

Limerick City and County Council
County Hall
Dooradoyle
Limerick

Friday, 3rd September 2021

[By Email]

DRAFT LIMERICK DEVELOPMENT PLAN 2022-2028
- SUBMISSION -

Dear Sir/Madam,

RE: FORMER RACECOURSE LANDS, GREENPARK, LIMERICK

1.0 INTRODUCTION

Tom Phillips + Associates, Town Planning Consultants, 80 Harcourt Street, Dublin 2 have been retained by Voyage Property Limited, Ashbourne Hall, Ashbourne Business Park, Corcanree, Dock Road, Limerick to make this submission in relation to the *Draft Limerick Development Plan 2022-2028* (generally referred to as the *Draft Plan* for the remainder of this submission) currently on public display. Voyage Property Limited is the owner of a strategic c.47 ha landholding comprising the former Racecourse lands located in Greenpark, Dock Road, Limerick. (The subject lands are generally referred to as the 'Greenpark Lands' for the remainder of this submission.)

The Draft Plan seeks to materially alter the land use zoning objectives that pertain to the lands under the current *Limerick City Development Plan 2010-2016* (generally referred to as the *Current Development Plan* for the remainder of this submission), which comprises General Mixed Use, New Residential, Neighbourhood Centre and Public Open Space zoning designations. The Draft Plan now proposes to replace the current General Mixed Use, Neighbourhood Centre and the majority of the New Residential zoning with a single use Enterprise and Employment zone. The Public Open Space zoning objective and a small residual area of Residential zoned land is retained. The proposed changes in the Draft Plan threaten the potential delivery of hundreds of new homes in the heart of Limerick City.

We wish to strongly object to these proposed changes, which are counter to National, Regional and Development Plan planning policies and objectives and do not accord with the core strategy for Limerick City and its environs as described in the Draft Plan.

1.1 Purpose of this Submission

As noted above, in the Current Development Plan, the Greenpark lands are currently zoned under four different zoning objectives as follows:

- Objective 5A - General Mixed Use (c.10.6 ha)
- Objective 2A - New Residential (c.19.3 ha)
- Objective 5C - Neighbourhood Centre (c.2.3 ha)
- Objective 6A - Public Open Space

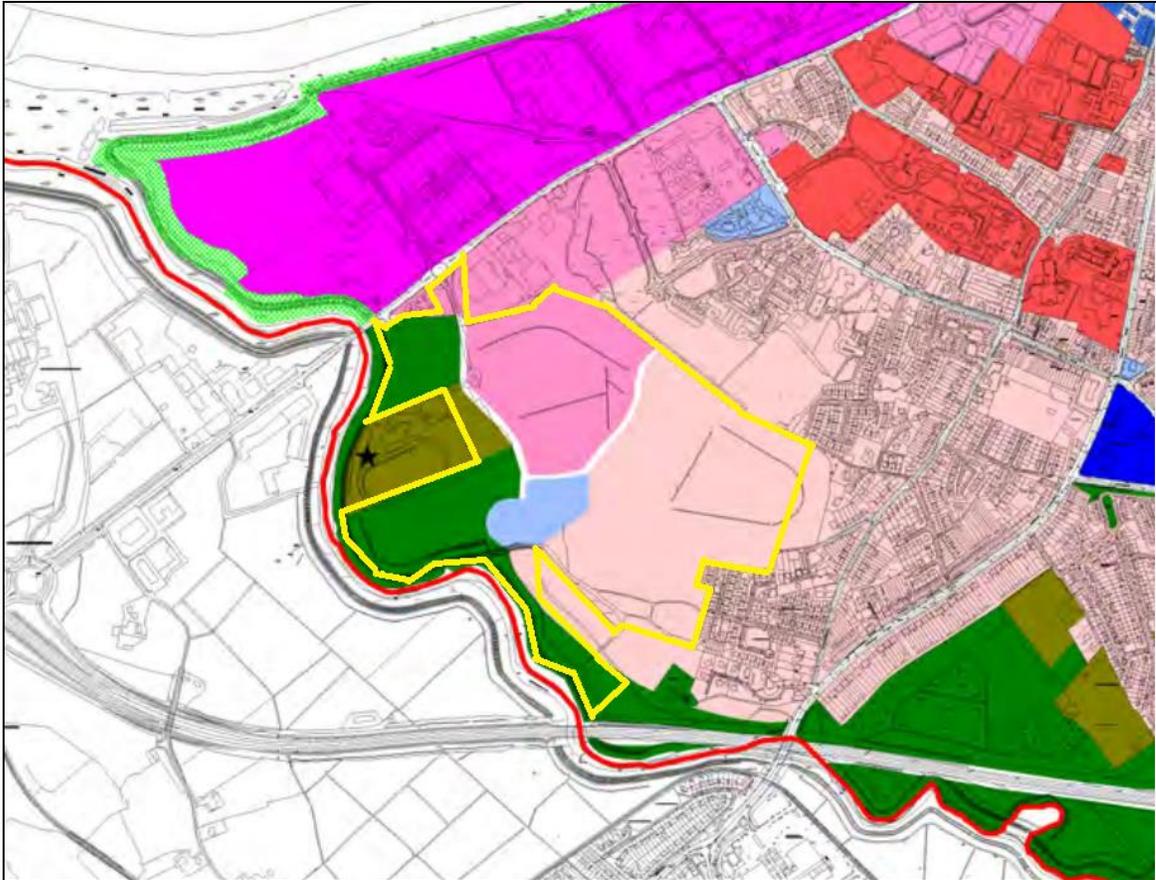




Figure 1.1: Extract of Land Use Zoning Map, with indicative site boundary in yellow, *Limerick City Council Development Plan 2010-2016* (cropped and annotated by Tom Phillips + Associates, 2021)

Under the Draft Plan, the zoning of the lands has changed significantly as follows:

- The General Mixed Use and Neighbourhood Centre zoning objectives have been removed from the lands, whilst the Residential component is very significantly reduced (from c.19.3 ha to c.4.4 ha). These areas have now been replaced with a single Enterprise and Employment zone (c.24.7 ha).
- The remaining residual New Residential zoned area comprises c.4.4 ha of land, which could not be considered a major residential development site in this context.
- An additional c.1.8 ha of land is now zoned for Public Open Space purposes in lieu of New Residential land use.



Figure 1.2: Extract of Land Use Zoning Map, *Draft Limerick Development Plan 2022-2028*
(Cropped and annotated by Tom Phillips + Associates, 2021)

It should also be noted that both the General Mixed Use and Neighbourhood Centre zoning objectives currently pertaining to the lands both permit Residential use in principle, so the potential Residential yield of the entire landholding is being very drastically reduced on foot of the Draft Plan.

Residential use is not permitted under the proposed Enterprise and Employment zone, which leaves only c.4.4 ha of a strategic c.47 ha inner suburban landholding available for Residential purposes. This cannot be considered to represent a planning strategy in line with current National or Regional planning policy.

By way of this submission, therefore, we are seeking:

- The maintenance of c.19.3 ha of New Residential zoned land in line with the Current Development Plan zoning provisions pertaining to the site.

Our Client is amenable to the change in zoning from the current General Mixed Use and Neighbourhood Centre to Enterprise and Employment use. No other changes are being sought on foot of the Draft Plan.



1.2 Executive Summary

- Having reviewed the Draft Plan in detail, our core observation regarding the Greenpark Lands and the current Development Plan review process is the inexplicable absence of any meaningful reference to Greenpark in the written statement of the Draft Plan (Volume One), despite the site comprising one of the largest remaining and best located undeveloped strategic land banks in the inner suburbs of Limerick City. The Draft Plan will essentially eliminate the potential for hundreds of new homes in the heart of Limerick City.
- Notwithstanding the Greenpark Lands superb locational characteristics and size, they are not identified as a *'Limerick City Opportunity Site'* in the Draft Plan, despite being better located and larger than many of the other designated opportunity sites and being of a similar strategic size to the strongly promoted Colbert, Parkway and Mungret landholdings. Some of the other sites being promoted are significantly further away from the city centre.
- The absence of any such designation is entirely inconsistent with the *Limerick 2030 Interim Update and Review*, which comprises Volume Six of the Development Plan. The written statement includes a number of policy objectives, which underline the Planning Authority's commitment to implementing the *Limerick 2030 Interim Update*. The Planning Authority has an obligation to give effect to these objectives under Section 15 of the *Planning and Development Act 2000*, as amended.
- The limited references to the Greenpark Lands that are included in the Draft Plan documentation (in particular, see Volume 6 - *Limerick 2030 Interim Update*) identify the site as being both an employment opportunity site (c. 12 ha) and a *'major residential opportunity site'*. This promotes a mixed use approach to the future development of the lands in line with the Current Development Plan and current National planning policy. This is not, however, reflected in the proposed zoning of the lands in the Draft Plan that will now include c.4.4 ha of Residential zoned land only with some c.24.7 ha of Enterprise and Employment zoned land.
- In stark contrast to the Draft Plan provisions, the Current Development Plan explicitly identifies the Greenpark Lands as being capable of delivering 1,188 no. residential units with related development objectives seeking *'...the balanced development of the existing under utilised lands...in particular the former racecourse'* (see Chapter 14). The proposed change in zoning to create an overwhelmingly commercial site eliminates the majority of these potential new homes in the Draft Plan.
- The strategic importance of the Greenpark Lands ('Racecourse lands') as a major Residential site in Limerick City is further illustrated by way of its designation as a key development site under the *Rebuilding Ireland LIHAF* programme, which is a Government sponsored initiative prepared by the then Department of Housing, Planning, Community and Local Government in March 2017. In this document, 'Greenpark' is explicitly identified as being within the inner suburbs of Limerick City and described as a *'Major Urban Housing Development Site'* close to the *'heart of the city'* with the capability of supporting c.400 units by 2021 and the potential for 700 units in the longer term. The Draft Plan would require a significant change to Government Housing policy in the Limerick area.



- The enclosed Report prepared by Lisney (see Appendix B) on behalf of Voyage Property Limited analysing residential and commercial lands in Limerick City concludes that the extent of employment- related zoned land as proposed in the Draft Plan could provide c. 1.98 million sq m of accommodation (530,000 sq m of offices and 1.46 million sq m of industrial/logistics/manufacturing).
- Taking into consideration the likely potential for expansion of the office and industrial markets in Limerick in the medium-term due to LCCC'S commitment to economic growth and dynamic revitalisation via *Limerick 2030*, Lisney estimate that the proposed level of potential development is equivalent to over 20 years' requirements assuming a generous 60% increase in demand in the medium term. (It is estimated that this level of employment-related zoned land would satisfy the significantly larger Dublin market for 5 years).
- Demand for residential properties remains strong but with clear undersupply in the market. Based on CSO data, 516 units were completed in Limerick in the 12 months to the end of March 2021; 483 (94%) were houses and 33 (6%) were apartments. This remains well below what is required in the market and only added about 0.6% to the stock of residential properties across Limerick.
- Lisney note that there are only five new housing schemes currently available in Limerick City. Two are in Mungret with a further scheme on Ballyneety Road, all of which are further from the city centre than Greenpark. Of the other two schemes, 'Revington' (located off the North Circular Road) comprises a low density development of large 4 and 5 bedroom detached properties only. The future development of the Residential zoned lands in Greenpark in line with the Current Development Plan zoning would deliver a significantly more affordable housing proposal with a greater selection of housing types in an inner urban location.
- An Bord Pleanála ('the Board'), as part of the recent pre-application consultation process regarding a Strategic Housing Development proposal on a portion of the lands (July 2021), noted in its formal Opinion the '*...status of the Racecourse lands as one of the largest remaining undeveloped land banks in Limerick City and the strategic importance of the lands in the context of National planning policy, residential density guidelines and its accessible location relative to Limerick City Centre, Mary Immaculate College, Dooradoyle District Centre and employment zones such as the Raheen Industrial Estate and University Hospital Limerick campus*'.
- The Board also noted the availability of existing and proposed roads, pedestrian, cycle and public transport infrastructure in the vicinity of the site, in the context of the Draft Limerick Shannon Metropolitan Area Transport Strategy (LSMATS).
- The Greenpark Lands are subject to Flood Risk designations and are, accordingly, subject to the provisions of the '*Planning System and Flood Risk Management Guidelines for Planning Authorities 2009*' including the Development Plan Justification Test in respect of land use zoning. It is noted that the zoning of the lands under the Current Development Plan (adopted in 2010), including New Residential, were previously considered in the context of these Guidelines (see Policy WS8, which references that all new development proposals must comply fully with the above Guidelines).



- The Greenpark Lands also satisfy the criteria of the Development Plan Justification Test. It is noted in the 2009 Guidelines that the Development Plan Justification Test applies to *'...future development of areas in an urban settlement that are at moderate or high risk of flooding, for uses or development vulnerable to flooding that would generally be inappropriate as set out in Table 3.2'*. There is no distinction drawn, therefore, in this Test between land use types (residential, commercial) or whether the uses are highly or less vulnerable. Future planning applications on zoned lands will be required to demonstrate that the criteria of the Development Management Justification Test will also be satisfied by Applicants, which will necessitate the submission of a Site Specific Flood Risk Assessment (SSFRA).
- We contend that the site is suitable for significant Residential use being crucial to the achievement of a balanced *'compact growth'* strategy and projected population increase, which are envisaged for Limerick City. This is a key National, Regional and Draft Plan objective and necessitates the sustainable provision of well-located housing. As demonstrated in this submission, the Greenpark Lands satisfy the criteria of the Development Plan Justification Test for Residential use.
- A detailed Site Specific Flood Risk Assessment (SSFRA) was carried out by RPS, Consulting Engineers in respect of the subject lands (see Appendix A), which includes substantial and robust modelling and breach analysis that confirms that the site can be fully developed in a safe manner without impact on third party lands. This was submitted for discussion with representatives of Limerick City and County Council who confirmed that they were satisfied that the methodology and analysis in that assessment was robust and accurate.
- The re-development of the lands for a mix of commercial and residential uses of scale complies in full with current National (*NPF 2018, Development Plan Guidelines, Residential Density Guidelines*), Regional (*RSES 2020*) and Draft Plan (including *Limerick 2030 Interim Update*) planning objectives regarding the achievement of compact urban growth; the sequential zoning of land; meeting population growth projections for Limerick as a Nationally designated city of scale, and the sustainable re-development of inner suburban serviced lands adjoining the city centre and public transport corridors.
- The re-development of the Greenpark Lands for a mix of commercial and residential uses of scale complies in full with the recommendations included in *'The Future Development of Limerick City'* as produced by Indecon Research Economists and published by Limerick Chamber in June 2021. This notes that *'Increasing the population density in Limerick city is a critically important challenge for the future development of the city'* and recommends that *'Strategic development areas should be identified in the city to facilitate new quality affordable residential developments'*.
- *'The Future Development of Limerick City'* further recommends that *'The focus of all policies and investments should be on facilitating compact growth'* and that *'Targets should be set (and monitored) to achieve an increase in apartment and other residential regeneration developments in inner areas of the city'*.



- Having regard to all of the above planning context, it is submitted that there is no planning and development rationale consistent for the proposed zoning of the lands under the Draft Plan, which would reduce the extent of Residential zoned land from the current c.19.3 ha (capable of delivering c.800+ no. units) to the proposed c.4.4 ha (c.200 no. units). The weighting in favour of Enterprise and Employment zoning is entirely disproportionate.
- We request, therefore, that the current extent and location of Residential zoned land should be maintained on the Greenpark lands as per the current Development Plan zoning arrangements (c.19.3 ha). Our Client accepts that it is appropriate to zone c.12 ha of land for Enterprise and Employment purposes on the north-western part of the subject lands (essentially replacing the existing General Mixed Use and Neighbourhood Centre zones) in order to support and complement the economic growth strategy proposed for Limerick City and its environs and in line with the *Limerick 2030 Interim Update* vision for the site.
- If the Draft Plan is not amended, Limerick City will lose hundreds of potential new homes, which are capable of delivery in the short term. This site is not reliant on the provision of major new infrastructure and, being in single ownership, is free from complex legal ownership arrangements involving multiple parties that will delay other sites being progressed for development.

1.3 Site Location

The c. 47 ha subject site is situated approximately 2 km to the south-west of Limerick City Centre and south of the River Shannon. The site generally comprises an extensive open area of the former Greenpark Racecourse (now re-located). The site is generally bounded by Ballinacloy River to the west and south-west and surrounding lands including the Greenpark Greyhound Stadium; Dock Road and industrial buildings to the north-west and existing clustered student accommodation and residential development to the south-east and east.

