



**Limerick
Chamber**
Advancing business together

Limerick Development Plan

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

Introduction

Limerick Chamber would like to thank Limerick City and County Council (LCCC) for the opportunity to provide our member's feedback with regards to *Proposed Variation No. 3 to the Limerick Development Plan 2022-2028 (as varied)*.

Limerick Chamber is the largest business organisation in the Mid-West representing 400 business and 50,000 employees across a wide array of organisations and sectors. Housing has been the biggest challenge across all business types over the last several years.

We welcome LCCC's efforts to accelerate housing delivery in alignment with the National Planning Framework. While the policy ambition is robust, the variation potentially fails to adequately address critical implementation capability gaps.

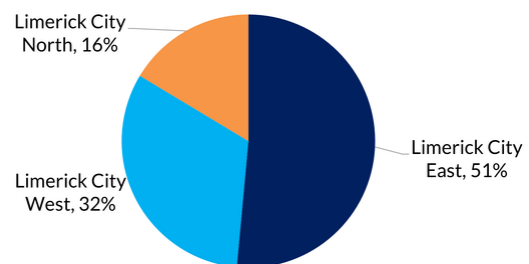
Scene Setting

Current housing development data for both Limerick City and the County in its entirety is extremely concerning. Not only is there simply not enough housing being built, the location of where the existing housing is being built is leading to further sprawl without equal housing development being brought forward in the core city area.

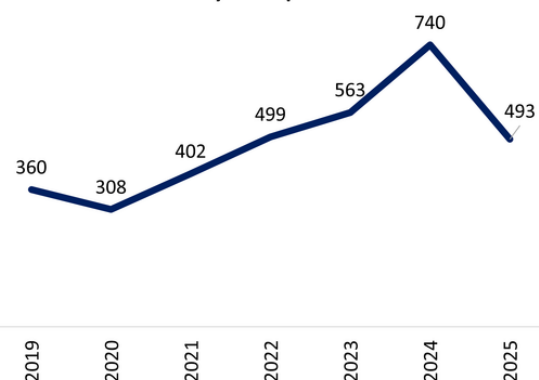
Four Key Points:

1. Limerick needs to **triple / quintuple its housing output** to meet existing demand (lower and upper targets calculated by the Housing Commission).
2. The number of homes being built in "city" Local Electoral Areas **decreased by one third** in 2025.
3. Other parts of the "city" i.e. **city east**, has **provided over half the housing** of the three city local electoral areas with the city centre area seeing minimal new homes built.
4. Limerick is almost **6,000 homes behind** its existing LDP target.

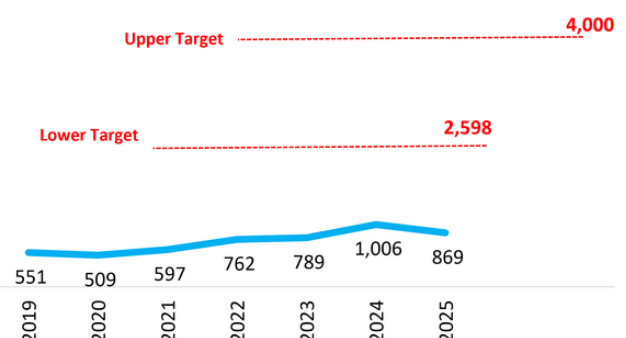
Share of "City" Home Completions (2015 - 2025)



"City" Completions



Co. Limerick Completions



Observations on the Variation

State-owned Land

To meet the stated capacity of lands zoned, approximately 17,500 homes, the LDP relies heavily on the delivery of homes on State-owned Land. While this is an admirable goal, one which Limerick Chamber supports. These sites are unlikely to deliver homes during the remainder of the plan (to 2028) and we are concerned that they might take the place of other sites closer to delivery. We estimate the number of homes in this category to be upwards of 3,800 - this represents 22% of home delivery as part of the LDP. Past delivery of scale by State-owned entities has also been at a glacial pace, which is concerning for housing delivery under the LDP.

Removing these sites decreases the number of homes to be delivered to just over 13,000.

Tier 2 Sites

Concerningly to deliver on the stated capacity of 17,000 homes the LDP relies on Tier 2 sites, which are **serviceable sites rather than already serviced** sites. We estimate this figure to be approximately 1,700 homes - 10% of the stated capacity of 17,000. Given the current issues surrounding Irish Water and grid connections, there is the likelihood that these homes are also not deliverable during the lifetime of the plan.

As Minister Browne stated, the focus should be on sufficient and zoned land; *"It is imperative that local authorities now commence the process of revising their individual development plans as quickly as possible to ensure that sufficient zoned and serviced land is available for housing development."*

Removing these homes, along with the State-owned land homes unlikely to be delivered would reduce the potential yield to just over 11,000 homes.

Other Sites

We understand from engaging with our membership that there are a further number of sites that are either subject to multiple folios making acquisition challenging, sites under existing legal disputes, lack of sewer connections, lack of

desire to sell the land. We estimate this total to be approximately 1,800 homes, ultimately reducing realistic deliverability of the LDP to just over 9,000 homes. Furthermore, we understand from previous planning applications and reports available from An Coimisiún Pleanála that the development of housing in proximity to Loughmore Common / Canal represents a challenge and could put future developments, totaling approximately 2,000 homes at planning risk.

Keeping that in mind with regard to "other sites" **there is the potential to diminish realistically developable homes to around 7,000 homes.**

Updated HNDA

The updated HNDA outlines that almost 10,000 homes must be completed over the remainder of the plan to 2028.

This is concerning as there is potential that the variation to the LDP might only realistically develop 7,000.

More concerning is, given our current rate of Limerick's delivery, these 7,000 homes would take 8 years to deliver.

