

Tionól Réigiúnach an
Deiscirt

Teach an Tionóil,
Sráid Uí Chonaill,
Pórt Láirge,
Éire.
X91 K256



Tionól Réigiúnach
an Deiscirt

Southern Regional
Assembly

Southern Regional
Assembly

Assembly House,
O'Connell Street,
Waterford,
Ireland.
X91 K256

Teil/Tel: +353 (0)51 860700 Facs/Fax: +353 (0)51 879887
R-phost/Email: info@southernassembly.ie Idirlíon/Web: www.southernassembly.ie

Forward Planning,
Planning, Environment and Place-Making Directorate,
Limerick City and County Council,
Merchant's Quay,
Limerick.

23rd October 2023

**RE: Submission to the Proposed Material Alterations to the Draft Newcastle West
Local Area Plan 2023-2029.**

SRA File Ref: 23/001

A Chara,

I refer to your notice of the preparation of *Proposed Material Alterations to the Draft Local Area Plan (LAP) for Newcastle West 2023-2029* received on 22nd September 2023.

The Southern Regional Assembly (SRA) welcomes this opportunity to make a submission on the Proposed Material Alterations and commends the continued work being undertaken as part of the preparation a new statutory LAP for Newcastle West. This is an important next step in the strategic planning framework for Limerick following on from the adoption of the *Limerick Development Plan 2022-2028*, and recognition of Newcastle West as a Key Town in the *Regional Spatial & Economic Strategy for the Southern Region (RSES)*.

This submission is a follow-up to our submission dated 19th June 2023, on the *Draft Newcastle West Local Area Plan 2023-2029*, and is intended to assist the Council in ensuring the principles set out in the LAP align with the Development Plan, RSES and National Planning Framework. It also aims to ensure Newcastle West can maximise its potential and investment under Project Ireland 2040 and the National Development Plan and promote its transition to a more sustainable settlement pattern. Comments are set out below as per the format of the Proposed Material Alterations document- under the relevant Chapter headings of the LAP and relate to matters considered to be of a strategic, regional nature, referring to the relevant policy context of the RSES and its current implementation actions, where relevant.

Chapter 3 Development Strategy

The SRA welcomes the inclusion of *Table x: Quantum of zoned land required and quantum of land zoned*, (Text Amendment 4) to show consistency with the Core Strategy of the *Limerick Development Plan 2022-2028*. However there appears to be a discrepancy between the amount of land proposed for zoning under this table and that shown under the table in Text Amendment 19 (from Chapter 10 Land Use Framework, Zoning Matrix and Settlement Capacity Audit). This matter should be clarified. The table in Amendment 19 (which appears to take account of amendments proposed by the members following on from the CE's Report), shows that the amount of land now proposed to be zoned for new residential use is 59.5 ha. (54.1 ha. for "New Residential" and 5.4 ha. for "Residential Serviced Sites"). This compares to 43.8 ha. in the Draft Plan (36.5 ha. For "New Residential" and 7.3 ha. for "Serviced Sites"). The additional land zoned is well in excess of the requirement set out in the Core Strategy of the Development Plan (equating to a requirement for 33.4 ha. to accommodate population growth for the plan period). As outlined in our previous submission, the amount of land zoned for residential development should be in line with the figures for Newcastle West set out in *Table 2.7 Settlement hierarchy, population and household growth up to end of Plan period Q2 2028 plus zoned land provision* of the Development Plan.

Chapter 5 Sustainable Communities

The SRA supports the proposed amendment in relation to the West Limerick Sports Complex and its potential to expand to facilitate a regional sports complex for the greater West Limerick area (Text Amendment 7). RPO 22 *Newcastle West* of the RSES supports and promotes the role of Newcastle West as a Key Town, that is strategically located and of significant influence in a sub-regional context. Specific support for regional recreational and sporting facilities is set out in RPO 198 *Sport and Community Organisations* and RPO 199 *Larger Sports Projects*.

Chapter 7 Sustainable Mobility and Transport

The SRA welcomes additions and clarifications on issues relating to sustainable mobility including the *National Sustainable Mobility Policy (2022)* and integration of actions from the Local Transport Plan into the document. RPO 151 *Integration of Land Use and Transport*, RPO 152 *Local Planning Objectives* and RPO 157 *Local Transport Plans* of the RSES support this approach. The proposal to investigate the potential for a Mobility Hub at an appropriate location in the town centre is particularly welcome and would be most appropriately located close to existing public transport facilities to support sustainable and multi-modal travel. This is supported through RPO 160 *Smart and Sustainable Mobility* and RPO 162 *Multi-Modal Travel Integration*. The SRA in conjunction with the two other Regional Assemblies, has recently launched the *Sustainable Mobility Academy* as part of *Pathfinder Programme* of the *National Sustainable Mobility Policy*, which could provide some useful examples or case studies to assist further development in this area, and is available through the following link: [Sustainable Mobility Academy - Home](#).

