



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

18th May 2026

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

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

A chara,

Thank you for your authority's work on preparing the Proposed Variation No. 3 (proposed Variation) to 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 the assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning. The Office has evaluated and assessed the proposed Variation pursuant to Part 3 of the Planning and Development Act 2024 (Act) and its functions under section 546 and this submission has been prepared accordingly.

Recommendations issued by the Office further to section 58(9) of the Act relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government. As such, planning authorities are requested to implement or address any recommendations made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

Observations issued by the Office pursuant to section 546 of the Act may take the form of a request for further information or justification on a particular matter, or clarification regarding particular provisions of a plan on issues that are considered necessary to ensure alignment with policy and legislative provisions. Planning authorities are requested by the Office to action an observation.

A submission can also include advice on matters that the Office considers would contribute positively to the proper planning and sustainable development of the area. Planning authorities are requested by the Office to give full consideration to the advice contained in a submission.

On adoption of the Variation, the Office will assess it in accordance with the statutory framework in section 63 of the Act.

Overview

Zoning in proposed Variation relates to lands within the settlement boundary of Limerick City and Suburbs including Annacotty and Mungret only. The Office notes that the Planning Authority proposes to progress further variations concentrating on accelerating housing in zoned settlements across the county as appropriate.

The proposed Variation includes changes to the Development Plan, primarily with regard to the implementation of the housing growth requirements where the following changes are proposed:

- rezoning of land and new/ amended objectives to facilitate the activation of zoned lands for residential use;
- updates to the core strategy table; and
- updates to the Settlement Capacity Audit (SCA).

In addition, a number of other changes also form part of the proposed Variation and include the following;

- amendments to land use zoning to reflect developments that have occurred since the adoption of the Development Plan;
- identification of lands for strategic planned projects;
- updates to the density ranges and the development management standards;
- updates to the Building Height Strategy; and
- an updated Housing Strategy and Housing Need Demand Assessment.

The Office notes and welcomes the significant work undertaken by Planning Authority as part of proposed Variation as outlined above.

The variation proposes a number of sites at increased densities in sustainable locations that can directly benefit from investment in existing and proposed social and physical infrastructure and reduce travel and energy demands. This approach is welcomed and is consistent with national policy for compact growth and the coordination of housing and infrastructure.

The identification of Moyross as a key Regeneration Opportunity Area in Objective M O1, supported by a number of compatible land use zonings (Amendments Z5, Z6, Z7, Z8, Z9 and Z32), is also strongly welcomed. The recently approved Moyross train station marks an important milestone and will play a central role in the overall success of the areas' regeneration. Increasing density around the train station will further maximise the benefits of this significant public investment in the rail infrastructure.

The new train station, combined with the planned 15-minute frequency BusConnects service along Moyross Avenue will support the development of a compact, walkable, and vibrant mixed-use urban neighbourhood. In particular, stronger north-south connections through Moyross will help to reconnect the area to key destinations, including the Technological University of the Shannon, Thomond Park, the Cratloe Road and the wider city.

Key to the success of any community is the provision of a range of community facilities. In this regard the Office notes and welcomes that through this proposed Variation, land use zonings are proposed to support the delivery of high quality playing pitches at Kincora and Carew Park (Objective KC O1), to support a local centre in Mungret (Amendment Z30) along with written objectives to support educational and sports facilities with respect to the Kilmallock Road Campus (Objective OK O1), and to recognise the importance of delivering residential development in tandem with the timely provision of supporting social, community and physical infrastructure at Crossagalla (Objective CA O1).

In relation to the proposal to rezone lands at Rosbrien, the Office recommends adopting a more plan-led approach for the wider area. This would help ensure that complex infrastructure constraints are fully addressed, thereby supporting the delivery of housing and the development of a sustainable, well-connected community.

A number of issues are also raised in relation to flood risk management which should be addressed in full prior to the adoption of the variation.

The submission below has been prepared to provide a strategic level input to your authority in finalising the proposed Variation. It is within this context the submission below sets out three (3) recommendations and four (4) observations under the following key themes:

Key theme	Recommendation	Observation
Implementation of the housing growth requirements	Recommendation 1	Observation 1
Masterplans	-	Observation 2
Tall buildings	-	Observation 3
Flood risk management	Recommendation 2	Observation 4

1. Implementation of the housing growth requirements

The Office notes that in accordance with National Policy Objective (NPO) 4 and NPO 16 of the National Planning Framework First Revision (2025) (NPF), there is an onus on Planning Authority to target population growth to Limerick and its suburbs. The proposed Variation has therefore been prepared to 2030 in this context.

Having regard to the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Guidelines), the Office welcomes the proposal by the Planning Authority to zone lands for residential development (either in whole or in part) in Limerick City and Suburbs, Mungret and Annacotty.

