

Forward Planning,
Economic Development and Enterprise Directorate,
Limerick City and County Council,
Merchants Quay,
Limerick

Date: 29th May 2023

Dear Sir / Madam,

RE: SUBMISSION TO THE DRAFT ABBEYFEALE LOCAL AREA PLAN 2023-2029 IN RESPECT OF LANDS AT COLBERT TERRACE, ABBEYFEALE, COUNTY LIMERICK

1. Introduction & Zoning Request

We, Paul Stack, The Square, Abbeyfeale, Co. Limerick and Thomas & Helen Mann, Killarney Road, Abbeyfeale wish to make a submission in respect of the draft Abbeyfeale Local Area Plan 2023-2029 in respect of lands in our ownership (c. 3.25 hectares) at Colbert Terrace, Abbeyfeale, County Limerick. We welcome the opportunity to make a submission to the draft Abbeyfeale Local Area Plan 2023-2029 and wish to express the broad support for the key themes and objectives set out in the draft Plan.

We are in combined ownership of majority greenfield lands located to the north of Colbert Terrace and east of New Street R524, Abbeyfeale as shown below.



Figure 1.1: Approximate location of submission lands shown in red

The site is currently zoned for 'Mixed Use' under the provision of the Abbeyfeale Local Area Plan 2014-2020 with the intention to 'facilitate renewal of these areas, which are generally located on the edge of the town but which are on the main approach roads'.

The site forms part of the mixed use zoning to the north of town centre which the current LAP confirms 'has been retained in order to facilitate the development of large retailer(s)'.

The site is therefore recognised as possessing the potential to accommodate the future sequential development of the settlement in a sustainable manner adjacent to the town centre, having regard to its proximity to existing surrounding development and proximity to the town centre.

The draft Abbeyfeale Local Area Plan 2023-2029 proposes the rezoning of the lands to 'Agriculture' use with the objective 'to protect and improve rural amenity and provide for the development of agricultural uses'. This is not supported by our client. It is noted that the draft Plan identifies in excess of 41 hectares as agricultural use within the LAP boundary, equating to over 19% of the total area. This proposed zoning is directly contrary to the zoning objective to facilitate the future development of Abbeyfeale in a sustainable manner.

The lands under our ownership are located centrally within Abbeyfeale approximately 195 metres from the Main Street. The lands are sequentially located and infill in nature, with development existing on three sides and has the potential to facilitate a new connection to the River Allaughan from the town centre which is noted as an objective of the draft LAP. The site is currently underutilised, is well placed, serviced and can contribute to the sequential expansion of Abbeyfeale, supporting the '10 Minute' town concept as promoted by the Limerick Development Plan 2022-2028 and national policy which strongly advocate compact settlement form in a sequential manner.

On this basis it is respectfully requested the Zoning Map of the draft Abbeyfeale Local Area Plan be amended as indicated in figure 1.1 above and 4.1 below.

"Zone part of lands north of Colbert Terrace for 'Town Centre' use."

It is noted that there are no suitable and available sites of a sufficient size in closer proximity to the town centre which would facilitate future development. In addition, it is submitted that the smaller parcel of land for town centre zoning would provide an appropriate buffer to the River Allaughan to the north, while at the same time allowing for the sequential and sustainable development of the town. The justification for this proposed zoning is detailed further below.

2. Site Location & Context

The subject lands occupy an underutilised, greenfield site located in the northern part of Abbeyfeale town centre. An existing Tesco store and its associated car park is located immediately to the south, with school and education facilities to the east and existing residential dwellings fronting New Street and extended rear gardens bordering the site to the west.

The site is located c. 200 metres north of Main Street which includes a range of shops, services and facilities including a Spar, various cafes, coffee shops, independent retailers and takeaways as well as a pharmacy, pub, hair salons etc.

The lands border the River Allaughan to the north and greenfield lands to the east.

The approximate location of the subject site is shown above in Figure 1.1.

3. Draft Abbeyfeale Local Area Plan

Zoning

As noted above, the draft LAP proposes an 'Agriculture' use zoning objective for our client's lands at Colbert Terrace, with a small portion in the southern part zoned town centre. The indicative location of the site in the context of the draft LAP Zoning Objectives Map is shown below, outlined in black. No rationale or context in making this very significant change to the zoning objective is provided in the LAP.

