENTAL ASSESSMENTS**

**Strategic Flood Risk Assessment**

- 2.1. The Strategic Flood Risk Assessment, in the opinion of our client and appointed consultants (JSA and ARUP) does not appropriately assess the lands against the Criteria of the Plan Making Justification Test.
- 2.2. A detailed Plan Making Justification Test and Development Management Justification Test have been submitted as part of the Motion to change the zoning of the subject lands, and are included as Appendix D of the SFRA.
- 2.3. The suitability of the lands for development appear to be predetermined based on flood risk, rather than first determining the appropriate land use zoning objective in accordance with the Flood Risk Guidelines.
- 2.4. The JBA SFRA Assessment is copied below with a response provided on behalf of our client. A separate Report prepared by Arup in response to certain items, listed below, is also enclosed as Appendix 1:
  - Residual Risk of Breach
  - Suggested prematurity pending the delivery of a public flood relief scheme for Limerick City
  - Consideration of Climate Change
  - Inconsistency in application of the Justification Test
  - Recommendations for flood risk concerns to be addressed through the conditions in the Material Alterations

Plan Making Justification Test Criteria	Chief Executive / JBA Comment	Response
<p><b>The urban settlement is targeted for growth under the National Planning Framework regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act 2000, as amended.</b></p>	<p>The Limerick Shannon Metropolitan Area is targeted for growth under the National Planning Framework (NPF) and Regional Spatial and Economic Strategy (RSES) for the Southern Region. The NPF envisages Limerick as the principal focus within the Mid-West Region, with the potential to generate and be the focus of significant employment and housing growth. The RSES includes a Metropolitan Area Strategic Plan (MASP) for the Limerick Shannon area. The MASP supports the NPF’s ambitious growth targets to enable Limerick City to grow by at least 50% to 2040 and to enhance its significant potential to become a city of scale</p>	<p>Agreed</p>

<p><b>The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the town and in particular:</b></p>		
<p><b>i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement</b></p>	<p>The lands are not essential to facilitate regeneration. Within the Metropolitan Area, the area zoned as Limerick’s “City Centre” would correspond with the centre of the settlement. Given the distance of these lands from the city centre, they are not essential to facilitate expansion of the centre of the settlement.</p>	<p>This point is strongly disputed.</p> <p>The lands are not essential to facilitate regeneration given their undeveloped nature; however, are essential to facilitate the expansion of the urban settlement.</p> <p>The subject lands are entirely suitable for such expansion given their infill nature and being located adjoining a District Centre with a range of services and amenities and access to high quality public transport.</p> <p>We additionally note the letter from the IDA (Appendix 2) and information from Cushman &amp; Wakefield (Appendix 3) included with this submission which sets out the requirements for sufficient lands to be zoned for employment uses and the current lack of availability of office space, with developments in the pipeline being under negotiation.</p> <p>The rationale for the favourable Justification Test applied to the Greenpark lands would also apply to the subject lands:</p> <p><i>“The undeveloped area at Greenpark consolidates the existing built up area between the City Centre and the natural boundary presented by the Ballinacurra Creek and N18. These greenfield and brownfield lands are therefore essential to facilitate expansion and compact growth of Limerick City in accordance with national and regional planning policy”</i></p>
<p><b>ii) Comprises significant previously developed and/or under-utilised lands</b></p>	<p>These are undeveloped greenfield lands.</p>	<p>This point is strongly disputed. The commentary only assessed if the lands have been previously developed; however does not consider if the lands are underutilised.</p> <p>The lands are undeveloped however comprise a significantly underutilised land bank in an infill location between two developed areas with exceptionally public transport access in the context of the existing services in Limerick.</p> <p>The material alterations employment settlement capacity audit identifies the lands as infill/brownfield and therefore there is an inconsistency; with the capacity</p>

		<p>audit clearly identifying the lands as infill and therefore underutilised given their undeveloped nature.</p> <p>Therefore, the lands are exceptionally under utilised and should be targeted for development.</p>
<p><b>iii) Is within or adjoining the core of an established or designated urban settlement</b></p>	<p>The lands are not within or adjoining the City core</p>	<p>This point is strongly disputed.</p> <p>The criterion of the Flood Risk Guidelines refers to 'within or adjoining an established or designated urban centre'. Firstly, the lands adjoin a designated District Centre. Secondly the lands comprise an infill site between two existing developed areas. The Flood Risk Guidelines provide a definition for 'Core of an urban settlement':</p> <p><i>"The core area of a city, town or village which acts as a centre for a broad range of employment, retail, community, residential and transport functions."</i></p> <p>The Dooradoyle District Centre clearly provides a range of services including employment, retail and community uses and the lands are located close to extensive residential areas. The lands are also exceptionally well serviced by bus routes i.e. within the definition of the Guidelines.</p> <p>A contradictory approach is taken in relation to the Greenpark lands in the JBA SFRA, which are no closer located to the city centre and not adjoining a District Centre. The JBA SFRA states:</p> <p><i>"The lands are located off of the Dock Road, a designated key employment location, adjoining the core of the Limerick Shannon Metropolitan Area"</i></p> <p>The Dooradoyle District Centre is an existing significant employment centre, with in the region of 1,500 persons employed.</p>
<p><b>iv) Will be essential in achieving compact or sustainable urban growth</b></p>	<p>The delivery of development on these lands is not essential to achieve compact or sustainable growth.</p>	<p>This point is strongly disputed and no rationale is put forward for the assertion.</p> <p>The contention that the lands are sequentially favourable has been set out in detail in this document in the documentation accompanying</p>

		<p>submissions to date, and indeed appended to the SFRA.</p> <p>The lands comprise an infill site between two developed areas and are the exact sites which should be developed to achieve a compact urban form. To leave the lands undeveloped would actually represent a missed opportunity to achieve sustainable compact urban growth objectives. This view is generally supported in the submission by the Limerick Chamber of commerce which states:</p> <p><i>“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”</i></p> <p>A contradictory approach is taken in relation to the Greenpark lands in the JBA SFRA, which states:</p> <p><i>“The delivery of development on these lands is essential to allow consolidation of the existing built up area of this employment area, achieve compact growth and enable Limerick to fulfil its economic development role in the Mid-West Region”</i></p> <p>As set out previously, the Greenpark lands are no better located than the subject lands in this respect.</p>
<p><b>v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement</b></p>	<p>Suitable alternative lands are available for enterprise and employment development elsewhere in areas outside of any flood risk.</p>	<p>This point is strongly disputed.</p> <p>In relation to the Greenpark lands, the JBA SFRA states:</p> <p><i>“Suitable alternative lands are not available for development within and adjoining the</i></p>