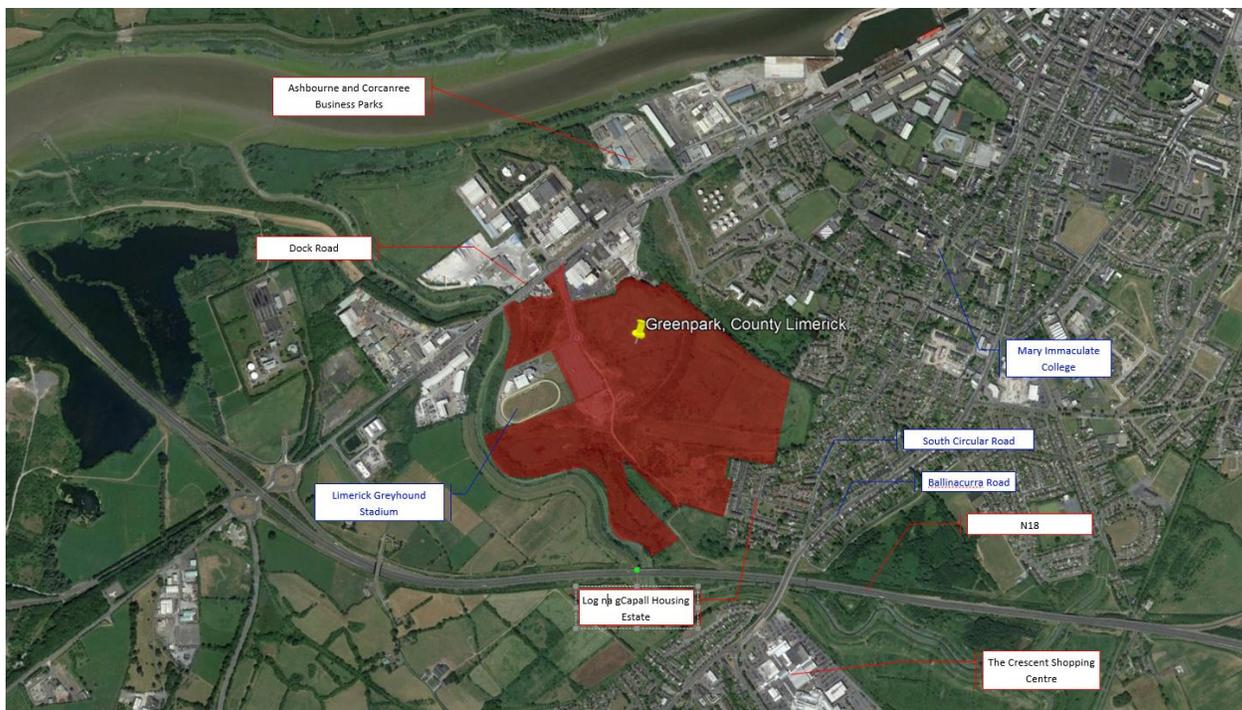


Figure 1.3: Aerial view of the subject site, with indicative site area in red
(Source: Google Maps, annotated by Tom Phillips + Associates, 2021)

The overall landholding can be accessed from three existing points as follows (i) via Greenpark Avenue; (ii) via an existing gated entrance in the Log na gCapall residential estate to the south, which is accessed off South Circular Road, and ultimately the Ballinacurra Road (R526), and (iii) via the Dock Road to north of the site, via an access road, which has a shared roundabout with the Limerick Greyhound Stadium. An additional potential access point via an existing roundabout at Ashdown to the north, near Alandale Square, may be provided at a future date and forms part of the overall Masterplan vision for the Greenpark lands. The future development of the site will also benefit from good quality pedestrian and cyclist linkages that can be readily provided via Log na gCapall and Greenpark Avenue

The site is located within easy reach of O'Connell Avenue, which is an important arterial route in and out of Limerick City Centre. This area of the City is well serviced with a variety of primary and secondary schools and Mary Immaculate College, a third level institution, is also located in close proximity to the site. Public transport facilities service this area of Limerick, with the bus routes No. 13, 14, 301, 304, 304A, 304X, 315, 320, 321 and 435 available nearby on Ballinacurra Road.

The re-location of the racecourse has facilitated the potential re-development of these lands in line with the provisions and land use zoning as set out in the Current Development Plan e.g. office campus, housing (including crèche), nursing home, neighbourhood centre and open space.



Change in Land Use Zoning

We strongly object to this proposed change in zoning classification, which we submit is not grounded in rational planning analysis of the land use requirements of Limerick City, nor is it supported by National and Regional planning policy guidance, or Development Plan policy, all of which seek to promote ‘compact growth’ and the efficient use of underutilised urban lands close to city centres nationwide.

The subject lands are ideally located to deliver on this concept and facilitate a mixed use, sustainable form of development that can maximise their locational advantages for the benefit of future residents and employees, given their location within reasonable walking and cycling distance of the city centre and existing and emerging public transport routes (see the *Draft Limerick Shannon Metropolitan Area Transport Strategy (LSMATS)* for further details).

The lands are also serviced (foul/surface water drainage and water supply) and will be served by a new internal link road providing vehicular access from Dock Road that will be delivered by the landowner through the planning process. Thus, the future development of the lands is not contingent on the future provision of new infrastructure that is beyond the control of the landowner and can, accordingly, deliver new development in a timely manner including much needed homes for Limerick residents, which is crucial for the further economic development of Limerick City.

The land use zoning arrangement pertaining to the lands in the current Development Plan comprises an excellent planning model that will enable the creation of a new mixed use urban quarter in line with the much vaunted ‘10/15 minute city’ (see Volume Six of the Draft Plan, *Limerick 2030 Interim Update*) models where people can live, work and enjoy recreational amenities (in this case, significant areas of Public Open Space) all within a 10-15 minute walk/cycle catchment that is not dependent on the private car.

The juxtaposition of General Mixed Use (which strongly promotes employment generation), Neighbourhood Centre and Residential uses as per the current Development Plan will also ensure that there will not be an abrupt transition in scale and land use between the future development of the site and the well-established uses adjoining the site and will enable new development to reflect the two principal character areas that define the lands, viz:

- the north-western Commercial area proximate to the Greyhound Stadium and the traditional industrial/manufacturing/dock-based uses associated with Dock Road, and
- the south-eastern Residential area generally centred around the former racecourse track that adjoins the well-established housing areas situated off South Circular Road (Log na gCapall, Greenpark Avenue, Castlewell, Alandale and student housing clusters). By its nature, these areas will be more sensitive to the potential effects of new development on the Greenpark lands and will require to be designed accordingly.

In planning terms, it is wholly appropriate that well designed contemporary new residential development should adjoin existing long established generally lower density residential areas noted above, where potential planning and environmental impacts can be minimised at the design stage and existing residential amenity protected from the outset.

To the north, the existing General Mixed Use zone enables an appropriate transition to occur from the heavier, more traditional industrial/manufacturing/dock-based uses associated with Dock Road to a more office/services-based form of development in a high quality landscaped campus style setting. The centrally located Neighbourhood Centre zone ensures that future employees and residents of the development alike would have easy access to a range of local services including shops, etc.



Figure 1.4: Greenpark Masterplan 2020 (Annotated by Tom Phillips + Associates, 2021)

Based on this model of development, our Client has prepared a Masterplan for the entire lands ('Greenpark Masterplan'), which demonstrates how this vision might be delivered on the site. This Masterplan, which goes well beyond an architectural vision, also assesses the likely ecological, traffic, construction and flood impacts of the entire development of the lands and confirms that the development of the lands can occur safely and without any significant impacts on the local environment. This approach to the development of the lands fully accords with the Transitional Zoning policy noted in the Draft Plan (see page 348), which states:

'Transitional Zoning Areas should be considered in the design of developments in order to avoid abrupt transitions in scale, density and use in the boundary areas of adjoining land use zones. In particular, developments which would be detrimental to the amenities of residential properties should be avoided in order to protect the amenities of such properties'.



The proposed juxtaposition of c.24.7 ha of new Enterprise and Employment zoning, which is a very substantial commercial area that allows a wide range of permitted uses such as offices, machinery sales, builders providers, car parking, food and drink processing, manufacturing, fuel depot, light industry, logistics, plant storage and warehousing, adjoining existing low density residential areas would result in an abrupt transition in scale and use. In summary, therefore, the removal of the majority of the Residential land use component from the current zoning of the lands does not accord with contemporary planning policy and its replacement with a mono-use Enterprise and Employment zoning objective is a retrograde step.

This submission describes how the proposed zoning identified in the Draft Plan for the Greenpark lands runs counter to National and Regional planning policy guidance for sites such as this in an inner urban context. In addition, the policies and objectives of the Draft Plan itself, which must follow the policy framework set out at National and Regional level, also support the Residential development of a significant portion of the subject lands.

2.0 KEY ISSUES ARISING

- The 47 ha site comprises a zoned serviced strategic undeveloped and underutilised landholding (former Racecourse lands) located at Greenpark within the built-up inner suburban area of Limerick City. The mixed use re-development of the lands, including a strong Residential component, is explicitly supported by National, Regional and Development Plan policies and objectives and represents the optimum planning and design solution for the future sustainable re-development of the lands.
- The site meets all relevant criteria as an appropriate location to support Residential land use zoning when assessed against the provisions of *Development Plans - Guidelines for Planning Authorities 2007* and the recently published *Development Plan - Guidelines for Planning Authorities Draft for Consultation August 2021*. The lands are contiguous to the existing built footprint of Limerick City and located proximate to the city centre, a range of employment centres, public transport services and an established social infrastructure. The zoning of lands for Residential purposes is in accordance with the sequential approach to the zoning of land noted in the above Guidelines, given the location of the lands relative to Limerick city centre. The proposed zoning of a substantial tract of land for a single commercial use (Enterprise and Employment – c.24.7 ha) represents an inappropriate use of what is scarce urban serviced lands that can also contribute significantly to meeting a defined need for better located residential development and a projected population increase in the city.
- The inclusion of a significant Residential component in the re-development of the lands accords in full with the ‘compact city’ model of development, which underpins *Project Ireland 2040 - National Planning Framework (NPF) 2018* and includes the key objective that 50% of future housing during the lifetime of the Strategy will occur within the existing built footprint of urban areas (as opposed to greenfield or locations at a remove from urban centres, which are often car dependent and reliant on new infrastructure). Unlike other sites identified in the Draft Plan, Greenpark is not constrained by the absence of any services and can deliver housing within the lifetime of the Development Plan.



- This compact city strategy is replicated at Regional level in the *Regional Spatial & Economic Strategy (RSES) for the Southern Region 2020* and the Draft Plan. The subject site clearly represents a far superior and sustainable alternative to other Residential zoned lands identified in the Draft Plan, which are located at a significant remove from the city centre and its contiguous inner suburbs.
- The population growth projected to occur in Limerick City is defined at both National and Regional levels and requires to be met through appropriately located Residential zoned land. The population of Limerick City and suburbs in 2016 was 94,000 and the above referenced NPF seeks population growth of 50-60% to 2040, or 47,000-56,000 additional people. As noted above, 50% of this growth (c. 23,000 – 28,000) should occur within the existing built-up area of the city, which would naturally include the subject lands, given their inner suburban location. The subject lands are ideally located to contribute towards meeting these population growth targets in a sustainable location.
- The Draft Plan projects population growth of 34,177 persons to 2028. The Plan notes that the Limerick Metropolitan Area (city and suburbs) has the capacity to accommodate 12,322 no. units on zoned land. It is clear, therefore, that there is significant population growth forecast for Limerick City, which requires to be met by appropriately zoned and located land. Significant strategic sites such as Greenpark, as opposed to lands located in peripheral locations of the city, must be prioritised to comply with current planning guidance.
- The NPF also explicitly supports making better use of under-utilised land and buildings, including ‘infill’, ‘brownfield’ and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport. The subject lands are undeveloped and highly underutilised but with the inherent advantages of being serviced and proximate to the city centre, major employment centres and public transport services.
- The Greenpark Lands are not noted anywhere in the *Limerick 2030* strategy as a potential location for significant new enterprise or employment uses, or as one of the ‘*knowledge locations*’.
- On the other hand, the *Limerick 2030 Interim Update* (see Volume Six of the Draft Plan), which is informed by the policy objectives of the RSES identifies the former Racecourse lands as part of the ‘*expanded plan*’ area and potentially being both ‘*...a major residential opportunity site*’ and a ‘*c.12 Ha enterprise and employment opportunity site*’. This mixed use form of development would accord with the Current Development Plan zoning parameters but is not reflected in the Draft Plan zoning provisions pertaining to the site. Policy ECON P1, Chapter 4 of Volume One (written statement) of the Draft Plan notes the importance of *Limerick 2030* as reviewed stating:

‘It is a policy of the Council to support the review and implementation of Limerick 2030 – An Economic and Spatial Plan to guide the economic, social and physical renaissance of Limerick City Centre and the wider County/Mid-West Region’.



- As part of the pre-application consultation process with An Bord Pleanála in relation to a proposed Strategic Housing Development (SHD) on part of the currently Residential zoned lands (see ABP Ref. 310233-21), the Board, in its Opinion of July 2021, noted a number of characteristics of the Greenpark lands in the context of future Residential development on the site, which we consider are pertinent to this submission:
 - *The status of the Racecourse lands as one of the largest remaining undeveloped land banks in Limerick City.*
 - *The strategic importance of the proposed development site and the Racecourse lands for the development of the Limerick Metropolitan area, in the context of national planning policy to achieve compact urban areas and, specifically, National Planning Objectives NPO 2a, NPO 3b, NPO 7, NPO8 regarding the development of Ireland’s existing cities; NPO 5 regarding the development of cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity and NPO 35 to increase residential density in settlements, as set out in the National Planning Framework. [our emphasis]*
 - *National planning policy on residential development as set out in the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities and the Design Standards for New Apartments Guidelines for Planning Authorities.*
 - *Table 2.4 of the Core Strategy of the Limerick City Development Plan 2010-2016 (as varied), which identifies the Racecourse lands (36 ha) as having capacity for 1,188 no. residential units, also the objectives for the Racecourse lands set out in Development Plan Chapter 14.*
 - *The accessible location of the proposed development site close to Limerick City Centre, Mary Immaculate College, Dooradoyle District Centre and employment zones such as the Raheen Industrial Estate and University Hospital Limerick campus.*
 - *The availability of existing and proposed roads, pedestrian, cycle and public transport infrastructure in the vicinity of the site, in the context of the draft Limerick Shannon Metropolitan Area Transport Strategy (LSMATS).*
- It is evident from the above that An Bord Pleanála consider the former Racecourse lands to be a key land bank for Limerick and of strategic importance to the future development of the city in respect of meeting several key National planning objectives pertaining to the achievement of compact growth and the required increase in residential density mandated for the State’s main cities.
- The Board also acknowledge the status of the lands in the context of National residential density (2009) and apartment design guidelines (2018), both of which explicitly encourage higher density residential development on lands that share the locational characteristics of the Greenpark Lands including its proximity to Limerick city centre, major third level institutions, a district centre, several major centres of employment and existing and emerging public transport services.



- By way of further illustration of the site's strategic importance as a future Residential development area, we refer the Planning Authority to the document entitled '*Rebuilding Ireland, Project Descriptions Local Infrastructure Housing Activation Fund (LIHAF)*' prepared by the then Department of Housing, Planning, Community and Local Government in March 2017. In this document, 'Greenpark' is explicitly identified as being within the inner suburbs of Limerick City.
- Under the heading '*Public Infrastructure*', the proposed works required associated with the lands are described as follows: '*The public infrastructure proposed includes the upgrading of roads infrastructure and a new link road*'.
- Under the heading of '*Housing Delivery*', the subject lands are described as follows:

*'This is a **Major Urban Housing Development Site**. Greenpark, which is located between the Dock Road and the South Circular Road in the inner suburbs of Limerick City, is close to the heart of the City Centre and the commercial business district. This area is comprised of the lands in former use as a racecourse, which remain undeveloped, comprising of a 44 hectare site. Works proposed include the upgrading of roads infrastructure to support the development of approximately 400 units by 2021 with the potential for 700 homes to be delivered on the identified lands long term. The total length of the new link road will be 1,000 metres'. [Department's emphasis]*

A total of €4.93 million was proposed to be allocated to facilitate the infrastructure required to realise this project. Notably, Greenpark was one of only two projects identified in the Limerick City and County area, the other being Mungret described as being '*...approximately 5km to the southwest of Limerick City. Limerick City and County Council is a partial owner of the lands*'. A total of €10.5 million is allocated towards roads infrastructure necessary for the Mungret project to proceed on a phased basis.

- Having regard to all of the above planning context, it is submitted that there is no planning and development rationale that is consistent with current planning policy to reduce the extent of Residential zoned land from the current c.19.3 ha capable of delivering c. 800+ no. units to the proposed c.4.4 ha (c.200 no. units).
- We request, therefore, that the current extent and location of Residential zoned land should be maintained on the Greenpark lands as per the current Development Plan zoning arrangements. Our Client considers it appropriate to provide for the zoning of c.12 ha of land for Enterprise and Employment purposes on the north-western part of the subject lands (essentially replacing the existing General Mixed Use and Neighbourhood Centre zones) in order to support and complement the economic growth strategy proposed for Limerick City and its environs and in line with the *Limerick 2030* Interim Update vision for the site.



- The Greenpark Masterplan prepared on behalf of Voyage Property Limited shows that this extent of commercial land can deliver c. 40,000 sq m of employment floorspace in a high quality landscaped campus setting. It is submitted that this is a significant potential contribution to the economic and employment growth strategy earmarked for Limerick City (as referenced in the *Limerick 2030 Interim Update* as a 12 ha enterprise site) and can complement adjoining Residential development on the Greenpark Lands.
- Regarding flood risk management, the flood risk designations pertaining to the lands are noted and have been integrated into the overall masterplanning of the entire landholding from the outset (see Greenpark Masterplan as previously submitted to LCCC). A detailed Site Specific Flood Risk Assessment (SSFRA) was carried out by RPS, Consulting Engineers in respect of the subject lands, which includes substantial and robust modelling and breach analysis (see Appendix A attached). This was previously submitted for discussion with representatives of Limerick City and County Council who confirmed that they were satisfied that the methodology and analysis in that assessment was robust and accurate.
- The SSFRA confirms that the lands can be safely developed for mixed use purposes including a major new residential development (New Residential zoning) and will facilitate all necessary flood alleviation measures. As confirmed in the Draft Plan (see Volume 4), the Greenpark Lands also satisfy the Development Plan Justification Test criteria as provided for in the *Planning System and Flood Risk Management Guidelines for Planning Authorities 2009*, albeit we contend that the site is also suitable for Residential use, having regard to the relevant test criteria. It is noted that the Justification Test draws no distinction between land uses or vulnerability to flooding.

3.0 NATIONAL AND REGIONAL PLANNING POLICY

This section of the submission assesses the Greenpark lands in the context of the suite of current National and Regional planning policy guidance documents, all of which would support the Residential development of a significant part of the subject lands.

