

Planning Submission

In respect of
**Proposed Material Amendments to
Draft Regional Spatial & Economic Strategy for the
Southern Region**

Prepared by

John Spain Associates

On behalf of

Clancourt

October 2019



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EXECUTIVE SUMMARY

Clancourt is the owner of a strategic landholding at Dooradoyle, which includes the Crescent Centre, and welcomes the publication of proposed amendments to the draft Regional Strategy for the Southern Region. Clancourt is generally supportive of these proposed amendments, although in a number of instances believes that the proposed wording could be further strengthened and enhanced.

Clancourt supports the introduction of a new form of planning at the metropolitan scale, in the form of the Metropolitan Area Strategic Plans (MASP's), which, in the case of the Southern Region, seeks to ensure the continued competitiveness of the three Munster cities and a supply of strategic housing & employments sites to support sustainable growth.

While this submission deals solely with the proposed amendments as published by the Southern Regional Assembly, it should be read in conjunction with our original submission to the draft strategy submitted in March this year.

In particular we welcome the introduction of a number of new or reworked policy objectives contained within the Metropolitan Area Strategic Plan for Limerick Shannon, which we believe improves the overall quality of the Plan.

However, where necessary and appropriate we have made a number of suggested refinements to the proposed material amendments, which, in our opinion, would further enhance or strengthen the stated policy objectives. In particular we believe that in the proposed Amendments to the Limerick MASP there is an undue focus on the city centre, without complimentary policy & objectives targeted at the city suburbs which would promote and encourage their regeneration and densification in line with the policies set out in the National Planning Framework. A number of important economic clusters are also located within the suburbs which should be targeted for further investment.

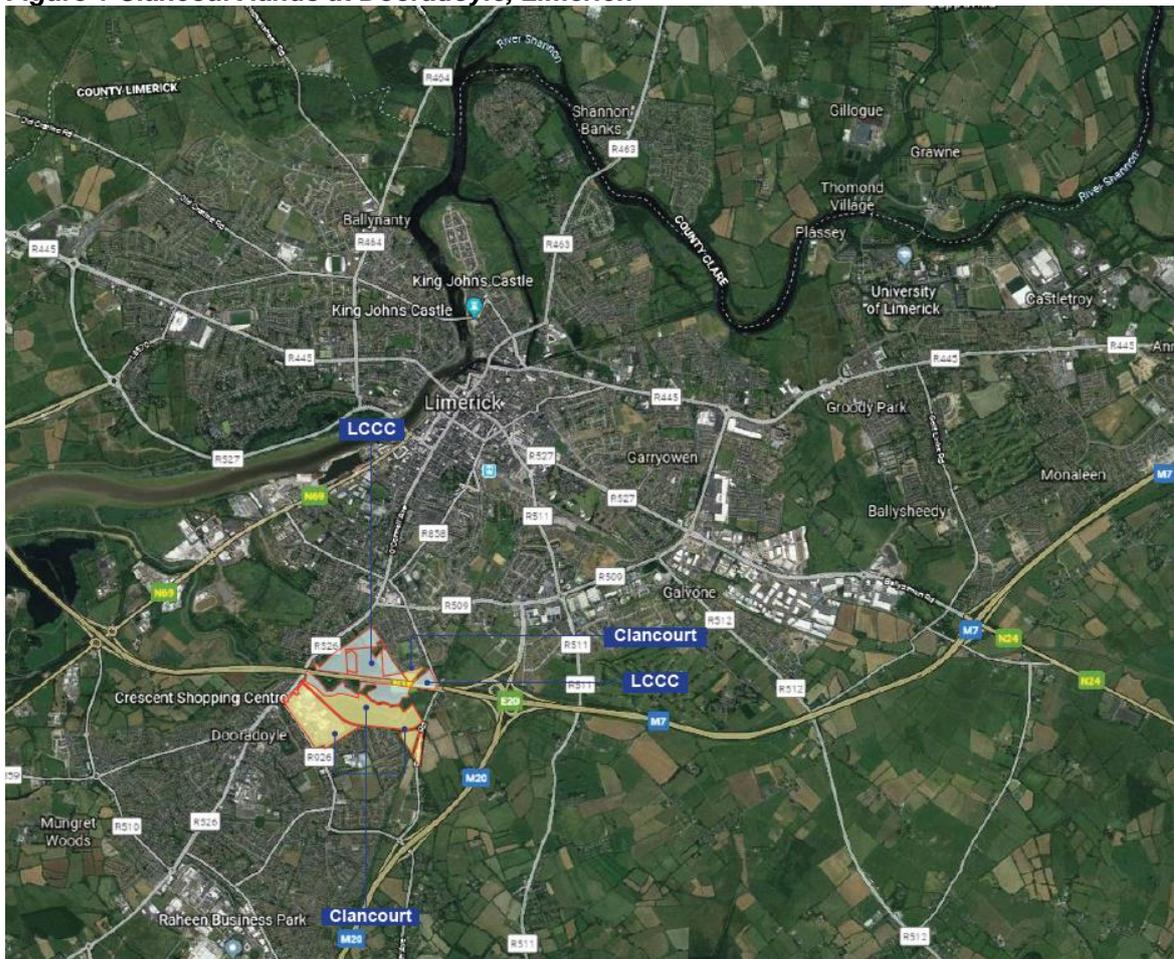
Accordingly, we have identified the relevant amendments which should be extended to cover suburban areas as well as targeting the city centre.

In conclusion, Clancourt would respectfully request that the Southern Regional Assembly would give careful consideration to the contents of this submission and make the necessary amendments to the RSES before finalising the document for adoption.

1.0 INTRODUCTION

- 1.1. On the 12th September 2019 the Southern Regional Assembly published a notice stating it was proposing to make a number of material amendments to the Draft Regional Spatial & Economic Strategy (RSES) for the Southern Region and invited written submissions to be submitted by the 11th October 2019.
- 1.2. This submission has been prepared on behalf of our client the Clancourt Group, who are experienced and well funded developers who, in addition to a number of major commercial development in Dublin, have a significant landholding (30.8 Hectares) in Dooradoyle, Limerick, including the Crescent Shopping Centre. (See Figures 1 & 2). Clancourt have owned and operated the Crescent Shopping Centre for the last 46 years, and this centre is the single largest rates payer in Limerick city, and is a major employer for the city (c.1,500 employees on site).
- 1.3. This submission builds on the earlier submission made by Clancourt to the draft Regional Spatial & Economic Strategy in March this year, copy of which is attached in Appendix 1.

Figure 1 Clancourt lands at Dooradoyle, Limerick



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2.0 PLANNING CONTEXT

- 2.1. At the outset we wish to state that our client welcomed the publication of the draft Regional Strategy for the Southern Region and are largely supportive of the overall policies and objectives contained therein. We note the principal purpose of the RSES is to support the implementation of Project Ireland 2040 - The National Planning Framework (NPF) and National Development Plan (NDP), and the economic policies and objectives of the Government by providing a long-term strategic planning and economic framework for the development of the Region.
- 2.2. Clancourt understands the need to translate the high level objectives set out in the National Planning Framework into more concrete and specific regional planning objectives, which in turn will provide guidance to local Planning Authorities in the review of existing City & County Development Plans which have to be undertaken post the adoption of the Regional Strategy in Q2 2019
- 2.3. In particular we welcomed the introduction of a new form of planning at the metropolitan scale, in the form of the Metropolitan Area Strategic Plans (MASP's), which seek to ensure the continued competitiveness of the three Munster cities and a supply of strategic housing & employments sites to support sustainable growth. This submission will primarily focus its attention on proposed amendments relating to the Metropolitan Plan for Limerick. However, before doing so we wish to make some comments regarding proposed amendments to the wider regional strategy.

3.0 PROPOSED AMENDMENTS TO REGIONAL STRATEGY

- 3.1. **Material Amendment 2;** Clancourt supports the introduction of additional text in Chapter 2 to reflect the importance of the topic of climate action and the need for integration with the regional planning system. We note the emphasis placed on objectives for compact Growth, Sustainable Travel and Placemaking to reduce travel demand between residential areas and centres of employment, education and commerce. Clancourt would support these objectives but would ask that these objective would be matched with proposals/objectives to significantly increase investment in sustainable transport infrastructure and services in the Metropolitan area.
- 3.2. **Material Amendment 27:** Our client supports the imposition of additional requirements in respect of achieving Compact Growth targets, and in particular supports the requirement that development plans shall state as a minimum requirement to deliver at least half of all new homes within the existing built up area of the city and suburbs of Cork, Limerick & Waterford. However, we would suggest that in order to facilitate same, the proposed amendment should go further to require the relevant local authorities to identify and specify how and where they propose in their respective cities to meet this target. Given the significance of this compact urban growth target it is considered critical that the MASP should include a map which identifies the boundary of the CSO defined city and suburbs, and that this should be replicated in the new development plans for the constituent local authorities.
- 3.3. **Material Amendment 39:** Clancourt supports the introduction of a new Regional Planning Objective dealing with Building Resilience to Climate Change and imposing the requirement on Local Authorities to work with the