		<p><i>core of the City for enterprise and employment uses which cannot be accommodated in the City Centre.”</i></p> <p>The subject lands are equally, if not better suited for enterprise and employment uses given the existing transport infrastructure and facilities in place.</p> <p>Additionally, as set out in the Arup Report (Appendix 1):</p> <p><i>As part of the Justification Test for the Clancourt site, when considering the Justification Test question of whether ‘there are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement’, the SFRA states that ‘Suitable alternative lands are available for enterprise and employment development elsewhere in areas outside of any flood risk.’</i></p> <p><i>This appears to be a direct contradiction of its consideration of the same question for the Greenpark lands where it states that ‘Suitable alternative lands are not available for development within and adjoining the core of the City for enterprise and employment uses which cannot be accommodated in the City Centre.’</i></p> <p><i>If in accepting that the Greenpark lands, which also lies within a defended flood risk area, should be zoned because suitable lands are not available elsewhere within or adjoining the city centre, even though it is not stated, it can only reasonably be interpreted as meaning that ‘there are no suitable alternative lands available for enterprise and employment development elsewhere in areas outside of any flood risk.’ Accordingly, the SFRA response to the question for the Clancourt lands can only be an error.</i></p> <p><i>Therefore, as the Strategic Planning part of the Justification Test has been passed for the Greenpark lands, it should also be passed for the Clancourt lands. There appears to be no rationale or evidence base for the decision to adopt an alternative approach to both sites.</i></p>
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		<p>The Arup Report also sets out how there is less residual risk at the subject lands than Greenpark</p> <p>As previously noted, it is contended by the IDA in their submission on the draft Development Plan that there is not sufficient lands proposed in the draft Development Plan to meet the potential needs of inward investment.</p>
<p><b>A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere.</b></p>	<p>The site is largely within Flood Zones A and B and at risk of flooding from tidally influenced fluvial sources. A FRA was included as part of the submission. This identifies a high risk of breach associated with the existing embankments and resulting high depth of flooding should occur. Furthermore, within the Shannon CFRAM, this was identified as a source of flood risk and was highlighted within the Flood Risk Management Plan. The embankments and associated flood protection are now within the scope of the Limerick Flood Relief Scheme, which has been progressed in a partnership project between OPW and Limerick City and County Council.</p>	<p>This point is strongly disputed. We refer to the detailed response in this respect set out in the Arup Report enclosed as Appendix 1.</p> <p>The SFRA assessment is inaccurate as to the content of the FRA included in the submission on behalf of our client.</p> <p>The Arup FRA did not identify a high degree of breach.</p> <p>The report in fact concluded that the likelihood of such a scenario was extremely remote and was easily mitigated.</p> <p>We would note that the detailed site specific SFRA prepared for the site is far more detailed and up to date than the Shannon CFRAMS and that the Shannon CFRAMS does not contain the suitable level of detail required to undertake the Justification Test for the subject site as required by the Guidelines, and that rather the site specific SFRA provided by the applicant should be used for this purpose.</p> <p>As stated above, the potential of a future flood relief scheme for the wider Limerick area cannot be used as a justification for delaying the consideration of strategic sites as part of the development plan making process, and the guidelines do not provide for arguments on prematurity on these grounds.</p> <p>The existing embankments form part of an existing Arterial Drainage Scheme which is maintained, independent of any future flood relief scheme.</p>

		<p>The SFRA provided by our client uses the most up to date survey data, flood risk information and highest resolution and accuracy of all available data on flood risk at the subject site and therefore represents the suitable level of detail required by the Guidelines.</p> <p>The accompanying Arup report notes:</p> <p><i>“The risk of sea level rise is far greater to the west of the R526 as the existing undersized culvert limits the propagation of the tidal wave upstream. In addition, due to the small upstream fluvial catchment, the small magnitude of fluvial inflows does not significantly impact flood levels. This means that while flood levels downstream of the R526 will increase directly in proportion to the increase in sea level rise in the Shannon, the impacts on flood levels upstream of the R526 (at the subject lands) will be dampened and thus will be significantly less. In other words, lands upstream of the R526 (including the subject lands) are less sensitive to sea level rise.”</i></p> <p>The Arup FRA clearly demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere. Furthermore, it demonstrates not only that it can be developed compatible with any future flood defence scheme, but in fact how such lands can facilitate the early delivery of a scheme which protects a larger area of land and critical sustainable infrastructure routes than the Scheme identified by the CFRAMS study. It is evident that the site specific FRA prepared for the site has considered a vision for the more sustainable flood protected development of the wider Dooradoyle area.</p>
	<p><b>Conclusion</b></p>	<p><b>Response</b></p>
	<p>The lands within Flood Zone A and B should be retained for water compatible uses as Parts 2 and 3 of the Justification Test have not been passed. Pending the completion of the flood relief scheme the zoning of these lands are considered premature. However, the Local</p>	<p>As set out in the OPW submission on the draft Development Plan, the appropriate use for lands should not be determined pending a Flood Relief Scheme.</p> <p>Additionally, as set out in the Arup Report (Appendix 1):</p>

	<p>Authority acknowledge that on completion of the flood relief scheme the potential for development of the lands can be re-appraised on foot of an appropriately detailed site specific flood risk assessment</p>	<p><i>“The Sequential Approach and Justification Test provisions within the Flood Risk Management Guidelines are included specifically in recognition that wider strategic planning grounds, sustainable development and consolidation of existing settlements will sometimes requires that development be allowed in flood risk areas where the risk can be appropriately mitigated. The flood risk management guidelines provide for zoning to be delayed on ground of prematurity only where the operative development plan had been prepared in advance of the Guidelines having come into being. This provision no longer applies as all development plans have now been revised since the Guidelines came into being in 2009. There is no provision to not zone lands on the grounds of prematurity for any other reason.”</i></p> <p>It is also submitted that having regard to the responses above, and detailed information set out in the accompanying Justification Tests, the lands are suitable and appropriate for the Employment and Enterprise land use zoning objective.</p>
	<p><b>Recommendation</b></p>	<p><b>Response</b></p>
	<p>Land to be retained as water compatible Semi Natural Open Space.</p>	<p>It is recommended that the material alteration to change the zoning objective of the subject lands to Enterprise and Employment is approved as part of the adopted plan and the SFRA is updated to reflect the above commentary.</p>

- 2.5. The subject lands comprehensively satisfy Part 2 of the Plan Making Justification Test. The submission by the OPW on the material alterations refers to lands which do not pass the Justification Test; however as set out herein, the subject lands clearly do pass the Justification Test.
- 2.6. In relation to Part 3, significant flood risk modelling exercises and supplementary analyses have been undertaken by Arup (summarized in Appendix 1), which satisfy this element of the Justification test, beyond which has been undertaken for other sites deemed to meet the test. Additionally in relation to Part 3, appropriate safeguards are incorporated into the objective related to the lands, emphasised below, to ensure as part of any development proposals that the risk of flooding would not be significantly increased elsewhere, would not impeded the delivery of the flood relief scheme, and in fact facilitate it. In reviewing the updates to the SFRA as part of the material alterations, references to breach analyses and evacuation plans are made. In the interests of consistency with the SFRA, the MA13 text may be slightly augmented as below and as set out in the Arup Report