City Centre Development

Leaving aside the varied LDPs ability to realistically deliver on the homes targeted, or required. The lack of zoning of scale for housing in proximity to the city centre is extremely concerning to Limerick Chamber. Since the first round of consultations for the LDP in 2022, Limerick Chamber has maintained that portions of the Dock Road are ripe for residential development. It is disappointing under this variation that the scale of delivery along the Dock Road and the wider Shannon area is not being realised.

"The location of the Greenpark lands is ideal in terms of both meeting this demand and in further energising Limerick. As it stands, the lack of available new homes within walking distance of the city centre / CBD is having an adverse effect on the potential of the city and the ability of businesses based therein to thrive"

- Limerick Chamber Submission to LDP Material Amenments 2022

There are two potential “landbanks” at scale that could delivery housing in proximity to the city centre, one of those is at Greenpark, while the other are the LDA lands at Colbert Station. Despite announcing plans in 2019, a planning application has yet to materialise for Colbert Quarter.

Meanwhile the Greenpark lands have owners in occupation as well as a proven record for delivery. We strongly urge Limerick City and County Council as part of the variation process to revisit the Greenpark lands for appropriate zoning for residential accommodation.

Attitude Towards Flood Zones

National Policy Objective 78 as part of the National Planning Framework states *“Avoiding inappropriate development in areas at risk of flooding **that do not pass the Justification Test**, in accordance with the Guidelines on the Planning System and Flood Risk Management;”*

Therefore with the proper assessment and justification, housing can be delivered on these lands. We have seen this process yield positive results for similar sites such as the proposed LDA Development at [Dyke Road in Galway](#).

The attitude towards these potential areas as part of the development plan is extremely dissappointing, and provides a strong signal for the future of city centre development. Much of the city centre is within a flood zone, if we are to ensure the future development of the city the LDP needs to zone lands that can pass the justification test. If the LDP fails to do this, compact growth at scale will be extremely difficult going forward.

Density

While Limerick Chamber supports densification goals of the core city centre, there is large concern regarding development economics and viability once the requirement exceeds 50 dwellings per hectare. The goal, while admirable, could hinder, rather than enable development.

This is particular relevant for “urban neighbourhoods”, which under the development plan variation are defined by areas such as Castletroy, Raheen, Mungret, Annacotty, Monaleen etc. Historically, these areas have a proven track record of delivering homes. For example, Limerick City East has been responsible for 51% of housing provision of last ten years. The concern from Limerick Chamber is that without adequate funding mechanisms, housing will no longer be built under the new density guidelines in these areas, or that more developers will rely on funding from Approved Housing Bodies for the development of higher density units. We ask if Limerick City and County Council have done an anlysis of viability of development in these areas under the new density guidelines.

Similarly, without adequate mechanisms for delivery and funding the viability gap, reaching densities of 100+ dwellings per hectare in the “city centre” zone will be extremely difficult.

Targets

It is unclear if LCCC has used the maximum headroom limit available under the guidelines issued by the Minister. This allows for 50% uplift on the target number of homes, which would result in 3,898 homes per annum - closer to the Housing Commission upper demand analysis for Limerick. Comparatively, the HDNA outlines a demand of 3,208 over the period. It is not clear if the development plan is being driven by the uplift figure of or the HNDA figure. The Chamber argue that it should be driven by the former as it provides not only more headroom but also aligns more with Housing Commission demand analysis.

Housing Delivery Plan

There needs to be a Housing Delivery Plan for Limerick, previous plans undertaken by LCCC were only required to focus on social and affordable homes. However, there is a clear gap in policy regarding the delivery of private homes. Notwithstanding the exclusion of private home development, the previous plans focus more on targets and tenure mixes rather than tangible delivery actions to encourage the building of homes and monitoring of such. In essence, it lacks adequate detail.

The Housing Need Demand Assessment (HNDA) completed for variation number 3 highlights that **of the 8,738 homes with planning permission in Limerick just 36% of homes were commenced**, meaning 64% of homes with planning permission i.e. 5,610 homes have not commenced.

An updated Housing Delivery Action Plan is needed that formally acknowledges the attrition rate of planning permissions, that focuses on private and public housing and the part LCCC can play in active land management mechanisms, prioritising infrastructure for developers who can demonstrate immediate site viability.

With Limerick moving backwards in housing supply, while other cities are moving forward there is a clear disconnect with national policy enabling local development.

For the removal of doubt, if Limerick continues at its current rate of delivery without adequate strategic intervention, it will take over 20 years to deliver the 17,500 homes outlined under the LDP.

Conclusion

In conclusion, the evidence demonstrates that Limerick is significantly behind its housing delivery targets and that the current strategy will not meet the plan-period requirements to 2028 and onwards.

While the LCCC's stated zoned capacity appears substantial, much of it is constrained by ownership, Tier 2 status, infrastructure limitations, environmental constraints, or other deliverability barriers, meaning the realistic supply of homes is potentially materially lower than suggested. That is not to say that these lands should be de-zoned, but that a greater buffer and more strategic approach needs to be adopted within the variation.

Continuing to rely on peripheral and uncertain sites risks undermining compact growth, sustainability, and the vitality of the city centre. Variation No. 3 should therefore take a more practical and policy-aligned approach by rezoning appropriately serviced urban lands in and near the city core, including lands capable of being justified under updated flood-risk policy where necessary, so that Limerick can meet housing demand, support national planning objectives, and deliver homes in the right locations within the required timeframe.

Without bridging the apartment and density viability deficit, updating zoning capacity to reflect real-world commencement data, ensuring that viability will not be a concern over 50 dph, the variation risks creating a plan that is statutorily compliant but practically undeliverable. We urge LCCC to incorporate pragmatic adjustments prior to final adoption.



Limerick
Chamber
Advancing business together

www.limerickchamber.ie