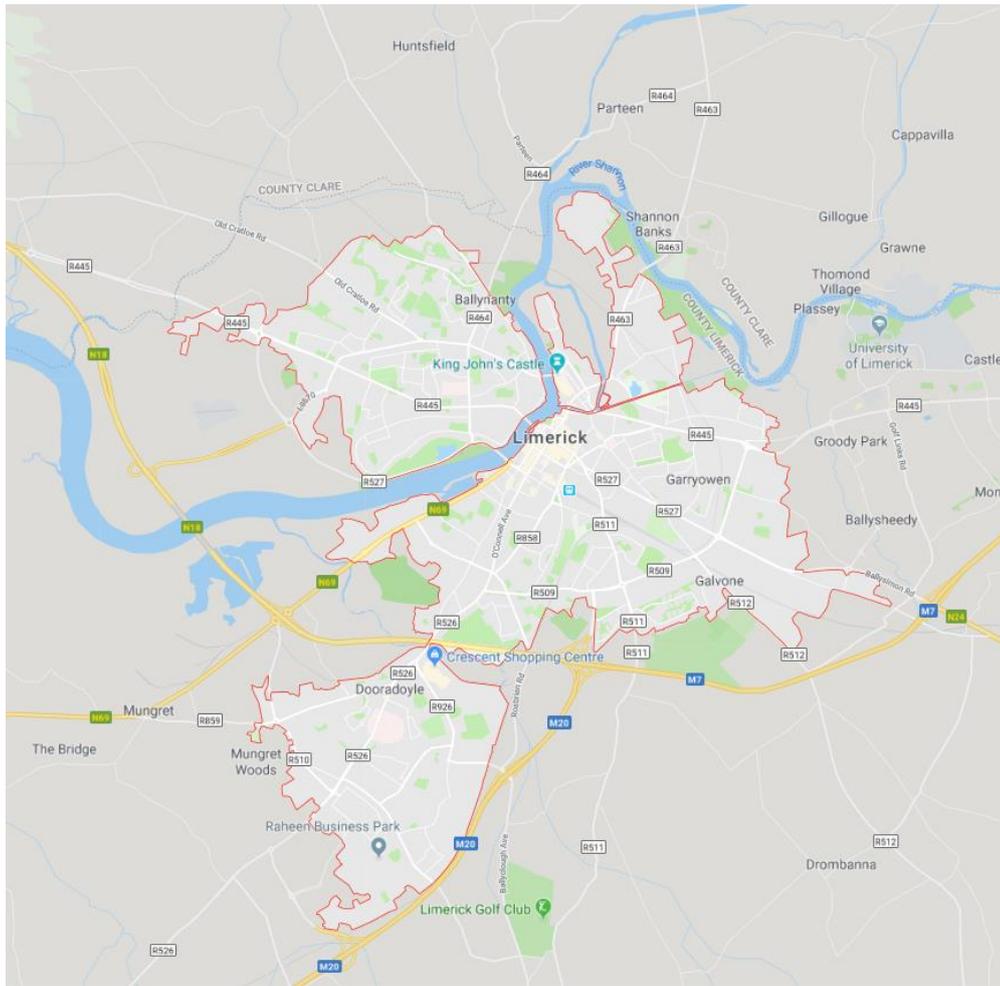
OPW to implement Flood Risk Management Plans and to address existing and potential future flood risks. However, this needs to be based on up to date records and best engineering information. With regards to flood risk, we welcome the acknowledgement within the Draft RSES, that appropriate flood risk management should rightly form a key part of good spatial development planning. We would note that the application of flood risk management principles within the various policies and development plans for Limerick, should as summarised in the Minister's foreword to 'The Planning System and Flood Risk Management' guidelines, *'recognise the fact that many of the areas where people live and work are already subject to flood risk, and that the needs of regeneration and growth can be reconciled, while taking due account of the need to minimise and mitigate such risks.'*

- 3.4. Accordingly we would respectfully suggest that these guiding principles of the Minister would be applied to the draft RSES and MASP plans, and that all identified regeneration and strategic employment areas located within the defined city and suburbs areas of Cork, Limerick & Waterford would be appropriately zoned following the application of appropriate flood risk assessment.
- 3.5. Given the ambitious plans for population growth in Limerick and the requirement to adopt a sequential approach of infilling the urban area in advance of expansion, key underutilised sites require careful planning to ensure that their potential can be unlocked. In particular, areas of underutilised land which are currently protected to a high standard by existing flood defences (for example, the embankments along the Shannon and tributaries such as Ballinacurra Creek), have huge potential for essential development subject to appropriate flood risk management measures being put in place to augment existing measures, and ensure a high standard of protection continues to be provided as climate change affects increase the risk. In many of these areas, the Shannon CFRAM has identified further potential flood defence measures. These should be prioritised. We would also note that it will be essential for the relevant public bodies such as OPW and Limerick City and County Council to work collaboratively with private sector landowners and developers to ensure that such potential can be safely and sustainably unlocked such that essential strategic development becomes viable and deliverable.
- 3.6. **Material Amendment 71:** As per our comments on Amendment 2, we support the introduction of explicit sustainability targets, but would respectfully request that this new RPO L would be strengthened by making it mandatory for local authorities to set complementary sustainable mobility targets following their development plan reviews. We would also suggest that greater emphasis should be placed on encouraging mixed use developments on regeneration sites within the city and suburbs in Cork, Limerick & Waterford through supportive development plan policies.

4.0 LIMERICK METROPOLITAN AREA STRATEGIC PLAN (MASP)

- 4.1 **Material Amendment 122:** Clancourt supports the proposed strengthening of MASP PO 2 by introducing additional points relating to the consolidation and regeneration of Limerick city and suburbs, and in particular the addition of objective (e) which seeks investment to achieve regeneration and consolidation in the city suburbs. However, we would respectfully suggest that proposed objective (d) should be amended to apply to regeneration of brownfield/

underutilized sites within the **city and suburbs**, as defined by the CSO, (see comments on proposed Amendment 126 and Map 1 below below).



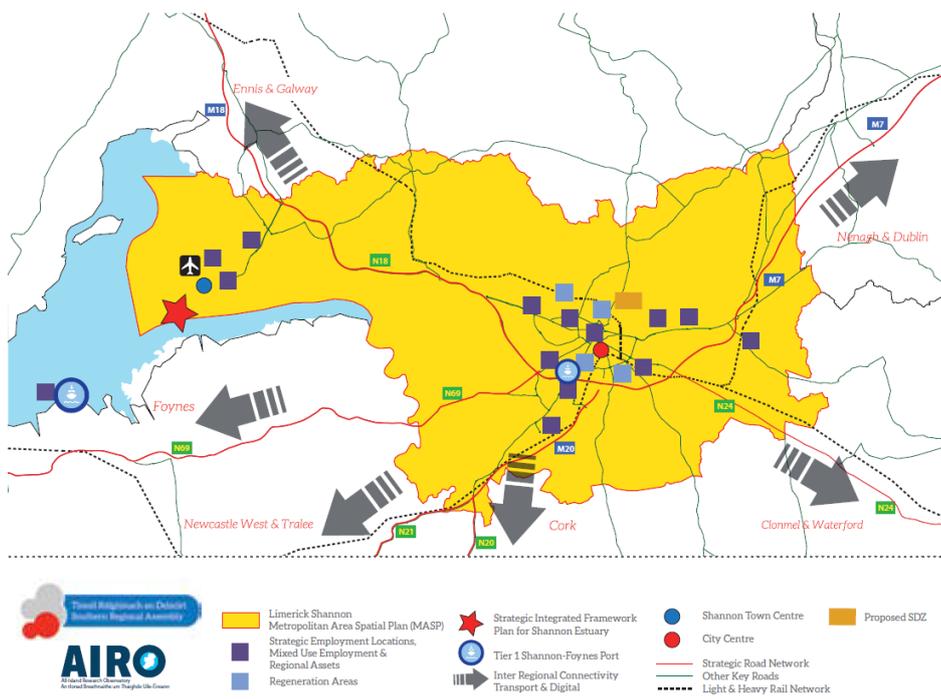
Map 1 Limerick City & Suburbs Boundary (outlined in red)

- 4.2 **Material Amendment 124:** Clancourt welcomes the introduction of the integration of land-use and transport as a specific objective (6A), and the recognition of the need for sustainable and infrastructure led regeneration, consolidation and growth of strategic residential, employment and nodal locations along public transport corridors. However, it would be beneficial if MASP PO 6 would be further amended to explicitly require local authorities to transpose this objective in their development plans.
- 4.3 **Material Amendment 126:** Clancourt welcomes the introduction of population projections for the Limerick Shannon Metropolitan Area, and their disaggregation into the component parts, within an emphasis on growing the population within the defined Limerick city & suburbs. We would suggest that in the new table of population projections on Page 94 would contain a footnote explaining what is meant by city and suburbs, as defined by the CSO., and that a map be included in the MASP clearly delineating the boundary to this defined City & suburbs.
- 4.4 **Material Amendment 127:** While our client welcomes the introduction of a new MASP Policy Objective (PO N) dealing with Housing & Regeneration, we are concerned that the way it has been drafted it only applies to Limerick city centre. This is inconsistent with the NPF policies and objectives for compact

urban development which promotes concentration of development & regeneration within the built up area of the city and suburbs. It is our considered view that this objective should therefore equally apply to the regeneration of brownfield/underutilized sites in the city suburbs, and we respectfully request that this Policy Objective be so amended to include suburban areas where housing and regeneration are also required. In doing so this would then make the policy objective consistent with the MASP summary Map (page 37 of draft RSES, and reproduced below in Figure 2) which identifies a number of Regeneration Areas and Strategic Employment Locations within the suburbs, including the lands at Dooradoyle.

Figure 3 Map of Limerick MASP

Limerick-Shannon | MASP Metropolitan Area Strategic Plan



4.5 **Material Amendment 128:** Clancourt welcomes the introduction of a new Policy Objective (PO O) promoting economic resilience and clusters by creating a vibrant and diversified enterprise base with strong, healthy connected clusters. However, this objective would be strengthened by the introduction of criteria for the identification and selection of such clusters, and we would respectfully suggest that proximity to public transport corridors should be included as one of the locational criteria, and that locations within the defined city and suburbs would be prioritised. We also suggest that the policy objective could be strengthened by making it a requirement that Local Authorities would have to identify the location and type of clusters in their development plans, consistent with the MASP map. In this regard, we would refer to our earlier submission to the draft RSES where we identified the Dooradoyle Urban Quarter as being an ideal candidate to be developed as a mixed use enterprise cluster, (see Figure 3 below), given the existing mixed uses and employment levels in both the Crescent Centre and the educational and health facilities and other employment uses in the wider Dooradoyle area.