**MA13:** *ECON OXX Dooradoyle Urban Quarter - It is an objective of the Council to:*

- a) *Promote the continued development of lands around the Dooradoyle District Centre and adjoining lands as a Strategic Employment Location through the delivery of additional office based employment uses in a phased manner in conjunction with supporting infrastructure development.*
- b) *Promote improvements to connectivity, signage and permeability within the wider area including pedestrian and cycle facilities linking to Portland Park and provide for the link road from Dooradoyle Road to Rosbrien Road.*
- c) ***Facilitate the early upgrading of the existing flood defence infrastructure, thus ensuring the long-term flood protection of the wider lands in Dooradoyle in a manner compatible with any future City Wide Flood Relief Scheme.***
- d) ***Ensure any application on lands at risk of flooding is accompanied by a Site Specific Flood Risk Assessment which shall demonstrate that any development does not result in additional significant flood risk in the area and does not impede the future delivery of a wider flood relief scheme for Limerick. This FRA shall also include a detailed Emergency Response Plan and a Breach Modelling Assessment using a methodology to be agreed in advance with LCCC.***
- e) *Require an overall framework plan/ masterplan to be prepared for the lands in advance of, or as part of, any application for a portion of the currently undeveloped lands.*

- 2.7. As set out above, it is recommended that the material alteration to change the zoning objective of the subject lands to Enterprise and Employment is approved as part of the adopted plan and the SFRA is updated to reflect the above commentary.

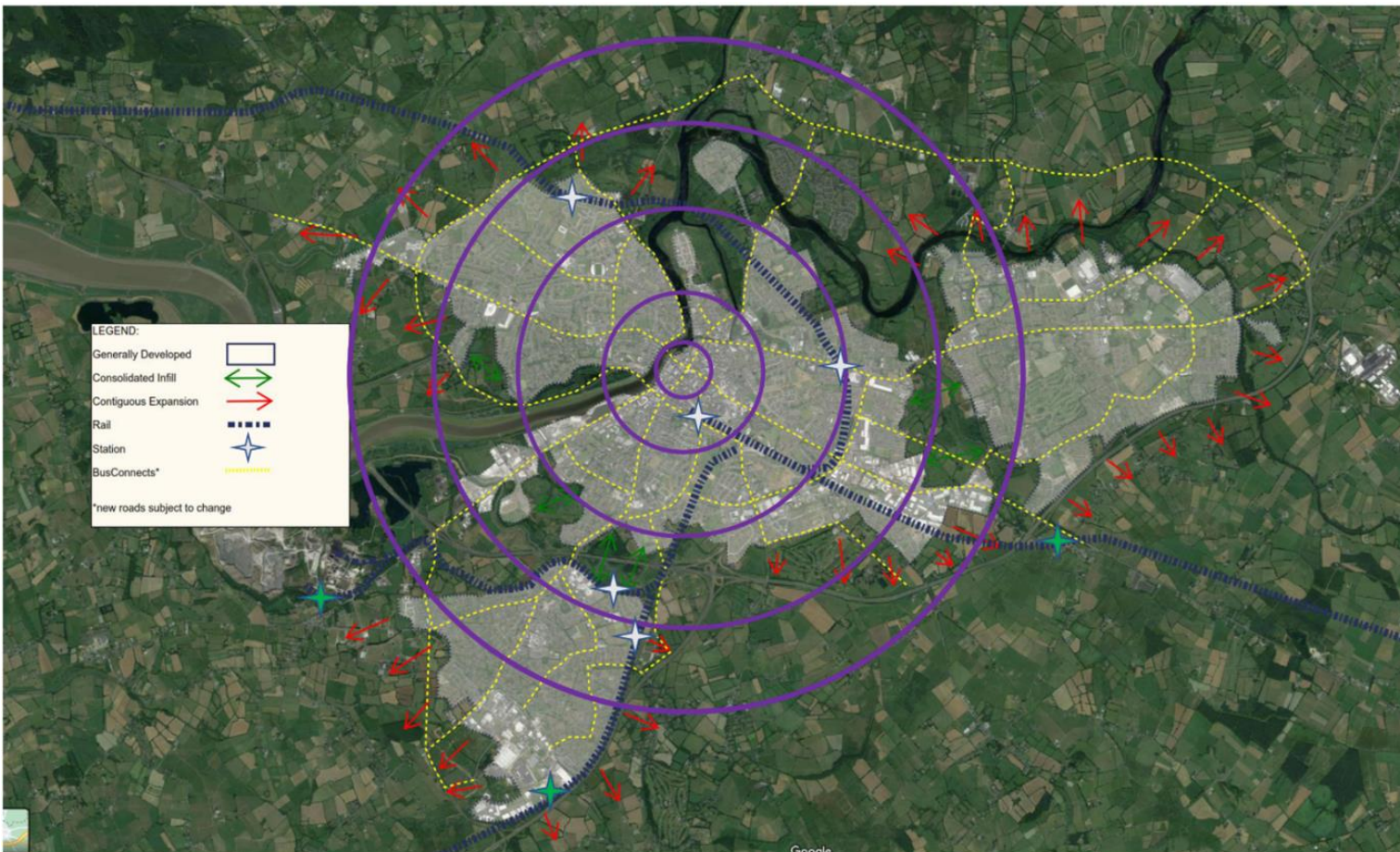
### **Strategic Environmental Assessment**

- 2.8. Following from the SFRA, the SEA identifies potential significant effects on the environment. In particular we note the SEA commentary in relation to the proposed change in zoning objective for the subject lands:

*“SEA Comments: The proposed material amendment made by the Elected Members, included a proposal to rezone this land to Enterprise and Employment. A site specific Flood risk assessment and justification test was submitted as part of the supporting documentation for the change of zoning. The information was reviewed as part of the SFRA on the material alterations, which concluded that site should be retained for less Vulnerable uses as appropriate to the flood zone. This proposed amendment is Inconsistent with EPO HTP 1 which requires compliance with higher tier plans such as the National Planning Framework and the Regional Spatial and Economic Strategy and other guidance issued by the Department. Furthermore, concerns have been raised by the OPW with regard the prematurity of zoning of these lands pending the Limerick City Flood Relief Scheme being progressed.*

- 2.9. Notwithstanding the contention that the SFRA should be revised as set out above, the SEA process does not preclude potential significant environmental effects; however, mitigation and monitoring may be put forward. No such mitigation or monitoring is put forward in the Material Alterations SEA.
- 2.10. The safeguards put forward under MA13 in relation to flood risk are mitigation measures incorporated into the Draft Development Plan as part of the material alterations, and should be acknowledged in the SEA. It is the a point of consideration, following the importation of such mitigations, if a residual risk remains which would be considered significant.