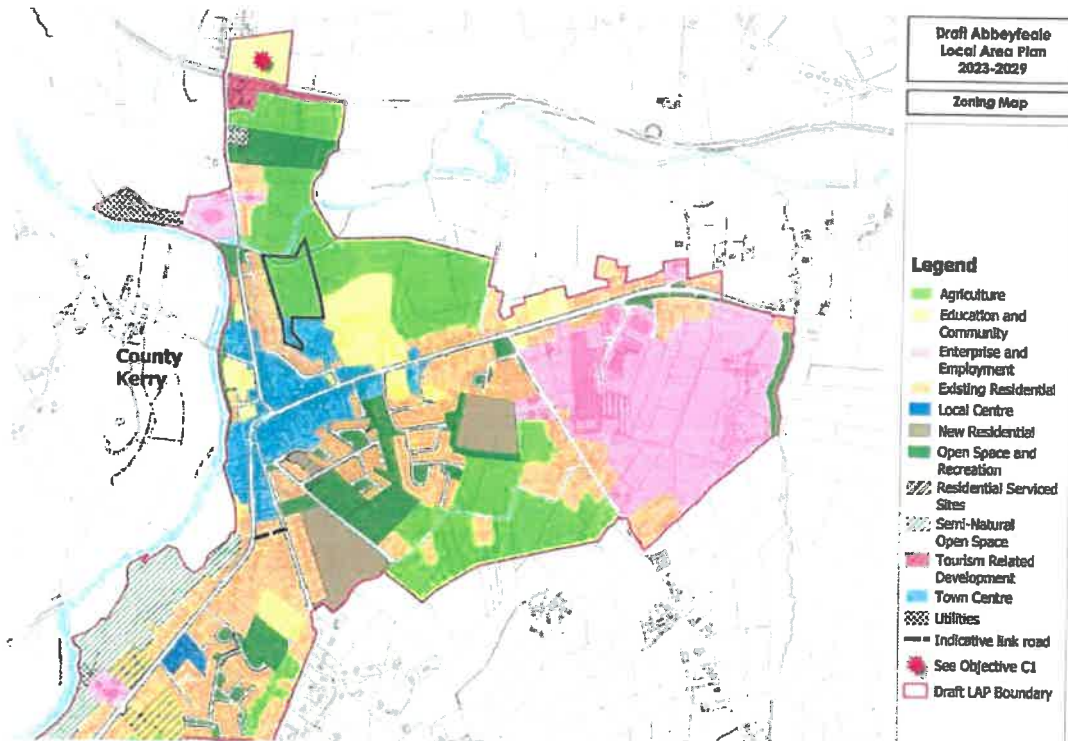


Figure 3.1: Approximate location of our lands shown in black (Draft Abbeyfeale LAP Zoning Map)

It is noted that the lands immediately adjacent to the south are zoned 'Town Centre' under the draft Plan. The southern part of the lands are located within the northern part of Abbeyfeale town centre and would be a logistical extension to the proposed town centre given proximity to the centre of the town and its amenities. The lands are suitably positioned to accommodate the future development of the settlement as underutilised infill lands which are adjoined by existing development on three sides. The site is the most sustainable and appropriate location to facilitate the future growth and expansion of the retail function of the town centre, located adjacent.

The site is serviced and can be considered Tier 1: Serviced Lands under Appendix 3 of the National Planning Framework. The NPF notes that this zoning 'comprises lands that are able to connect to existing development services, i.e. road and footpath access including public lighting, foul sewer drainage, surface water drainage and water supply, for which there is service capacity available, and can therefore accommodate new development. These lands will generally be positioned within the existing built-up footprint of a settlement or contiguous to existing developed lands'. The lands are within the footprint of the settlement and are 'spatially sequential' to the town centre of Abbeyfeale, consistent with the provisions of the NPF. The lands are adjoined by development on three sides and well placed to avail of existing development services such as roads and drainage infrastructure.

The proposed agriculture zoning in the draft LAP is directly contrary to the key provisions of national policy.

In this respect, the proposed rezoning of the site from 'Mixed Use' as currently identified under the extant Abbeyfeale LAP 2014-2020 (extended to 2024) to 'Agriculture' as proposed under the draft LAP is not considered appropriate in the context of the national planning framework and the promotion of sequentially placed and serviced lands within an existing settlement boundary. The location of the site in the context of the extant LAP zoning map is included below.

