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Forward Planning Section,
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19th June 2023

RE: Submission 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 the Draft Local Area Plan (LAP) for Newcastle West 2023-2029 received on 5th May 2023.

The Southern Regional Assembly (SRA) welcomes this opportunity to make a submission on the Draft Plan 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 intended primarily to assist and support the Council in ensuring the principles set out in the LAP align with the Development Plan, RSES and National Planning Framework. It also intends 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. The submission addresses the following themes:

A: Role of Newcastle West as a Key Town

B: Compact Growth and 10 Minute Town Concept

C: Economic Development and Enterprise

D: Sustainable Transport and Mobility

E: Climate Action

F: Environmental Assessment

A: Role of Newcastle West as a Key Town

The SRA notes and welcomes the recognition of the role of Newcastle West as a Key Town throughout the Draft Plan. Regional Policy Objective (RPO) 22 *Newcastle West* of the RSES aims to: support and promote the role of Newcastle West as a strategically located urban centre of significant influence in a sub-regional context, promote the opportunity for inter-regional collaborations across county boundaries with Abbeyfeale, Listowel and Rathkeale and locations identified in the Strategic Integrated Framework Plan for the Shannon Estuary, which offer collective strengths and potential for project partnerships to drive sustainable economic growth in the West Limerick/North Kerry area. It also aims to: support the initiatives of the Atlantic Economic Corridor to realise the full potential of the Newcastle West enterprise assets to support job creation, improve competitiveness, attract investment and create future economic growth. Delivery of identified infrastructural requirements, tourism potential and opportunities for investment in incubation and innovation infrastructure for ICT and related companies are also supported. The inclusion of these key aspects of the RSES in the various chapters of the Draft Plan are of key importance in ensuring it develops to its potential and grows in a planned and sustainable manner.

B: Compact Growth and 10 Minute Town Concept

In terms of the overall development strategy for Newcastle West set out in the Draft Plan, the SRA particularly welcomes the inclusion of a specific chapter on *Town Centre First*, which is a very proactive approach to promoting the town centre in the first instance with the strategic vision: *to facilitate the development of the town centre as a place to live, work, visit and enjoy by ensuring a vibrant mixed-use environment, facilitating high quality new development and through the enhancement and development of the town's rich architectural heritage and development of the public realm.* The SRA also commends the proposal to implement the 10 Minute Town Concept in accordance with the SRA's *10 Minute Towns Accessibility & Framework Report*, where short travel time and ease of access via sustainable travel modes is achieved between where we live, work, access services, access recreation and amenity.

In terms of compact growth targets, NPO 3c of the NPF and RPO 35 *Support for Compact Growth* of the RSES state that 30% of all new homes should be located within the existing built-up footprint of the settlement, which is defined as the CSO urban settlement boundary. The Draft Plan states that all the lands zoned *New Residential* are located within the settlement boundary which is welcomed. However 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. It is noted that *Table 3.1: Core Strategy Units Allocated* of the Draft Plan states that the total land required to accommodate population

growth to 2029 as *New Residential* and *Serviced Sites* is 33.4 ha. However the quantum of land zoned as set out Table 3.3 *Quantum of Land Zoned* in the Draft Plan amounts to 43.8 hectares (36.5 ha. For *New Residential* and 7.3 ha. for *Serviced Sites*). To ensure consistency with the Core Strategy of the Development Plan, the amount of land zoned should be in line with the amount required as per the Development Plan methodology. This would also ensure that the plan aligns with its objectives of compact and sequential growth, embracing the Town Centre First approach.

It is noted that the broad-based residential density targets for Newcastle West have already been set out in the Core Strategy of the Development Plan i.e. 35+ dph for *New Residential* and 10 dph for *Serviced Sites* zonings. This has been carried through to the Draft Plan, however consideration should be given to higher density targets particularly for sites within the town centre and close to public transport services. This would reflect the importance of Newcastle West as a Key Town and align with the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns & Villages)* (2009), which promotes higher densities for cities and larger towns (including towns with 5,000 or more people). The *Good International Practice: minimum densities for 10-minute city and town neighbourhoods* example included in Section 3.9 *Placemaking* of the RSES, notes how international experience shows that the critical density at which a large portion of people will change to accessing services by foot and bicycle is approximately 10,000-12,500 people per square kilometre.

The inclusion of specific opportunity sites for development identified within the Draft Plan is noted as is the requirement set out in *Objective DSO2: Development Strategy*, to prepare Design Briefs, Masterplans, Sustainability Statements and Social Infrastructure Assessments as part of the development of these sites. The importance of ensuring excellence in the design approach to developing these sites will be a key factor in attracting people to live, visit and work in Newcastle West. RPO 31 *Sustainable Place Framework* of the RSES supports this approach, promoting the development of quality places through integrated planning and consistently excellent design. In addition RPO 34 *Regeneration, Brownfield and Infill Development* provides guidance on developing urban infill and brownfield sites. It is important that sites close or within the town centre are developed in line with these principles.