- 2.11. As noted in the submission by the EPA, “Where the SEA has identified any alterations as having potential for likely significant environmental effects or which conflict with national environmental or planning policy, clear justification should be given for proceeding with those alterations.”
- 2.12. The justification for the zoning of the subject lands for enterprise and employment is set out in detail in the Plan Making Justification Test document accompanying the Motion.
- 2.13. The subject lands in Dooradoyle are sequentially favourable as illustrated in the following diagram, which outlines developed and undeveloped lands, existing and proposed public transport corridors and appropriate sequential infill. It is respectfully submitted that such lands should be targeted and explored for development to achieve national objectives for a compact urban form and efficient use of lands:



**Sequential Assessment**

- 2.14. A National and regional planning policy in the form of the National Planning Framework 2040 and the Regional Spatial and Economic Strategy - Southern Regional Assembly both promote consolidation of the Limerick Metropolitan Area.
- 2.15. Consolidation of the Limerick Metropolitan Area is seen as paramount in order to achieve a successful regional development through the promotion of higher densities at appropriate locations in harmony with improved public transport systems.
- 2.16. The NPF recognises the importance of consolidation of cities in order to realise a competitive city, stating that:



*“Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.”*

- 2.17. This consolidation is achieved through use of strategically located lands such as the site which are highly accessible and which provide a natural infill between existing developed areas of the city and southern suburbs, adjacent a District Centre and public transport corridor. The accompanying IDA letter and their submission on the draft Development Plan sets out how the NPF objectives will assist in attracting investments and the delivery of employment uses, and the importance of ensuring sufficient quantity and variety of employment lands are provided for.
- 2.18. The National Planning Framework (NPF) is the Government’s plan to cater for the extra one million people that will be living in Ireland, the additional two thirds of a million people working in Ireland and the half a million extra homes needed in Ireland by 2040.
- 2.19. As a strategic development framework, Ireland 2040 sets the long-term context for our country’s physical development and associated progress in economic, social and environmental terms and in an island, European and global context.
- 2.20. National investment planning, the sectoral investment and policy frameworks of departments, agencies and the local government process will be guided by these strategic outcomes in relation to the practical implementation of Ireland 2040. The NPF sets out the importance of development within existing urban areas by *“making better use of under-utilised land including ‘infill’ and ‘brownfield’ and publicly owned sites together with higher housing and job densities, better services by existing facilities and public transport”*.
- 2.21. Objective 3a of the NPF states that it is a national policy objective to *“deliver at least 40% of all new homes nationally within the built up envelope of existing urban settlements”*. For the country’s five cities, this minimum target is 50%. The proposed development is a strategically located underutilised site adjacent a District Centre in an existing urban settlement along a public transport corridor and in close proximity to the M7. The proposed development is therefore compliant with the objective of the NPF.
- 2.22. Objective 4 states *“ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well being”*. The proposed development would provide for a high quality mixed use development in conjunction with amenity, permeability and connectivity benefits. The lands are adjacent an existing District Centre, and therefore there is a significant amount of existing services in the vicinity, which the subject lands are well linked to. The additional employment opportunities of the proposal would further strengthen the viability of the District Centre in an appropriate location and provide significant amenities to the wider area.
- 2.23. It is considered that the proposed development provides for the creation of an attractive, high quality, sustainable new development within the existing urban area of the city. The provision of the new sustainable development is therefore consistent with the NPF objective.
- 2.24. Objective 11 of the National Planning Framework states that *“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”*.

- 2.25. The proposed development would provide a significant employment opportunity, strengthening the delivery of compact growth with an integrated mix of uses, reducing commuting by car as the lands site are well served by public transport.
- 2.26. The zoning of appropriate sites, serviced by public transport in the interests of compact growth and climate action was highlighted by the Planning Regulator in its submission to the Council on the draft Plan, by reference to sites not well serviced where he states:

*“The Office does, however, have some concerns in relation to number of the proposed zoning objectives having regard to the ‘Guiding Principles to identify locations for Strategic Employment Development’ in the draft Plan, and RPO 62 of the RSES. It would appear that some of the employment zonings would have potential to conflict with the principle of compact growth and having regard to deficiencies in public transport access and/or their accessibility in terms of walking and cycling distances to residential areas, would tend to be car based development, which would run counter to the requirements under section 10(2)(n) of the Act in relation to climate action.”*

- 2.27. The proposed development is located along one of the main routes into the city centre and is well served by public transport. The existing site is underutilised and presents a key opportunity for development. The proposed development is therefore in accordance with the objectives of the NPF in this regard.
- 2.28. The RSES set out the planned direction for growth up to 2040. The lands are located within the Limerick Shannon Metropolitan Area Strategic Plan. The overview for the MASP states:

*“Limerick City is the largest urban centre in Ireland’s Mid-West and the country’s third largest city. The NPF supports ambitious growth targets to enable Limerick City to grow by at least 50% to 2040 and to achieve its potential to become a city of scale.”*

- 2.29. There is therefore a strong justification for the development of the subject lands on environmental grounds, should the Planning Authority consider there to be a potential significant environmental effect.

### **3.0 SUMMARY & CONCLUSIONS**

- 3.1. Our client is generally supportive of the proposed material alterations to the Draft Development Plan; however, a number of observations on the accompanying Environmental Reports are set out in the submission.
- 3.2. In summary this submission raises the following points in relation to the Environmental Reports;
- The SFRA should be revised to acknowledge the subject lands at Dooradoyle meet the criteria of the Plan Making Justification Test and afforded similar assessment to comparably located lands with similar flood risk. A slight revision to the MA13 is provided on behalf of the applicant for consistency with the SFRA if deemed necessary as a safeguard.
  - The SEA should be revised to consider the mitigations built in to the objective for the development of the subject lands, which incorporates safeguards in relation to flood risk. The residual risk should be further considered in this respect.