3.1 *Project Ireland 2040 - National Planning Framework (NPF) 2018*

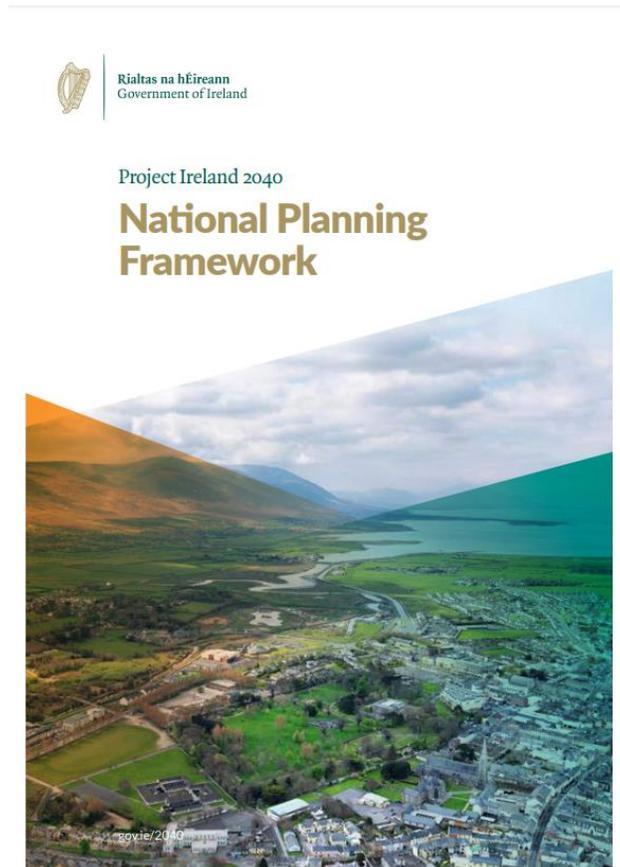


Figure 3.1: *Project Ireland 2040 - National Planning Framework (NPF)* (Source: Government of Ireland, 2018)

There have been a number of recent national policy changes that strongly support the sustainable redevelopment of the Greenpark lands incorporating a significant Residential component. In summary, 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.

The Framework focuses on:

- Growing regions, their cities, towns and villages and rural fabric;
- Building more accessible urban centres of scale and
- Better outcomes for communities and the environment, through more effective and coordinated planning, investment and delivery.



The NPF states that in Ireland, the location of housing has taken on a dispersed and fragmented character, which has led to people living further away from their jobs and often being at a sizeable remove from important services such as education and healthcare. Development sprawl at every settlement level in Ireland has manifested as scattered development, ‘leapfrogging’, continuous suburbs and linear patterns of strip or ribbon development.

Under the concept of ‘*Compact Growth*’, which underpins much of the Strategy, the NPF is:

‘Targeting a greater proportion (40%) of future housing development to happen within and close to existing built-up areas. Making better use of under-utilised land, including ‘infill’ and ‘brownfield’ and publicly owned sites together with higher housing and jobs densities, better serviced by existing facilities and public transport.’

More balanced growth also means more concentrated growth. There are five cities in Ireland today in terms of population size (>50,000 people): Dublin, Cork, Limerick, Galway and Waterford. The NPF targets these five cities for 50% of overall national growth between them, with Ireland’s large and smaller towns, villages and rural areas accommodating the other 50% of growth.

The planned growth of the four cities including Limerick is designed to enhance their significant potential to become cities of scale. In the case of Limerick, the population of Limerick City and suburbs in 2016 was 94,000 and the NPF seeks population growth of 50-60% to 2040, or 47,000-56,000 additional people. As noted above, 40% of this growth (c. 19,000 – 22,000) should occur within the existing built-up area of the city including the subject lands.

The NPF also supports making better use of under-utilised land and buildings, including ‘infill’, ‘brownfield’ and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport. This ‘compact growth’ strategy is designed to counter the prevailing situation whereby the fastest growing areas are at the edges of and outside the cities and towns. This results in:

- A constant process of infrastructure and services catch-up in building new roads, new schools, services and amenities and a struggle to bring jobs and homes together, meaning that there are remarkably high levels of car dependence and that it is difficult to provide good public transport;
- A gradual process of run-down of city and town centre and established suburban areas as jobs, retail and housing move out, leaving behind declining school enrolments, empty buildings and a lack of sufficient people to create strong and vibrant places, both day and night;
- Most development takes the form of greenfield sprawl that extends the physical footprint of urban areas, and when it is the principal form of development, this works against the creation of attractive, liveable, high quality urban places in which people are increasingly wishing to live, work and invest.



The NPF identifies the preferred approach, which is compact development that focuses on reusing previously developed, 'brownfield' land and building up infill sites, which may not have been built on before and either reusing or re-developing existing sites and buildings.

With regard to Limerick City and Metropolitan Area, the NPF supports growing and diversifying the City's employment base and attracting more people to live in the city, both within the city centre and in new, accessible green-field development areas. This means improving housing choice, supported by facilities and infrastructure.

The NPF identifies the following as a key growth enabler for new development in Limerick City:

'Identifying infill and regeneration opportunities to intensify housing and employment development throughout inner suburban areas'.

In summary, it is clear that National Planning Objectives NPO 2a, NPO 3b, NPO 5, NPO 7 and NPO8 regarding the development of Ireland's existing cities would support significant Residential development on the Greenpark lands. In addition, NPO 5 relates to the development of cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity, whilst NPO 35 seeks to increase residential density in existing settlements. In summary, the key NPF objectives for Limerick seek increased population and employment activity. This means encouraging more people, jobs and activity generally within our existing urban areas, rather than mainly 'greenfield' development.

Key Issue Arising: The re-development of the Greenpark Lands inherently complies with the overarching policies and NPOs of the NPF to encourage '*compact growth*' and to accommodate part of the population increase projected for Limerick in appropriate locations. The lands are ideally situated in close proximity to Limerick city centre in an inner suburban location and, as a former racecourse, meet the definition of 'brownfield' lands. The lands are serviced and close to the established urban social infrastructure of the city and provide a far superior sustainable alternative to lands located in peripheral greenfield locations that are reliant on new infrastructure to become developable. The principal zoning of the Greenpark lands in the Current Development Plan for Mixed Use and New Residential purposes provide the perfect blend of land uses in that both will contribute to the realisation of NPF objectives in relation to population growth and increased economic activity.

The removal of the Residential zoning from a very significant part of the overall landholding runs counter to the policy objectives of the NPF that seek to promote Limerick as a city of scale with significant population growth and housing provision in inner suburban locations (see NPOs 2a, NPO 3b, NPO 5, NPO 7, NPO8 and NPO 35). The Greenpark Lands represent a textbook example of a well located landholding of a scale that will deliver on the above core planning objectives of the Strategy.

3.2 Development Plan Guidelines

There are currently two sets of National Guidelines governing the preparation of Development Plans at present in Ireland viz., the *Development Plan Guidelines for Planning Authorities 2007* and the recently published *Development Plan - Guidelines for Planning Authorities Draft for Consultation August 2021*.

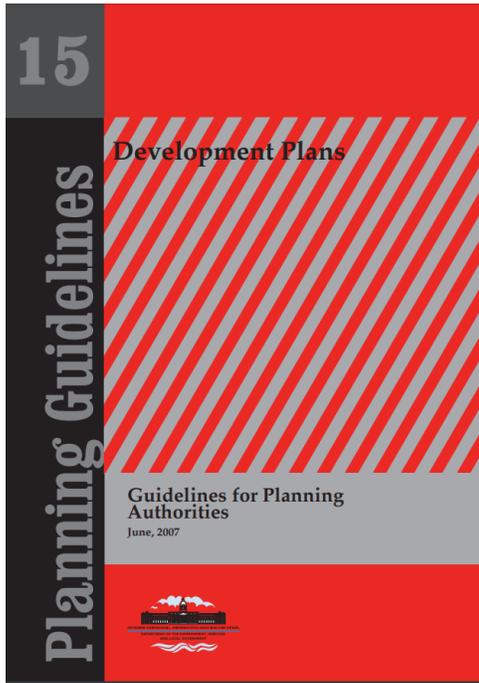


Figure 3.2: *Development Plan Guidelines for Planning Authorities*
(Source: Department of the Environment, Heritage and Local Government, 2007).

Both documents set out detailed best practice in the making and implementation of Development Plans and, of particular relevance to this case, the appropriate process for the zoning of lands including for Residential use. This is considered in further detail below.

Development Plan Guidelines for Planning Authorities 2007

Regarding the zoning of land, the 2007 Guidelines state:

'Land-use zoning is therefore about identifying the quantity of land needed over the plan period, the best locations for such land, the acceptability or otherwise of the various classes of land use within any particular zone, and in the case of relevant land uses, the intensity of development to be permitted. Zoning gives a degree of certainty to residents, developers etc. The use of non-specific zoning designations should be avoided. Following the approach set out, a development plan should ensure that enough land will be available to meet anticipated development requirements and will be developed in a sequential and co-ordinated manner. This will avoid, for example, a situation where housing estates are built beyond the outer edges of existing built-up areas while intervening lands lie undeveloped resulting in deficiencies in terms of footpaths, lighting, drainage or adequate roads infrastructure. [our emphasis]



Section 4.9 of the Guidelines note that:

'Development plan land use zones have traditionally been single-use zones such as residential, industrial or commercial and related uses. This will continue to be appropriate in some cases. In other areas, such as city, town or neighbourhood centres, it may be more appropriate to consider mixed use zones where a wide range of compatible activities would normally be considered appropriate. This will help promote the achievement of sustainable development by facilitating a balance of housing, employment and local facilities within an area, and by promoting compatible re-use of existing development, thereby reducing the need to travel. It is important that zoning designations are applied in a manner which generally facilitates an appropriate mix of compatible uses within urban areas. Factors to be taken into account in determining compatibility include traffic impact, amenity considerations, possible phasing issues and the character or sense of place which it is intended to create or protect. The intention should be to guide and influence change in the interests of the common good, balancing various interests, in preference to creating homogenous land-use areas. [our emphasis]

Section 4.12 states that:

'...when considering the suitability of specific lands for development, within the process of preparing zoning objectives in making a development plan, the members are restricted to considering the proper planning and sustainable development of the area to which the development plan relates, statutory obligations and Government policy. Matters typically relevant to the proper planning and sustainable development of areas, inter alia, include:

- *Need*
- *Policy Context*
- *Capacity of Water, Drainage and Roads Infrastructure*
- *Supporting Infrastructure and Facilities*
- *Physical Suitability*
- *Sequential Approach*
- *Environmental and Heritage policy, including conservation of habitats and other sensitive areas.*

In terms of Residential zoning on the Greenpark lands, there is a clear need for additional Residential development in appropriate locations (which includes these lands) in Limerick City as quantified in the RSES and Draft Development Plan and arising from significant projected population growth. As described above, and in the Draft Development Plan itself, the planning policy context at National and Regional level fully and unequivocally supports the zoning of Residential lands in this location. In terms of water, drainage and roads infrastructure, the Greenpark lands are fully serviced with access to mains drainage and water supply. A new internal link road providing vehicular access from Dock Road will be delivered by the landowner as part of the planning process. No other roads or services infrastructure is required to be provided to facilitate the development of the lands.



The Guidelines also note that supporting infrastructure, such as community facilities, health-care, schools, public open space, retail and other service provision and public transport is required when allocating land for development. Given the site's location proximate to the city centre and a well-established social infrastructure in the area, there will be good access to the required range of supporting services. The development of the lands will further augment these facilities as required.

Regarding physical suitability, Section 4.18 of the Guidelines state that:

'The development plan should strive to ensure that the form and location of new development offers the best "value for money" in terms of efficient use of existing infrastructure, while minimising the need for costly new infrastructure. Where land in green-field locations is to be zoned, account should be taken, in considering the different options available, of the land's capacity for development by way of the most cost effective means of providing the necessary infrastructure.'

The development of the Greenpark site would represent a highly sustainable model of development, as it would maximise the efficient use of public transport, roads and services infrastructure and minimise the requirement for costly new infrastructure required to service greenfield lands in more peripheral and far less sustainable locations. This section of the guidance notes the issue of flood risk, which is addressed elsewhere in this submission in the context of the subject lands (see Section 3.8 below).

In terms of the sequential approach to zoning, Section 4.19 of the Guidelines state:

'In order to maximise the utility of existing and future infrastructure provision and promote the achievement of sustainability, a logical sequential approach should be taken to the zoning of land for development:

- (i) Zoning should extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference (i.e. 'leapfrogging' to more remote areas should be avoided);*
- (ii) A strong emphasis should be placed on encouraging infill opportunities and better use of under-utilised lands; and*
- (iii) Areas to be zoned should be contiguous to existing zoned development lands. Only in exceptional circumstances should the above principles be contravened, for example, where a barrier to development is involved such as a lake close to a town. Any exceptions must be clearly justified by local circumstances and such justification must be set out in the written statement of the development plan.'*

The Greenpark Lands fully adhere to the sequential approach described above regarding the zoning of lands. The site is within 2km of the city core and is contiguous to existing Residential zoned lands/housing areas. Its zoning and consequent development clearly follows a logical sequential approach and would avoid 'leapfrogging' or the zoning of more remote lands further from the city centre. In addition, the site comprises a major infill opportunity and, as a former 47 ha racecourse, comprises a significantly underutilised land bank in need of regeneration.

Finally, with regard to Environmental and Heritage policy, including conservation of habitats and other sensitive areas, the site has been subject to a holistic site wide Ecological Impact Assessment and also a Natura Impact Statement. There are no environmental or heritage designations in play that would preclude the zoning and consequent development of the lands. In summary, therefore, the zoning of the lands accords with the criteria noted in the above referenced Guidelines and Greenpark would have an important role in meeting the predicted residential housing requirements necessary to accommodate a growing urban population.

Development Plan - Guidelines for Planning Authorities Draft for Consultation August 2021

These Draft Guidelines are designed to ultimately replace and update the 2007 Guidance and will reflect the changes in the policy, institutional and regulatory framework that have occurred since 2007.

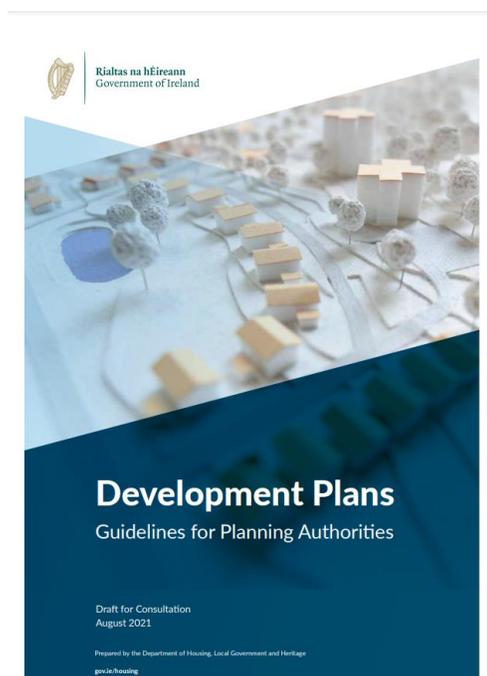


Figure 3.3: *Development Plan - Guidelines for Planning Authorities Draft for Consultation* (Source: Department of Housing, Local Government and Heritage, 2021)

Section 6.2.4 of the Draft Guidelines relate to ‘*Sequential Development in the City Context*’ and notes:

‘While sequential development at the city scale is not comparable to town settlements with a single central spatial focus from which the town has grown historically, city development must also be approached sequentially, taking into consideration multiple opportunities for the intensification of development at appropriate scales relative to context. In a city area, development policy must ensure that the focus of the development plan is on securing a sufficient quantum of infill and brownfield development and regeneration to meet national policy objectives. As part of this approach, prioritising new development along high quality public transport corridors must be integrated into the policies and objectives of the development plan, in order to support and reinforce public



transport investment. Similarly, parts of urban areas identified as specific focus for regeneration, may be appropriate for prioritised new residential development in tandem with programmed investment in new infrastructure and amenities'. [our emphasis]

The Greenpark Lands comprise a significant brownfield infill site in need of regeneration that can contribute significantly to the provision of new residential development and employment growth in a sustainable manner close to the city centre and public transport corridors. As noted above, the site is also appropriately located in terms of the sequential approach being contiguous to existing zoned lands and a logical site for development purposes in the context of the growth of the core city area.

Section 6.2.5 of the Draft Guidelines relates to 'Zoning for Employment Uses' and notes that:

'Ensuring that the economic or employment strategy of the development plan is translated into the appropriate land use zoning proposals is an important consideration in the plan preparation process. The evidence and rationale underpinning the zoning of land for employment purposes must be clear and strategic in nature. Development plan preparation should include a comprehensive approach to estimating the differing zoning requirements for employment uses.

The development plan should provide an overview of the existing quantum and rate of take-up of zoned employment land, both developed and undeveloped and should also include relevant servicing information. The plan must include a rationale for any requirement to zone additional lands, based on projected population, economic and employment growth and change over the lifetime of the development plan.

Estimating the land-use zoning requirement for employment development may require some flexibility and a strategic, long-term perspective. However, proposed employment zonings must have a credible rationale, particularly with regard to location and type of employment. It should be possible to demonstrate that the quantum of land zoned is not significantly out of step with estimated future demand arising from population, economic and employment growth and change. The economic policy objectives of the Regional Spatial and Economic Strategy will be instructive in this regard and the development plan must demonstrate consistency with these'.

