

Observation on Material Amendment No 150 to Draft Limerick Development Plan (LDP) 2022-28 to change Agriculture zoning (1.6 ha) to District Centre zoning at Caherdavin, Ennis Road.

The Material Amendment proposal states that a comprehensive planning application was submitted for the construction of a Primary Health Care Centre on the site in question, however, it fails to mention that this application was refused by Limerick City and County Council (LCCC). The application was refused for the very good reason that the site is at risk of flooding.

For over 20 years, up to and including the LDP 2010-16 as extended, the land in question has been zoned Residential without any building activity taking place. It is a relic of Celtic Tiger era planning excess when lands were zoned Residential irrespective of their suitability.

Following the 2018 CFRAM Study, Local Authorities can no longer ignore the risks of building on clearly identified flood zone lands. In formulating the Draft LDP 2022-28, LCCC rightly decided to rezone the land in question from Residential to Agriculture as they are in the highest category of flood risk, Flood Zone A. Nothing has changed since, ie, ground levels, flood risk, etc, to justify a change from Agriculture zoning.

The proposer states that a comprehensive Site Specific Flood Risk Assessment (SSFRA) found that the site is at low risk of flooding. LCCC commissioned an equally comprehensive SSFRA for the site which found to the contrary, that the site is indeed at risk of flooding and would not pass a Justification Test. I can personally attest to the real risk of flooding at this site having canoed over it in my youth following a major riverbank breach in 1961.

The proposal also states that the site is a brownfield site which is incorrect, The site is a greenfield site which has never been developed or used, except for a small section where road repair materials and machinery are occasionally stored.

A Primary Health Care Centre would be welcome on the north side of the City but there is no justification for building one, or anything else, on a flood plain. There are many sites on the north side of the city where such a development could take place without the risk of flooding.

Finally, it is disappointing after the many exhortations by LCCC for the Limerick public to 'have your say' in the preparation of LDP 2022-28, and after three periods of public consultation of which I availed, that at the 11th hour, LCCC Councillors themselves can at one meeting propose and approve Material Amendments to the Draft LDP 2022-28, which have been carefully and expensively drafted for them by agents of developers and landowners, without the public having sight of them until after they were passed.. The planning system in Ireland is still loaded against the ordinary citizen.

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