3.3. Additionally, we note the Arup conclusions in their accompanying Report:

*“In making its various submission as part of the Development Plan process, our client has engaged JSA as planning experts and Arup as flood risk management experts to prepare very detailed reports to provide a clear evidence base as to the strategic need for the zoning of the subject lands and with respect to the quantification of existing flood risk and the details of how firstly, the residual risk could be managed to an acceptable level, and secondly how it could improve flood risk by fast tracking the upgrading of some of the existing flood defences and extending them to offer protection to the vital sustainable transport corridor on the Rossbrien Road.*

*This information has been provided in full to LCCC to provide full transparency with regard to the due diligence undertaken, demonstrating that the issue of flood risk as been considered in great detail and has been a key driver of the masterplanning for the site.*

*It is worth remembering that it is equally in the interest of the developer that flood risk is appropriately addressed so as to minimise the risk to its asset over its lifetime.*

*Unfortunately, the SFRA prepared for the Development Plan does not appear to have considered this information in sufficient detail and contains a number of errors with regard to the application of the Flood Risk Management Guidelines.*

*Notwithstanding, it is important that the elected members can have confidence that the appropriate checks and balances are in place following the adoption of the Development Plan. Given the need for such development and the likelihood that the citywide flood relief scheme will not be delivered within the lifetime of this plan, it would appear contrary to good development planning to sterilise the potential delivery of such key development over this period. By adopting the proposed material alteration, the Elected Members are simply keeping open the possibility of such development.*

*By the incorporation of the proposed MA 13 wording, we are satisfied that the Development Plan will include the necessary checks and balances to ensure that any future development applications will be required to address the general concerns raised in the SFRA with regard to reduction of residual risk (particularly around breach), does not impede any future flood relief scheme (and in fact could enhance and/or expedite same) and will ensure that future flood risk is reduced to acceptable levels in a sustainable way, compatible with all relevant national legislation.”*

3.4. We trust this submission will be taken into consideration in finalising the Development Plan.





Clancourt Group

**Dooradoyle Urban Quarter**

Submission in respect of Material  
Alterations Draft Limerick City &  
County Development Plan 2022 -  
2028

Issue 1 | 8 April 2022

This report takes into account the particular instructions and requirements of our client.

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 262009

**Ove Arup & Partners Ireland Ltd**

**Arup**  
One Albert Quay  
Cork  
T12 X8N6  
Ireland  
[www.arup.com](http://www.arup.com)

**ARUP**

# Document verification

<b>Job title</b>		Dooradoyle Urban Quarter		<b>Job number</b>		262009	
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# 1 Introduction

---

This submission has been prepared on behalf of our client, Clancourt Group, with respect to its lands which are the subject of:

**MA13:** ECON OXX Dooradoyle Urban Quarter - It is an objective of the Council to:

- a) Promote the continued development of lands around the Dooradoyle District Centre and adjoining lands as a Strategic Employment Location through the delivery of additional office-based employment uses in a phased manner in conjunction with supporting infrastructure development.
- b) Promote improvements to connectivity, signage and permeability within the wider area including pedestrian and cycle facilities linking to Portland Park and provide for the link road from Dooradoyle Road to Rosbrien Road.
- c) Facilitate the early upgrading of the existing flood defence infrastructure, thus ensuring the long - term flood protection of the wider lands in Dooradoyle in a manner compatible with any future City-Wide Flood Relief Scheme.
- d) Ensure any application on lands at risk of flooding is accompanied by a Site-Specific Flood Risk Assessment which shall demonstrate that any development does not result in additional significant flood risk in the area and does not impede the future delivery of a wider flood relief scheme for Limerick.
- e) Require an overall framework plan/ masterplan to be prepared for the lands in advance of, or as part of, any application for a portion of the currently undeveloped lands.

and

**MA148:** Change the Zoning of 30ha. From Semi Natural Open Space to Enterprise and Employment at The Crescent, Dooradoyle.

Our client generally welcomes and supports the published Material Alterations which provide for Enterprise and Employment lands adjoining the Dooradoyle District Centre, as above, but has requested that we address certain aspects of the Environmental Assessments undertaken as part of the Material Alterations process, and in particular the Strategic Flood Risk Assessment (SFRA) and Strategic Environmental Assessment (SEA).

A parallel submission has been prepared on behalf of our client by John Spain and Associates (JSA), which should be read in conjunction with this submission.

We agree with and support the points set out in the JSA submission and do not generally intend to address the strategic spatial planning aspects of the Material Alterations, as these are addressed comprehensively by JSA who are expert in this area.

Instead, we will focus in this submission on the Flood Risk aspects of the Material Alterations, reflecting our own expertise in this area, both in general and specific to the Limerick area, and having completed the detailed site-specific flood risk assessment for the subject lands.

In particular, we would like to address the following matters which we consider have been either inappropriately or incorrectly addressed in the SFRA and/or consideration of same by the Executive:

- Residual Risk of Breach
- Suggested prematurity pending the delivery of a public flood relief scheme for Limerick City
- Consideration of Climate Change
- Inconsistency in application of the Justification Test
- Recommendations for flood risk concerns to be addressed through the conditions in the Material Alterations

These points are addressed in the following sections below:

## 2 Residual Risk of Breach

---

It appears that the SFRA prepared for the Development Plan concludes that the residual risk of breach on the Clancourt lands is too high. However, it is evident that the authors of the SFRA have misinterpreted the degree of risk as outlined in the breach analysis provided in the Arup FRA which confirms that the risk of breach at the site is very remote.

It is unclear as to how the SFRA objectively assessed whether the residual risk was too great or not. In this regard, it is notable that the SFRA adopts a contradictory view when assessing the Greepark lands, where it states that *'Although not suitable for highly vulnerable development due to the level of residual risk and the brownfield nature of the site, less vulnerable uses (Enterprise and Employment) with appropriately detailed FRA and emergency plan, may be accommodated.'*

We would note that whether the site is a brownfield or greenfield site makes no difference to the flood risk of any future redevelopment of the site, so it is unclear why this rationale is included at all.

However, it appears to assert that the residual risk is sufficiently low to be suitable for Enterprise and Employment Development, but not for residential, although no rationale is provided to explain how it objectively arrived at this conclusion and at a different conclusion for the Clancourt site.

We would note and agree with the submission made by the planning consultants for the Greepark lands who correctly point out that the decision as to the particular zoning should be made on the basis of the strategic planning requirements in the first instance, and not on a subjective interpretation of the degree of residual risk. The question in the Justification Test, with regard to the flood risk mitigation requires that it be demonstrated that the residual risk can be mitigated and managed to an acceptable level. The guidelines contain no provision for the assessment of the degree of residual flood risk to dictate the type of development zoning.

In considering the apparent difference in the consideration of both sites in the SFRA, it is worth considering the following with respect to the residual risk of breach at both sites:

- The embankments protecting both sites are part of the same Arterial Drainage Scheme, of the same origin, likely constituted of similar material. There is clearly no differentiator here.
- From a review of the relative lengths of embankment where a breach could result in flooding of the respective sites, it is evident that the Clancourt lands are at a lower risk.
- In addition, it should be noted that an undersized culvert under the R526 limits the propagation of the tidal wave upstream of this point, thus limiting the levels and volumes that can extend up the Ballinacurra Creek to the Clancourt lands which lie upstream of the point. It is for this reason, that predicted tide levels are lower in the vicinity of the Clancourt lands

than at the Greenpark Lands. In the 1 in 200year tidal event, peak water levels adjoining the Clancourt lands are 600mm lower than at the Greenpark lands. The delta increases to 800mm in the 1 in 1000year event. This means that the potential impact of any breach of the embankments local to each site is much reduced at the Clancourt lands. This also means that the impact of climate change in terms of both breach and overtopping risk is also mitigated/reduced at the Clancourt lands due to the positive influence of the undersized culvert.