4.6 This Urban Quarter at Dooradoyle already has many of the ingredients for a successful cluster, with substantial employment concentration at the mixed use

Crescent Centre (c. 1500 employees), the 170 Hectare Raheen Business Park, home to many large multi-national companies such as Regeneration Pharma, and the 520 bed University Hospital Limerick, which itself is a major employer in the region. Taken together this cluster should be recognised, promoted and developed under both the Limerick MASP, and the new Limerick City & County Development Plan.

Figure 3 Dooradoyle Cluster



6182 - Dooradoyle Urban Quarter Diagram

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- 4.7 In the draft RSES published in March, the Dooradoyle Quarter is identified as being a Strategic Employment Location, Mixed Use Employment & Regional Asset. It is not apparent from the proposed Material Amendment 128, how this policy objective of promoting clusters, relates to these employment locations. This needs to be clarified and further developed. In this regard we would respectfully submit that the approach taken in Dublin to regeneration areas, through the designation of Strategic Development & Regeneration Areas (SDRA's) with accompanying masterplans, could be successfully replicated in Limerick to Regeneration & Strategic Employment areas such as Dooradoyle.
- 4.8 **Material Amendment 132:** Our client strongly supports this proposed amendment which seeks to put some flesh on what was a very skeletal Retail Policy Objective (PO 13) in the draft RSES. In particular Clancourt welcomes the introduction of a time-bound objective of requiring the relevant Planning Authorities within the Metropolitan area to commence preparation of a Joint Retail Strategy within one year of the adoption of the RSES. However, we are of the view that this objective is rather open-ended and would benefit by having the commencement date brought forward to be within 13 No. weeks of adoption of the RSES, which is the statutory period within which the review of the Limerick City & County Plan must commence. Given that this retail strategy will be a critical input for the new Limerick City & County Development Plan, it is imperative that this new retail strategy be prepared in advance of the completion of the new Development Plan. We are also of the view that it would

be beneficial for the MASP plan to provide a more detailed policy guidance setting out the appropriate retail hierarchy for Limerick, and how both the city and district centres can grow in a complementary way to meet the needs of a rapidly growing city.

5.0 CONCLUSION

- 5.1 Our client welcomes the publication of these proposed amendments to the draft Regional Strategy for the Southern Region and are largely supportive of the overall policies and objectives contained therein, which are improvements on the original draft.
- 5.2 In particular we welcome the introduction of a number of new or reworked policy objectives contained within the Metropolitan Area Strategic Plans (MASP's), which seek to ensure the continued competitiveness of the three Munster cities and a supply of strategic housing & employments sites to support sustainable growth.
- 5.3 Where necessary and appropriate we have made a number of suggested refinements to the proposed material amendments, which, in our opinion, would further enhance or strengthen the stated policy objectives. In particular we believe that in the proposed Amendments to the Limerick MASP there is an undue focus on the city centre, without complimentary policy & objectives targeted at the city suburbs which would promote and encourage their regeneration and densification in line with the policies set out in the National Planning Framework. A number of important economic clusters are also located within the suburbs and these should be targeted for further investment.
- 5.4 Accordingly, we have identified the relevant amendments which should be extended to cover suburban areas as well as targeting the city centre.
- 5.5 In conclusion, Clancourt would respectfully request that the Southern Regional Assembly would give careful consideration to the contents of this submission and make the necessary amendments to the RSES before finalisation.

APPENDIX 1

Planning Submission

In respect of

**Draft Regional Spatial & Economic Strategy for the
Southern Region**

Prepared by

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EXECUTIVE SUMMARY

Clancourt is the owner of a strategic landholding at Dooradoyle, which includes the Crescent Centre, and welcomes the publication of this draft Regional Strategy for the Southern Region. Clancourt is largely supportive of the overall policies and objectives contained therein, which are to support the implementation of the National Planning Framework (NPF).

In particular the introduction of a new form of planning at the metropolitan scale, in the form of the Metropolitan Area Strategic Plans (MASP's), which seeks to ensure the continued competitiveness of the three Munster cities and a supply of strategic housing & employments sites to support sustainable growth is welcomed.

While the MASP for Limerick does build on the NPF principles of supporting compact urban growth where at least 50% of all future housing units are to be provided within the existing built-up area of the city and suburbs, it is noted with concern that no population, housing, employment or retail projections have been undertaken. The position and importance of Limerick City in driving the success of the Region in implementing the objective of more balanced regional growth set out in the National Planning Framework should be explicitly recognised.

Unlike what has been prepared in the Dublin, Cork & Galway MASP's, we note that the Limerick Shannon MASP does not incorporate any form of demographic projections for the city or the wider metropolitan area. The only reference is the NPF objective for Limerick city to grow by 50% by 2040. This equates to 50,000-60,000 additional people by 2040. No details have been provided in the draft MASP as to where these people are going to live, what number of new housing units will be needed, and how/where 50% of these new housing units are going to be built within the existing built up area of Limerick city & suburbs to meet the NPF target? This should be set out clearly in a revised MASP.

Similarly, no employment projections have been provided to estimate the quantum of jobs required to support the population growth targets. For instance, for the city to grow by a further 30,000 by 2031, we would estimate that in excess of 18,000 net new jobs will have to be created in the city and suburbs. Again, as with the estimation of housing supply, the MASP should then identify sufficient suitable sites and associated capacities to accommodate this level of future employment growth within city and wider metropolitan area.

While the Summary Map for the Limerick MASP, does contain symbols identifying what are termed '**Strategic Employment Location, Mixed Use Employment & Regional Assets**' sites, no details have been provided as to what these designations are, what objectives relate to them, or what capacities they have to accommodate future employment growth. This omission should be rectified.

It is noted that the Crescent Centre lands in Dooradoyle have been identified as being located in one such strategic employment and mixed-use regional asset, which is welcomed. However, the draft MASP needs to set out what the planning objectives for these lands are and what capacities the lands have to accommodate future employment and residential growth.

Accordingly, we would respectfully request that the current draft MASP for Limerick would be amended to incorporate the following text to accompany the designation of the Dooradoyle lands as a *Strategic Employment Location, Mixed Use Employment & Regional Assets site*:

Dooradoyle Urban Quarter

The Dooradoyle area represents a strategically located parcel of lands providing a gateway to the city on an important public transport corridor within the built-up area of the southern suburbs of Limerick. The Crescent Centre and adjoining lands, extending to over 30 hectares, represent a strategically important large scale under-developed site within the inner suburbs with potential to be further developed at the heart of a comprehensive mixed-use Urban Quarter. The existing Crescent Shopping Centre alone already employs nearly 1,500 workers, and when fully built out the total site area has the capacity to accommodate in the order of 4,000 employees (additional jobs mainly in offices, technology and support services) and circa. 350 housing units, together with new amenities and greenway, in an integrated mixed use urban quarter. Taken together with the University Hospital and Limerick Council lands, this Dooradoyle Urban Quarter is considered to be a Strategic Development and Regeneration Area (SDRA)¹. The future development of this urban quarter will be guided by a masterplan for the area.

This approach is fully consistent with the recently published Urban Development & Building Height Guidelines, and in particular the Specific Planning Policy Requirement (SPPR 2).

Finally, while we note that the draft MASP does contain an objective for a new Joint Retail Strategy to be prepared, it is respectfully submitted that further details should be included on the scope of such a strategy and when it will be undertaken.

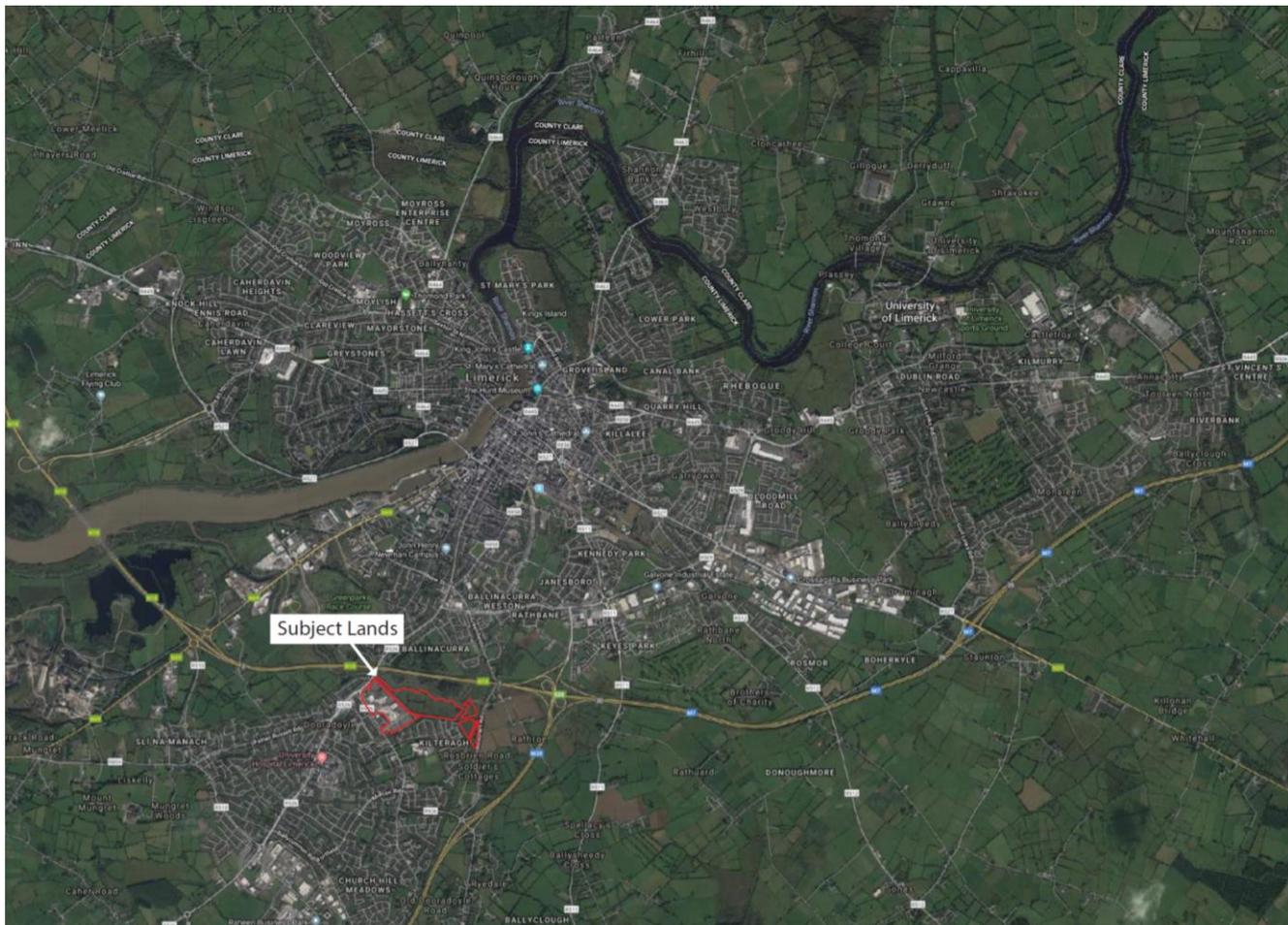
Accordingly, we would respectfully request that, given the importance of having this retail strategy prepared in advance of the impending review of the Limerick City & County Development Plans, this objective would be elaborated on to set out a prescribed timetable within which the retail strategy would be prepared, and how it should be coordinated by the Southern Regional Assembly. We also recommend that the unique position the Crescent Shopping Centre holds in Limerick as the only Tier 2 District Centre be appropriately recognised in both the Limerick MASP and Joint Retail Strategy.