Following the adoption of this variation, the Office considers that Limerick will be strongly positioned to meet its housing growth requirements to 2030 under the Housing Growth Guidelines, while also establishing a robust pipeline of residential development for the years ahead.

The Office notes that further variations will be progressed that will concentrate on accelerating housing in settlements across the county in due course that would further add to the overall housing supply in Limerick City and County.

Within this context, and taking account of the significant and welcome proposals for additional residential zoning, there are a limited number of sites that the Office has identified where the proposed approach to zoning requires further consideration to ensure that the full opportunities for plan-led development can be realised, and to avoid zoning land in peripheral and non-sequential locations without a clear rationale for doing so.

Lands at Rosbrien

A significant opportunity for a plan-led and co-ordinated approach to development is presented at Rosbrien (Amendment Z23) that could create active travel linkages with nearby existing retail, residential and community facilities.

The Office notes that the Limerick Shannon Metropolitan Area Transport Strategy 2040 recognises the disused Irish Cement railway running to the west of Rosbrien (from Mungret) as a possible transport route in the future.

Having regard to the above therefore, the Office considers that a framework plan should be prepared for the whole of the Rosbrien area (to the south of the N18 and to the west of the M20 to coordinate and guide the development of these lands, with particular emphasis on sustainable transport linkages and ensuring that full consideration is given to the railway line in terms of the design and layout of new development schemes. This framework plan could be advanced as a future variation to the Development Plan, or as part of the forthcoming development plan review. This approach would facilitate the engagement of all key stakeholders including Iarnród Éireann in relation to the railway corridor, the National Transport Authority (NTA) in relation to public transport connections to directly serve the site, Transport Infrastructure Ireland with respect to potential ingress/ egress in proximity to a motorway junction, the Office of Public Works with respect to potential flooding in the Rosbrien area and Uisce Éireann with respect to the servicing of the lands.

Lands at Rosbrien are proposed to be rezoned from Data Centre/ Agriculture to New Residential. The subject lands are not currently served by public transport. A new BusConnects network schedule has been published which is proposed to be delivered on a phased approach from 2027 however the subject lands at Rosbrien are not included in this network schedule. The nearest bus stop is noted as being at the Crescent Shopping Centre in Dooradoyle which would require pedestrians to walk/cycle along Rosbrien Road which is

neither served by footpaths or cycle infrastructure and is located c. 3km from the furthest part of the Rosbrien lands.

Furthermore, the subject lands do not score highly in the SCA which identifies that public transport and schools are located within a 1.5km - 3km walk (noting the above comments in relation to the nearest public transport node) and investment would be required with respect to wastewater facilities, surface water, footpaths and lighting. The SCA identifies road access as being available however the Office notes that while the Rosbrien Road, bounding the subject lands to the west is of double carriageway in width, the minor Rosbrien Road that runs through the site in a north-west/ south-east direction is of single carriageway width. The Office notes however that Objective RN 01 (d) states that a 'Transport and Traffic Assessment shall be undertaken to assess the impact of the proposed development...including the delivery by the developer of a continuous footpath along the full Rosbrien Road site frontage'.

The Office would question therefore the appropriateness of the Rosbrien lands for new residential development at this time where zoning for a Data Centre previously existed. Data Centres by their nature would generate lower volumes of traffic compared to New Residential development which, in the case of the Amendment Z23 lands (which comprise only a part of the Rosbrien lands south of the N18 and west of the M20) could generate between 600 units (low density) and 857 units (high density) or 1,700 cars at a rate of 2 cars per unit. The rationale for residential development at Rosbrien at this time has not been provided.

Recommendation 1 - Rosbrien

Having regard to the co-ordination of housing delivery, infrastructure and services, and having considered:

- NPO 17, 26, and 43 of the NPF for provide for balanced, proportionate and sustainable growth, regeneration and renewal, and the alignment of investment in infrastructure, employment and supporting amenities and services;
- NPO 101, 102 and 103 of the NPF to consider the serviceability of land zoned for development; and

- RPO 35c of the RSES to deliver new homes through evidence based planning;

the Office recommends that the Planning Authority:

- (i) makes the proposed Variation No. 3 to the Limerick Development Plan 2022-2028 without Rosbrien (Amendment Z23), pending the preparation of a framework plan for the wider lands at Rosbrien - encompassing the lands between the N18 to the north, M20 to the east, and the railway line to the west - to fully realise the potential of these strategically located lands and to coordinate the delivery of housing and associated infrastructure, services and amenities; and
- (ii) prepares a local transport framework (taking account of the Area Based Transport Assessment methodology) to inform the framework plan, and should include the following:
 - a) appropriate provision of sustainable transport options to serve future residents in consultation with the National Transport Authority (NTA) along with a clear timeline for the delivery of same;
 - b) pedestrian and cycle linkages through the lands and also in a westerly direction over the railway line towards Dooradoyle to avail of supporting retail and other community facilities; and
 - c) consideration of the potential for the future reuse of the railway corridor to the west and any impact this may have on lands at Rosbrien.