In our opinion, the zoning of the additional lands in Greenpark from c.10.6 ha of General Mixed Use zoned land to c.24.7 ha of Enterprise and Employment lands is not consistent with the commitment under the Draft Plan to give effect to the *Limerick 2030 Interim Update*. It is also submitted that the existing and proposed employment centres noted in the Draft Plan may not be in line with 'estimated future demand' noted above for this quantum of employment-related lands (see Appendix B – Lisney Report). This also requires to be considered in the context of the consequent reduction in Residential zoned land from c.19.3 ha to c.4.4 ha, where significant future population growth and housing demand is quantified in detail in both the NPF, RSES and Draft Development Plan and will categorically exist, especially in accessible inner urban locations such as Greenpark.

3.3 Residential Density and Apartment Design Guidelines

There are two key National planning guidance documents that govern levels of residential density on zoned land in appropriate locations. It is evident that the Greenpark lands enjoy the locational characteristics required for compliance with these Guidelines and readily applicable to the site. These are described in greater detail below.

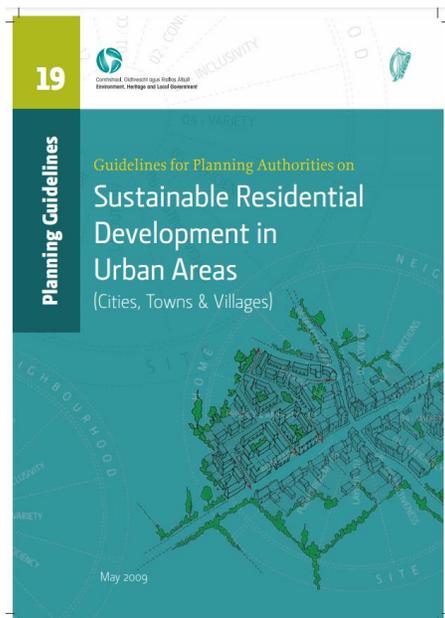


Figure 3.4: Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities
(Source: Department of Environment, Heritage and Local Government, 2009)

Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (2009)

These Guidelines provide national guidance in relation to the appropriate locations for the siting of higher density residential development, having regard to the locational characteristics of the lands in question. In this regard, it is considered that the subject lands may comprise either 'Brownfield' lands or an 'Inner Suburban/Infill' site, as it shares characteristics of both as per the descriptions included in the Guidelines. Section 5.7 of the Guidelines describes 'Brownfield' lands (within city or town centres) as follows:

'Brownfield' lands, which may be defined as "any land which has been subjected to building, engineering or other operations, excluding temporary uses or urban green spaces", generally comprise redundant industrial lands or docks but may also include former barracks, hospitals or even occasionally, obsolete housing areas. Where such significant sites exist and, in particular, are close to existing or future public transport corridors, the opportunity for their re-development to higher densities, subject to the safeguards expressed above or in accordance with local area plans, should be promoted, as should the potential for car-free developments at these locations'.



The Greenpark lands comprise a former racecourse, so the site was subjected to some previous building (grandstand, racetrack, fencing, ancillary structures, etc) but is now a redundant site close to the city centre. It is a significant landholding, given its site area (c. 47 ha). It is close to public transport routes (existing and emerging), so is deemed an appropriate location for higher density residential development.

Regarding Inner Suburban/Infill sites, Section 5.9 of the Guidelines state:

'The provision of additional dwellings within inner suburban areas of towns or cities, proximate to existing or due to be improved public transport corridors, has the revitalising areas by utilising the capacity of existing social and physical infrastructure. Such development can be provided either by infill or by sub-division: (i) Infill residential development Potential sites may range from small gap infill, unused or derelict land and backland areas, up to larger residual sites or sites assembled from a multiplicity of ownerships.

In residential areas whose character is established by their density or architectural form, a balance has to be struck between the reasonable protection of the amenities and privacy of adjoining dwellings, the protection of established character and the need to provide residential infill. The local area plan should set out the planning authority's views with regard to the range of densities acceptable within the area. The design approach should be based on a recognition of the need to protect the amenities of directly adjoining neighbours and the general character of the area and its amenities, i.e. views, architectural quality, civic design etc. Local authority intervention may be needed to facilitate this type of infill development, in particular with regard to the provision of access to backlands'.

As noted above, the site is acknowledged as being an 'inner suburban' location in the *Rebuilding Ireland LIHAF* document pertaining to Greenpark and is also an Infill site, as it is bounded by existing development on several boundaries and, to be developed successfully, will require to recognise the need to protect the amenities of directly adjoining neighbours, which in this case, principally comprises the established adjoining residential communities to the east of the lands. It also comprises a large site (47 ha) capable of significant residential development.

The site is also in close proximity to public transport corridors, which are assessed under Section 5.8 of the Guidelines, which state:

"Walking distances from public transport nodes (e.g., stations/halts/bus stops) should be used in defining such corridors. It is recommended that increased densities should be promoted within 500 metres walking distance of a bus stop, or within 1 km of a light rail stop or rail station. The capacity of public transport (e.g., the number of train services during peak house) should also be taken into consideration in considering appropriate densities... In general, minimum net densities of 50 dwellings per hectare, subject to appropriate design and amenity standards, should be applied within public transport corridors, with the highest densities being located at rail stations / bus stops, and decreasing with distance away from such nodes."



Whilst the subject lands do not have the benefit of being proximate to very high quality public transportation services at present, they are within reasonable proximity of a number of bus routes with further improvements due to come on stream under the above referenced LSMATS. In our opinion, on the basis of these Guidelines, the Greenpark lands are appropriate for densities in the range of 35-50 units per ha. As previously noted, the SHD scheme delivers a residential density of 47 no. units per ha (in line with what was proposed on the submitted Greenpark Masterplan Residential zoned lands, subject to planning parameters) which accords with the above guidance.

Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (March 2018)

These guidelines seek to promote high density apartment development on Residential zoned land in appropriate locations in line with the above referenced NPF overarching policies in relation to encouraging residential development within existing urban settlements. Having regard to the site's location close to Limerick city centre, and within reasonable walking/cycling distances of some employment centres and public transport routes, these Guidelines are appropriate for application to the Greenpark lands.

In our view, applying the locational criteria noted in the Guidelines objectively, the site cannot be classified as a 'Centrally Accessible Urban Location' appropriate for very high density apartment development (in excess of 50 units per ha) arising from its relative walking distances from the city centre, major employment centres and the absence of high frequency public transport routes.

The site would, however, meet most of the criteria in respect of what is classified as an 'Intermediate Urban Location' as per these Guidelines. As such, this would require overall residential densities on the site to be in the order of 45 units per ha. The aforementioned SHD proposal demonstrates that a density of 47 units per ha can be achieved on the application site (and c.47 units per ha on the overall Residential zoned lands as per Greenpark Masterplan).

Key Issue Arising: The above density and apartment design guidelines both identify the required locational characteristics necessary to support higher density residential development in urban areas. Where such sites exist, there is an imperative that they are used to accommodate sustainable forms of residential development ahead of other less suitable land uses that could be sited elsewhere. The Greenpark Lands unequivocally meet the locational characteristics noted in both Guidance documents and, therefore, must be considered appropriate to deliver Residential development at the densities discussed above.

3.4 Regional Spatial & Economic Strategy (RSES) for the Southern Region 2020

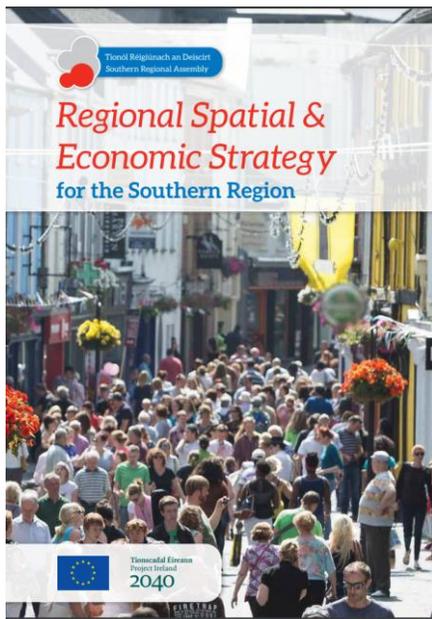


Figure 3.5: Regional Spatial & Economic Strategy (RSES) for the Southern Region
(Source: Southern Regional Assembly, 2020)

Each of the three Regional Assemblies have prepared their own RSES which will provide a long-term regional level strategic planning and economic framework in support of the implementation of the *National Planning Framework*. The RSES for the Southern Region was adopted in January 2020, which includes the Limerick City Metropolitan Area and encompasses the Greenpark lands. The RSES seeks to achieve balanced regional development and full implementation of *Project Ireland 2040 – the National Planning Framework*. It will be implemented in partnership with local authorities and state agencies to deliver on this vision and build a cohesive and sustainable region.

Regarding Employment and Enterprise use in Limerick, the RSES notes ‘key employment locations’ including the Shannon Free Zone, National Technology Park, IDA Raheen Business Park, Limerick’s Dock Road, Annacotty Business Park, Ballysimon and Clondrinagh Industrial Estates with development in progress in Limerick City Centre (Gardens, Opera, Cleeves).

The *Limerick Metropolitan Area Spatial Plan (LMASP)* identifies a number of key infrastructure and transformative projects within Limerick City including:

- Projects identified within the *Limerick 2030* plan;
- Densification of development in the city centre including identification and assembly of brownfield sites for development;
- Development of key strategic sites including Opera site, Cleeves, Arthur’s Quay and continuation of the riverside links;
- Potential for alternative uses in Limerick Docklands;
- Development of a new business park on the north side of Limerick City linked with Limerick IT, Moyross and building on the regeneration process.



MASP Objective 2(f) seeks ‘investment to achieve the regeneration and consolidation in the city suburbs’.

In terms of population, the LMASP identifies a projected population increase in the Limerick City and Suburbs (located in Limerick) of 22,328 persons by 2026 and by 33,528 by 2031. As noted in the NPF, some 50% of this population growth will occur within the existing built-up area of the city, which equates to c. 11,000 – 17,000 people.

Regarding employment distribution, the LMASP notes that:

‘Modern service companies require high quality office space in areas that offer a good quality of life and reliable public transport. The completed Gardens International Centre, the Opera Centre and the planned Cleeves development have the capacity to add 7,000 additional jobs. There is also existing capacity in Ballysimon (c. 54.6 hectares), Clondrinagh (c. 27.7 hectares) and Annacotty (c. 37.5 hectares). The MASP supports further plans for development of central sites for continued employment growth, which should also add to the core regeneration of Limerick City. The proposed development of the Dock Road provides significant potential. Concentrations of employment outside the City Centre area are predominantly at locations in Shannon, Castletroy and Raheen. The MASP area has capacity for expansion of scale at these primary locations. These strategic locations offer the capacity to cater for companies that complements access to an international airport and third level graduates.’

Table 3 of the LMASP identifies strategic employment locations in the area including higher level institutions, public hospitals, the Shannon Free Zone (195 ha), the National Technological Park (71 ha), Raheen (57.5 ha), Cleeves (4 ha), Dock Road (113.2 ha) and a new Northside Business Campus.

Key Issue Arising: It is submitted that there is no evidence basis for the increase in the former Mixed Use zone in Greenpark from the current c. 10.6 ha to c. 24.7 ha of Enterprise and Employment zoning (an over 230% increase in land area) with significant uncertainty over the demand for, and viability of, same. The demand for such a quantum of additional Enterprise and Employment zoned land cannot be justified and its viability is open to serious question and would serve to undermine the strategy of seeking to deliver the transformational projects earmarked for the city centre many of which include a substantial office and employment-based component. (This issue is discussed in further detail below in respect of *Limerick 2030*.)

In this context, the omission of c.15 ha of Residential zoned land in a highly accessible location to facilitate this zoning change is contrary to proper planning and sustainable development. The ambitious targets identified to significantly increase numbers working in the city will necessitate a consequent increase in residential development to provide good quality and well located housing accommodation for this cohort of people.

The removal of a substantive Residential land use from this location is counterintuitive in that context. As noted above, however, our Client does accept that the provision of c.12 ha of Enterprise and Employment zoned land as a direct replacement for the current Mixed Use and Neighbourhood Centre zonings is appropriate.

Such a quantum on part of the subject lands could be complementary to the future transition of the Dock Road as a new employment area. However, it is crucial that the quantum of the existing Residential zoning is retained.

3.5 *Limerick 2030 – An Economic and Spatial Plan for Limerick*

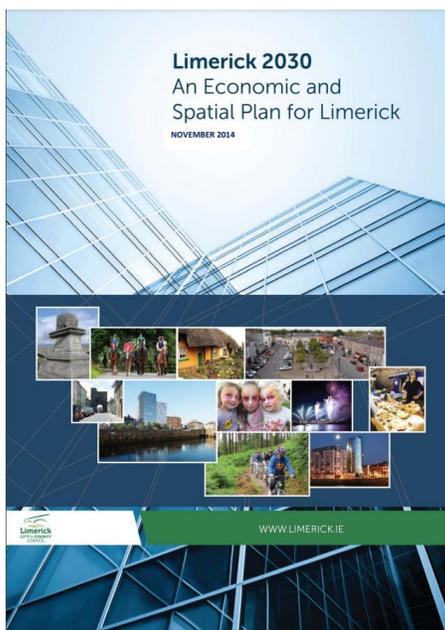


Figure 3.6: *Limerick 2030 – An Economic and Spatial Plan for Limerick*
(Source: Limerick City and County Council, 2014)

Limerick 2030 was published in 2014 and is described as a ‘*once in a generation*’ plan designed to guide the economic, social and physical renaissance of Limerick City Centre and the wider County/Mid-West Region. The plan included targets of €1 billion in enterprise and investment infrastructure and the creation of 12,000 jobs and seeks to integrate economic development with spatial planning throughout the city centre area. In order to deliver the required changes to Limerick city centre, seven ‘transformational projects’ have been identified as being key to the strategy. These are:

1. A ‘World Class’ Waterfront – a renaissance of Limerick’s entire Waterfront;
2. The ‘Limerick Cultural Centre’ – an iconic destination building on the Waterfront;
3. ‘Great streets’ – a transformation of the City’s three main streets – O’Connell Street, Catherine Street and Henry Street;
4. A new City Square/Plaza – to define the focal point or ‘heart’ of the City Centre;
5. A City Centre higher education campus - the creation of a multi-versity combining facilities from Limerick Institute of Technology, University of Limerick and Mary Immaculate College in the heart of the City Centre;
6. Renewal of the Georgian Quarter – a concentrated programme to restore the Georgian part of the City to its former glory; and
7. Colbert Station renewal – a new public transport interchange and enhanced station environment.



It is clear, therefore, that *Limerick 2030* is centred on reimagining and revitalising Limerick City Centre as the primary location for new business and enterprise in the Region with particular emphasis on the ‘knowledge economy’. The Plan notes that Limerick had traditionally been the focus of FDI in IT Manufacturing. As a sector, this has shifted towards lower-cost locations, most recently in Eastern Europe and the Far East. *Limerick 2030* considers that this has been to the detriment of Limerick, which had seen its labour and business costs rise prior to the recession.

Notably, the plan states that the IDA clustering policy is not deemed to be effective for Limerick, where an emphasis on a broad sector approach to promote innovation and interaction with distinctive strengths in ICT and Digital is needed. The plan recommends that Limerick should capture elements of sectors which are clustering elsewhere based on a competitive proposition focussed on its skills, R&D assets and a regenerated City Centre. *Limerick 2030* identifies a number of knowledge economy locations across Limerick and the wider area each bringing different strengths and characteristics including the City Centre, Raheen/Dooradoyle, Castletroy/Plassey, Newcastle West and Shannon.

The plan also describes several potential city centre sites as new business/enterprise locations as follows:

‘The Opera Site is a major opportunity site for new business activity – tying into the heart of the City’s shopping offer. The Plan envisages that a key component of this mix would be an ‘Innovation Hub’ closely aligned to new higher education facilities, providing graduation space for fledgling businesses as highlighted in the economic strategy. The Plan advocates detailed consideration of the removal and redevelopment of Sarsfield House, currently occupied by the Revenue Commissioners. This could generate a pre-let to help kick-start the redevelopment of the Opera Site. Secondly, the revitalisation of the Georgian Quarter is intended to reinforce the cluster of important professional service businesses already located there, benefiting from good access to the railway station and ready access by car. There is also potential to reinforce Henry Street and the Waterfront as a business location. This can be achieved by the redevelopment of the site at Bishop’s Quay for mixed use, complementing the ‘Hanging Garden’ Site directly opposite on Henry Street.’

Limerick 2030 also identifies the need for an ‘urban’ Science and Technology Park in the city centre. The plan identifies potential alternative locations for this technology park, subject to further feasibility, on the former ‘Cleeves’ Site at the entrance to the Shannon Bridge on the north side of the River; or to the south of Colbert Station (described as being ‘ripe for redevelopment/regeneration’) or at the Docks area to the immediate west of Steamboat Quay.

Limerick 2030 states that there is the potential to generate over 12,000 new high value jobs in the Limerick area with approximately 5,000 new jobs specifically identified for the city centre. This would include higher value jobs linked to key sectors identified by the *Limerick 2030* Economic Strategy at locations such as the Medical Park at King’s Island, the Opera Site, the Colbert Station area, etc. The plan notes that the Limerick Quays also have the potential to accommodate additional office employment, as well as hotel and leisure employment. Wider and secondary economic impacts can be expected from this activity.



With regard to residential development, *Limerick 2030* identifies the potential for a minimum of 800-1,000 new homes in the city centre located in the Georgian Quarter and Irishtown (renovation, conversion and infill). The Plan notes that '*The wider invigoration of the City Centre can be expected to lead to organic and private sector-led development activity which could substantially increase housing outputs*'.