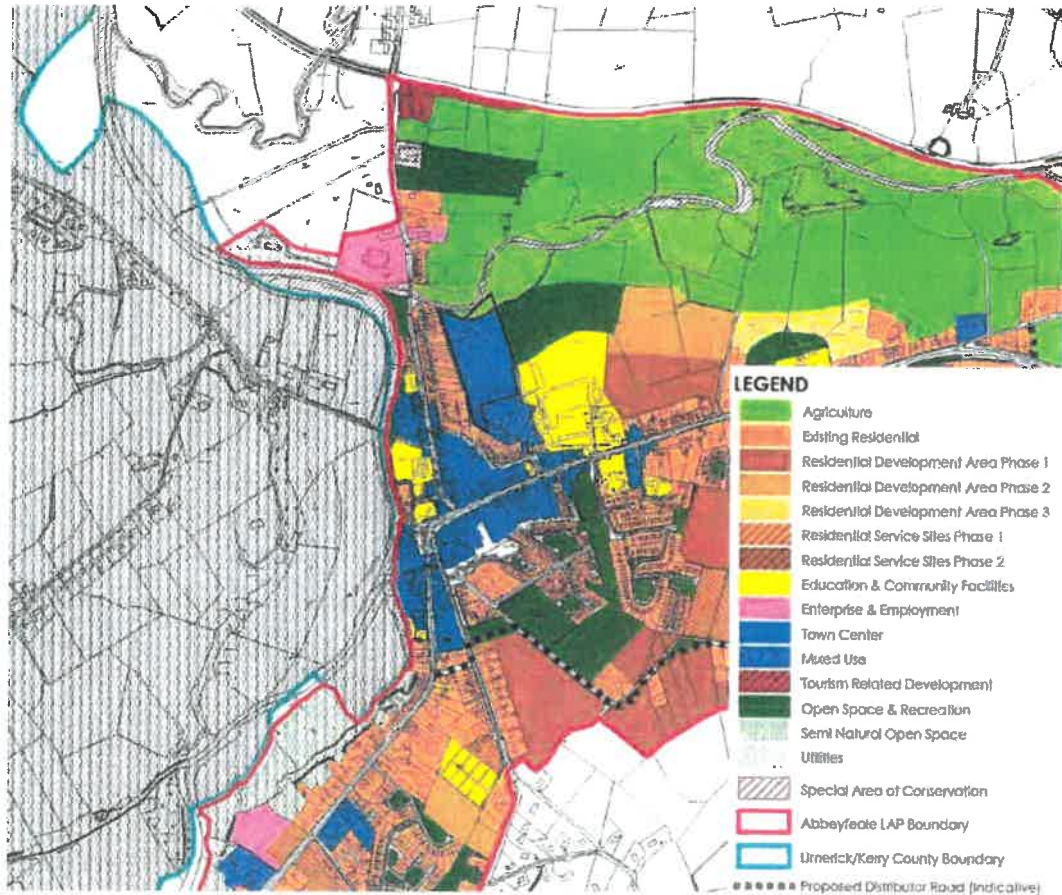


Figure 3.2: Approximate location of the subject site shown in black (Abbeyfeale LAP 2014-2020 Zoning Map)

The site's 'Mixed Use' zoning objective under the provision of the Abbeyfeale Local Area Plan 2014-2020 seeks to *'facilitate renewal of these areas, which are generally located on the edge of the town but which are on the main approach roads'*.

The significant change to the zoning of the lands will result in the zoning objective of the 2014 not being realised.

Development proposals have been invited in relation to the subject lands and the proposed change of zoning to agricultural use would entirely undermine this progress, which had been undertaken in good faith based on the objective of the extant LAP. Such inconsistency in the statutory plan however should be avoided as it undermines investment confidence.

The site forms part of the mixed use zoning to the north of town centre which the current LAP confirms *'has been retained in order to facilitate the development of large retailer(s)'*. The site is therefore recognised as possessing the potential to accommodate the future development of the settlement in a sustainable manner having regard to its proximity to existing surrounding development and proximity to the town centre.

The Retail Planning Guidelines 2012 set out policies and objectives to ensure that retail development is plan-led, to promote city and town centre vitality and promote *'the sequential approach to development'* as well as enabling *'good quality development in appropriate locations, facilitate modal shift and to deliver quality design outcomes'*. The subject site is sequentially placed to enable good quality development in an appropriate location which is an extension to the town centre and will encourage modal shift due to being at an accessible position in the context of Abbeyfeale.

The subject site can also facilitate a connection from the town centre to the River Allaughan which is an objective of the draft LAP.