The Planning Authority should engage with key stakeholders including Iarnród Éireann, the NTA, Transport Infrastructure Ireland, the Office of Public Works and Uisce Éireann as part of the preparation of any framework plan for Rosbrien.

Observation 1 - Settlement Hierarchy

Having regard to the city status of Limerick and the likelihood that higher densities will be achievable on serviced, well located lands within the built up area boundary, the Planning Authority is advised to include data on expected housing yields from the highest densities related to table 2.6 Settlement Hierarchy, and Household Growth up to December 2030 plus zoned land provision.

2. Masterplans

Crossagalla is located to the southeast of Limerick with the railway line forming the northern boundary of the site and the R512 bounding the site to the southwest. The M7 Motorway is located in proximity to the southeastern boundary of the subject lands. Objective CA O1 requires the preparation of a single, integrated Masterplan for Crossagalla which

shall be prepared by suitably qualified professionals and shall be subject to consultation with, and agreement by, the Planning Authority prior to the submission of any planning application.

Part (e) of Objective CA O1 in this regard states that ‘the development shall deliver a coordinated, developer-led road network linking the R512 and the Old Ballysimon Road’. The Office notes however that this new route would require the crossing of the rail line. The Office therefore considers that appropriate consultation should take place with both Iarnród Éireann and the NTA before any Masterplan is agreed for Crossagalla.

Observation 2 - Crossagalla

Having regard to the need to properly integrate housing with the necessary supporting physical infrastructure, the proposal to develop a road network linking the R512 and the Old Ballysimon Road over a railway line, and in particular to:

- RPO 151, 152 and 154 of the RSES (integration of transportation and land use planning),

the Planning Authority is recommended to amend the wording of Objective CA O1 with respect to Crossagalla to ensure that meaningful consultation takes place with

both Iarnród Éireann and the National Transport Authority before any Masterplan is agreed for Crossagalla.

3. Tall buildings

The Office notes a number of inconsistencies in relation to the policies/ objectives relating to tall buildings where it is unclear if the policies/ objectives should read ‘and in accordance with the locations’ or ‘or in accordance with the locations’ in respect of maps 3.6 and 6.8 - Tall Buildings at City Level.

Observation 3 - Tall Buildings

In the interests of clarity, the Planning Authority is advised to review the tall buildings policies and objectives with respect to the following:

- Objective CGR O9 (Volume 1, Written Statement);
- Policy BH2 (Volume 6, Accompanying Strategies); and
- Policy TB2 (Volume 6, Accompanying Strategies),

in order to ensure consistency with regard to whether the policies/ objectives should read ‘and in accordance with the locations’ or ‘or in accordance with the locations’.

4. Flood risk management

The Office welcomes the preparation of the Strategic Flood Risk Assessment (SFRA) in accordance with NPO 1 of the NPF and The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines).

The Office has noted the absence of Plan Making Justification Test (Justification Test) with respect to sites in Moyross, King’s Island, Clonmacken Road and Knocklisheen Road. In the case of Amendment Z9 at Moyross, while there is a minor overlap between these lands and Flood Zones A and B, it is noted that Flood Zones at this location have been defined based on National Coastal Flood Hazard Mapping, and that the Catchment Flood Risk Assessment and Management (CFRAM) coastal dataset shows a greater overlap between zoned lands and identified flood risk. The Office also notes that while Amendment U3 at

Clonmacken Road overlaps with the 1% AEP NCFHM extents¹ it has not been included in section 2.1 of the SFRA. In the case of Amendment Z10 (King's Island), Amendment U2 (Mungret), Amendment U37 (Greenpark), Amendment U42 (Mungret) and Amendment U43 (Mungret), there are minor overlaps with Flood Zones A/B.

Due to the proximity of water features to proposed development sites in a limited number of locations, the Planning Authority should undertake a risk assessment for each of the identified sites at Ballysimon/ Towleron, Rosbrien and Castletroy in order to establish whether a Stage 3 detailed flood risk assessment is required to be carried out (as set out in section 2.21 of the Flood Guidelines), and if necessary to amend or omit land use zonings to water compatible uses only, where it is found that highly vulnerable development is proposed within Flood Zones A/B or less vulnerable development is proposed in Flood Zone A and the Justification Test has not been passed.