Key Issue Arising: *Limerick 2030* seeks to provide a spatial planning and policy framework to reinvigorate the city centre and to establish the area as the primary new office and enterprise location in the region. In this regard, seven specific 'transformational' projects are identified to be progressed in the city in order to deliver this vision. The plan notes the creation of an urban technology park as an important part of the strategy with several potential city locations identified (Opera site, Colbert lands, Cleeves, etc), together with knowledge economy locations across the wider county each bringing different strengths and characteristics including the City Centre, Raheen/Dooradoyle, Castletroy/Plassey, Newcastle West and Shannon. An estimated total of 12,000 jobs are proposed to be delivered in the wider area (5,000 in the city centre) and c. 800-1,000 new housing units.

The Greenpark lands are not noted anywhere in the *Limerick 2030* strategy as a potential location for significant new enterprise or employment uses or as one of the '*knowledge locations*'. This is notwithstanding the fact that when *Limerick 2030* was published in 2014, the Greenpark lands comprised some 10.6 ha of 'General Mixed Use' (Objective 5A) zoned lands, the primary purpose of which was '*to provide for a range of employment and related uses*'.

Thus, it is clear that the primary focus of the *Limerick 2030* strategy was the regeneration of the city centre to be largely delivered by the creation of new office floorspace including a significant new urban technology park. Whilst significant progress has been made since 2014 in advancing several of the *Limerick 2030* projects, there is still considerable work to be done regarding the completion of these projects. In that context, it is again unclear as to why the Planning Authority has zoned an additional c.14 ha of lands just outside the city centre for Enterprise and Employment purposes (24.7 ha in total including the former Mixed Use and Neighbourhood Centre zoned lands) and significantly reduced the Residential zoned area.

As noted above, the Greenpark lands were not identified as being of strategic importance in this regard in *Limerick 2030*. In our opinion (see Appendix B - Lisney Report), there is sufficient zoned land for Enterprise and Employment use in the city that would likely accommodate potential demand for this form of development in Limerick City for many years to come. As such, there would seem to be no rationale for substantially increasing the extent of Enterprise and Employment zoned lands in a location not identified as being of strategic importance in the Planning Authority's key regeneration strategy.

In this regard, the enclosed Report prepared by Lisney (see Appendix B) on behalf of Voyage Property Limited analysing residential and commercial lands in Limerick City concludes that the extent of employment-related zoned land as proposed in the Draft Plan could provide c. 1.98 million sq m of accommodation (530,000 sq m of offices and 1.46 million sq m of industrial/logistics/manufacturing).



Taking into consideration the likely potential for expansion of the office and industrial markets in Limerick in the medium-term due to LCCC'S commitment to economic growth and dynamic revitalisation via *Limerick 2030*, Lisney estimate that the proposed level of potential development is equivalent to over 20 years' requirements assuming a generous 60% increase in demand in the medium term. (It is estimated that this level of employment-related zoned land would satisfy the significantly larger Dublin market for 5 years). This extent of Enterprise and Employment zoned land might also serve to undermine the *Limerick 2030* central strategy, should these lands attract users at the expense of the city centre.

Given the extent of other Enterprise and Employment zoned lands proposed in the Draft Plan, we would also query whether this extent of zoned land is required to facilitate the likely demand arising in Limerick over the life of this Development Plan (and several future Plans) and, consequently, whether this is the correct use of this site, given its location. It is acknowledged that there may be an indirect or secondary demand for lands outside the city centre, but still in close proximity, for certain employment uses. As such, our Client is amenable to the former Mixed Use and Neighbourhood Centre zoned lands (as per the Current Development Plan) being zoned for Enterprise and Employment use to ensure that this extent of enterprise and employment zoned lands remains available to cater for any potential demand that might arise in this regard.

Regarding residential use, we note that *Limerick 2030* identifies the potential for a minimum of 800-1,000 new homes in the city centre located in the Georgian Quarter and Irishtown (renovation, conversion and infill). The Plan notes that '*The wider invigoration of the City Centre can be expected to lead to organic and private sector-led development activity which could substantially increase housing outputs*'.

Whilst the estimated delivery of 800-1,000 residential units in the city centre is to be welcomed, it is a relatively small quantum of housing to meet the accommodation needs of a rejuvenated city employing up to an additional 12,000 people. The Greenpark Residential lands, which are in close proximity to the city centre are superbly located to contribute to meeting this demand and to provide a range of additional residential unit types and sizes within easy walking/cycling distance of the city proximate to public transport services.

In summary, it is considered that Greenpark is ideally located to complement the *Limerick 2030* plan in terms of providing proximate commercial floorspace arising from secondary or indirect demand generated by the rejuvenation of the city centre but, crucially, also Residential land use to facilitate new employees that are seeking to live in close proximity to their places of work, without being reliant on the private car and unsustainable commuting.

3.6 *Limerick 2030 Interim Update*

Limerick 2030 Interim Update June 2021 (see Volume 6 of the Draft Development Plan) reviews and analyses the progress of the Limerick 2030 Plan 2013 over the last seven years and updates the plan with new targets and recommendations to take the city and county to 2030. This updated plan builds on the original Limerick 2030 objectives and project ambitions. The focus of this document is to complement the original plan's emphasis on transformational sites and projects, as well as capturing emerging projects and opportunity areas.



The interim update notes that Limerick City centre has a very low population compared to the suburbs (with some areas suffering population decline between 2011 and 2016), indicating a level of sprawl. The Limerick 2030 Plan outlines the importance of the city growing and consolidating its population in order to realise the goals set out in the plan, with an appropriate critical mass being an important influence on the feasibility and achievability of the Limerick 2030 vision.

The interim update notes the policy requirements of the NPF and RSES (neither of which existed in 2013 at the time of the publication of the original Limerick 2030), with the NPF including a target of half (50%) of future population and employment growth to be focused in the existing five cities and their suburbs. It further notes that:

‘For Limerick, compact growth (both in the city centre and across the county’s towns and villages) is thus a key priority to 2030. The city centre and its environs have opportunities to significantly increase population over the next 8 years. Housing delivery is central to this. A diverse offer of quality homes attracts and retains talent, and is vital to enabling the city centre and the region’s wider economic growth’.

The revised plan identifies a series a new opportunity sites and identifies potential connections between them to the work progressed to date – building new opportunity from the transformations of the current plan. The Greenpark Lands (referred to in the interim update as the ‘old Greenpark Racecourse’) is identified as one such new opportunity site as described below.

The interim update adds the following objective to the initial Limerick 2030 spatial plan:

‘To expand the provisions of the plan to encompass opportunities for transformation across the wider city and outlying urban areas’.

The ‘expanded plan’ concept is described as follows:

‘The expansion of the spatial plan allows it to consolidate this city identity and to ensure that the growth is managed in a way that not only avoids sprawl but actively reinforces the sense of a coherent urban area’. (see pg 78)

In this regard, the ‘old Greenpark Racecourse’ is identified as a ‘City Gateway’ clearly located within the inner part of the city and suburbs as delineated on page 79 of the interim update document.

The graphic on page 85 of *Limerick 2030 Interim Update* (see Figure 3.9 below) also illustrates the subject lands as being comfortably within the 2.5km radius of the city centre and notes part of the site as being ‘enterprise and employment’ lands (site no. 21). (As an aside, we would query whether some of the graphics used in the Interim Update (see pages 82 and 85) accurately represent the centre of Limerick City and whether the radii as shown are centred on the city centre proper. We submit that these may not be accurate in that regard, which could change how certain sites including Greenpark are represented in locational terms and in the associated analysis.)

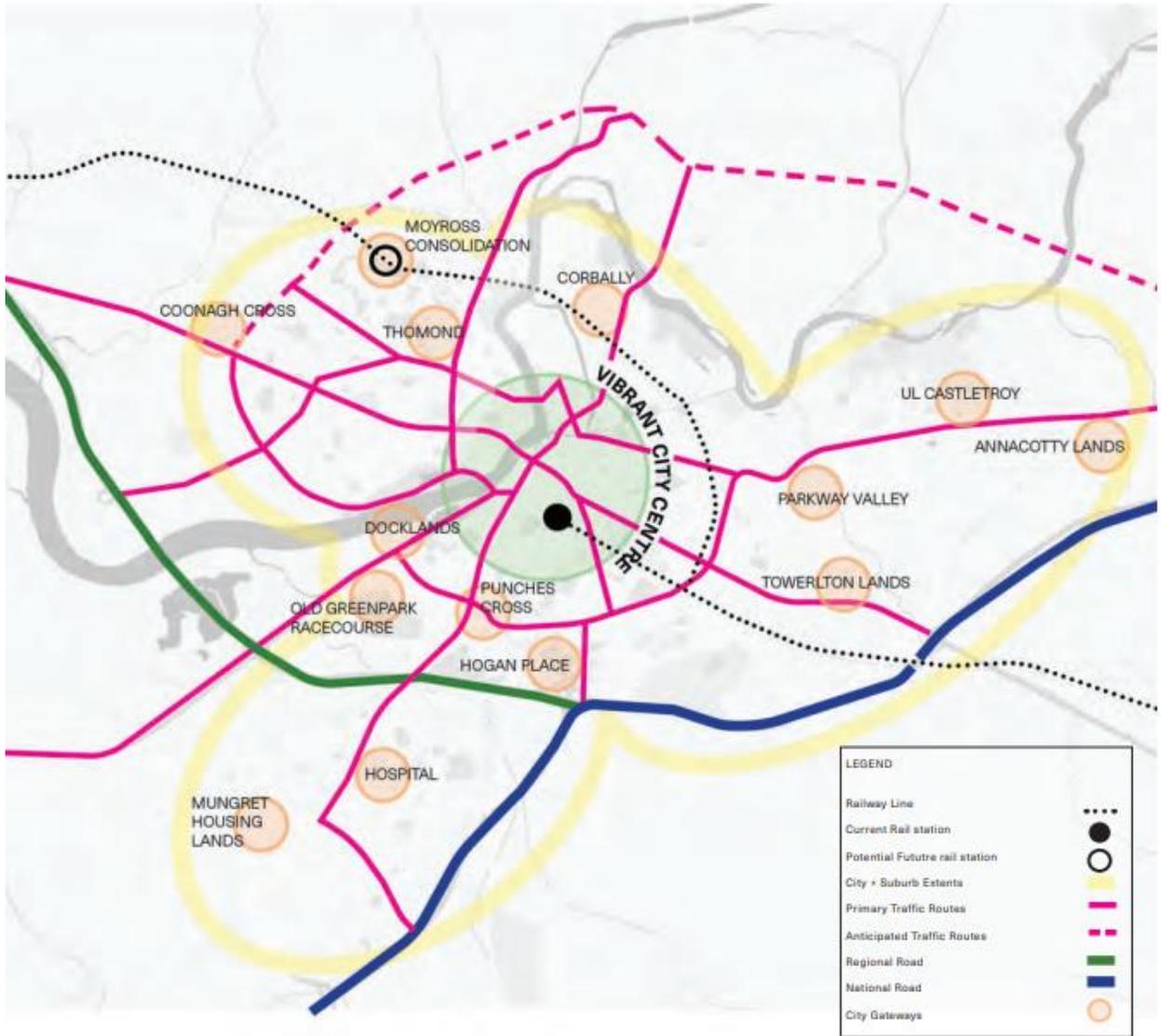


Figure 3.7: 'Gateways in a Polycentric City'
(Source: Draft Limerick Development Plan 2022-2028 – Limerick 2030 Interim Update, 2021, Page 79)

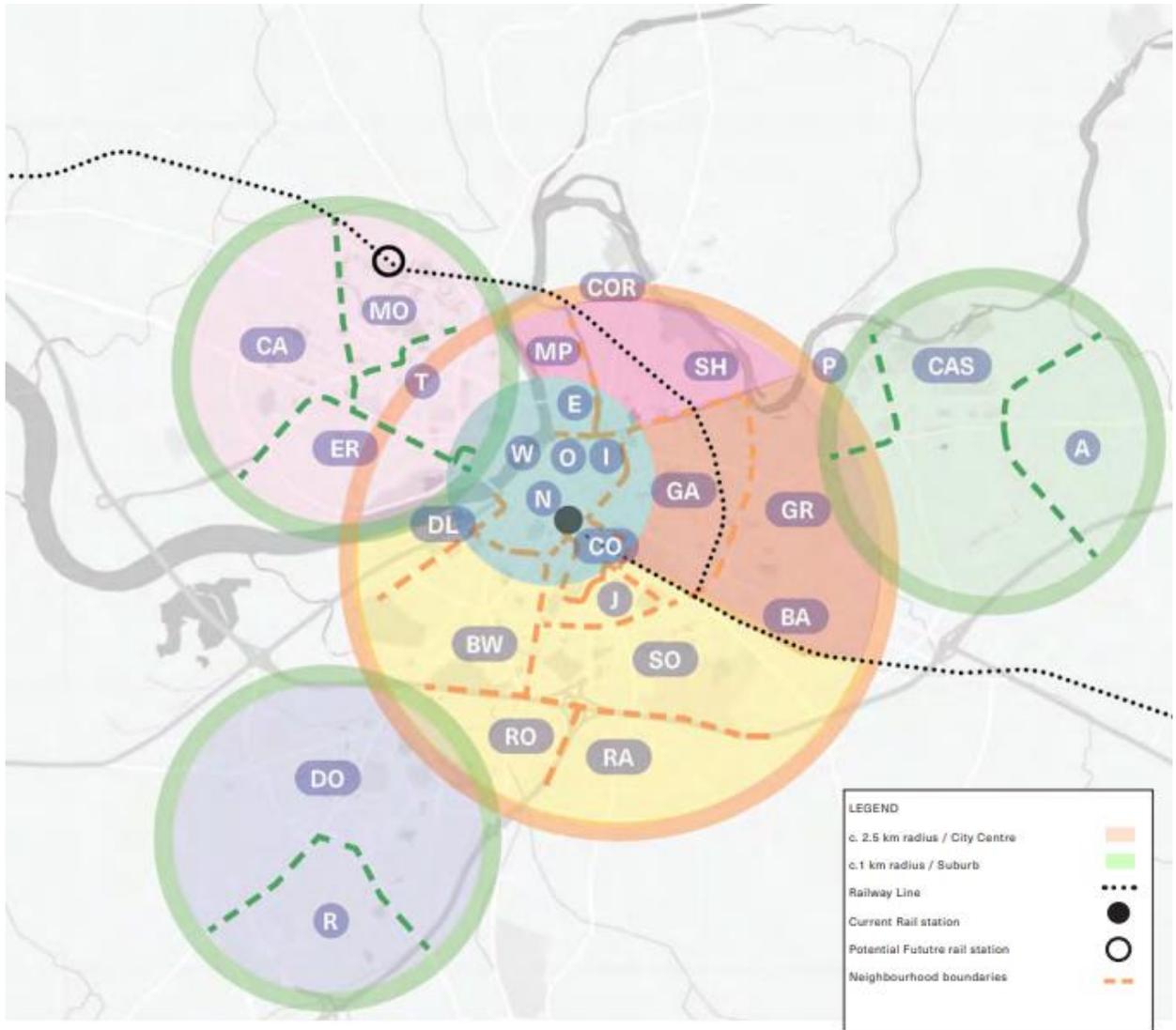


Figure 3.8: 'The City Neighbourhoods'.
(Source: *Draft Limerick Development Plan 2022-2028 – Limerick 2030 Interim Update*, 2021, Page 82)

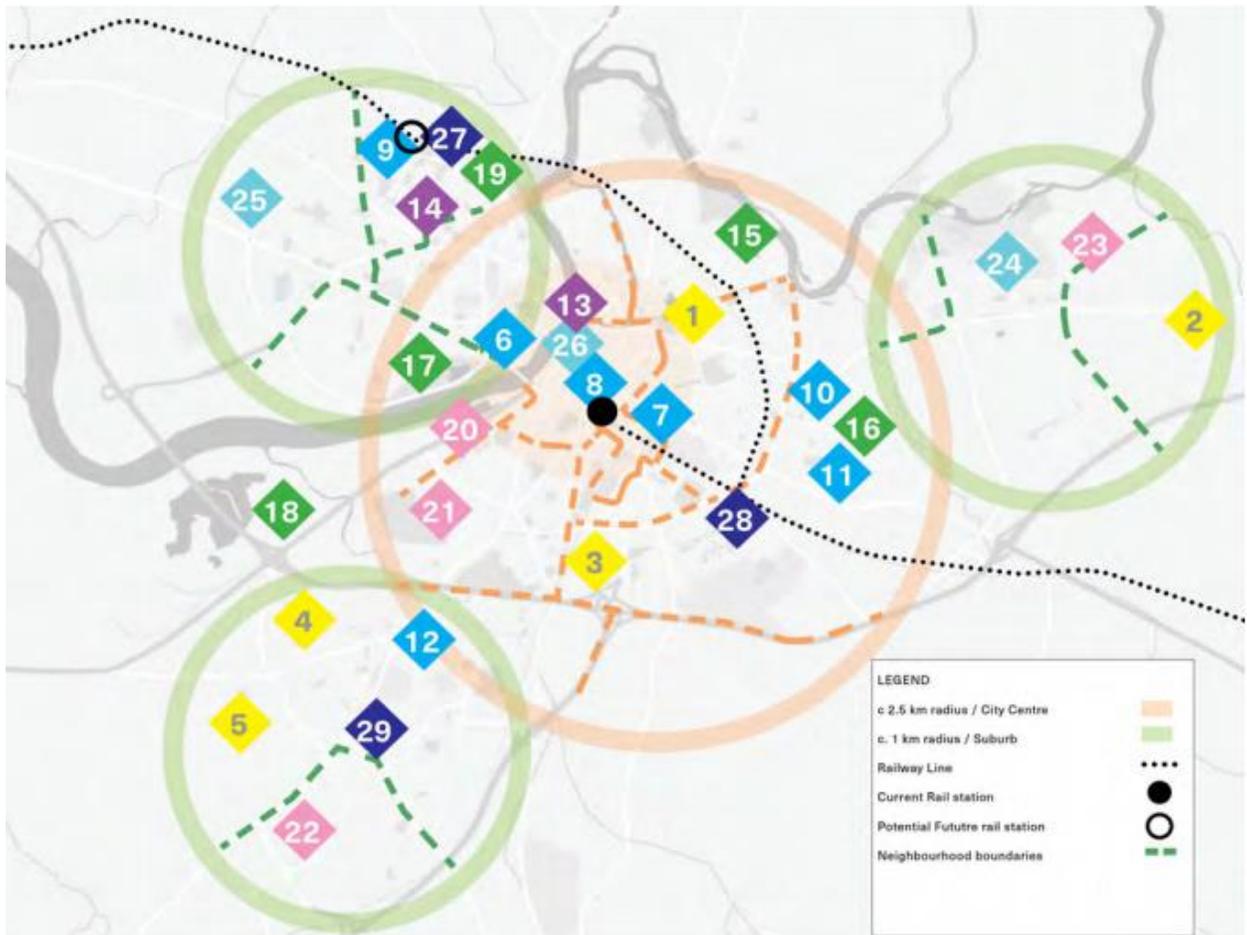


Figure 3.9: 'Opportunities and Destinations'

(Source: Draft Limerick Development Plan 2022-2028 – Limerick 2030 Interim Update, 2021, Page 85)

The expansion of the city's urban settlement is further described in Chapter 7 (Spatial Opportunities) and notes that '...proposals in Moyross and King's Island each assume a new pedestrian bridge at Thomond Weir; so proposals at the Limerick Docks and at Clonmacken reference a new pedestrian bridge at Barrington Pier; so proposals in the Dooradoyle-Raheen neighbourhood forge linkages to the Greenpark Racecourse lands and the Limerick Docks' (our emphasis - see pg 108). The vision for the site in the expanded growth strategy is explained under the heading of 'Limerick Docklands' (see pg 120) and is described as follows:

*'Greenpark Racecourse site should be progressed as a **major residential opportunity site** along its northern extents and the opportunity explored for the feasibility of **the provision of a c.12Ha enterprise and employment opportunity site** accessed from Dock Road to supplement the IDA lands at capacity in the Castletroy/ UL neighbourhood.*
[our emphasis]

It is clear, therefore, from the above statement that c. 12 ha of the Greenpark lands is identified as being potentially feasible as an enterprise and employment 'opportunity site' accessed from Dock Road, together with a 'major residential opportunity site' all within an emerging 'expanded plan' area for the city centre.