¹ SDRA is a designation which is utilised in the Dublin City Development Plan 2016-22 to promote the integrated development of particular areas of the city.

1.0 INTRODUCTION

- 3.7. On the 18th December 2018 the Southern Regional Assembly published a notice stating it has prepared a Draft Regional Spatial & Economic Strategy (RSES) for the Southern Region and invited written submissions to be submitted by the 8th March 2019.
- 3.8. This submission has been prepared on behalf of our client Clancourt, who are experienced and well funded developers who, in addition to a number of major commercial development in Dublin, have a significant landholding (30.8 Hectares) in Dooradoyle, Limerick, including the Crescent Shopping Centre. (See Figure 1). Clancourt have owned and operated the Crescent Shopping Centre for the last 45 years, and this centre is the single largest rates payer in Limerick city.
- 3.9. This submission builds on the earlier submission made by Clancourt to the Regional Issues Paper.

Figure 1 Clancourt lands at Dooradoyle, Limerick



4.0 PLANNING CONTEXT

- 4.1. At the outset we wish to state that our client welcomes the publication of this draft Regional Strategy for the Southern Region and are largely supportive of the overall policies and objectives contained therein. We note the principal purpose of the RSES is to support the implementation of Project Ireland 2040 - The National Planning Framework (NPF) and National Development Plan (NDP), and the economic policies and objectives of the Government by providing a long-term strategic planning and economic framework for the development of the Region.
- 4.2. Clancourt understands the need to translate the high level objectives set out in the National Planning Framework into more concrete and specific regional planning objectives, which in turn will provide guidance to local Planning Authorities in the review of existing City & County Development Plans which have to be undertaken post the adoption of the Regional Strategy in Q2 2019
- 4.3. In particular we welcome the introduction of a new form of planning at the metropolitan scale, in the form of the Metropolitan Area Strategic Plans (MASP's), which seek to ensure the continued competitiveness of the three Munster cities and a supply of strategic housing & employments sites to support sustainable growth. This submission prepared on behalf of Clancourt will focus its attention on the Metropolitan Plan for Limerick. However before doing so we wish to make some general comments regarding wider regional strategy.

5.0 REGIONAL DEMOGRAPHICS

Past Trends

- 5.1. The regional profile provided in section 1.3 of the draft RSES provides a good overview of past demographic trends and the implications of these trends for future growth patterns. The document notes that from 2006 to 2016 the Region grew by 9.9% - an increase of just under 143,000 people – which was lower than the state average growth rate of 12% over the same period. The region contains some rapidly growing communities, particularly in commuter areas near to Cork & Limerick cities, which increases demand for housing, infrastructure and services in those areas.
- 5.2. Recent trends show that population growth is set to continue having regard to the Region's young demographic profile and a return to net inward migration as the country returns to economic growth after a severe economic crash in 2008. However, the draft RSES has identified that population growth rates varied across the region, with some peripheral and inner urban areas experiencing population decline between 2006 and 2016, while other areas have seen significant growth rates. In line with a prevailing state-wide trend of urbanisation, the region saw the continued increase in the share of population residing in urban areas.
- 5.3. What these past demographic trends and associated spatial patterns of development illustrate is that the new planning policies being espoused in the National Planning Framework, and now in the draft Regional Strategy, which are seeking to promote compact urban growth, will require a focused and sustained effort, which will need to be actively supported by the constituent local authorities in their reviewed Development Plans.

5.4. In particular, it is critical that the two Planning Authorities which make up the Limerick Metropolitan area quantify and identify sufficient serviced land to enable the right quantum of housing and employment to be delivered in the right places at the right times to ensure that the policies of compact sustainable growth are fully implemented. This is a very important issue which we shall return to below in dealing with the Metropolitan Area Strategic Plan.

Future Growth

5.5. The NPF sets out a targeted pattern of growth for the Region and its three cities, and this is further expanded in the Implementation Roadmap for the National Planning Framework (July 2018). These growth figures taken from the NPF Roadmap are reproduced in Table 4.2 of the draft Strategy.

Table 4.2 NPF Population projections

<i>Strategic Planning Area</i>	2016	2026	2031
<i>South-West</i>	690,500	784,000 - 802,500	823,000 - 854,500
<i>Mid-West</i>	385,000	436,000 - 446,000	460,500 - 475,500
<i>South-East</i>	509,500	561,000 - 572,000	581,500 - 598,500
Total	1,585,000	1,781,000 - 1,820,500	1,865,000 - 1,928,500

5.6. A further breakdown of population projections to county level has been provided in Appendix 1 of the draft RSES for use by Local Authorities in the formulation of their core strategies of their Development Plans. These figures were taken directly from the NPF Implementation Roadmap issued by the Minister in July 2018.

5.7. The approach in core strategies of development plans to realise these population targets is to be informed by the transitional population projections methodology set out in the NPF Roadmap, and a robust evidence-based analysis of demand, past delivery and potential. We understand further guidance on these matters is to be provided by the Department of Housing Planning & Local Government by way of Planning Guidelines to be issued to all Planning Authorities in Q1 2019.

5.8. Outside of these figures the only other population projections provided in the draft RSES are in respect of the Cork Metropolitan Area as set out in the Cork MASP in Volume 2. Of note is the fact that there are no equivalent population projections provided for either Limerick or Waterford Metropolitan areas. This is a matter we will return to below when dealing with the Limerick Metropolitan Area Strategic Plan.

6.0 REGIONAL GROWTH STRATEGY

- 4.1 The Growth Strategy, as set out in Chapter 3, identifies the growth scenario to be pursued in the Region in order to accommodate the growth identified in the National Planning Framework. The key element in the development of the Growth Strategy is built around the pillars of the Region's three cities and their metropolitan areas, recognising that these cities provide a key strength for the overall development of the region. The RSES should more clearly recognise the key role of Limerick City in achieving national planning policy objectives.
- 4.2 For Limerick City and Suburbs, we note that the RSES supports the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built up area of the city and suburbs and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects. The draft RSES also adopts the NPF target of at least 50% of all new homes to be delivered within or contiguous to the existing built up area of Limerick.
- 4.3 Clancourt are supportive of both the overall regional growth strategy, and the approach for the development of Limerick proposed in the growth strategy as set out in Chapter 3. However, given the relative difficulties in developing brownfield/infill sites vis-à-vis greenfield/edge of town sites, it is imperative that the RSES would identify and quantify the infill and brownfield sites necessary to meet this 50% target, and to demonstrate how the requisite number of new housing units on brownfield/infill sites can be delivered within the short (2026) and medium term (2031). These figures are currently absent from the draft strategy.
- 4.4 The draft RSES sets out a settlement and economic growth strategy that seeks to ensure that the needs of the Regions' citizens such as access to employment opportunities and services, ease of travel and overall well-being are met.
- 4.5 In devising this vision the draft Regional Strategy recognises a number of key challenges which the region is facing. These include the need for a better alignment between population growth, location of residential development and employment to create healthy and attractive places. A further key challenge identified is the transition to a low carbon society, which for the RSES means such areas of transition as spatial development patterns which reduce transport demand and encourage sustainable transport modes, as well as energy efficiency in the building stock.
- 4.6 In particular we note that the draft RSES seeks to determine at a regional scale how best to achieve the shared goals set out in the National Strategic Outcomes (NSOs) of the NPF. In Section 3.1 it sets out 7 No. Key Principles in developing the Regional Strategy
- 4.7 Our client Clancourt is supportive of such principles and would highlight, in particular, the following matters:
 1. **Provide for sufficient housing supply** - the need to provide adequate quantity & quality of housing to meet existing and future housing demand, including addressing the current housing crisis.

2. **Compact Growth** – provide strong regional support for policy & initiatives at local level which restrict urban generated sprawl and promote compact growth.
 3. **Urban regeneration** – make regeneration & development of existing built up areas as attractive and viable as greenfield development.
 4. **Integrating regeneration with environmental protection** – linking regeneration and development initiatives to environmental protection, climate action to support a reduced carbon footprint.
- 4.8 As Clancourt is an owner of a substantial landbank (30+ Ha.) in Dooradoyle, Limerick (see Map 1), which includes a significant undeveloped ‘infill’ site, in close proximity to the Ballincurra Road public transport corridor, and situated with the CSO defined Limerick City & Suburbs we welcome this support for and emphasis on compact growth on infill sites in close proximity to public transport corridors within the built-up area and which can utilise existing public infrastructure. This will be elaborated on further when we comment on the content of the MASP in the following Section.

