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Date: 11th April 2022

**RE: Proposed Material Alterations to the
Draft Limerick Development Plan 2022-2028
SRA File Ref: 20/006**

A Chara,

I refer to your notice of the publication of Proposed Material Alterations to the Draft Limerick Development Plan 2022-2028. The Southern Regional Assembly (SRA) welcome this opportunity to comment on the Proposed Material Alterations.

The SRA commend the continued work undertaken in the preparation of the Draft Plan and these alterations to strengthen policies and objectives. These observations are focused solely on the published Material Alterations and are intended to assist the Council in achieving successful alignment of the Development Plan with the Regional Policy Objectives (RPOs) of the Regional Spatial and Economic Strategy (RSES), Limerick-Shannon Metropolitan Area Strategic Plan (LSMASP) and National Policy Objectives (NPOs).

Chapter 2 - Core Strategy

Proposed Material Alteration 5 assists in addressing Recommendation 1 of the SRAs submission to the Draft Plan.

It is noted Material Alteration 5 provides a new Core Strategy table. This table provides greater clarity on the population projections in relation to the Metropolitan Area. This issue was raised in Recommendation 1 (b) of the SRA submission. It is considered the table can achieve further alignment with Section 5 of the LSMASP through the inclusion of a population category for the 'Remainder Metropolitan Area (Limerick)' as per Table 1 of the LSMASP.

It is noted that Metropolitan Area information in Material Alteration 5, particularly the terminology used in Tables 2.2, 2.4, 2.5 and 2.6 appears not to have been amended consistently with the proposed new Core Strategy table. The need for consistency in terminology based on the established hierarchy set through the NPF, RSES and Limerick-Shannon Metropolitan Area was raised in Recommendation 1 (d) of the SRA submission, and it is noted in this regard that the revised Core Strategy table also includes terminology not consistent with these. For example, references to the 'Limerick Metropolitan Area' and 'Limerick City and Environs' appear in the new Core Strategy table, and it is considered these should be changed to 'Limerick-Shannon Metropolitan Area' and 'Limerick City and Suburbs'. These changes should also apply to associated text in Material Alteration 5 and all Material Alterations.

It is noted that the 2028 population projection for Limerick City and Suburbs (referenced as 'Limerick City and Environs' in the new Core Strategy table in Material Alteration 5) is higher than the pro-rata LSMASP projections. Moreover, the Core Strategy projected figure of 123,124 for 2028 is very close to the LSMASP 2031 projection of 123,289. The SRA considers this proposal to be reasonable as the NPF and RSES supports ambitious growth targets to enable Limerick City and Suburbs to grow by **at least 50%** to 2040. In addition, Section 5 of the LSMASP does not inhibit the reallocation of population growth to Limerick City and Suburbs. Facilitating this significant local ambition is therefore consistent with the LSMASP.

There appears to be information gaps under headings in the new Core Strategy table. For example, figures for Limerick City and Suburbs under the heading '*population growth as % of 2016 base*' are not included. These gaps should be addressed where appropriate.

Chapter 3 - Spatial Strategy

Proposed Material Alteration 6 assists in addressing Recommendations 1 and 2 of the SRAs submission to the Draft Plan. The issue of inconsistent terminology with the NPF, RSES and MASP arises throughout and should be addressed as per Recommendation 1(d) of the SRA submission. However, the additions in relation to the City which include text, maps and objectives are very positive.

It is noted in Section 2(b) of Material Alteration 6 that a Local Area Plan (LAP) will deal with the more detailed approach to the development of Newcastle West in line with its ambition as a Key Town. Notwithstanding this proposal, it is considered that Newcastle West should have a strong and distinct expression in the Draft Plan that builds on the RSES policy platform. This point was made in Section D1.3 and Recommendation 2(a) of the SRA submission. **Proposed Material Alterations 16 and 17** provide additional policies in relation to economic development while **Proposed Material Alteration 53** provides further policy support on sustainable transport. These proposed additions are welcomed.

Chapter 5 - A Strong Economy

Proposed Material Alteration 8 sets out the vision of the RSES Economic Strategy including the five economic principles of Smart Specialisation, Clustering, Placemaking for enterprise development, Knowledge Diffusion and Capacity Building. This assists in addressing Recommendation 5 of the SRAs submission to the Draft Plan.

In addition, **Proposed Material Alteration 9** sets out a new policy supporting the provision of increased employment through the expansion of the existing enterprise ecosystem in the region and the development of smart specialisation.

Proposed Material Alteration 16 sets out support in relation to the Atlantic Economic Corridor and assists addressing Recommendation 6 of the SRAs submission to the Draft Plan.

Proposed Material Alteration 21 provide a new objective to support the further development of Limerick, as an inclusive Learning City and County and to work with relevant stakeholders as appropriate. This assists in addressing Recommendation 13 (a) of the SRA submission.