Town Centre First Approach and the '10 minute' Town Concept

It is noted that Section 4.2 of the draft LAP promotes the Government's 'Town Centre First' approach *'with a focus on creating a thriving town centre with a strong service and social function'* which is based on the principle of the '10 Minute' town concept and promotes *'infill development'*, amongst others.

The draft LAP *'seeks to consolidate the town rather than encourage sprawl'* and supports investment in high quality pedestrian and cycle networks. Figure 4.2 of the draft Plan demonstrates 10-minute walking and cycling network from Abbeyfeale town centre as shown below with the subject site identified.

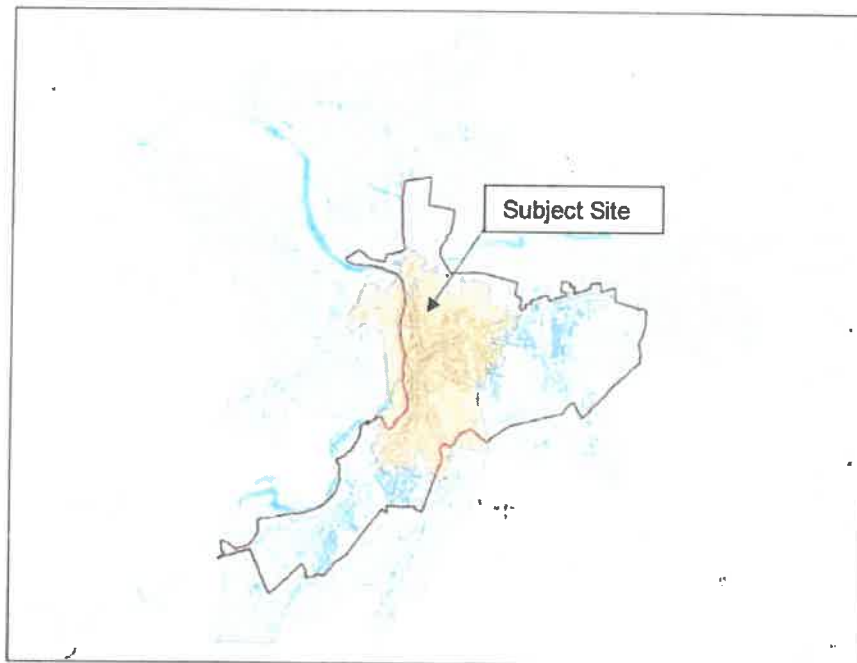


Figure 3.3: 10-minute walking and cycling network from Abbeyfeale town (Draft Abbeyfeale LAP Figure 4.2)

It is noted that the subject site is comfortably within a 10 minute walking distance of Abbeyfeale town centre and is therefore suitable for zoning for town centre use. The content

of draft **Policy TCF P2: Town Centre First and '10 Minute' Town Concept** is noted as follows:

'a) Implement the 10 Minute Town Concept in Abbeyfeale ensuring that future development including residential, community and educational facilities, employment centres are within a 10-minute walk or cycle from the town centre and/or accessible by public transport services connecting to settlements, including Limerick City, North Kerry, West Limerick and North Cork.

b) Prioritise the town centre as the most appropriate location for future development of the town. Planning applications for future development will be assessment as per the zoning objectives of this Plan and considered sequentially in relation to the town centre zoning.'

The subject site is considered suitable for development zoning due to its proximity to the town centre. It is submitted that the proposed agriculture use zoning at the site directly conflicts with Part A of Policy TCF P2 which does not suggest such uses should be located within a 10 minute walk or cycle from the town centre. Adopting an agricultural use on the lands would constitute underdevelopment contrary to the principles of the NPF which seeks to promote compact growth within the boundaries of existing settlements.

To this end, in June 2022 a strip of land (Corridor) along the western boundary running the entire property north to south, was made available to Limerick County Council to provide a cycle and pedestrian link between the town centre and Greenway.

Furthermore, the site is sequential to the town centre zoning consistent with Part B of Policy TCF P2 and is therefore an appropriate location for future development of the town. As an infill site it is considered appropriate for development which can assist with the sustainable development of the town.

Retail

It is noted that the extant Abbeyfeale LAP 2014-2020 (as extended) zones the majority of the site for 'Mixed Use'. The land use matrix of the LAP notes "*Supermarket > 900sqm*" as "*Open for Consideration*" in the zone. There are no specific objectives or policies relating to the subject site or surrounding area.

The site forms part of the mixed use zoning to the north of town centre which the current LAP confirms *'has been retained in order to facilitate the development of large retailer(s)'*. The site is therefore recognised as possessing the potential to accommodate the future development of the settlement in a sustainable manner having regard to its proximity to existing surrounding development and proximity to the town centre.