Map 1 Clancourt & Limerick Council Lands, Dooradoyle, Limerick



5.0 LIMERICK METROPOLITAN AREA STRATEGIC PLAN (MASP)

- 5.1. The requirement to have metropolitan scale plans prepared for each of Ireland's five cities, as part of the regional planning process was introduced as a specific objective of the National Planning Framework, and in the case of the Southern Region, this involves Metropolitan Area Strategic Plans (MASP's) for Cork Limerick & Waterford. These three MASP's are contained in a separate volume (Volume 2) of the draft RSES, although their summaries are included in Chapter 3 of the RSES. In the case of Limerick, the metropolitan plan has been widened to be the Limerick-Shannon MASP. This so defined metropolitan area had a 2016 population of 132,420, making it the third largest metropolitan area in the State.
- 5.2. Section 2.6 of the draft MASP sets out 11 No. Guiding Principles for the sustainable development of the metropolitan area. Of these we would like to highlight the following points:
- **A living city** – investment must be supported in revitalising and reinvigorating Limerick city for higher density living and high density high value jobs.
 - **Compact sustainable growth** – the development of brownfield and infill lands to achieve a target of at least 50% of all new homes within the existing built up area of the city
 - **Integrated transport & land-use** – target growth along high quality public transport corridors and nodes linked to the delivery of key public transport projects.
 - **Accelerate housing delivery** – activate strategic residential areas and support the steady supply of sites to accelerate housing supply.
 - **Employment density in the right places** – re-intensify employment in Limerick City and activate strategic employment locations to complement existing employment hubs in city centre.
- 5.3. Clancourt is supportive of these Guiding Principles and therefore supports the approach put forward in the MASP whereby the delivery of strategic development areas for housing and employment should be facilitated, where practicable, in a sequential manner to promote sustainable compact growth in coordination with the provision of enabling infrastructure and services. However, we would recommend that the MASP strategy be made more explicit to support, as a matter of priority, brownfield and infill sites within the defined city & suburbs.
- 5.4. However of concern is that fact that, unlike the MASP for Cork, the Limerick-Shannon MASP does not contain any population projections for the city or the wider metropolitan area. In fact it is striking that, notwithstanding the National Planning Framework (NPF) requirement that the RSES's should identify and quantify locations for strategic housing and employment development, this has not been undertaken in the draft strategy. Furthermore, the NPF clearly sets out on page 135 that each MASP should set out a clear and concise strategy to;

“Identify the key change parameters for the city in question, i.e population, employment, housing, retail, travel patterns and key renewal, development and amenity areas”

- 5.5. In the case of the Limerick MASP, none of this is done. In fact, unlike the Dublin MASP in the Eastern & Midland Region, the Galway MASP in the Northern & Western Region, and the Cork MASP in the Southern Region, the current draft Limerick MASP contains no population, housing or employment projections for the Limerick Metropolitan Area. The only reference is the NPF objective for Limerick city to grow by 50% by 2040. This equates to 50,000-60,000 additional people by 2040.
- 5.6. No details have been provided in the draft MASP as to where these people are going to live, what number of new housing units will be needed, and how/where 50% of these new housing units are going to be built within the existing built up area of Limerick city & suburbs to meet the NPF target?
- 5.7. It is respectfully submitted that this deficiency should be addressed. Set out below is the type of Table which should be included to provide appropriate population projections for Limerick city & suburbs and for the metropolitan area for 2026 and 2031.

Limerick MASP Population Projections 2016-2031*

Location	2016 Base year	Growth to 2026	Growth to 2031	Population Target 2031
Limerick City & Suburbs	94,192			
Balance of Metro In Limerick Co.	15,281			
Balance of Metro In Clare Co.	22,947			
Total Limerick Metropolitan Area	132,420			

- Fields in Table required to be populated
- Note NPF target a minimum of 50% of new housing in Limerick to be located within the CSO defined city & suburbs.

Housing Supply & Demand

- 5.8. Having established the population projections for the city and the wider metropolitan area, there then is a requirement to estimate the future housing needs and to identify where this growing population is going to be housed. As per the MASP’s for Dublin, Cork & Galway (see summaries in Appendix 1), this entails identifying the main key strategic housing sites, and their associated housing capacities to demonstrate that sufficient capacities exist within the city and metropolitan area.
- 5.9. Again, the draft Limerick MASP does not do this. The only identified site for which details are provided is in respect of Mungret, which it states has a capacity to accommodate 2,000 housing units. It is submitted that this detail should be replicated and mapped for other strategic housing sites in the city and wider metropolitan area, to demonstrate that there is capacity to meet the future housing needs, based on the projected population growth, in both the short (2026) and medium (2031) term, and that at least 50% of the required new housing can be accommodated within the city & suburbs.

6.0 ESTIMATING LIMERICK'S HOUSING NEEDS

- 6.1 Given that the Limerick Metropolitan Area operates as a single housing market, and given the seriousness of the current housing crisis, in our view a fundamental requirement of any metropolitan plan for Limerick would be to quantify the scale of the current and future housing needs based on the projected population figures contained in the NPF Implementation Roadmap, and to set out a framework and pathway as to where and when housing can be delivered to meet these quantified needs.
- 6.2 We note that the draft RSES does not convert the population forecasts into housing demand requirements to project the number of additional housing units required to accommodate the projected population increases. Apart from the MASP figures for Cork, the only other housing figures which are included in the draft RSES are contained on page 28 where it states that it is estimated that the entire Southern Region will require an additional 86,000 new homes by 2026 and 125,000 by 2031. No breakdown has been provided as to how many housing units will be required to meet the housing needs of Limerick city.
- 6.3 However for illustrative purposes, taking an average household size of 2.6 for Limerick city from the 2016 census, this would indicate that within the CSO defined city and suburbs Limerick will require in the order of 5,800 additional housing units by 2026 to accommodate an estimated population increase of 15,000. (Note: this does not include any under supply of housing to meet current needs.). The equivalent figure for 2031, based on an estimated population growth of 30,000 would be circa.11,500 housing units.
- 6.4 Given these levels of projected housing needs, it is critical that the Limerick MASP would identify and quantify where and when these numbers of housing units can be delivered to meet future demand. As stated above, the only identified site for which details are provided is in respect of Mungret, which it states has a capacity to accommodate 2,000 housing units. This detail should be replicated and mapped for other strategic housing sites in the city and wider metropolitan area, to demonstrate that there is capacity to meet the future housing needs in both the short (2026) and medium (2031) term.
- 6.5 Furthermore, given that there are different targets at the different spatial scales, and for different time periods, and for infill/brownfield sites, it is critical that the MASP would disaggregate the figures to reflect these different dimensions. In absence of same it will not be possible, in the first instance, to determine whether there is sufficient capacity to meet projected demand, and subsequently to track progress against the stated targets.

7.0 WHERE SHOULD NEW HOUSING STOCK BE LOCATED?

- 7.1 As noted above it is a specific objective of both the draft RSES and MASP that at least half of all future housing should be located within the built-up area of Limerick city & suburbs in order to address the guiding principles of Compact Growth, Urban Regeneration and Integrated Transport & Land Use Objectives.
- 7.2 To address the housing supply requirements estimated above, the draft MASP together with the two Local Authorities need to identify and include further lands within the metropolitan area, and located within the city & suburbs, suitable for housing.
- 7.3 Such sites must be capable of being delivered in a timely fashion and at a scale & density to utilise the finite supply of undeveloped or under-utilised lands in accordance with the recently published Urban Development & Building Height Guidelines, and which makes full utilisation of existing transport, physical & social infrastructure.
- 7.4 Accordingly, we would suggest that the Regional Assembly, in conjunction with the relevant local authorities, would seek to identify further strategic housing sites, preferably located within the Limerick city & suburbs, and have these included within a revised MASP