The land use zoning of the Greenpark Lands in the Draft Plan does not, however, support this vision for the site and retains only c.4.4 ha of Residential zoned land, which could not be considered a ‘major residential opportunity site’ as described above. This contrasts with the c.12 ha of land earmarked as a potential enterprise and employment opportunity site to be accessed from Dock Road, which does equate to the existing General Mixed Use and Neighbourhood Centre zones in the Current Development Plan (c. 12 ha). This confirms that this part of the site is deemed the correct general location for this form of development.

In line with the above recommendation, we would request that the lands are otherwise zoned to facilitate the major residential opportunity as identified to be realised on the lands.

3.7 *The Future Development of Limerick City, June 2021*

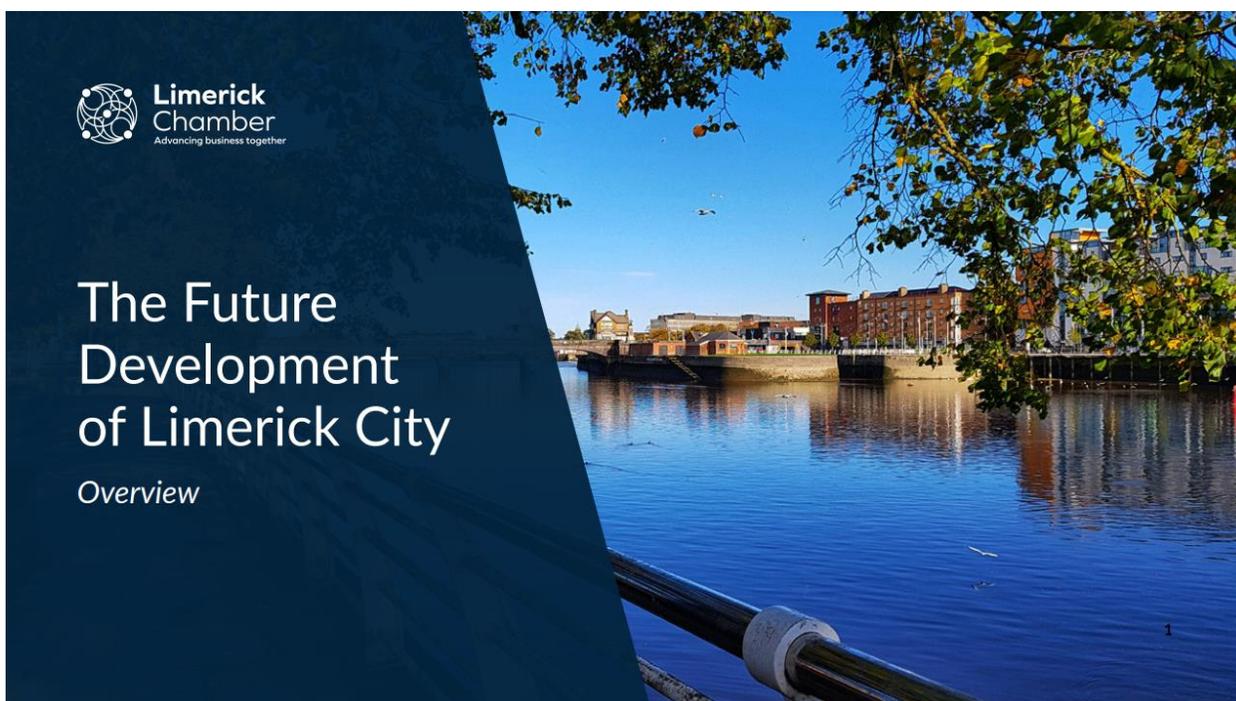


Figure 3.10: *The Future Development of Limerick City.* (Source: Limerick Chamber, 2021)

Limerick Chamber appointed Indecon Research Economists in late 2020 to undertake ‘an independent benchmarking assessment of the performance of Limerick city versus other Irish cities; to analyse international experiences and best practice; and to outline recommendations that support the development of an environmentally and economically sustainable future Limerick city’. This report, known as ‘*The Future Development of Limerick City*’ (generally referred to below as ‘*Future Limerick*’) identifies a ‘Future Limerick Model, which includes the following key concepts:

- Compact growth with high density housing and;
- Location of employment opportunities in proximity to residential areas.



The re-development of the Greenpark Lands would deliver the above objectives through the mixed use development model that can deliver substantial employment opportunities in close proximity to new residential areas.

The *Future Limerick* report was commissioned as a result of concerns held by Limerick Chamber and its members surrounding *inter alia*: *'the pace of delivery of key public projects; **the lack of private commercial and residential development in the city centre**; the decline in footfall in the city centre; the emerging skills shortage across several sectors'*. [our emphasis]

In this regard, *Future Limerick* notes that:

'The current crisis in our city centre is a result of poor planning decisions by successive administrations leading to significant sprawl of large housing and retail developments across suburbs. This 'hollowing out' has contributed to several problems in our city centre including increased numbers of vacant buildings and a general sense of diminishing shared public space'.

With regard to future housing provision, the Report states:

'There is a need to ensure that housing supply increases to meet forecasted population growth for Limerick. ESRI estimates that the population in Limerick city and county will grow by 10% by 2040. Indecon notes that this rate is lower than the national average and would fail to meet the targets of the National Planning Framework. However, even with this lower level of population growth, there will be a requirement for approximately 1,100 new homes per year over the next 20 years. This would represent a 100% increase on the current annual delivery rate for Limerick City and County. This does not account for historical undersupply of affordable homes that has led to Ireland having the highest rate in the EU (47.2%) of individuals aged 25-29 still living with their parents'.

There is a clear and significant demand for, and shortage of, well-located new housing in the Limerick City and environs area that can facilitate the population growth envisaged for the settlement in National and Regional planning policy. Greenpark is ideally located to contribute to meeting this demand in a sustainable manner.

Future Limerick concludes that:

'Population density is important in ensuring a sustainable economic base and in realising the benefits of economic externalities. This is fundamental to meeting climate change objectives and in supporting a vibrant retail and local service economy. The population density in Limerick city and suburbs is higher than Cork but is lower than Galway and Dublin. Increasing the population density in Limerick city is a critically important challenge for the future development of the city'.

In order to achieve the objectives of population density in the city and the required levels of new housing, *Future Limerick* recommends that:



- *Strategic development areas should be identified in the city to facilitate new quality affordable residential developments. This could potentially be introduced in tandem with strengthened regulation and improved access to finance for small and medium developers.*
- *The focus of all policies and investments should be on facilitating compact growth.*
- ***Targets should be set (and monitored) to achieve an increase in apartment and other residential regeneration developments in inner areas of the city. [our emphasis]***

We submit that Greenpark comprises a ‘strategic development area’ and should be so designated in the Development Plan as a suitable to meet the ‘compact growth’ policy underpinning the planning of the city. As an ‘inner area of the city’, the Greenpark Lands represent a residential regeneration area that can facilitate a mix of residential unit types and sizes including apartments.

Future Limerick also recognises that the planning of the city area will play a significant role in tackling climate change and unsustainable commuting patterns. It states:

‘Evidence on the commuting patterns of the population in Limerick city examined by Indecon indicated that more than half of the population in Limerick city rely on a car to travel to work or school or college. Ensuring that the infrastructure and services are available to reduce this percentage, is an important challenge for the city.’

The Greenpark Lands are superbly located to minimise the need to travel and reduce reliance on the private car. In this regard, it is noted that:

‘Indecon has used Geographic Information System (GIS) techniques to analyse the accessibility to essential facilities (Hospitals, Schools, Parks) within the Limerick metropolitan area. The results show that accessibility to services by pedestrians is particularly high in most of the electoral districts of the metropolitan area, where it is possible to reach these facilities within 10 minutes from virtually every point. Highlighting and utilising the strength of proximity within Limerick city should be a core element of a future sustainable strategy. The results of the analysis carried out suggest that the city has the potential to facilitate a significant shift in commuting patterns’.

Greenpark is located within reasonable walking/cycling distance from the city centre, hospitals, schools, open space and several major places of employment together with a well-established social infrastructure. Its promotion as an appropriate location to facilitate sustainable development is entirely consistent with the above recommendations.

3.8 Flood Risk Considerations

It is acknowledged that the Greenpark Lands are subject to flood risk designations viz., principally Flood Zones A (High Probability of Flooding) and B (Moderate Probability of Flooding). The existence of these designations has formed a central tenet of the future planning and development of the lands and its design from the outset (see Greenpark Masterplan).



This Masterplan sets out a detailed vision for the future development of the lands and includes a detailed Site Specific Flood Risk Assessment (SSFRA) prepared by RPS, Consulting Engineers, which includes substantial and robust modelling work and breach analysis. The Masterplan illustrates how the SSFRA recommendations can be implemented and managed on the lands to ensure that future development can take place safely and in line with National and Regional planning policy.

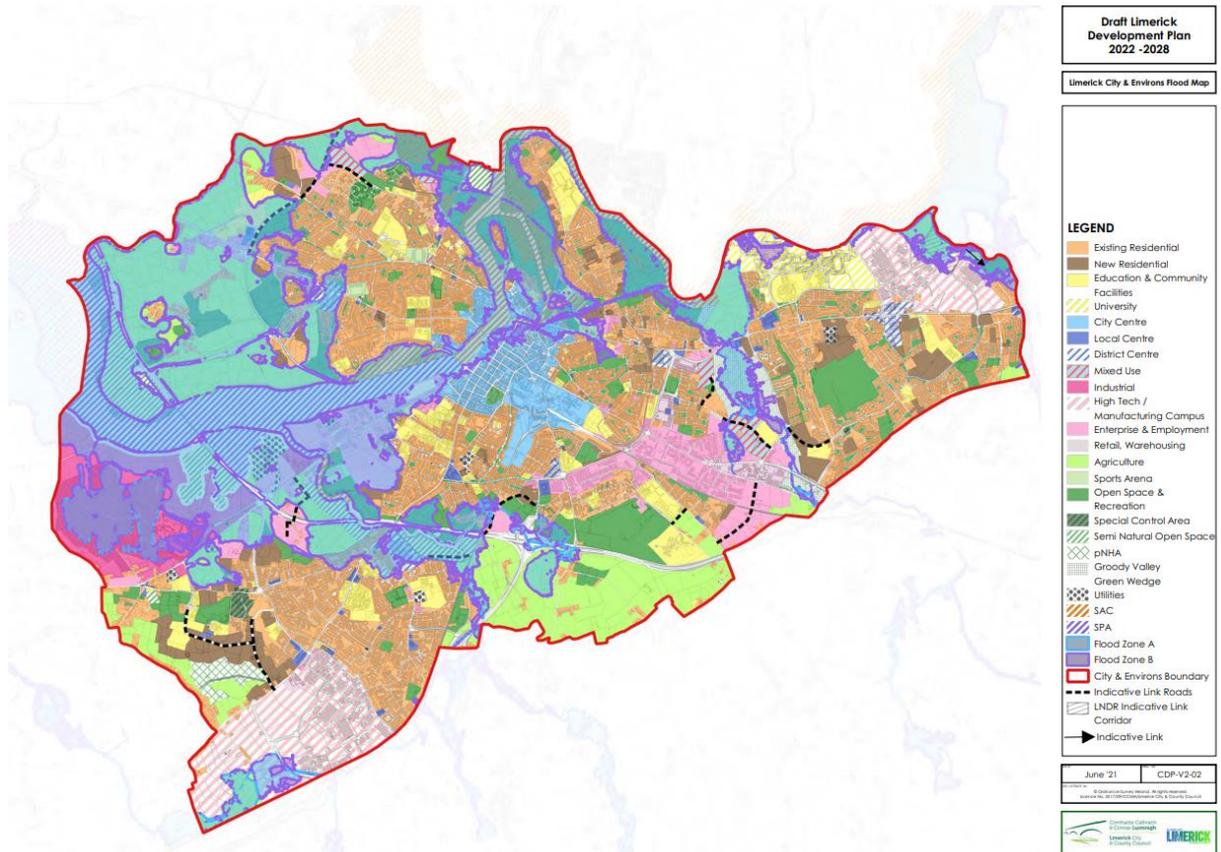


Figure 3.11: ‘Limerick City and Environs Flood Map’
(Source: *Draft Limerick Development Plan 2022-2028* – Volume 2, Limerick City and County Council, 2021)

It should also be noted that the lands have been zoned for both General Mixed Use, Neighbourhood Centre and Residential uses since 2010 under the Current Development Plan, which was adopted having regard to the provisions of the *Planning System and Flood Risk Management Guidelines for Planning Authorities 2009*.

Limerick City is a ‘*strategically located urban centre*’ as referenced in the 2009 Guidelines much of which is subject to flood risk designations including significant areas of land in the city centre and inner suburbs. It is, however, earmarked for ‘*continued growth and development*’ in order to ‘*bring about compact and sustainable urban development and more balanced regional development*’.



The Development Plan Guidelines as referenced in the *Planning System and Flood Risk Management Guidelines for Planning Authorities 2009* are described in detail in Section 3.2 of this submission and these explicitly support the sequential development of urban areas, which would comfortably include Greenpark in the Limerick City context.

It is submitted that Limerick City must continue to be developed in a sequential manner in order to achieve these overriding National and Regional planning objectives; otherwise, very significant tracts of scarce serviced urban lands in close proximity to the city centre may not be developed and a wholly unsustainable growth model focused on lands in outer suburban locations will be promoted. As illustrated in the enclosed SSFRA (see Appendix A), the Greenpark Lands can be developed safely and will not increase flood risk elsewhere.

It is noted that since the Flood Risk Management Guidelines were published in 2009, the National Spatial Strategy and Regional Planning Guidelines referenced in that document have been replaced by the *National Planning Framework (NPF) 2018* and the *Regional Spatial & Economic Strategy (RSES) for the Southern Region 2020* respectively, which are described in detail above in this submission (see Sections 3.1 and 3.4). Both planning guidance documents, however, remain centred on the promotion and delivery of the ‘compact growth’ concept and explicitly support the redevelopment of underutilised lands in inner urban locations. In addition, it is a stated NPF and RSES objective to meet 50% of all new housing provision within the existing built-up area of the country’s main cities (including Limerick), which also underpins the overall growth strategy of the Draft Plan.

Thus, notwithstanding the flood risk designations pertaining to the lands, it is evident that the strategic nature of the Greenpark lands located in close proximity to Limerick city centre means that they are ideally located to meet these National, Regional and Draft Plan policy objectives. As noted above, the alternative to this strategy is the zoning and development of lands in peripheral remote locations well beyond the core and inner suburban areas, which will give rise to an inherently unsustainable pattern of development that will undermine the compact city strategy that will encourage reliance on the car. This, in turn, will result in the new Development Plan failing to comply with mandated National and Regional planning guidance.

The *Planning System and Flood Risk Management Guidelines for Planning Authorities 2009* note the requirement for a ‘Plan-making Justification Test’ described in Chapter 4 and used at the plan preparation and adoption stage, where it is intended to zone or otherwise designate land, which is at moderate or high risk of flooding. It is noted that the Justification Test will apply to ‘uses or development vulnerable to flooding’ with no distinction drawn between ‘highly’ or ‘less vulnerable development’ or particular land uses. Section 4.23 and Box 4.1 of the Guidelines describe the Development Plan Justification Test in detail. The relevant components of the Justification Test, which must be satisfied, are set out below when assessed against the Greenpark site.