Proposed Material Alteration 22 provides a new objective to support the continued collaborative work undertaken by the Mid-West Regional Enterprise Plan (REP) and the Mid-West Regional Skills Forum in employment generation and fostering of the knowledge-based economy. This assists in addressing Recommendation 13 (a) of the SRA submission.

Chapter 6 - Environment, Heritage, Landscape and Green Infrastructure

Proposed Material Alteration 46 provides a new objective which seeks to advance the use of an ecosystem services approach and ecosystem services valuation as a decision-making tool in plans and projects, subject to appropriate ecological assessment. This assists in addressing Recommendation 12 of the SRA submission.

Proposed Material Alteration 49 provides a new section and objective on an Ecosystem Services Approach. This assists in addressing Recommendation 12 of the SRA submission.

Chapter 7 - Sustainable Mobility and Transport

Proposed Material Alteration 53 provides a new restructured chapter on Sustainability Mobility and Transport. Sections, policies, objectives, tables, figures and map numbering etc. have also been revised to correspond with this alteration. Proposed amendments to Objective TR O5 assist in addressing Recommendation 10 of the SRA submission.

The addition of targets for mode share along with baseline figures is welcomed. This assists in addressing Recommendation 9(b) of the SRA submission.

Chapter 8 - Infrastructure

Proposed Material Alteration 54 provides an amended objective to support emerging innovations in the digital transformation of transportation, E-Mobility and sustainable mobility in line with Regional Policy Objective 160 Smart Mobility, including those identified in LSMATS. This assists in addressing Recommendation 10(a) of the SRA submission.

Proposed Material Alteration 55 provides a new objective enhance digital innovations and digital transformation throughout Limerick and the Limerick-Shannon Metropolitan Area. This assists in addressing Recommendation 11(a) of the SRA submission.

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

Proposed Material Alteration 73 identifies the potential for renewable energy development in Limerick within the lifetime of the Plan and provides Renewable Energy allocations for differing technologies. This assists in addressing Recommendation 9(c) of the SRA submission.

Chapter 10 - Sustainable Communities and Social Infrastructure

Proposed Material Alteration 73 provides a new objective for Health Place Audits and Healthy Place-Making. This assists in addressing Recommendation 13(b) of the SRA submission.

Settlement Capacity Audit, Zoning, Flood and Transport Maps

Section D1.4 and Recommendation 3 of the SRA submission advised that it is difficult to ascertain the anticipated population and housing ambition for various parts of the Limerick City and Suburbs from the information provided in the Draft Plan. The Proposed Material Alterations to maps and information assist in this regard and the Planning Authority are commended on the level of detail provided but that brings its own challenges in terms of effective presentation and there are difficulties in effectively correlating and connecting the information as presented. The Planning Authority is asked to address this issue.

In addition, the inclusion of the built-up footprint. i.e. the Census boundary of Limerick City and Suburbs, would assist in addressing Recommendation 3(a) of the SRA submission.

Section 12(5)(aa) Notice - Response

In accordance with Section 12(5)(aa) of the Planning and Development Act 2000 (as amended) the Planning Authority has provided notice of its decision not to comply with Recommendation 1(a) of the SRAs submission to the Draft Plan in relation to developing a shared section on the LSMASP with Clare County Council and the SRA. LSMASP Policy Objective 1 states that it is an objective to promote the Limerick-Shannon Metropolitan Area as a cohesive Metropolitan Area and it is noted that that a purpose of the MASP under the NPF was to address the 'multiplicity of plans addressing the individual and specific requirements of local authorities makes co-ordination of strategic development challenging'.

It is within this context that Recommendation 1(a) was made, and it should be noted that the SRA have issued the same request in its submission to the Draft Clare County Development Plan 2023-2029. The intent of the recommendation was that the Plan should give a greater emphasis to the shared ambition and purpose of the MASP as provided for in the NPF and that this would be of benefit to both local authorities. A key priority is the planning and sustainable development of Limerick City and Suburbs. It is in two functional areas but shares services such as schools and infrastructure. In this regard it is considered reasonable to co-ordinate the objectives of both Development Plans.

The Planning Authority has also provided notice of its decision not to comply with Recommendation 4(b) of the SRAs submission to the Draft Plan in relation to the identification of areas adjacent to Newcastle West as structurally weak in the Rural Housing Map. The intent of the recommendation was that the Plan should provide greater clarity on the criteria used for the Rural Housing Map, particular in relation to area surrounding the Key Town of Newcastle West.

Conclusion

The SRA welcomes the publication of Proposed Material Alterations to the Draft Limerick Development Plan 2022-2028 which strengthen the content of the Development Plan and will improve implementation of key policy objectives of the RSES.

These observations are provided to assist and demonstrate that strengthened alignment between the Draft Development Plan and RSES Strategy is being achieved through these proposed amendments.

The RSES team are available for further consultation and for any clarification required regarding this submission.

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David Kelly

Director Southern Regional Assembly