

From: [Sean Brosnahan](#)
To: [Forward Planning](#)
Subject: [EXTERNAL]Re Proposed Variation No 1 to Limerick Development Plan 2022-2028
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Importance: High

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By post and Email

Re Proposed Variation No 1 to Limerick Development Plan 2022-2028

A Chara,

I welcome the Council's decision to place on public display the proposed amendment to the Limerick City and County Development Plan in respect of decisions to grant permission for the construction of dwellings on those roads that are deemed by the Council as substandard.

It is the responsibility of the Council under the relevant Roads Acts to maintain public roadways to a standard that makes them suitable for the conveyance of traffic in a safe manner. The use of the term "sub-standard" in the Development Plan, could I believe have unintended negative consequences, including for policy decisions to be taken around the maintenance of those roads under 3m wide, and also potential issues around accidents and subsequent claims.

The rural elected members of the Council will all be aware of many examples of where the Council have arbitrarily decided to discontinue the maintenance of some public rural roads due to the width and traffic volume. Many of these roads, had up to recently been included in the Council's multi-annual roads maintenance program funded by the Government and the Council's own resources. The discontinuation of this maintenance is a practice which is causing huge concerns for people across the County. This operation model of the Council is leaving some people in rural areas without an adequate road surface maintenance program, which is contrast to those homeowners residing in suburban housing estates, with roads widths of the same or less. The cessation of the roads program could be used as a reason to deny permissions on these public roads as per the proposed wording of the amendment.

For these reasons I would ask that the term "sub-standard" be removed from the amendment in its entirety.

I would further request that a revised formula of words be agreed which does not allow those maintenance standards of the Council be used as a mechanism for refusal. A revised insertion should reflect capacity to have adequate safety standards including width, stopping and sight distance, junction alignment and other safety concerns as opposed to the discontinuation of a publicly funded maintenance program on a public road by the Council.

The proposed amendment also deals exclusively with those applicants on a particular road, where the only alternative access is onto "strategic regional roads." Amending the plan with this formula of words only will exclude those applicants onto particular roads, where the only

alternative access is onto National Primary, National Secondary, ordinary regional, and local roads.

Therefore I would suggest the words “Strategic Regional” be deleted from Objective TR037, paragraph (b) and replaced with the words “another public road” during the variation process.

Le gach dea guí

Patrick O'Donovan T.D.

Aire Stáit d'Oifig na nOibreacha Poiblí agus don Ghaeltacht
Minister of State for the Office of Public Works and the Gaeltacht

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