- Whilst the FRAs prepared for both the Clancourt and Greenpark lands demonstrate that there is an appropriate engineering solution to appropriately mitigate residual flood risk, and thus facilitate development of both landbanks, it is evident that the residual risk is in fact lower on the Clancourt lands, and thus it is difficult to understand how the authors of the SFRA could objectively effectively conclude the opposite.

In summary, the risk of residual risk has been thoroughly evaluated in the site-specific FRA prepared by Arup, for the subject lands, as submitted previously, whereas the SFRA has not adequately assessed the residual risk in any detail, or if it has, has not provided any evidence base for same. From the work we have carried out, it is evident that the existing embankments provide a high degree of protection, will continue to be maintained by OPW, and if replaced as part of any future scheme, will be to a similar or higher standard. In addition, the consequence of breach of the embankments downstream of the site is very low as a result of the protection provided by the high level of the N18 and R526 as well as the high ground to the west.

As stated in the FRA and breach assessment report, the risk of breach is very remote and in our opinion is not sufficient for it to be used as a ground to justify not zoning the site for development.



### 3 Suggested prematurity pending the delivery of a public flood relief scheme for Limerick City

---

The Justification Test in the SFRA states that *'pending the completion of the flood relief scheme the zoning of these lands are considered premature.'*

Large tracts of Limerick are at risk of flooding and may be a beneficiary of a future Scheme, including many areas which unlike the Clancourt lands, don't already benefit from flood defence infrastructure.

However, we believe that the SFRA is in error in seeking to link the potential zoning of any site to the potential for a flood scheme which is neither yet defined nor certain to be constructed at all.

We would respectfully suggest that this approach would amount to 'putting the cart before the horse'. The Sequential Approach and Justification Test provisions within the Flood Risk Management Guidelines are included specifically in recognition that wider strategic planning grounds, sustainable development and consolidation of existing settlements will sometimes requires that development be allowed in flood risk areas where the risk can be appropriately mitigated. The flood risk management guidelines provide for zoning to be delayed on ground of prematurity only where the operative development plan had been prepared in advance of the Guidelines having come into being. This provision no longer applies as all development plans have now been revised since the Guidelines came into being in 2009. There is no provision to not zone lands on the grounds of prematurity for any other reason.

There is already sufficient flood risk information available, including the FRA submitted for the subject lands, for LCCC to establish the areas of lands needed for the various uses and to apply the Justification Test where essential lands in flood risk areas should be properly zoned. Having done so and having adopted the Development Plan, the development plan should then act as a roadmap for the scoping of any later Flood Relief Scheme, not the other way around.

It is of course prudent to ensure, in so far as possible, that any development does not hinder the delivery of a future flood relief scheme. This can be addressed by way of an appropriate objective in the Development Plan as is proposed in the Material Alteration.

In the context of the subject lands, it should be noted that the primary risk of flooding is tidal and therefore direct defences are likely to be the only viable solution. The Standard of Protection (SOP) of OPW Schemes nationally is normally the 1 in 200year SOP in tidal reaches. As the subject lands are already protected by an embankment originally designed to this same SOP, it is almost certain that the scheme in this location will consist of topping up and strengthening of the existing embankment to address any settlement or local degradation that has occurred since it was originally constructed. As part of the site-specific FRA submitted on behalf of our client, we have also provided a preliminary geotechnical assessment which confirms that the optimum viable

solution is to upgrade the existing embankment on its current alignment. Doing so will ensure that:

- costs are minimised,
- no additional land needs to be acquired,
- there is no impact on the portion of lands to the rear which needs to be retained for surface water attenuation as provided for in the Arup FRA,
- the length of the embankment is minimised (thus reducing residual risk of breach),
- the volume of material needed to be imported is minimised, thus minimising the carbon footprint of the Scheme and thus assisting Ireland in reaching its annual carbon budget goals,
- and is consistent with a sustainable circular approach which will be consistent with imminent legislation around a circular economy.

In conclusion, zoning of the subject lands for development, by incorporating the wording included in the current material alteration MA 13 will ensure that the ability to deliver a future flood relief scheme is not compromised. In fact, the opposite is true, it creates the potential for this section of embankment to be upgraded sooner and as set out in the FRA, it presents the opportunity to deliver infrastructure on Clancourt lands which in conjunction with upstream defences would provide an integrated fluvial/tidal defence which would protect the sustainable transport corridor along Rossbrien Road.

## 4 Consideration of Climate Change

---

Many of the key points to be discussed here have already been noted earlier, but we will recap under this heading as follows:

- The risk of sea level rise is far greater to the west of the R526 as the existing undersized culvert limits the propagation of the tidal wave upstream. In addition, due to the small upstream fluvial catchment, the small magnitude of fluvial inflows does not significantly impact flood levels. This means that while flood levels downstream of the R526 will increase directly in proportion to the increase in sea level rise in the Shannon, the impacts on flood levels upstream of the R526 (at the subject lands) will be dampened and thus will be significantly less. In other words, lands upstream of the R526 (including the subject lands) are less sensitive to sea level rise.
- Equally, the requirement for higher flood defence levels upstream of the R526 will also be less. Minor raising and strengthening of the existing embankments is the low cost, low carbon, low impact and circular means of delivering long term flood protection to both the subject lands and the existing developed lands in the Dooradoyle Area.

## 5 Inconsistency and lack of evidence base in application of the Justification Test

---

As part of the Justification Test for the Clancourt site, when considering the Justification Test question of whether ‘*there are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement*’, the SFRA states that ‘*Suitable alternative lands are available for enterprise and employment development elsewhere in areas outside of any flood risk.*’

This appears to be a direct contradiction of its consideration of the same question for the Greenpark lands where it states that ‘*Suitable alternative lands are **not** available for development within and adjoining the core of the City for enterprise and employment uses which cannot be accommodated in the City Centre.*’

If in accepting that the Greenpark lands, which also lies within a defended flood risk area, should be zoned because suitable lands are not available elsewhere within or adjoining the city centre, even though it is not stated, it can only reasonably be interpreted as meaning that ‘*there are no suitable alternative lands available for enterprise and employment development elsewhere in areas outside of any flood risk.*’ Accordingly, the SFRA response to the question for the Clancourt lands can only be an error.

Therefore, as the Strategic Planning part of the Justification Test has been passed for the Greenpark lands, it should also be passed for the Clancourt lands. There appears to be no rationale or evidence base for the decision to adopt an alternative approach to both sites.