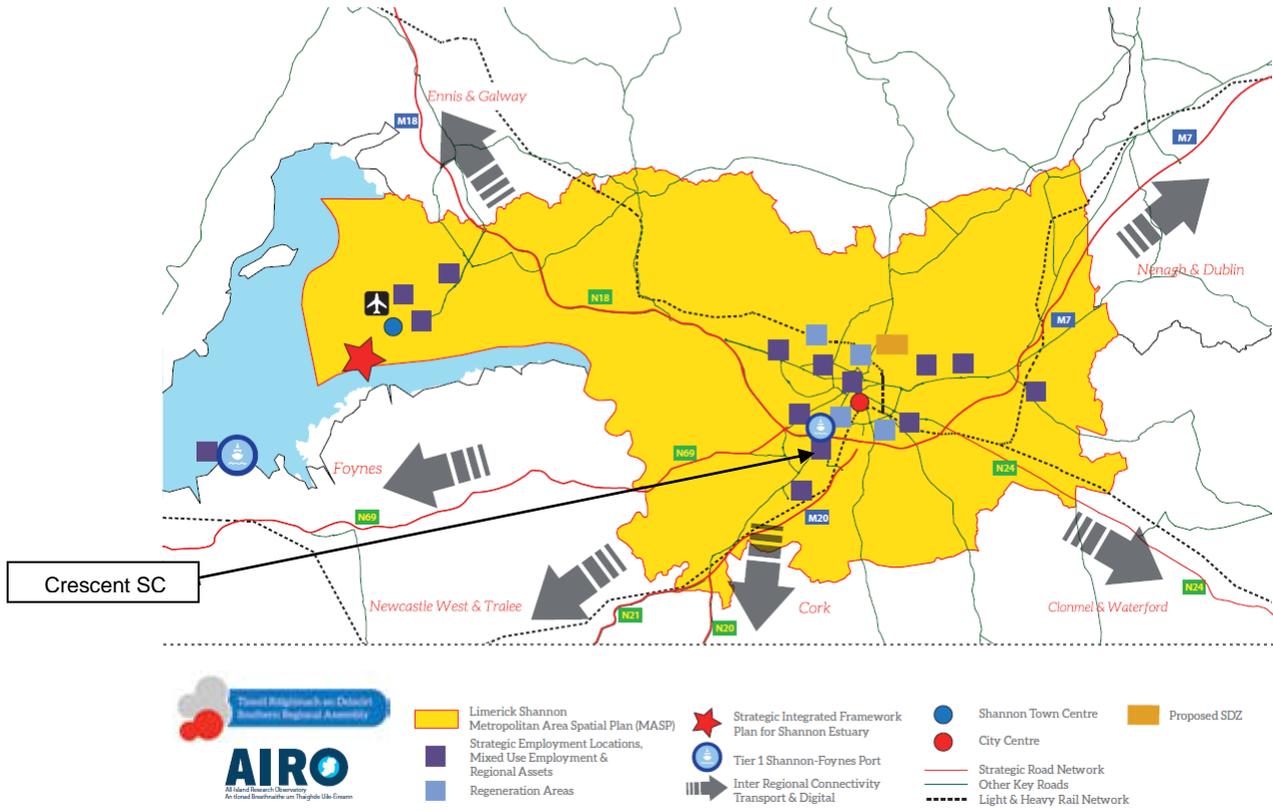
8.0 ENTERPRISE & EMPLOYMENT

- 8.1 As noted above, no employment projections have been provided to estimate the quantum of jobs required to support the population growth targets. One methodology to estimate the jobs requirement is to apply the approach utilised in the Cork MASP where a population growth to jobs ratio of 1.6 was deployed. Applying this to a population growth estimation of an additional 30,000 people by 2031, this suggests that in the order of 18,750 nett new jobs will need to be created in Limerick if this level of population growth is to be achieved.
- 8.2 Again, as with the estimation of housing supply, the next requirement for the MASP is identification of suitable sites and associated capacities to accommodate this level of future employment growth within city and wider metropolitan area. At present the draft Limerick MASP simply lists the three regeneration sites within the city centre controlled by the LCCC, together with the existing IDA/Shannon Group Industrial & Business Parks.
- 8.3 In addition, contained in a summary of the three MASP's in the Southern Region in Chapter 3 (People & places) of the draft RSES (but not in the MASP's themselves), is a summary diagram for each metropolitan area, showing a map of the area on which various symbols have been affixed indicating the locations of different types of sites and facilities. This includes a number of, what are called, "*Strategic Employment Locations, Mixed Use Employment & Regional Assets*". Unfortunately, there are no references in the text of the MASP's as to what these are and what their status is, nor is there any estimation as to what their employment capacities are.
- 8.4 In the case of Limerick, the MASP diagram within Limerick city and environs, 10 such locations have been so identified (see Figure 1 below), but no information has been provided as to the lands to which they relate, or the purpose and capacity they have for employment. This needs to be rectified by

the inclusion of such material, as has been done for Cork & Galway (see examples in Appendix 2).

Figure 2 Map of Limerick MASP

Limerick-Shannon | MASP Metropolitan Area Strategic Plan



Source: Southern Region draft RSES

9.0 CONTRIBUTION CRESCENT CENTRE LANDS IN DOORADOYLE CAN MAKE TO MEETING EMPLOYMENT & HOUSING NEEDS

9.1 The lands at the Crescent Centre, Dooradoyle, represent a very strategically located site providing a gateway to the city on an important public transport corridor within the built-up area of the southern suburbs of Limerick. Extending to over 30 hectares, these lands represent a strategically important large scale under-developed site within the inner suburbs suitable for a mixed use, including housing. (see Figure 3 below) These lands meet all of the relevant criteria for a strategic employment & housing site, as set out in the draft MASP, which include:

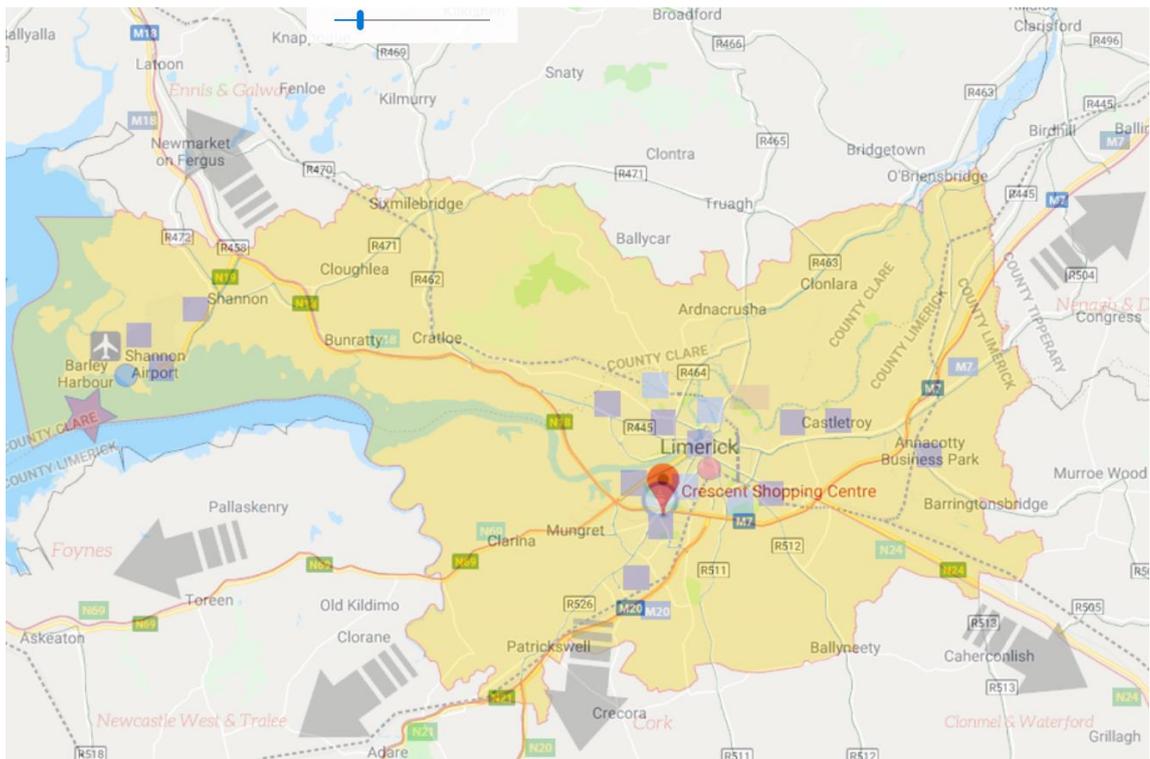
- **Infill site within Limerick City & Suburbs close to city centre**
The Clancourt lands at Dooradoyle are located within the CSO defined Limerick city & suburbs, less than 3 km from the city centre, on an infill site located between
- **Public transport accessibility**
Lands are located directly on an existing bus corridor. This will be further enhanced by the roll out of Bus Connects for Limerick
- **Supports consolidation and intensification**
Located within the metropolitan consolidation area as defined by South Dublin County Council in their Core Strategy of their current County Development Plan. The development of these lands next to high frequency public transport corridor would permit the creation of high quality employment & housing area which would complement and consolidate this part of Limerick southside.
- **Makes full use of existing transport and other public infrastructure**
These lands are already fully serviced and benefit from the presence of high quality public transport, advanced communications infrastructure, water and waste water networks, and energy infrastructure, all with spare capacity.

9.2 Given all of the above locational and infrastructural attributes which the Crescent site possesses, these lands are eminently suitable as being included as an important strategic employment and housing site within the defined city & suburbs.

9.3 The following provides a good overview of the existing & future potential capacity of the Crescent Centre lands, which have been identified as being within a Mixed Use Employment & Regional Asset site for Limerick in the draft MASP, but for which no details are currently included in the Plan.

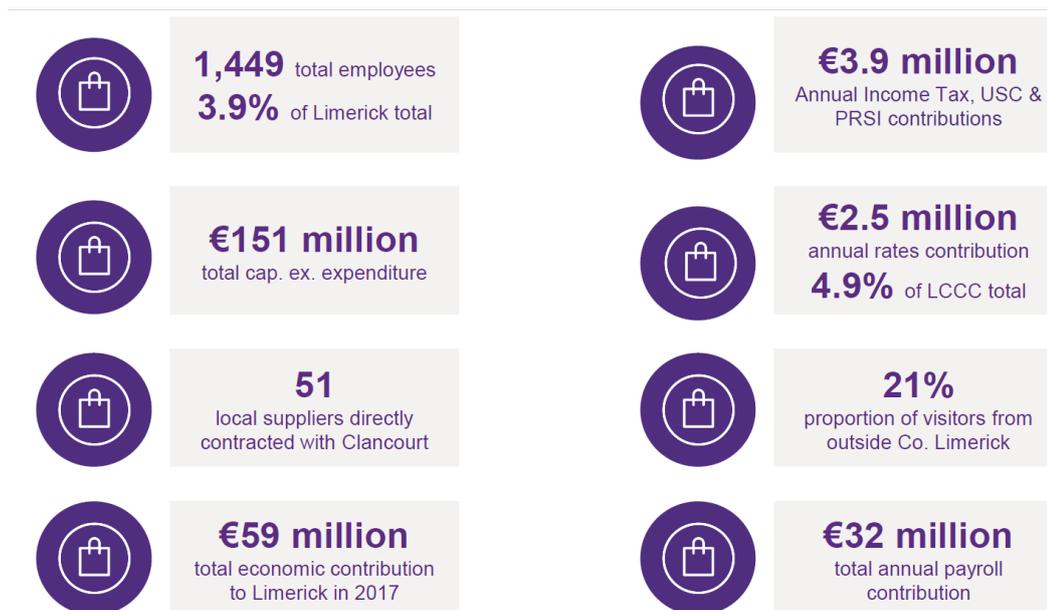
9.4 Figure 3 below superimposes the MASP summary map on a map of Limerick to illustrate the inclusion of the Crescent lands.

