



30th September 2019

Forward/Strategic Planning Section,
Economic Development Directorate,
Limerick City & County Council,
Merchants Quay,
Co. Limerick

RE: Draft Croom Local Area Plan 2019-25

A Chara

Thank you for your authority's work in preparing the local area plan for Croom.

The Office of the Planning Regulator has assessed the draft Local Area Plan (LAP) above under the relevant provisions of the Planning and Development (Amendment) Act 2018 and under which the Office of the Planning Regulator (OPR) was established on 3rd April last.

As your authority will be aware, one of the key functions of the OPR includes assessment of statutory plans and strategies to ensure consistency with legislative and policy requirements relating to planning.

1. Consistency with the Hierarchy of Statutory Plans

The Office notes that the proposed LAP was prepared prior to the making of the Regional Spatial and Economic Strategy (RSES) for the Southern Regional Assembly, which will further develop and apply the policies of the National Planning Framework (NPF) at regional level. Once adopted, the RSES for the Southern Regional Assembly area will provide strategic direction for the formulation of the subsequent Limerick City and County Development Plan and a further context for alignment of plans at national, regional and local level.

The Office acknowledges the Strategic Policy position as set out in Section 3.4 of the Draft Croom LAP 2019-25, and the objective to review the LAP following the publication of the regional and county statutory plans as set out in policy objectives S1 and S2. The Office welcomes these policy objectives. Once the city and county development plan review has been completed, the Office wishes to further engage with your authority in relation to the development of a timetabled program of reviews of relevant local area plans in the light of the new development plan.

2. Residential Development Land Zonings

Section 3.7 of the Draft Croom LAP details the population and zoning requirements and the assumptions. The Draft LAP estimates that the population of Croom will increase from 1,157 in 2016 by an additional 439 persons in 2026. This amounts to a population increase of 38% within a 6 to 7 year timeframe and based on average household sizes would require 176 additional housing units. The Implementation Roadmap for the NPF (2018) indicates a maximum headroom not exceeding 25%. This would provide for a total population increase of 549 persons and an increase in population of 47% over and above the 2016 level. The anticipated required housing is 220 units. Table 6, Chapter 3 of the Draft Croom LAP indicates a housing vacancy of 15 residential units which would therefore suggest overall housing requirement of 205 units.

Appendix 4 of the draft Croom LAP sets out a 'Serviced Lands Matrix and Map' which provides commentary on the infrastructure provision for undeveloped residential land. The total area of undeveloped serviced residential land is 14.28ha and density recommendations as set out in Chapter 6 of the Sustainable Residential Developments in Urban Areas, Guidelines for Planning Authorities (2009) is 15 – 20 dwellings per hectare for sites situated on the 'edge of small town / villages'. The sites identified no. 1 to no. 8 in the 'residential and service sites infrastructure assessment' having regard to densities recommended in the S. 28 guidelines, would have the potential to deliver approximately 250 housing units. This housing provision would accommodate an increase of 625 persons on average. An additional 625 persons in Croom would amount to a population increase of 54% from the 2016 census figure.

The planning authority has made assumptions on this target population growth in advance of the relevant RSES and City and County Development Plan being completed for the Limerick City and County. In addition, National Policy Objective (NPO) 37 of the NPF calls for the preparation of a Housing Need Demand Assessment (HNDA) to be undertaken for each local authority area in order to correlate and accurately align future housing requirements.

An oversupply of residentially zoned lands and their development outside the Limerick City area could potentially erode the compact growth model.

It is considered that the proposed residential zonings in the LAP may likely exceed the quantum of lands deemed appropriate in the context of the future adoption of the RSES and the subsequent CDP including its core strategy. Accepting the interim nature of this local area plan review, a phasing schedule should be applied. Accordingly, the Office recommends;

Recommendation 1: The Office recommends that your authority includes a phasing schedule for residentially zoned lands. The phasing must ensure that an appropriate level of new housing development is provided during the interim period pending future review of the Croom LAP (in accordance with Recommendation 1 above), which would appear to be an increase of 200 housing units over the initial phasing period.

3. Proposed Road Infrastructure

This Office notes a proposed distributor road, approximately 500m in length, located to the north and travelling through land zoned for 'agriculture'. The proposed road travels through lands that are subject to flooding. The function of this road and the proposed funding mechanisms as well as the delivery timescale are unclear, bearing in mind the nature of the surrounding land-use zoning objective. The Local Area Plans, Guidelines for Planning Authorities (2013) highlight the critical need to identify infrastructural delivery phasing and funding mechanisms where a significant new development is proposed in an LAP.

The transport rationale, funding mechanisms and planned timescale for the delivery of this new road infrastructure have therefore not been sufficiently set out in the LAP.

Recommendation 2: The Office recommends that the planning rationale for this substantial distributor road infrastructure is provided and a timescale for the anticipated delivery and funding mechanisms are clarified or that the inclusion of the objective be re-considered.

4. Education & Community Facilities - Land Zonings

There is significant land zoned 'Education and Community Facilities' located to the north and to the north east of a flood zone area. The draft plan is unclear in its rationale and basis for the significant extent of these zoned lands given the extent of other lands zoned for 'Education & Community Facilities' (both developed and undeveloped) which are centrally provided within Croom under the Draft LAP. The Development Plans, Guidelines for Planning Authorities (2007) and the Local Area Plans, Guidelines for Planning Authorities (2013) encourage sequential development requiring that undeveloped lands closest to the core are given preference, while also requiring a clear evidence base supporting the need for the specific zoning. The zoning of these lands would appear to be contrary to these requirements and excessive given the scale of development provided for in the Draft LAP for Croom.

Recommendation 3: The Office recommends that your authority reviews and examines the proposed zoning of lands 'Education & Community Facilities' at the northern periphery of Croom and provide a robust planning rationale for the need to zone these lands for such a purpose.

Summary

The Office requests that your authority addresses the three specific recommendations outlined above, which are made in the context of the provisions of Section 31AO(3)(a), in order to ensure that the LAP is consistent with relevant national policy obligations, guidelines and legislative requirements.

The report of the Chief Executive of your authority prepared for the elected members under Section 20 of the Act must summarise these recommendations and the manner in which they should be addressed.

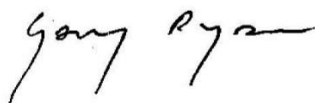
Your authority is required to notify this Office within 5 working days of the making of the local area plan and send a copy of the written statement and maps as made.

Where the planning authority decides not to comply with a recommendation of the Office, or otherwise makes the plan in such a manner as to be inconsistent with any recommendations made by the Office, then the Chief Executive shall inform the Office and give reasons for the decision of the planning authority.

Such notice requirements enable the Office to consider the matters further as regards the making of any recommendations to the Minister in relation to the provisions of Sections 31AO and 31AP of the Act.

Please feel free to contact the staff of the OPR in the context of your authority's responses to the above, which we would be happy to facilitate. Contact can be initiated through the undersigned or at plans@opr.ie.

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