As the required area of Enterprise and employment development lands does not appear to be quantified in the Development plan, it is unclear whether there is sufficient land even if both sites were so zoned.

Whilst it is not the intent of this submission to seek to argue for or against the merits of either site on strategic planning grounds (with the merits for the subject lands addressed by the JSA Report as part of this submission), it is apparent from the earlier section of this submission that the flood risk at the Clancourt lands is lower than at the Greenpark lands (which also appears as at low residual risk) and therefore on flood risk grounds, the Clancourt lands appears more favourable and certainly no less favourable than the Greenpark lands.

Furthermore, given the apparent recognition that some enterprise and employment lands are needed in flood risk areas, it is prudent to next consider areas of lowest residual flood risk that benefit from a high degree of protection. These include both the Greenpark lands and Clancourt lands. If as proposed elsewhere in the Material Alterations, (and as proposed by the submission for those lands) that a residential zoning is more appropriate for the Greenpark lands, there is an even greater case that the Clancourt lands should be zoned for Enterprise and Development to ensure that sufficient lands are available for this need, when it has been clearly illustrated by virtue of a detailed flood risk assessment, (which included a preliminary breach assessment and an assessment of the suitability of

the existing flood defence embankment) that the residual risk to the Clancourt lands is very low.

## 6 Recommendations for flood risk concerns to be addressed through the conditions in the Material Alterations

---

In section 5.10.5 of the SFRA, the issue of an Emergency Response Plan is discussed. This is mentioned in the Justification Test for some lands considered for rezoning, but is not mentioned with respect to the Clancourt lands. As part of the proposed Material Alteration for the subject lands, we recommend that the text of MA13 be amended to include a provision requiring any development application to include an Emergency Response Plan in the site-specific flood risk assessment for the development application.

In Sections 4.2.3 and 5.8.1 of the SFRA, the issue of Breach is addressed and considered in the context of proposed development in defended areas. It is evident that the SFRA contemplates and makes provision for development in defended areas and the appropriate approach to consideration of breach in such areas. As such, any future development application on the Clancourt lands would be required to submit an appropriate breach modelling assessment with details to be agreed with LCCC in advance. Therefore, there is no real need for a specific requirement with regard to MA 13. However, to avoid uncertainty and provide confidence that any development application for this site will undertake the necessary due diligence in terms of the risk of breach, we recommend that an explicit provision also be included to address the obligation to undertake a breach modelling exercise.

As a result of the above, we would in light of the additions to the SFRA, recommend that the wording of the draft MA 13 be slightly augmented for consistency as follows (suggested changes in red):

**MA13: ECON OXX Dooradoyle Urban Quarter** - *It is an objective of the Council to:*

- a) Promote the continued development of lands around the Dooradoyle District Centre and adjoining lands as a Strategic Employment Location through the delivery of additional office-based employment uses in a phased manner in conjunction with supporting infrastructure development.*
- b) Promote improvements to connectivity, signage and permeability within the wider area including pedestrian and cycle facilities linking to Portland Park and provide for the link road from Dooradoyle Road to Rosbrien Road.*
- c) Facilitate the early upgrading of the existing flood defence infrastructure, thus ensuring the long - term flood protection of the wider lands in Dooradoyle in a manner compatible with any future City Wide Flood Relief Scheme.*
- d) Ensure any application on lands at risk of flooding is accompanied by a Site Specific Flood Risk Assessment which shall demonstrate that any development does not result in additional significant flood risk in the area and does not impede the future delivery of a wider flood relief scheme for Limerick. **This FRA shall***

*also include a detailed Emergency Response Plan and a Breach Modelling Assessment using a methodology to be agreed in advance with LCCC.*

*e) Require an overall framework plan/ masterplan to be prepared for the lands in advance of, or as part of, any application for a portion of the currently undeveloped lands.*

In addition to the above, we would recommend that the SFRA be amended to correct the errata noted above, particularly with respect to the Justification Test for the site, such that it is consistent with the Justification Test as more correctly applied (in general) for the Greenpark lands (notwithstanding some errors noted earlier in the Justification Test for the Greenpark lands).

## 7 Conclusion

---

In making its various submission as part of the Development Plan process, our client has engaged JSA as planning experts and Arup as flood risk management experts to prepare very detailed reports to provide a clear evidence base as to the strategic need for the zoning of the subject lands and with respect to the quantification of existing flood risk and the details of how firstly, the residual risk could be managed to an acceptable level, and secondly how it could improve flood risk by fast tracking the upgrading of some of the existing flood defences and extending them to offer protection to the vital sustainable transport corridor on the Rossbrien Road.

This information has been provided in full to LCCC to provide full transparency with regard to the due diligence undertaken, demonstrating that the issue of flood risk as been considered in great detail and has been a key driver of the masterplanning for the site.

It is worth remembering that it is equally in the interest of the developer that flood risk is appropriately addressed so as to minimise the risk to its asset over its lifetime.

Unfortunately, the SFRA prepared for the Development Plan does not appear to have considered this information in sufficient detail and contains a number of errors with regard to the application of the Flood Risk Management Guidelines.

Notwithstanding, it is important that the elected members can have confidence that the appropriate checks and balances are in place following the adoption of the Development Plan. Given the need for such development and the likelihood that the citywide flood relief scheme will not be delivered within the lifetime of this plan, it would appear contrary to good development planning to sterilise the potential delivery of such key development over this period. By adopting the proposed material alteration, the Elected Members are simply keeping open the possibility of such development.

By the incorporation of the proposed MA 13 wording, we are satisfied that the Development Plan will include the necessary checks and balances to ensure that any future development applications will be required to address the general concerns raised in the SFRA with regard to reduction of residual risk (particularly around breach), does not impede any future flood relief scheme (and in fact could enhance and/or expedite same) and will ensure that future flood risk is reduced to acceptable levels in a sustainable way, compatible with all relevant national legislation.





April 7<sup>th</sup> 2022

To whom it may concern,

FDI covers a full spectrum of activities including manufacturing, research development & innovation and business services, which result in significant capital investment and employment creation in Ireland.

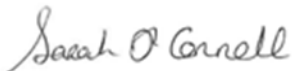
The FDI sector has been a key contributor to Ireland's economic performance over the past number of years and has had an important impact on the economy. It has provided critical support to Ireland's GDP, employment base and Government revenue. Over the past decade, employment growth in the Limerick City region has been significantly underpinned by major FDI investments in the life science and large-scale manufacturing sectors. Limerick city is now recognised as a global cluster location of choice for advanced manufacturing including both life science and semiconductor manufacturing. Multinationals.

In order to ensure a robust value proposition for clients and to achieve the NPF targets for population growth, Limerick's future employment profile will rely heavily on its ability to capitalise on the success of its established activities and attract new investments.