Chapter 9 Infrastructure and Utilities

The SRA welcomes clarifications in relation to water and wastewater capacity in Newcastle West for Chapter 9. There is some concern regarding the capacity constraints outlined for the town and potential for it to reach its growth targets, which as a Key Town is for more than 30% growth by 2040. As outlined in RPO 4 *Infrastructure Investment* of the RSES, infrastructure investment should be aligned with the spatial planning strategy of the RSES. The SRA therefore supports the Council in liaising with Uisce Éireann to progress investment plans and delivery in this area, to ensure the town develops as planned. Chapter 8 *Water & Energy Utilities* of the RSES also provides a number of additional supportive objectives in this area.

The SRA also welcomes the proposal under Text Amendment 16 to examine the potential of district heating for the town. RPO 221 *Renewable Energy Generation and Transmission Network* of the RSES supports this approach.

Chapter 10 Land Use Framework, Zoning Matrix and Settlement Capacity Audit

In terms of Text Amendment 19 and the extent of land zoned for new residential use, please refer to the section under *Chapter 3 Development Strategy* above. There is also some concern regarding the proposed reduction in the amount of land zoned for *Open Space and Recreation* from 82.9 ha in the Draft Plan to 78.3 as part of the Proposed Amendments. It is important that sufficient areas can be provided for Blue and Green Infrastructure to serve both the existing and planned population of the town, particularly where residential densities are likely to increase, with consequent reduction in the provision of private open space. It is also noted that the *Land Use Zoning Matrix* has been amended, so that the *Campsite/Caravan Park-Holiday Use* is now open for consideration on land zoned for *Open Space and Recreation*, as well as *Education and Community* and *Enterprise and Employment*. It is important that sufficient land is zoned specifically for these uses and they are situated close to the residential population.

The SRA welcomes more detailed guidance and layouts shown for the Development Opportunity Sites under the amendments, providing more information on where connections can be provided etc. The proposal to prepare more detailed Masterplans to incorporate a planned and integrated approach to their development is also welcomed, to ensure they are designed and developed to a high standard.

Amendments to Maps

In terms of the amendments shown on the *Zoning Changes Map*, it is noted that a large parcel of land is being proposed for rezoning from *Agriculture* to *New Residential* adjacent to the southern LAP boundary. As outlined under *Chapter 3 Development Strategy* above, the amount of land zoned for new residential use is well in excess of the requirement set out in the Core Strategy of the Development Plan. This proposal involves a large tract of land in a peripheral location, away from the town centre. It is located outside the Census 2016 Settlement boundary for Newcastle West, and should be considered in terms of the compact growth requirement set out under the National Planning Framework. As outlined in our previous submission on the *Draft Plan*, in order to ensure consistency with the Core Strategy of the Limerick Development Plan 2022-2028, the amount of land zoned for residential development should be in line with the figures for Newcastle West set out in Table 2.7 *Settlement hierarchy, population and household growth up to end of Plan period Q2 2028 plus*

zoned land provision of the Development Plan. RPO 151 *Integration of Land Use and Transport* of the RSES, also states that residential development should be carried out sequentially, where lands which are, or will be most accessible by walking, cycling and public transport prioritised. Furthermore RPO 176 *“10-minute” city and town concepts* aims to attain sustainable compact settlements, whereby a range of community facilities and services are accessible in short walking and cycle timeframes or public transport from homes. The principle of compact settlements, where people have the option to walk or cycle should be fully considered in this regard.

It is also noted that a proposed distributor road along the southern LAP boundary has been included as part of the amendments. The RSES Key Town Section refers to a Distributor Road as well as other transport measures under the *Key Infrastructural Requirements heading* for Newcastle West. However it is noted that this is to be included through the preparation of a Local Transport Plan. The Local Transport Plan prepared with the Draft Plan has not identified a need for the Distributor Road. The submission of the National Transport Authority on the Draft Plan is also noted in this regard. Since the adoption of the RSES in 2020, the Limerick Development Plan 2022-2028 has been prepared with changes to anticipated population growth for the town and the amount of residentially zoned land to the south of the town proposed to be reduced significantly. The planning and design of the N21 Newcastle West Road Scheme has also progressed, to relieve congestion on the existing N21 through the town and which is supported through RPO 167 *National Road Projects* of the RSES. The promotion of more sustainable modes of transport for the town in the Draft Plan and amendments is welcomed and in line with national, regional and local policy. RPO 163 *Sustainable Mobility Targets* of the RSES states that significant progress is sought in the Region to reduce the modal share of private car travel and increase the modal share of travel by walking, cycling, public transport and car sharing. The justification for the Distributor Road, which would facilitate greater use of the car, therefore needs reconsideration within this context.

Conclusion

The SRA welcomes the public consultation at Proposed Material Alterations stage for the preparation of a new Local Area Plan for Newcastle West. The RSES team is available for further consultation and for any clarification required regarding this submission.

Mise le meas,



David Kelly

Director, Southern Regional Assembly