The draft LAP notes that the Retail Strategy for Limerick Shannon Metropolitan Area and County Limerick 2022 – 2028 designates Abbeyfeale as a Tier 3, Level 1 Service Town. Policy ED 14 Town Centres in the Limerick Development Plan states that for Abbeyfeale as a Tier 3 Level 1 Town, it is the policy of the Council to: *'a) Support the improvement of retail facilities so as to improve the service they provide to their local catchment population; b) Encourage the provision of tourism and visitor orientated retail provision to capitalise on the inherent potential in this centre'*.

As identified in the extant LAP, the southern part of the subject site can assist in achieving the policy objectives of the Limerick Development Plan 2022-2028 by supporting the improvement of retail facilities to improve the service provided to local catchment populations and encourage visitor orientated retail provision. In this respect, the inclusion of the southern part of the site as a 'Town Centre' zoning is considered appropriate to assist

in achieving the aims of the development plan as well as being consistent with the draft LAP **Policy RL 3: Retail Strategic Policy** – *‘To support the sustainable long-term retail growth of Abbeyfeale as a Tier 3 Level 1 Small Town, in accordance with the Limerick Development Plan and the Retail Strategy for the Limerick Shannon Metropolitan Area and County Limerick 2022 – 2028’.*

In addition, **Objectives RL 01: Retail Development** of the draft LAP seeks to *‘Enhance the vitality and viability of Abbeyfeale as a retail service centre and to improve the quantity and quality of retail provision in the town by:*

- a) *Emphasising the town centre as the primary shopping location.*
- b) *Encouraging the upgrade and expansion of existing retail units and the development of new units in the town centre.*
- c) *Ensuring that proposals with retail development elements comply with the provision of the Retail Strategy for the Limerick Shannon Metropolitan Area and County Limerick 2022 – 2028 in relation to site suitability and the sequential approach and ensure proposals which would undermine the vitality and viability of Abbeyfeale town centre will not be permitted...’*

The site has the potential to accommodate new retail provision at a central location within Abbeyfeale which is sequentially preferable in accordance with the Retail Planning Guidelines 2012 and as identified in the extant LAP to potentially accommodate ‘larger retailer(s)’. A retail development at the infill site would along be consistent with draft LAP **Objective ED 01: Enterprise and Employment Objectives:** to *‘a) Encourage the reuse and redevelopment of appropriately zoned vacant units, brownfield, derelict and infill sites for employment creation, subject to normal planning and environmental criteria’.*

Special Area of Conservation

It is recognised that the draft LAP seeks to protect the ecological integrity of the River Allaughan by retaining a buffer zone between the watercourse and any future development on nearby lands. The role of lands zoned agriculture in achieving this is also acknowledged.

We are supportive of **Objective CH 03: Special Area of Conservation** which requires *‘the protection of a 20m riparian buffer zone on greenfield sites free from development’.*

Having regard to the SAC which includes part of our lands in the northern perimeter, it is considered appropriate that this section remains zoned ‘Agriculture’ in the adopted version of the Abbeyfeale LAP 2023-2029.

In addition, it is noted that the southern portion of the lands are located outside the Flood Risk zone areas A and B identified in the LAP and the SSFRA prepared by JBA, included with the Draft LAP reports.

4. Conclusions

We make this submission broadly in response to the draft Abbeyfeale Local Area Plan 2023-2029. We seek an amendment to the Zoning Map to include the southern part of our lands for ‘Town Centre’ use, contiguous with the adjoining site to the south currently occupied by Tesco; consistent with the zoning objective in the 2014 Local Area Plan.

No justification or rationale has been set out in the Draft LAP for the proposed agricultural use. This proposed zoning is directly contrary to the zoning objective to facilitate the future development of Abbeyfeale in a sustainable sequential manner.

It is further submitted that town centre related development would complement the existing pattern of development within the immediate vicinity of the site and help to draw trade to Abbeyfeale town centre by attracting additional shoppers to the town and increase the variety and choice of convenience retail available, enhancing the role and function of the town centre as a whole.

Recommendation to adopted Abbeyfeale LAP

On the basis of the above, we respectfully request the following amendment to the Zoning Map of the draft LAP:

“Zone part of lands north of Colbert Terrace for ‘Town Centre’ use.”