C: Economic Development and Enterprise

The SRA welcomes the inclusion of policies within the Draft Plan to promote Newcastle West as an employment centre, recognising inter-regional collaborations with Abbeyfeale, Listowel and Rathkeale, its proximity to the Shannon Estuary and Shannon Foynes Port, the Atlantic Economic Corridor and tourism potential such as the Limerick Greenway. *Chapter 6 Economic Development and Tourism* also encourages the redevelopment of vacant commercial units, and brownfield, derelict, and infill sites for local enterprise development, which aligns with the Town Centre First principle. The proposal for small-scale employment opportunities and start up business incubation units to be explored in the town with a view to re-use of existing buildings is welcomed and could provide new uses to tackle issues of vacancy within the town centre.

The Draft Plan also promotes inter-urban linkages and partnerships across county boundaries and a diverse range of employment opportunities by facilitating appropriate development on land zoned *Enterprise and Employment*. It is noted that two of the Opportunity Sites (19 and 20) zoned for *Enterprise and Employment* use are located in peripheral locations outside the *Ten-Minute Walk Time zone* from the Square/town centre shown in Figure 4.2. In addition no cycle or walking infrastructure is currently provided for Site 19 at Dromindeel. It is important that sites close to the town centre are the preferred location for employment development in the first instance, so that people living in the town can walk or cycle or people travelling to the town for work could use public transport rather than promoting more car-dependent developments. It is also noted that the indicative access point for Site 19 shown on Figure 6.2 would be directly onto the existing N21 National Road. It is important that the strategic capacity of the N21 would not be significantly impacted by such a proposal. RPO 153 *Capacity of Inter-Urban Road Connections* of the RSES aims to protect, improve and maintain the operation of the National and Strategic Regional inter-urban road connections within and between the cities, settlements, ports and airports.

D Sustainable Transport and Mobility

The SRA welcomes the preparation of the Local Transport Plan for Newcastle West as part of the LAP process. RPO 157 *Local Transport Plans (LTP)* notes how LTPs maximise the opportunities for the integration of land use and transport planning, prioritise the delivery of sustainable and active travel, identify the extent to which estimated transport demand associated with local development objectives can be supported and managed on the basis of existing transport assets and identify the transport interventions required within the plan area and in the wider context, to effectively accommodate the anticipated increase in demand. The LTP has informed the Draft Plan and some very useful, potential linkages have been identified to ensure more people can use sustainable modes of transport within the town. The promotion of walking and cycling is welcomed, including the support for linking connectivity between the town centre and the Limerick Greenway, which acts as an amenity corridor. RPO 201 *National Trails, Walking Routes, Greenway and Blueway Corridors* supports investment in the development of walking and cycling facilities as well as greenway and blueway corridors within the region.

In terms of reducing traffic congestion within Newcastle West, the Draft Plan outlines how Limerick County Council will work with Transport Infrastructure Ireland and the Department of Transport to deliver the N21 Newcastle West Road Scheme to enhance regional accessibility and relieve congestion on the N21 Limerick to Tralee Road. RPO 167 *National Road Projects* identifies the N21 Newcastle West bypass as a project being progressed to achieve NSO 2 *Enhanced Regional Accessibility*. RPO 166 *Investment in Strategic Inter Regional Multi-Modal Connectivity to Metropolitan Areas and Economic Corridors*, states that it is an objective to achieve and maintain the sustainable development of infrastructure that strengthens the quality of inter-regional connectivity to other regions on the Atlantic Economic Corridor.

E Climate Action

Chapter 8 *Climate Action, Environment and Heritage* of the *Draft Plan* sets out important objectives on tackling climate change and transition to a low carbon economy including natural

heritage, biodiversity and blue/green infrastructure. This endorses the SRA's approach in promoting a Green and Liveable Region and the recognition given to the SRA's *Our Green Region - a Blue Green Infrastructure and Nature-based Solutions Framework for the Southern Region* in achieving this is welcomed. The proposal to provide new connections and linkages to enhance accessibility between existing residential areas and areas of public open space and recreation is also a welcome approach.

F Environmental Assessment

We note the preparation of Strategic Environmental Assessment (SEA) Reports, Natura Impact Report in support of the Appropriate Assessment (AA) and Strategic Flood Risk Assessment published alongside the Draft Plan. The Planning Authority should note that the RSES is informed by extensive environmental assessments, contained in the SEA Statement, AA Determination and Natura Impact Report, which are available on the SRA Website. These assessments looked at environmental sensitivities for all parts of the Region and we would recommend that Limerick City and County Council review these documents to inform the Council's own environmental assessments and to ensure that mitigation measures identified to address environmental sensitivities and constraints are included in the Final LAP where relevant.

Conclusion

The SRA welcomes the public consultation at draft stage for the preparation of a new Local Area Plan for Newcastle West.

Further engagement between the SRA as a key stakeholder and the Forward Planning Section of Limerick City and County Council in the final phase of the Local Area Plan is encouraged. The RSES team is available for further consultation and for any clarification required regarding this submission.

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David Kelly

Director, Southern Regional Assembly