Fundamental to achieving this will be the availability of sufficient zoned, serviced and accessible land in strategic locations that will ultimately provide a compelling location option for multinationals in the mobile FDI marketplace. The availability of land zoned for industrial and enterprise development in advance of demand is a key element of IDA's strategy to attract foreign direct investment to Ireland and to facilitate employment growth in regional locations.

IDA's strategy, *Driving Recovery & Sustainable Growth 2021 - 2024* sets out ambitious employment and investment targets to be achieved in regional locations. In this regard, it is critical that regional urban centres such as Limerick, with its critical population mass, is well positioned to compete for and win mobile FDI investments.

Yours sincerely,



---

Sarah O'Connell  
Head of Strategic Property Division  
IDA Ireland

**APPENDIX 3 – CUSHMAN & WAKEFIELD OFFICE REPORT Q1 2022**

# Limerick MARKET

Office Q1 2022

	YoY Chg	12-Mo. Outlook
<b>7.4%</b> Vacancy Rate	▼	▼
<b>15,950 Sq M</b> Take Up YoY	▼	—
<b>€269</b> Prime Rents (Standing Stock), PSM	▲	▲
<b>€375</b> Prime Rents (New Build), PSM	—	—

**ECONOMIC INDICATORS Q4 2021**

	YoY Chg	12-Mo. Forecast
<b>2.4M</b> Ireland Employment*	▲	▲
<b>7.4%</b> Ireland Unemployment Rate*	▼	▼
<b>+13.5%</b> Ireland Annual GDP Growth	▲	▼

Source: CSO  
\*COVID-19 Adjusted Measure

**Occupier Activity**

The Limerick office market has experienced an interesting 12-month period. Despite COVID-19 related market challenges, activity has persisted. A total of 11,050 sq m was occupied in 2021, followed by 6,250 sq m in the opening quarter of 2022. Take up in Q1 is bolstered by it's largest deal, namely 3,475 sq m at the LEED Gold Grade A Hawthorn House, Castletroy, Plassey, by an expanding occupier. Other space of note occupied was the combined 1,150 sq m at Hamilton House, Castletroy, Plassey by Bosch and Optel Group. Unlike all other regional office markets in Ireland, the suburbs is dominating take up volumes, accounting for 51% over the past twelve months.

**Availability**

Availability in the Limerick office market remains particularly tight, as further declines were recorded over the past twelve months. Availability sat at 30,885 sq m in Q1 2022, reflecting an annual decrease of 15%. The corresponding vacancy rate is 7.4%, the lowest vacancy rate in our +20 years detailed data series. Market churn, meaning the release of second-hand stock, decreased in 2020 and despite improving in 2021, it remains low. This trend, combined with limited development activity and continued take up, contributes to the decrease in availability. In terms of location, the majority of space is located in the Shannon Free Zone, 46%. Looking ahead, our market intelligence provides visibility on a number of larger units due to come to the market over the coming quarters. These units will improve vacancy levels somewhat, however some of this space is under active negotiation.

**Development Activity**

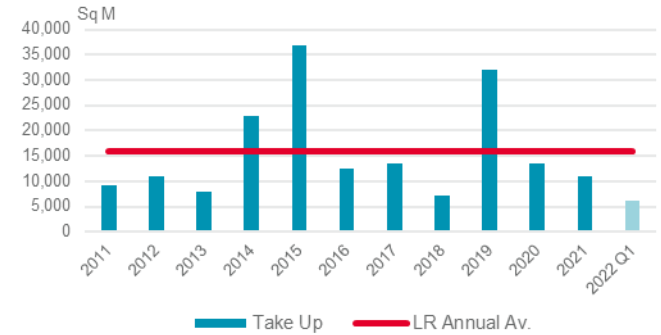
At the end of March 2022, approximately 10,200 sq m was under construction via a new build and an extensive refurbishment. Development activity of 8,900 sq m commenced at 1BQ in the city centre at the end of 2021. On the site of the old ESB building, the mixed-use unit is due for completion in 2023. The remaining 1,300 sq m under construction is at Bay 137, Shannon Free Zone. The extensive refurb will complete later this year.

**Market Commentary**

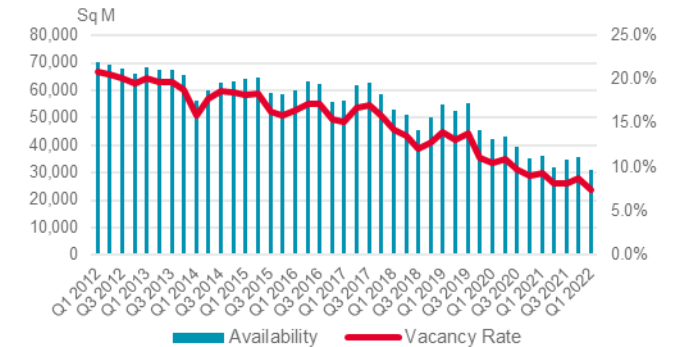
*"There is currently a shortage of modern Grade A office accommodation in the market with the majority of the available stock comprising older legacy space in need of refurbishment. The activity Limerick has witnessed over the past 12 months was predominantly existing Limerick based companies who completed expansion plans which were triggered pre-COVID-19. This trend has continued into 2022."*

Ciara McCarthy, Divisional Director, Cushman & Wakefield Limerick

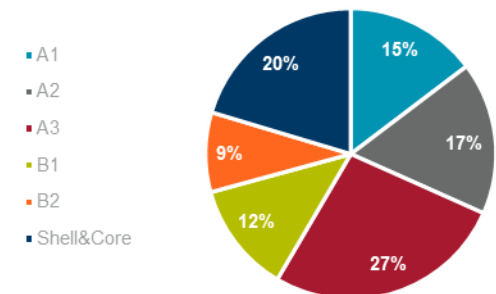
**Take Up (Sq M), 2011 – 2022 Q1**



**Availability (Sq M) and Vacancy Rate (%), Q1 2012 – Q1 2022**



**Availability by Grade (Sq M), Q1 2022**



# Limerick MARKET

Office Q1 2022

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**KATE ENGLISH**

*Chief Economist, Head of Research & Insights Ireland,*

Tel: +353 (0) 1 639 9206

[Kate.English@cushwake.com](mailto:Kate.English@cushwake.com)

**KATIE O' NEILL**

*Economist, Research & Insights Ireland*

Tel: +353 (0) 1 639 9200

[Katie.oneill@cushwake.com](mailto:Katie.oneill@cushwake.com)

**Patricia Staunton**

*Regional Director,*

Tel: +353 (0) 91 569 181

[Patricia.staunton@cushwake.com](mailto:Patricia.staunton@cushwake.com)

**CIARA MCCARTHY**

*Divisional Director, Limerick*

Tel: +353 (0) 61 418 111

[ciara.mccarthy@cushwake.com](mailto:ciara.mccarthy@cushwake.com)

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