Figure 3 Strategic Employment Locations & Mixed Use Employment & Regional Assets identified in Limerick MASP



- 9.5 In 2018 Clancourt commissioned Grant Thornton to prepare an economic impact analysis of the Crescent Shopping Centre. In their report completed in June 2018 Grant Thornton found that since the opening of the Crescent Centre in 1975, the Centre has been one of the largest and most key contributors to the local economy in terms of both direct and indirect employment.
- 9.6 The Centre provides employment for 552 full time staff and 897 part time staff, supporting the livelihoods of a total of 1,449 employees. Crescent Shopping Centre has also been one of the main sources of tax revenues in the region, through the payment of commercial property rates, income taxes, social insurance contributions and taxes on consumption.
- 9.7 The Crescent Shopping Centre accounts for €2.5 million in annual commercial rates expenditure and €3.9 million in annual taxation expenditure. Set out below in Figure 4 is a summary of the report's key findings:

Figure 4 The Crescent Shopping Centre Key Facts



Source: Grant Thornton Report June 2018

- 9.4 The Crescent Shopping Centre has a total Floorspace c. 33,425 sq.m. of which convenience retail sales floorspace amounts to c. 2,445 sq.m. and comparison retail sales floorspace to c. 16,135 sq.m., with the balance in restaurants/cafes and ancillary services. It is important to note that over the period 2006 to 2018 the Crescent Centre only expanded its footprint by less than 1,800 sq.m., which as the Figure 5 below illustrates, is far less than comparator shopping centres.

Figure 5 Additional Floorspace in Shopping Centres since 2016



Source: Grant Thornton Report June 2018

Potential site capacity

At present less than half of the total site area of 30.8 hectares is in active use. The balance of the undeveloped part of the lands and the intensification of use of the existing shopping centre site has the capacity to support in the order of

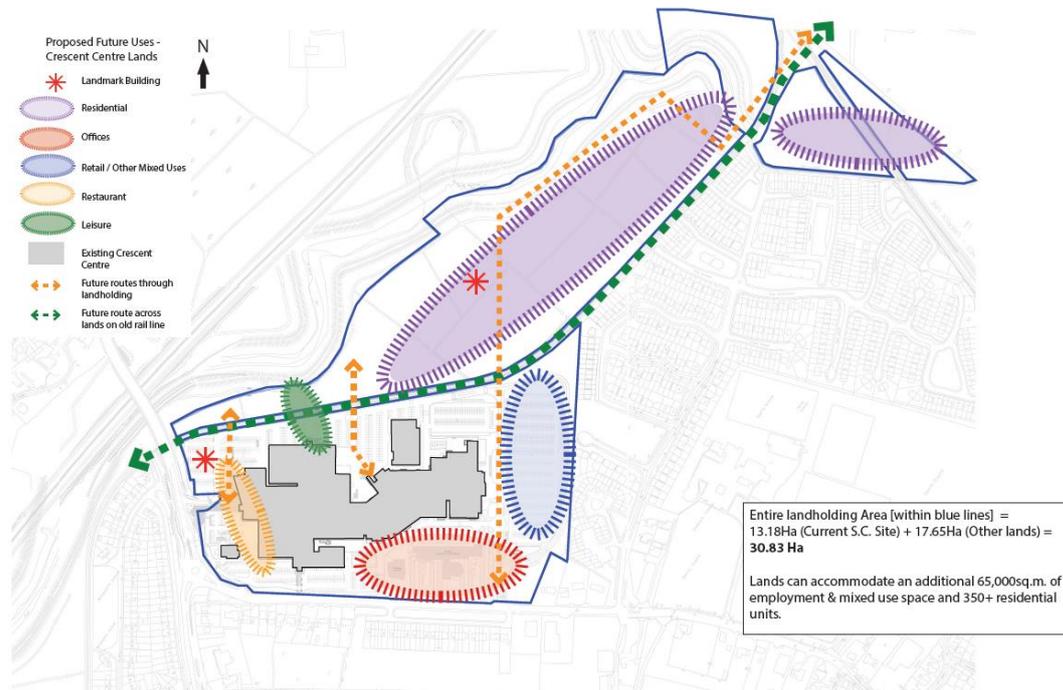
over 65,000sq.m. of employment and mixed use development, together with circa. 350 residential units. This would create a fully functioning mixed use District Centre to serve the expanding population of Limerick southside.

Employment

When fully built out the site has the capacity to accommodate in the region of an additional 2,500 jobs, mainly in offices, technology & support services, bringing the total number of jobs which could be supported on site to around **4,000, which constitutes a major strategic employment location for the city.**

- 9.8 The build out of these lands also contributes to achieving a number of other key planning objectives. These include:
- **Creating a stronger urban structure** with mixed use buildings directly fronting onto the surrounding roads to create streets
 - **Potential to create a landmark** to emphasise the gateway into the inner city.
 - **Provide upgraded public open space areas** with new housing providing passive surveillance
 - **Creating opportunities for sustainable transport links** across radial routes and into city centre, including new greenways
- 9.9 Our Client, Clancourt have also commissioned a number of other background reports relating to their Crescent centre lands. For the purpose of this submission the two most relevant reports are the Ecological Report prepared by Openfield in March 2019 and the Flood Modelling Study prepared by ARUP in August 2018 (summary report attached in Appendix 4).
- 9.10 The main findings from these two reports are that a) there are no flora or fauna on site of national or international significance; and b) the lands adjoining the Ballinacurra Creek, can accommodate development, without materially altering flood risk elsewhere, by incorporating an appropriate flood risk management strategy which utilises the existing OPW arterial drainage scheme. Accordingly, we our of the view that there are no material physical constraints to the development of the wider Crescent Centre lands.
- 9.6 Figure 6 below illustrates how the above residential and mixed use floorspace could be provided on this strategically located site, in close proximity to the city centre and on a public transport corridor, and which can make a major contribution towards Limerick city achieving its housing and employment targets, which should be set out clearly in the Metropolitan Area Strategic Plan.

Figure 6 Indicative Mixed Use Development Potential of the Crescent Lands, Dooradoyle, Limerick



bkdarchitects
BUREAU OF ARCHITECTURE

- 9.7 The Crescent Centre lands form part of cluster of employment intensive sites located in Dooradoyle. These sites are located on a core strategic development corridor, linking the city centre, Dooradoyle, University Hospital, Raheen Business Park and major residential districts. The completion of the Green Route bus corridor is an important addition to this district. This Green Route has provided a vital piece of infrastructure in ensuring the efficient delivery of high frequency bus services to the people of Limerick. The importance of these green routes needs to be further exploited in the MASP for Limerick.
- 9.8 Clancourt welcomes the designation of the these lands in Dooradoyle as a *Strategic Employment Locations, Mixed Use Employment & Regional Assets*” in the draft MASP (see Figure 2 which an extract from the draft MASP), but would respectfully request that that this designation would be augmented by the inclusion of suitable text providing an appropriate description of the existing attributes and future development potential. Set out below is a suggested wording:

Dooradoyle Urban Quarter

The Dooradoyle area represents a strategically located parcel of lands providing a gateway to the city on an important public transport corridor within the built-up area of the southern suburbs of Limerick. The Crescent Centre and adjoining lands, extending to over 30 hectares, represent a strategically important large scale under-developed site within the inner suburbs with potential to be further developed at the heart of a comprehensive mixed-use Urban Quarter. The existing Crescent Shopping Centre alone already employs nearly 1,500 workers, and when fully built out the total site area has the capacity to accommodate in the order of 4,000 employees (additional jobs

mainly in offices, technology and support services) and circa. 350 housing units, together with new amenities and greenway, in an integrated mixed use urban quarter. Taken together with the University Hospital and Limerick Council lands, this Dooradoyle Urban Quarter is considered to be a Strategic Development and Regeneration Area (SDRA)². The future development of this urban quarter will be guided by a masterplan for the area.

Figure 7 Dooradoyle Urban Quarter



6182 - Dooradoyle Urban Quarter Diagram

This approach is fully consistent with the recently published Urban Development & Building Height Guidelines, and in particular the Specific Planning Policy Requirement (SPPR 2).

10.0 RETAILING

10.1 As with housing and employment, the draft Limerick MASP contains no retail projections setting out the retail requirements for Limerick city and the wider metropolitan area to cater for the growing population in the years ahead. Despite the importance of retailing to the vitality and economic performance of the city and region, the draft MASP for Limerick gives very little prominence to this sector. In fact the draft plan devotes a single paragraph to retailing (section 6.6) and which solely summarises the 2010 Mid-West Region retail strategy. No analysis is provided as to the current situation regarding retailing in the city and region, and all that is contained in the draft plan is a single policy objective (MASP P.O. 13) for a new Joint Retail Strategy to be prepared in accordance with the Retail Planning Guidelines; to support the primacy of Limerick city centre in the retail hierarchy; and to investigate the potential to develop Shannon as a District Centre.

