

24th August 2026

Forward Planning- Planning,
Heritage and Ryder Cup Directorate,
Limerick City and County Council,
Merchants Quay,
Limerick,
Dublin 24,
D24 A3XC.

**Re: Proposed Material Alterations to Proposed Variation No. 3 of the Limerick
Development Plan 2022-2028 (as varied)**

A chara,

Thank you for your authority's work in preparing the Material Alterations (material alterations) to the proposed Variation No. 3 (proposed Variation) of the Limerick Development Plan 2022-2028 (Development Plan).

As Limerick City and County Council (Planning Authority) is aware, a key function of the Office of the Planning Regulator (Office) is to evaluate and assess statutory plans to ensure consistency with legislative requirements and national and regional planning policy. The Office has evaluation and assessment pursuant to Part 3 of the Planning and Development Act 2024 (Act) and its functions under section 546, and this submission sets out the outcome.

In this context, submissions may include recommendations and observations. Recommendations arise where the Office identifies clear inconsistencies with legislative provisions or policy frameworks and are intended to be addressed to ensure compliance. Observations highlight areas where further clarification, justification, or refinement would strengthen the plan. The submission may also include advice to support the proper planning and sustainable development of the area.

Following the adoption of the Variation, the Office will carry out a further assessment under section 63 of the Act.

1. Response to the Office's submission on the proposed Variation

The Office welcomes and commends the significant work undertaken by the Planning Authority to address the recommendations and observations raised in its submission at draft stage. In particular, the proposed material alterations have substantially strengthened the Variation's approach to transport planning, flood risk management, and the delivery of compact growth through a coordinated, plan-led framework.

In relation to transport and infrastructure provision, the Office acknowledges the response to Recommendation 1 regarding the Rosbrien lands, where Objective RN 01 has been amended through proposed MA 4 (Volume 1) to require that the Rosbrien Masterplan be informed by an Area Based Transport Assessment prepared in consultation with the Planning Authority and relevant stakeholders, including the National Transport Authority and Iarnród Éireann.

While the lands are not currently served by existing or proposed public transport infrastructure, their strategic location within the built-up area of Limerick City and Suburbs, adjacent to Dooradoyle, presents a significant opportunity for the sequential consolidation and growth of the city. The Office supports the proposed plan-led approach and welcomes the strengthened requirements for stakeholder engagement and transport assessment, together with the inclusion of Objective TF O1 under MA 5 (Volume 1), which provides for pedestrian and cycle connectivity through the Rosbrien area and across the railway line to Dooradoyle.

In relation to flood risk management, the Office welcomes the positive response to Recommendation 2 and the inclusion of additional text within Objective CAF O21 at MA 7 (Volume 1), incorporating key findings of the Strategic Flood Risk Assessment (SFRA) relating to both current and future flood risk.

The Office particularly commends the review of the Plan Making Justification Test (Justification Test) and the consequent rezoning of site Z9 from New Residential to Open Space and Recreation (MA 3, Volume 2(a)) and site U8 from Community and Education to Open Space and Recreation (MA 2, Volume 2(a)), thereby avoiding

vulnerable development within identified flood zones. The Office has, however, identified a small number of opportunities to provide further clarification and to update the SFRA, as set out in MA Observation 1 below.

The Office also welcomes the Planning Authority's review of the core strategy and the inclusion of additional information on low, medium and high-density residential yields across the settlements. The Office further welcomes the amendments to Objective CA O1 for the Crossagalla Masterplan (MA 3, Volume 1), which support a coordinated, plan-led approach with stakeholder engagement, together with the additional clarification provided under Policy TB2 regarding appropriate locations for tall buildings (MA 1, Volume 6).

2. Overview of submission on proposed material alterations

As set out above, the Office welcomes the proposed material alterations which positively respond to the recommendations made in its submission at draft stage.

The Office's assessment of the proposed Variation at material alterations stage concludes that one observation is warranted.