3.8.1 Development Plan Justification Test

The following criteria are identified in the Development Plan Justification Test (Box 4.1) in the 2009 Guidelines. These are set out below in italics and assessed in turn.

'The urban settlement is targeted for growth under the National Spatial Strategy, 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'.

As noted above, the NPF and RSES replace the above referenced National Spatial Strategy and regional planning guidelines respectively. As described in detail in Sections 3.1 and 3.4 of this submission, Limerick City and suburbs is targeted for significant and ambitious population growth of 50-60% (47,000 – 56,000 people) to 2040 with 50% of this growth mandated to occur within the existing built-up area of the city, which would naturally include the subject lands, given their inner suburban location.

Similarly, the Draft Plan projects population growth of 34,177 persons to 2028. The Plan notes that the Limerick Metropolitan Area (city and suburbs) has the capacity to accommodate 12,322 no. units on zoned land. It is clear, therefore, that there is significant population growth forecast for Limerick City that will generate future demand for housing, which requires to be met by appropriately zoned and located land. Significant strategic sites such as Greenpark close to the city centre, as opposed to lands located in peripheral locations of the city, should be prioritised as required by all current planning guidance. This criterion is met by the subject lands.

The next criterion noted in Box 4.1 states:

'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 urban settlement and, in particular:

(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement';

The Greenpark site is a strategically important zoned and serviced landholding of notable scale (47 ha) located in the inner suburbs of Limerick City within 2km of the city centre. Moreover, it is explicitly identified in the *Limerick 2030 Interim Update June 2021* (see Volume Six of the Draft Plan) as part of the 'expanded plan' area described as follows:

'The expansion of the spatial plan allows it to consolidate this city identity and to ensure that the growth is managed in a way that not only avoids sprawl but actively reinforces the sense of a coherent urban area'. (see pg 78)

In this regard, the 'old Greenpark Racecourse' is identified as a 'City Gateway' clearly located within the inner part of the city and suburbs as delineated on page 79 of the *Limerick 2030 Interim Update* document. The graphic on page 85 also illustrates the subject lands as being comfortably within the 2.5km radius of the city centre and notes part of the site as being 'enterprise and employment' lands (site no. 21).



The expansion of the city's urban settlement is further described in Chapter 7 (Spatial Opportunities) and notes that '*...proposals in Moyross and King's Island each assume a new pedestrian bridge at Thomond Weir; so proposals at the Limerick Docks and at Clonmacken reference a new pedestrian bridge at Barrington Pier; so proposals in the Dooradoyle-Raheen neighbourhood forge linkages to the Greenpark Racecourse lands and the Limerick Docks*' (our emphasis - see pg 108). The vision for the site in the expanded growth strategy is explained under the heading of 'Limerick Docklands' (see pg 120) and are noted as follows:

*'Greenpark Racecourse site should be progressed as a **major residential opportunity site** along its northern extents and the opportunity explored for the feasibility of **the provision of a c.12Ha enterprise and employment opportunity site** accessed from Dock Road to supplement the IDA lands at capacity in the Castletroy/ UL neighbourhood.*
[our emphasis]

It is clear from the above statement that c.12 ha of the Greenpark lands is identified as being potentially feasible as an enterprise and employment '*opportunity site*' accessed from Dock Road, together with a '*major residential opportunity site*' all within an emerging '*expanded plan*' area for the city centre. Given this planning context, it is clear, therefore, that the lands are '*essential to facilitate regeneration and/or expansion of the centre of the urban settlement*'. This criterion is met by the subject lands.

(ii) Comprises significant previously developed and/or under-utilised lands;

The Greenpark site comprises a strategically important land bank of significance (47 ha) and constitute the former Limerick racecourse, so is '*previously developed*', having accommodated another land use with associated ancillary development. At present, the lands are undeveloped and are grossly underutilised, having regard to their strategic locational context on the edge of core city area in the city's inner suburbs proximate to several employment areas and public transportation corridors. This criterion is met by the subject lands.

(iii) Is within or adjoining the core of an established or designated urban settlement;

Limerick is a designated urban settlement and growth area under the provisions of the NPF and RSES with projected population growth in the order of 47,000-56,000 people up to 2040. The Draft Plan envisages growth of c. 34,000 people to 2028. The Greenpark Lands are centrally located within the inner suburbs of Limerick City within 2 km of the city core and adjoining the existing built-up area of the city centre. This criterion is met by the subject lands.

(iv) Will be essential in achieving compact and sustainable urban growth;

Limerick City is a designated growth centre in the NPF and RSES, whilst ambitious population and economic growth are explicitly supported in the current Draft Development Plan and the Limerick 2030 Plan Interim Update. All relevant planning policy (National, Regional and Draft Plan) require this growth to be delivered in accordance with the compact city model utilising underutilised brownfield and centrally located lands where possible.



The projected growth of Limerick is earmarked to be accommodated in the city centre and the adjoining inner suburbs, where possible, in line with National planning policies and guidance in respect of the sequential approach to the zoning of land (see also Section 3.2 above). The Greenpark lands are of scale (47 ha), so can deliver a significant contribution towards meeting both economic and residential growth targets in a sustainable location proximate to the city centre, employment centres, established social infrastructure and existing and emerging public transport corridors. The *Limerick 2030 Interim Update* (see Volume 6 of the Draft Plan) further support these objectives and explicitly reference the subject lands as forming an important part of the 'expanded plan' strategy as both an employment (c.12 ha) and major residential opportunity site.

The lands will, therefore, be essential in achieving this compact city model of sustainable urban growth being contiguous to the existing built-up area and promoting the use of cycling, walking and public transport. If the lands are not developed in this manner, it will promote the zoning and development of lands, particularly for residential purposes, in greenfield remote locations on the periphery of the existing built-up area at a significant remove from the city centre often requiring costly and significant new infrastructure and likely highly car dependent. This latter form of development is the antithesis of the 'compact city' and results in an unsustainable form of growth that will serve to undermine the overriding planning strategy guiding the growth of Limerick. This criterion is met by the subject lands.

- (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*

There are no suitable alternative lands to accommodate the appropriate combination of commercial and residential use within, or adjoining the city's core area that are at a lower risk of flooding. There are limited available development lands adjoining the subject site that are located closer to the city centre and, where such limited sites exist, these are also designated as being at risk of flooding or otherwise committed for development/already developed. This criterion is met by the subject lands.

In summary, therefore, the Greenpark Lands satisfy the criteria included in the Development Plan Justification Test and are, therefore, appropriate to be zoned for development including commercial and residential uses.

The final requirement of the Development Plan Justification Test requires the preparation of a flood risk assessment to an appropriate level. In this regard, a detailed SSFRA was completed by RPS Consulting Engineers in respect of the Greenpark Lands (see below). The Guidelines state:

'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.'



N.B. The acceptability or otherwise of levels of any residual risk should be made with consideration for the proposed development and the local context and should be described in the relevant flood risk assessment'.

As noted, RPS have undertaken a detailed site specific flood risk assessment (SSFRA) for the Greenpark Lands in accordance with the sequential approach required under *The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)* (PSFRMG). The SSFRA is appended to this submission as Appendix A.

The SSFRA identified that the risk of flooding to the Greenpark Lands is low, as the OPW maintained Arterial Drainage scheme provides protection during both the 0.5% and 0.1% AEP tidal events. This was established previously by modelling during the OPW CFRAM process and, more recently, by comprehensive modelling undertaken by RPS to inform the SSFRA. The lands are still predominantly classed as Flood Zone A, in accordance with the *PSFRMG*, due to the residual risk of breach of the OPW embankments, which were constructed of a material of unknown origin.

The focus of the RPS SSFRA was, therefore, to demonstrate, that during a breach scenario, the risk to property and life could be safely managed in the knowledge that this event could be sudden and without warning. The general approach to this was to raise the Greenpark Lands above the predicted breach level with a suitable allowance for Climate Change and freeboard, while ensuring there was no unacceptable adverse impacts to neighbouring lands or property. This was achieved and the mitigation measures provided the following benefits to ensure long term sustainability and a neutral impact on surrounding lands:

1. There is no reliance on the existing OPW embankments to provide protection to the Greenpark Lands.
2. The proposed mitigation is entirely self-sufficient, sustainable and will place no burden on Limerick City and County Council to provide additional flood defence infrastructure in the future.
3. The Greenpark Lands will remain free from flooding during a 0.5% AEP Mid-Range Future Scenario event where overtopping of the existing defences occurs.
4. The Greenpark Lands will be protected during a 0.5% AEP Mid-range Future Scenario event, even when a breach of the existing defences has also occurred.
5. It has been robustly demonstrated that there is no increase in flood risk, even during a breach event, to surrounding developments.
6. A clear access and egress route for emergency vehicles can be provided through Log na gCapall, even during a breach event. This is essential, given that Dock Road itself will be impassable due to the depth of water.
7. All storm drainage will be attenuated to existing run-off rates and, therefore, will not cause capacity issues on the existing network or raise the increase of flooding elsewhere.



The RPS SSFRA, the analysis undertaken and the report produced meets the requirement of the final criterion of the Development Plan Justification Test.

Key Issue Arising: The application of the *Planning System and Flood Risk Management Guidelines 2009*, at the Development Plan stage, demonstrates that the Greenpark Lands satisfy the requirements of the Development Plan Justification Test.

4.0 **DRAFT LIMERICK DEVELOPMENT PLAN 2022-2028**

Future Residential Development

The written statement (Volume 1) of the Draft Development Plan sets out the Planning Authority's vision for the Limerick City and County administrative area. Chapter 2 of the Draft Plan sets out the core strategy, which informs the overall framework for the objectives and policies throughout the Draft Plan. The Core Strategy provides a rationale for the amount of land proposed to be zoned for new residential development and for mixed use development, involving a residential component that is required to meet the proposed population growth over the lifetime of the Draft Plan period, at settlement level. This section reinforces that the Draft Development Plan must be underpinned by the policy objectives of the NPF and RSES (as described above in this submission) in respect of achieving the projected population growth in Limerick City and Environs of at least 50% by 2040 and promoting the compact growth concept with 50% of new housing development to occur within the existing built-up area of the city environs.

Table 2.4 identifies the Limerick Settlement Hierarchy with the top of the hierarchy (Level 1) described as the Limerick City Metropolitan Area, which comprises '*Limerick City and Environs, including Mungret and Annacotty*'. The bulk of new population and housing growth will occur within this area.

Table 2.3 estimates a total household projection for the Plan period (2022-2028) of 15,591 and a population growth of 33,618 persons in Limerick city and suburbs to 2031. Table 2.6 identifies '*Density Assumptions per Settlement Hierarchy*', which is broken down into Density Zones 1-3 for City Centre, Central & Accessible Locations (100+ units per ha); Intermediate Urban Locations/Transport Corridors (45+ units per ha) and Suburban Edge (35+ units per ha) respectively. Figure 2.2 of the Draft Plan suggests that the site is located at the interface of the Intermediate Urban Location and the Suburban Edge, which would give an appropriate residential density of 35-45 units per ha for the Greenpark Lands. (As noted above, the current SHD proposal on part of the subject lands shows a density of 47 units per ha as being achievable on the lands).

Section 2.4 of the Draft Plan notes that:

'Guidance throughout the Draft Plan on housing densities, building height and development layouts, are all aimed at ensuring the economic use of land for development, compact, quality neighbourhoods and integration with infrastructure and non-residential land uses that nurtures sustainable travel patterns and choices.'



Table 2.7 comprises the core strategy table and suggests that no additional zoned land is required to accommodate additional growth in the Level 1 settlement tier (Limerick Metropolitan City and Environs including Mungret and Annacotty) with 358 ha of existing zoned undeveloped land available with capacity for 12,322 residential units.

Key Issue Arising: Given that the Residential zoning of the Greenpark Lands has decreased by c. 15 ha in the Draft Plan with capacity for c. 650+ no. residential units in a highly accessible inner suburban location, we submit that there may be lands identified for residential development purposes that are less suitable when assessed against the relevant National, Regional and Draft Plan policies and the sequential approach to the zoning of residential land as set out in the Development Plan Guidelines.

Chapter 3 of the Draft Plan further details the proposed settlement and housing strategy for Limerick, which once again reinforces that the strategy aligns with the overriding policy objectives of the NPF and RSES (see Policies SS P1 and SS P2).

Regarding 'compact growth', Objective SS 01 states:

'It is an objective of the Council to strengthen the core of settlements and encourage compact growth, through the development of infill sites, brownfield lands, under-utilised land/buildings, vacant sites and derelict sites, within the existing built-up footprint of the settlements and develop outwards from the centre in a sequential manner'.

Policy SS P3 Level 1 – Growing Limerick City Metropolitan Area, including Mungret and Annacotty states that:

'It is a policy of the Council to strengthen and consolidate Limerick City Metropolitan Area as a key driver of social and economic growth in Limerick and become a vibrant living, retailing and working City. In accordance with national and regional policy it is a requirement that at least 50% of all new homes will be located within the existing built-up footprint of the settlement, in order to deliver compact growth and reduce unsustainable urban sprawl'.

Regarding Housing Mix, Objective HO 01 states:

'It is an objective of the Council to ensure that new developments are socially inclusive and provide for a wide variety of housing types, sizes and tenure, throughout Limerick, to cater for the demands established in the Draft Housing Strategy and the Housing Need Demand Assessment'.

Section 3.7.4 of the Draft Plan again notes the key objectives of the NPF and RSES that seek to increase the density of development in all built up areas, in order to achieve the indicated population targets in a compact and sustainable manner. The Draft Plan confirms that increased densities will facilitate optimising the use of serviced lands and maximising the viability of investment in social and physical infrastructure, in particular public transport. Integration of land use and transport planning is identified as being crucial to deliver the '10 minute city/town' concept and this will be supported with higher densities at appropriate locations.



Key Issue Arising: As noted throughout Section 3 of this submission above, the Greenpark Lands are a textbook example of a significant underutilised and undeveloped infill urban land bank located in close proximity to the city centre, areas of employment, existing social infrastructure and public transport corridors. The lands are inherently suitable to accommodate substantial residential development as an expansion of the core urban area of Limerick.

Allied to an Enterprise and Employment zoned area adjoining the Residential component, this would enable the creation of a highly sustainable '10 minute' city district as referenced above and encourage walking, cycling and the use of public transport. The lands are also serviced, so do not require expensive and lengthy infrastructural upgrades to become available for development in the short term. The development of a significant portion of the lands for Residential purposes will contribute significantly to the achievement of the above Draft Plan objectives (viz., compact growth, urban consolidation and housing mix).

Future Employment Development

Chapter 4 of the Draft Development Plan is entitled 'A Strong Economy' with the aim of supporting the growth of employment and enterprise, retail, tourism and the marine economy in Limerick, in a manner, which ensures that economic development does not impact adversely on the environment. Section 4.3.1 notes that the Limerick 2030 Economic and Spatial Plan for Limerick has the ambition to create a City Centre that can attract new inward business investment and encourage the formation of new local business by providing high quality, flexible space.

It is noted that:

'The Draft Plan seeks to protect and promote the strategic employment locations identified in the RSES. Chapter 10: Compact Growth and Revitalisation identifies opportunity sites for future development. In line with the Core Strategy, the Draft Plan considers how best to ensure that there are sufficient zoned lands available in appropriate locations, to support the range of future employment needs for Limerick'.

Policy ECON P1 notes the importance of *Limerick 2030* stating:

'It is a policy of the Council to support the review and implementation of Limerick 2030 – An Economic and Spatial Plan to guide the economic, social and physical renaissance of Limerick City Centre and the wider County/Mid-West Region'.

Policy ECON P3 states that:

'It is a policy of the Council to: a) Promote, facilitate and enable economic development and employment generating activities in Limerick City Centre, at Strategic Employment Locations and other appropriately zoned locations in a sustainable manner. b) Facilitate the future sustainable economic development of Limerick City and Environs to optimise the benefits of its strategic location in the Limerick Shannon Metropolitan Area, in accordance with the National Planning Framework and the Regional Spatial and Economic Strategy'.



Section 4.7 of the Draft Development Plan focuses on Enterprise and Employment. The National and Regional policy context is noted particularly the provisions of the MASP, which supports Limerick City in becoming a major economic force in the Irish and international economy, a leading centre for commercial investment.

Section 4.7.2 relates to Strategic Employment Locations in Limerick City and Environs. It states that:

'The Local Authority is committed to the delivery of a vibrant and compact community where people live close to where they work in Limerick City Centre, which must be prioritised for investment. The strategic employment areas identified, support the objectives for compact growth of the settlement of Limerick City and Environs... With an increase of critical mass in the City and Environs, it is envisaged that population and jobs growth will occur in a sustainable manner focusing on clusters and smart specialisation.'

Regarding the Docklands area, the Draft Plan states:

'The maintenance of the city's existing working port and associated industries will also be supported in the Draft Plan. These lands represent an invaluable asset for the future maritime related economic development of the City Centre. There is also potential for significant development of underutilised City Centre lands within the Docklands area for a major employment and residential quarter'.

The juxtaposition of employment residential land uses is further restated in the Draft Plan:

'It is therefore acknowledged that additional locations may become available and the Local Authority recognises the need to be flexible to accommodate employment opportunities and the aims of revitalising and regenerating Limerick City, for higher density living and higher value jobs during the lifetime of the Draft Plan.'