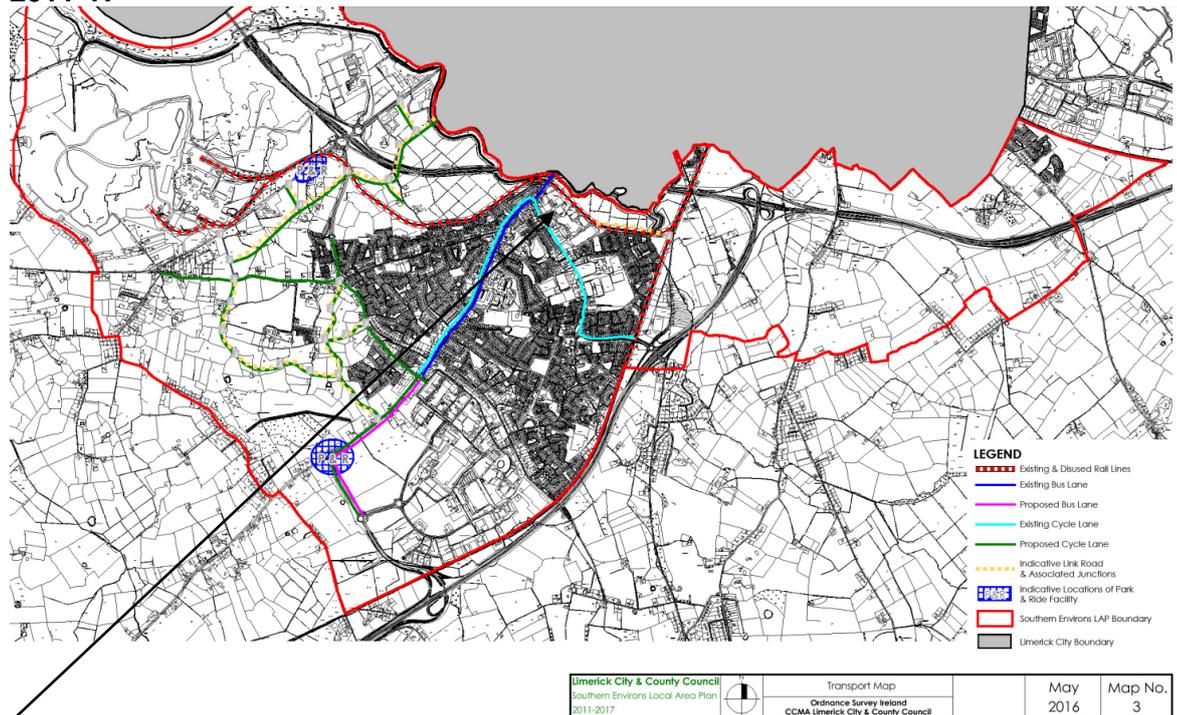
² SDRA is a designation which is utilised in the Dublin City Development Plan 2016-22 to promote the integrated development of particular areas of the city.

- 10.2 In our view this is an inadequate consideration of this important sector of the economy, which warrants a much greater consideration and a proper analysis is required to be undertaken to underpin the stated retail policy objective contained in the draft MASP. It is respectfully submitted that this objective should be more explicit about who and when this Joint Retail Strategy is to be prepared. In our view work on this strategy should be coordinated by the Southern Regional Assembly and be commenced immediately so as to be ready to inform the reviews of the Clare and Limerick City & County Development Plans, which must follow the adoption of the RSES.
- 10.3 The Metropolitan Plan is also the appropriate geographic scale to establish both the overall retail hierarchy, and the associated principles for the different tiers appropriate to the Limerick metropolitan area. Thus we would expect that the MASP would define and identify the extent of the Limerick city centre retail area, and the various centres at the district, town, neighbourhood and local levels throughout the metropolitan area. In this regard the unique position the Crescent Shopping Centre holds in Limerick as the only Tier 2 District Centre should be appropriately recognised in both the Limerick MASP and Joint Retail Strategy.

11.0 TRANSPORTATION

- 11.1 Section 4.0 of the draft MASP deals with Transportation issues. Very little detail is contained in the current draft. However, Clancourt welcomes the statement that development within the metropolitan area *“should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport – including infill and brownfield sites – are prioritised”,* and that *“high employment density offices and retail, should primarily be focused in locations which are well served by existing or proposed public transport corridors.”*
- 11.2 From this it is clear that the Crescent lands in Dooradoyle represent such an accessible site located on an existing public transport corridor, and as such is suitable for further development for high employment density offices and retail as part of a mixed use urban quarter. Set out below in Figure 8 is the Transportation Map taken from the current Limerick Southern Environs Local Area Plan 2011-17 (as extended to 2021) which shows the existing and proposed bus lanes and cycle lanes which demonstrate how well connected the Crescent Centre lands are to sustainable transport routes through Dooradoyle to the city.

Figure 8 Transport Map Limerick Southern Environs Local Area Plan 2011-17



↙ **Crescent Centre**

- 11.3 Despite the fact that Limerick is a Smarter Travel demonstration city, further progress is required to achieve greater modal shift in favour of sustainable transport modes. However, beyond the commitment to have prepared a Limerick Shannon Metropolitan Area Strategic Transport Strategy (MASTS) during the lifetime of the MASP, there is an absence of any detail in the plan detailing with strategic transportation issues.
- 11.4 We do note that under MASP Policy Objective 6 on Strategic Road Infrastructure, it states that it is an objective to improve accessibility to Limerick Southside, including the possible provision of a motorway interchange connection on the M20/M7 to the Southside. Set out below in Figure 9 is Clancourt’s suggested approach to improving vehicular access to Limerick Southside, based on initial work prepared by ARUP consulting engineers.

Figure 9 Southern Corridor – Proposed Strategic Access Routes to City



Source: ARUP

The following are the primary vehicular traffic proposals:

- Improved connectivity between the Motorway network (via the Dooradoyle Interchange) and the South side of Limerick, including Roxborough Road and John Carew Park Road (this is an objective of Limerick City and County Council) as the existing M7 Interchange has restricted access movements;
- New local road connections between Dooradoyle Road and Rossbrien Road (as noted in the Development Plan) and between Rossbrien Road and Roxborough Road (South);

12.0 CONCLUSIONS

- 12.1 Our client welcomes the publication of this draft Regional Strategy for the Southern Region and are largely supportive of the overall policies and objectives contained therein, which are to support the implementation of the National Planning Framework (NPF).
- 12.2 In particular we welcome the introduction of a new form of planning at the metropolitan scale, in the form of the Metropolitan Area Strategic Plans (MASP's), which seek to ensure the continued competitiveness of the three Munster cities and a supply of strategic housing & employments sites to support sustainable growth.
- 12.3 While the MASP for Limerick does build on the NPF principles of supporting compact urban growth where at least 50% of all future housing units are to be provided within the existing built-up area of the city and suburbs, our Client is very concerned that no population, housing, employment or retail projections have been undertaken.
- 12.4 Unlike what has been prepared in the Dublin, Cork & Galway MASP's, it is striking that no attempt has been made to undertake any form of demographic projections for the city or the wider metropolitan area. The only reference is the NPF objective for Limerick city to grow by 50% by 2040. This equates to 50,000-60,000 additional people by 2040. No details have been provided in the draft MASP as to where these people are going to live, what number of new housing units will be needed, and how/where 50% of these new housing units are going to be built within the existing built up area of Limerick city & suburbs to meet the NPF target? This needs to be set out clearly in a revised MASP.
- 12.5 Similarly, no employment projections have been provided to estimate the quantum of jobs required to support the population growth targets. For instance, for the city to grow by a further 30,000 by 2031, we would estimate that in excess of 18,000 net new jobs will have to be created in the city and suburbs. Again, as with the estimation of housing supply, the MASP should then identify sufficient suitable sites and associated capacities to accommodate this level of future employment growth within city and wider metropolitan area.
- 12.6 While the summary Map for the Limerick MASP, does contain symbols identifying what are termed '**Strategic Employment Location, Mixed Use Employment & Regional Assets**' sites, no details have been provided as to what these designations are or what capacities they have to accommodate future employment growth. This omission needs to be rectified.
- 12.7 It is noted that the Crescent Centre lands in Dooradoyle have been identified as being located in one such strategic employment and mixed-use regional asset, which is welcomed. However, the draft MASP needs to set out what the planning objectives for these lands are and what capacities the lands have to accommodate future employment and residential growth.
- 12.8 Accordingly, we would respectfully recommend that the current draft MASP for Limerick would be amended to incorporate the following text to accompany the designation of the Dooradoyle lands as a *Strategic Employment Location, Mixed Use Employment & Regional Assets site*:

Dooradoyle Urban Quarter

The Dooradoyle area represents a strategically located parcel of lands providing a gateway to the city on an important public transport corridor within the built-up area of the southern suburbs of Limerick. The Crescent Centre and adjoining lands, extending to over 30 hectares, represent a strategically important large scale under-developed site within the inner suburbs with potential to be further developed at the heart of a comprehensive mixed-use Urban Quarter. The existing Crescent Shopping Centre alone already employs nearly 1,500 workers, and when fully built out the total site area has the capacity to accommodate in the order of 4,000 employees (additional jobs mainly in offices, technology and support services) and circa. 350 housing units, together with new amenities and greenway, in an integrated mixed use urban quarter. Taken together with the University Hospital and Limerick Council lands, this Dooradoyle Urban Quarter is considered to be a Strategic Development and Regeneration Area (SDRA)³. The future development of this urban quarter will be guided by a masterplan for the area.

This approach is fully consistent with the recently published Urban Development & Building Height Guidelines, and in particular the Specific Planning Policy Requirement (SPPR 2).

12.9 Finally, while we note that the draft MASP does contain an objective for a new Joint Retail Strategy to be prepared, it is respectfully submitted that further details should be included on the scope of such a strategy and when it will be undertaken.

12.10 Accordingly, we would respectfully request that, given the importance of having this retail strategy prepared in advance of the impending review of the Limerick City & County Development Plans, this objective would be elaborated on to set out a prescribed timetable within which the retail strategy would be prepared, and how it should be coordinated by the Southern Regional Assembly. We also recommend that the unique position the Crescent Shopping Centre holds in Limerick as the only Tier 2 District Centre be appropriately recognised in both the Limerick MASP and Joint Retail Strategy.

³ SDRA is a designation which is utilised in the Dublin City Development Plan 2016-22 to promote the integrated development of particular areas of the city.