Embankments with varying standards of protections are present at a number of locations in Limerick. In the interests of flood risk management, defences should be readily identified and protected from interference or removal. To this end the Office considers it important that the Planning Authority would include a register of key flood risk infrastructure in the Development Plan.

The Office notes that high end future scenario climate change extents are present on lands in Limerick City where the potential future risks and associated mitigation measures are unclear. The Office advises the Planning Authority to address flood risk management taking account of the potential impacts of climate change on flood risk.

Recommendation 2 - Flood Risk Management

Having regard to flood risk management and having considered:

- NPO 78 of the NPF (ensuring flooding and flood risk management informs place making);
- RPO 89, 114 and 116 of the RSES (incorporating flood risk management into the planning system); and

¹ Annual Exceedance Probability; National Coastal Flood Hazard Mapping

- The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009),

the Planning Authority is recommended to;

- (i) incorporate both bullet points in section 2.1 of the Strategic Flood Risk Assessment (SFRA) into the written statement of the Limerick Development Plan 2022-2028 and to also reference in Plan Making Justification Test (Justification Test) as appropriate;
- (ii) update the SFRA to provide Justification Tests for the following sites:
 - a) Amendment Z9 (White Cross/ Sarsfield Gardens, Moyross);
 - b) Amendment Z10 (King's Island);
 - c) Amendment Z11 (King's Island);
 - d) Amendment U2 (Mungret, N69);
 - e) Amendment U3 (Clonmacken Road);
 - f) Amendment U8 (Knocklisheen Road);
 - g) Amendment U37 (Greenpark, Dock Road);
 - h) Amendment U42 (Skehacreggaun, Mungret); and
 - i) Amendment U43 (Skehacreggaun, Mungret).

Further to the preparation of the Justification Tests as above, where the criteria cannot be satisfied and the zoning is proposed to be retained to reflect the existing land use, the Planning Authority should include appropriate policies/ objectives to restrict any further development which may introduce people or property to areas of identified flood risk, increase flood risk elsewhere or obstruct flow paths.

Where sites satisfy criteria (i) and (ii) of the Justification Test, and only a portion of the subject sites are at risk of flooding, the Planning Authority should propose appropriate mitigation measures.

- (iii) undertake a site visit to establish whether a Stage 3 detailed flood risk assessment is required with respect to each of the sites listed below. Where it is found that highly vulnerable development (Flood Zones A/B) or less

vulnerable development (Flood Zone A) is proposed and the Justification Test has not been passed, the Planning Authority is required to amend or omit land use zonings to water compatible uses only:

- a) Amendment Z17 (Ballysimon/ Towlerton);
- b) Amendment Z23 (Rosbrien) (noting Recommendation 1 above); and
- c) Amendment U24 (Newtown, Castletroy); and

(iv) include a register of key flood risk infrastructure and highlight the defended area on an appropriately sized map.

Observation 4 - Flood Risk Management - Climate Change Scenario

Having regard to flood risk management and having considered:

- NPO 78 of the NPF (potential impacts of climate change on flooding and flood risk);
- RPO 116 of the RSES (consideration of potential impacts of flood risk arising from climate change); and
- the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009),

the Planning Authority is advised to:

- (i) amend the Strategic Flood Risk Assessment to discuss how potential future climate change risk and any associated mitigation measures have been considered in relation to the following sites:
 - a) Amendment Z7 (Moyross Avenue);
 - b) Amendment Z10 (King's Island);
 - c) Amendment U1 (North Circular Road);
 - d) Amendment U4 (Knockhill, Ennis Road); and
 - e) Amendment U37 (Greenpark, Dock Road); and

(ii) include appropriate policies/ objectives into the written statement of the Limerick Development Plan 2022-2028 with regard to new, more intensive uses, or extensions of existing uses on the lands referenced in (i) above.

Summary

The Office requests that your authority addresses the recommendations and observations outlined above. As you are aware, the report of the Chief Executive of your authority prepared for the elected members under section 58(11) of the Act must summarise these recommendations and how the Chief Executive proposes they should be dealt with.

Where a Planning Authority makes a variation, it is required to notify the Office **within one week** of the decision to adopt the Variation. Where an authority decides not to comply with the recommendations of the Office, then it shall inform the Office as soon as practicable and provide reasons for the decision not to so comply.

Your authority is also required to send the Office a copy of the Variation and any submissions made by the Minister, the relevant regional assembly and the National Transport Authority during the Variation preparation process.

Please be advised that planning authorities are also required to publish notice of the Variation within a week of the adoption, stating that a copy of the Development Plan as varied will be available for inspection on a website and at a place specified in the notice no later than five weeks after the date of adoption.

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

Is mise le meas,



Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluation

Designated Public Official under the Regulation of Lobbying Act 2015