Objective ECON O13 'Strategic Employment Locations City and Environs' sets out policy provisions that promote a diverse range of employment opportunities in appropriate locations and explicitly identifies the following as 'Strategic Employment Locations' in line with the RSES MASP:

- Limerick City Centre,
- University Hospital Limerick,
- Raheen Business Park,
- the National Technology Park,
- Higher Education Institutes,
- Public Hospitals,
- Dock Road,
- Northside Business Campus,
- Opera Centre and
- Cleeves Site



Key Issue Arising: Notwithstanding that the quantum of zoned Enterprise and Employment zoned lands increasing to c.24.7 ha in the Draft Development Plan (a c.14 ha increase from the General Mixed Use zone in the existing Development Plan), which is a very significant site area, the Greenpark Lands are not identified at any stage in the Draft Plan as a Strategic Employment Location. This is despite the fact that this would comprise one of the largest Enterprise and Employment zoned land parcels in the inner suburban part of the city environs.

As noted above, however, the *Limerick 2030 Interim Update* identifies Greenpark ('old racecourse') as being both an employment opportunity site (c.12 ha) and a major residential opportunity site. All of the above suggests that whilst part of the Greenpark Lands may have a role in supporting the future economic growth of the city centre and an emerging new Docklands centre, they do not represent a Strategic Employment Location. Given its locational characteristics, the overall site comprises a landholding ideally suited to accommodating mixed use development in line with the above Draft Plan policies that seek to co-locate employment and residential development in line with sustainable development principles.

Chapter 10 relates to Compact Growth and Revitalisation and, as with all other parts of the Draft Plan, this provides the National and Regional planning context, which explicitly supports:

- The City Centre as the primary location at the heart of the Metropolitan Area and Region;
- Compact growth and revitalisation of Limerick City Centre and suburbs;
- Densification of development in the City Centre, including identification and assembly of brownfield sites for development.

It is also explicitly referenced that Limerick City and County Council will have regard to, *inter alia*, *Limerick 2030: An Economic and Spatial Plan for Limerick*.

Regarding 'compact growth', the Draft Plan makes a series of statements all of which clearly support the development of the Greenpark Lands for uses including Residential:

'Limerick City and County Council acknowledges the social and economic benefits of more compact settlements and is committed to delivering compact growth, through active land management and initiatives to revitalise urban settlements. The policies and objectives in this Draft Plan promote the efficient use of urban lands to achieve compact growth, through the intensification, consolidation and positive revitalisation of the City, towns and villages throughout Limerick.

The compact growth concept requires the provision of higher densities and mixed-use developments in urban settlements, in order to ensure a more efficient use of scarce lands and optimise public investment in infrastructure. This requires the integration of land use and transport, an intensification of use of existing underutilised lands and the consolidation of the built environment through the development of brownfield and infill lands, as well as the reuse of vacant and derelict buildings in urban settlements. In conjunction with the provision of social and green infrastructure, the principles of compact growth set the foundations for a higher quality of life, through the promotion of mixed-use settlements, served by sustainable modes of transport and the creation of an attractive environment in which to live, work and do business.



Successful compact growth requires enhanced connectivity and accessibility for pedestrians and cyclists, as well as the provision of viable public transport services through the concentration of higher density developments at strategic employment locations and along public transport nodes. There are many sustainability benefits of the compact growth concept compared to that of urban sprawl or greenfield developments at the edge of settlements. Such benefits include maximising the viability and cost efficiency of providing public transport and other infrastructure, as well as reduced car dependency and commuting times, which will facilitate the mitigation of climate change, through a reduction in traffic congestion, energy consumption and greenhouse gas emissions.

The Local Authority acknowledges the social and economic benefits of more compact settlements as outlined above. Therefore, this Draft Plan will continue to support the sequential approach to the delivery of development, with priority given to the revitalisation of settlements and the consolidation of the existing built environment, through the development of brownfield, infill and backland urban sites’.

Policy CGR P1 provides policy support for the above principles. It is submitted that the Greenpark Lands enjoy all the locational characteristics described in the above commentary and comprise an ideal site that would demonstrate how the above principles could be implemented in practice.

Chapter 10 also addresses the importance of Brownfield sites in achieving compact urban growth and describes these sites as follows:

‘Brownfield land is a term used to describe previously developed land that is not currently in use and which has the potential for redevelopment. Often such lands are of large scale and have previously been in use for industrial or commercial purposes and became derelict due to obsolescence, vacancy or demolition of structures

Redeveloping brownfield sites provides opportunities for revitalisation of the built environment and reuse of existing infrastructure including roads and utilities. The Planning Authority will encourage the redevelopment of brownfield sites in settlements throughout Limerick, in accordance with the concept of compact growth and the Development Management Standards of this Draft Plan. A number of strategic brownfield sites have been identified for redevelopment in Limerick City Centre, which will have transformational effects on the revitalisation of the City. Such strategic sites include, for example, the Opera Centre, Cleeves Riverside Quarter, the University of Limerick Riverside Campus and Colbert Station Quarter. Some of these projects are briefly outlined under the Limerick City Revitalisation Projects and Opportunity Sites section further below’.

As above, the Greenpark Lands are not identified as being a Brownfield Site despite being located in the inner suburbs of the city and comprising a largescale site (47 ha) that was formerly in use.

This chapter also reinforces the importance of Limerick 2030 in the future regeneration of the city and environs:



‘The key tool for the revitalisation of Limerick is the Limerick 2030 – An Economic and Spatial Plan. The Limerick 2030 Plan sets out a blueprint for the economic and spatial revitalisation of Limerick City, to reposition it as a world class City in Ireland and Europe. The NPF sees its implementation as a growth enabler, which can act as an exemplar to other cities not just nationally but internationally. The establishment of the Limerick Twenty Thirty Strategic Development DAC (Designated Activity Company) has accelerated the implementation of the Limerick 2030 Plan, with actions proposed over a 20-year period. The DAC is the first entity of its kind created by a Local Authority to deliver a City and countywide programme of investment. It is the biggest single Irish commercial property development programme undertaken outside of Dublin.’

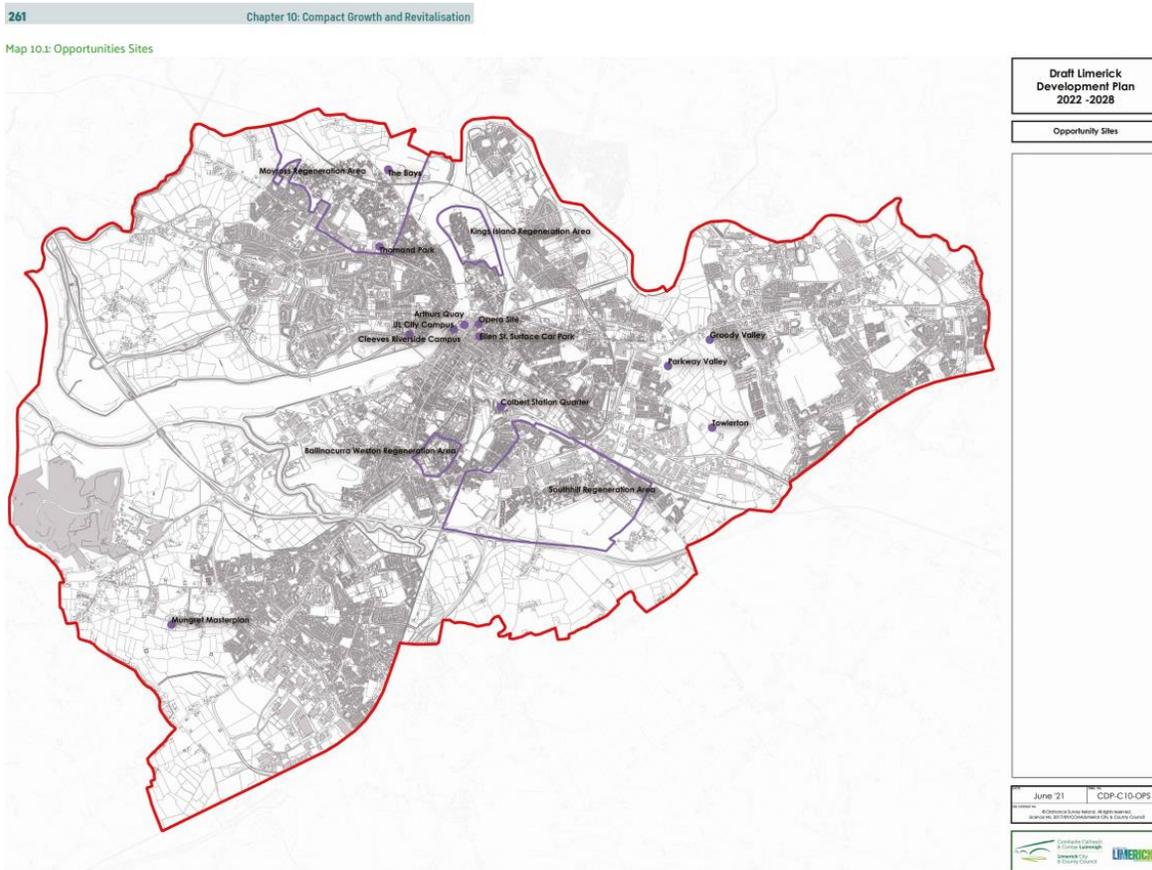


Figure 3.12: ‘Opportunity Sites’

(Source: *Draft Limerick Development Plan 2022-2028*, Limerick City and County Council, 2021, Page 261)

Section 10.4.2 relates to the ‘*Limerick City Opportunity Sites*’, which are noted to include the Opera Site, Cleeves Riverside Quarter, UL City Campus, Arthur’s Quay, Colbert Quarter, Ellen Street Car Park, Thomond Park, The Bays, Moyross, Mungret Masterplan, Parkway Valley, Groody Valley and Towlerton. These sites are illustrated on Map 10.1 together with the regeneration areas of Kings Island, Southhill and Ballinacurra-Weston. It is notable that Greenpark is not an identified ‘Opportunity Site’ despite its size and strategic location in the context of Limerick city centre. As noted above, however, the *Limerick 2030 Interim Update* identifies Greenpark (‘old racecourse’) as being both an employment opportunity site (c.12 ha) and a major residential opportunity site.



Key Issue Arising: It is apparent that the Greenpark Lands meet the policy objectives outlined in the Draft Plan regarding the achievement of compact growth and revitalisation objectives. Its re-development for a mixture of employment and residential uses will inherently accord with the relevant planning objectives. In spatial planning terms, It is remarkable, therefore, that the lands do not feature as one of the identified Opportunity Sites (see Volume One written statement) in the Limerick City and Suburbs area, given the strategic size of the landholding (47 ha) and its location close to the city centre, centres of employment and public transport corridors. Moreover, the lands are hardly mentioned at all anywhere in the Draft Plan, which seems scarcely believable, given the superb locational characteristics of the site and their suitability for sustainable new development in line with National and Regional planning policies. This omission makes little sense, having regard to the fact that the site meets virtually all relevant Draft Plan policies and objectives regarding compact growth, regeneration, sustainable development, mixed use, densification, the 10 minute city, etc.

In terms of size, the site is significantly larger than Towlerton (16.4 ha), Groody Valley (2.4 ha) and Parkway (16.4 ha) and is, in relative terms, of similar scale to Colbert (69 ha) and Mungret (59.6 ha). It is also significantly closer to the city centre than Mungret, Towlerton, Groody Valley and Parkway and, therefore, in terms of the sequential development of cities from the centre outwards as per National guidance, it should clearly be a site of significant priority on those grounds alone as a sustainable development opportunity. It is also a serviced site and can be developed with relative ease and speed through the provision of a new internal link road from Dock Road, which can be delivered by the landowner through the planning process.

The virtual disappearance of Greenpark from the Draft Plan is in stark contrast to the Current Development Plan, which explicitly identified the site as being part of the South Circular/Ballinacurra Area with an objective:

‘To seek the balanced development of the existing under-utilised lands in the area in particular the former racecourse lands.’

The existing Development Plan notes that the c. 36 ha of undeveloped, zoned land at the former race course could release 1,188 residential units and its explicitly noted in Table 2.5 (core strategy) as the *‘former racecourse’*. It is submitted that with the adoption of the NPF and the RSES, as now copperfastened by the *Limerick 2030 Interim Update*, the lands are more suitable for a mix of commercial and residential development in National planning policy terms than was the case in 2010.



5.0 CONCLUSION

We contend that this submission provides a compelling evidence-based planning case as to why the proposed overwhelmingly commercial zoning of the Greenpark Lands in the Draft Plan is not supported by National and Regional planning policies and objectives, particularly in the context of the ambitious projected growth of Limerick in population terms and as an NPF-designated city of scale. In summary, the overriding planning policy imperative at all levels of the Irish planning hierarchy is that 50% of anticipated future housing and population growth to 2040 requires to be accommodated within the existing built footprint of urban centres preferably on underutilised lands close to existing city centres, public transport routes, employment centres and services. This is the mandated growth model enshrined in the NPF and RSES LMASP that must now be adhered to in the Draft Limerick Development Plan and is the sustainable alternative to continued urban sprawl and new car-reliant greenfield development on the periphery of cities often involving complex ownership arrangements, costly significant new infrastructure provision and lengthy development programmes.

The Greenpark Lands comprise a serviced underutilised 47 ha site located within 2 km of Limerick city centre consisting of a former racecourse that can be developed in the short-term. As described in detail in this submission, it is ideally located to deliver both residential and commercial development in a mixed use planning model that will deliver substantial housing provision and also significantly contribute to the ongoing economic growth of Limerick by way of employment-based uses. It is proximate to established social infrastructure, public open space zoned land, existing and emerging public transport routes, employment centres, third level institutions and the city centre. Its re-development will facilitate and encourage the use of public transport, walking and cycling in the city. This vision is fully supported in the zoning provisions of the Current Development Plan, which also explicitly acknowledges the site's importance as a strategic residential land bank with the capability of accommodating over 1,100 housing units. We contend that this model of development remains appropriate and wholly in compliance with current planning policy.

As described above, our Client is fully cognisant of the flood risk designations that apply to the lands and the provisions of the *Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)*, which were also in force when the Current Development Plan was adopted in 2010. We do not consider that these designations constitute grounds to alter the current zoning of the lands as now proposed. This change is not supported by the 2009 Guidelines, given the strategic central location of the Greenpark Lands adjoining the city centre and their crucial role in meeting the core strategic planning objectives underpinning the future growth of Limerick as required in the NPF, the LMASP and the Draft Plan. As confirmed in this submission, the lands satisfy the criteria of the Development Plan Justification Test (see 2009 Guidelines) as being appropriate for land use zoning. This Test does not distinguish between particular land uses, so commercial and residential uses are deemed appropriate on the site.

In addition, the entirety of the lands have been subject to a Site Specific Flood Risk Assessment (SSFRA), which informed the vision for the lands and was integrated into the design of the overall landholding as detailed in the Greenpark Masterplan. The SSFRA confirms that the lands can be developed safely with appropriate mitigation measures and will not increase flood risk on other lands.



The substantial reduction in Residential zoned land proposed in the Draft Plan at Greenpark is counter to planning policy and the provisions of a wide range of National and Regional planning policy documents including:

- *Project Ireland 2040 - National Planning Framework (NPF) 2018*
- *Development Plan Guidelines for Planning Authorities 2007*
- *Development Plan - Guidelines for Planning Authorities Draft for Consultation August 2021*
- *Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities 2009*
- *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, March 2018*
- *The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)*
- *Rebuilding Ireland, Project Descriptions Local Infrastructure Housing Activation Fund (LIHAF) 2017*
- *Regional Spatial & Economic Strategy (RSES) for the Southern Region 2020*
- *Limerick Metropolitan Area Spatial Plan (LMA SP) 2020*

At the local planning level, numerous policies and objectives of the Draft Plan also fully support the re-development of the Greenpark Lands for a mix of uses including a significant residential component as detailed above in this submission. The recently published '*The Future Development of Limerick City*' published by Limerick Chamber further supports this planning approach and strategic residential regeneration in the inner urban areas of Limerick.

Despite the site's strategic size and location, it is not identified as an 'Opportunity Site' in Volume One of the Draft Plan, notwithstanding being larger and better located than many of those so designated. Whilst Greenpark is not specifically referenced in the written statement (Volume One), the lands are clearly identified in the *Limerick 2030 Interim Update* (see Volume Six of the Draft Plan) as being a '*City Gateway*' clearly located within the inner part of the city and suburbs. They are further described as forming a '*major residential opportunity site*' and the Interim Update makes reference to exploring the opportunity for the '*...feasibility of the provision of a c.12Ha enterprise and employment opportunity site accessed from Dock Road*'.

The written statement notes the importance of the *Limerick 2030 Interim Update* in Policy ECON P1, which confirms the Council's policy support regarding '*...the review and implementation of Limerick 2030 – An Economic and Spatial Plan to guide the economic, social and physical renaissance of Limerick City Centre and the wider County/Mid-West Region*'.

However, the proposed Enterprise and Employment zoning of the lands in the Draft Plan does not reflect this aspect of the *Limerick 2030 Interim Update*. In summary terms, the overwhelming provision of Enterprise and Employment zoned lands at Greenpark (in the context of the overall Draft Plan that will provide over 20 years supply of employment zoned land assuming a 60% increase in demand for employment based floorspace – see Lisney Report enclosed in Appendix B) and the consequent substantial reduction in Residential zoning cannot be supported in the midst of an acute and ongoing housing crisis.



We request, therefore, that the existing quantum of New Residential zoned lands be retained in the Draft Plan as described above in the interest of the proper planning and sustainable development of Limerick City. Our Client is amenable to the proposed change from General Mixed Use and Neighbourhood Centre zoned land to Enterprise and Employment in order to support the City's economic growth strategy.

We look forward to written acknowledgement of receipt of this submission.

Yours sincerely

John Gannon
Director
Tom Phillips + Associates

Encl.



APPENDIX A

Site Specific Flood Risk Assessment for Greenpark
as prepared by RPS, Consulting Engineers



APPENDIX B

Lisney Report