The extent of the proposed amendment is shown below, with the southern part of the lands shaded blue consistent with the ‘Town Centre’ zoning adjoining to the south. This would help ensure that the LAP will confirm with the key principles of national, regional and local policies on sequential zoned development and achieving a compact form of settlement.

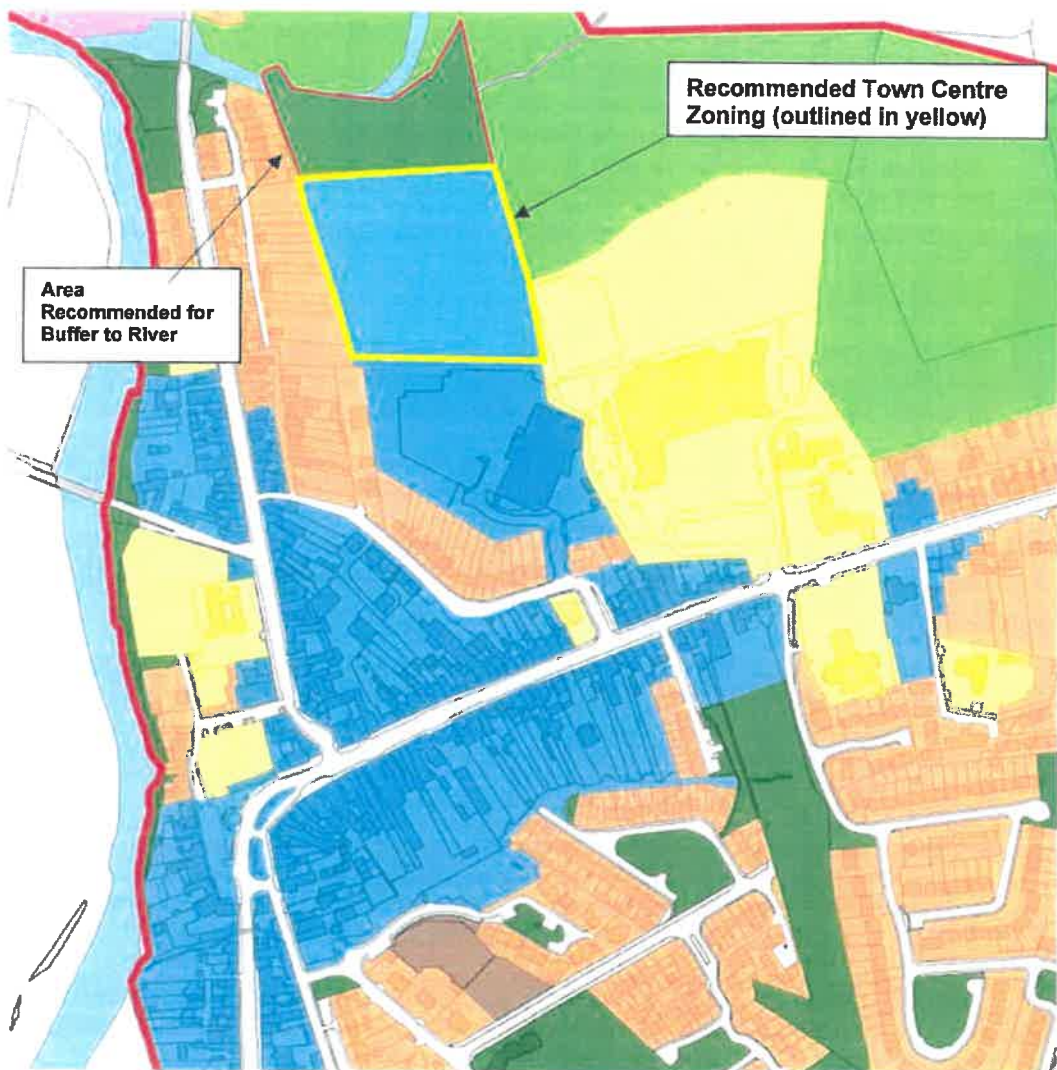


Figure 4.1: Proposed amendment to draft LAP Zoning Map

We are satisfied that the northern part of land under our ownership maintain an 'Agriculture' zoning to provide an appropriate buffer and protect the Special Area of Conservation around the River Allaughan to the north.

Our client respectfully requests that the Planning Authority amends the zoning of the subject lands from agriculture to town centre within the adopted version of the Abbeyfeale LAP 2023-2029 to help facilitate the proper and sustainable development of the site and the appropriate growth of the settlement.

Yours faithfully,

Paul Stack and Thomas & Helen Mann