The following observation as set out below is intended to support the Planning Authority in finalising the proposed Variation and ensuring its effective implementation:

Subject	Recommendation	Observation
Flood risk management	-	MA Observation 1

3. Flood risk management

The Office notes the additional Justification Tests included at MA 1 of the SFRA Addendum Report by way of response to Recommendation 2. The Office also welcomes MA 3 (Volume 2(a)), which proposes rezoning site Z9 from New Residential to Open Space and Recreation.

While no zoning changes are proposed for sites Z10 or Z11, new paragraphs (f) and (g) under Objective CAF O21 are proposed to address flood risk mitigation measures. Although these additions are welcomed, the Office considers that, in the

interests of clarity and transparency, the Planning Authority should clearly cross-reference sites Z10 and Z11 on the land use zoning map to paragraphs (f) and (g) of Objective CAF O21.

The Office notes the Planning Authority's response regarding unmapped watercourses, including the rezoning of a small portion of site Z17 (Ballysimon/Towlerton) from New Residential to Open Space and Recreation (MA 5, volume 2(a)) to address identified flood risk. The Office also notes and welcomes the review of the two remaining sites raised in Recommendation 2, namely Z23 (Rosbrien) and U24 (Newtown), which clarified that no watercourses currently exist on these zonings, and that no further action is required in relation to these sites. To ensure the evidence base is fully reflected, the Office advises updating the SFRA to include the findings of this review.

The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) recommend that SFRAs provide guidance on the likely applicability of different Sustainable urban Drainage Systems (SuDs) techniques for managing surface water run off at key development sites and identify area provision of SuDs and green infrastructure where appropriate. Given that the proposed Variation includes a number of large residential zonings, the Office advises that the Planning Authority should review opportunities for integrated, area-based SuDS provision to support sustainable surface water management.

MA Observation 1 - Flood Risk Management

Having regard to flood risk management, and having considered the following:

- NPO 77 of the NPF to integrate sustainable water management solutions and nature-based solutions;
- RPO 116 of the RSES; and
- The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009),

the Planning Authority is advised to:

- (i) clearly cross-reference both sites Z10 and Z11 on the land use zoning map with paragraphs (f) and (g) of Objective CAF O21;
- (ii) update the Strategic Flood Risk Assessment to reflect the findings of the review of unmapped watercourses relating to sites Z23 Rosbrien and U24 Newtown, Castletroy; and
- (iii) update the Strategic Flood Risk Assessment to incorporate an integrated and area-based provision of Sustainable urban Drainage Systems and green infrastructure related to the proposed rezoned lands where appropriate, in order to avoid reliance on individual site-by-site solutions.

4. Summary

The Office requests that the Planning Authority addresses the observation set out above.

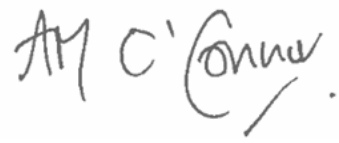
As part of this process, the Chief Executive's report to the elected members, prepared under section 58(15) of the Act should summarise the Office's recommendations and outline how it is proposed to address them.

Following adoption of the Variation, the Planning Authority is required to:

- provide the Office with a copy of the adopted Variation, together with any submissions received from the Minister, regional assemblies, and the National Transport Authority during the plan preparation process, within **one week** of the adoption;
- inform the Office, **as soon as practicable**, where elected members decide not to comply with a recommendation of the Office or the Minister, including the reasons of the elected members for this decision; and
- publish notice of the Variation within **one week** of adoption, confirming that the Development Plan as varied will be available for inspection (online and at a specified location) no later than **five weeks** after adoption.

The Office looks forward to continued constructive engagement with the Planning Authority. If further clarification or discussion would be helpful, the Office would be pleased to assist and can be contacted at plans@opr.ie.

Is mise le meas,

A handwritten signature in dark ink, appearing to read 'AM O'Connor' with a flourish at the end.

Anne Marie O'Connor

Deputy Regulator and Director of Planning Policy Implementation

Designated Public Official under the Regulation of Lobbying Act 2015
