

Manager's Report on Public Consultation to Members

Limerick Regeneration Framework Implementation Plan

Delivering safe and sustainable communities



***Office of Regeneration
February 17, 2014***

SECTION I: PUBLIC CONSULTATION PROCESS

Manager's Report on issues raised in relation to the consultation on the Draft Limerick Regeneration Framework Implementation Plan 2013

SECTION I

I.1 INTRODUCTION

This report is the Manager's Report on the formal public consultation process that was undertaken following publication of the draft Limerick Regeneration Framework Implementation Plan (including an Environmental Report and Natura Impact Report). The purpose of this report is to inform members of the Council of the consultation process outcome in relation to the plan, and to seek approval for a number of amendments, in response to issues raised.

I.1 CONTENT OF THE REPORT

There are four sections to the Manager's Report outlined as follows:

Section 1

Section 1 notes the formal public consultation process that is the subject of this report and sets out the next steps that are necessary to allow for the variation of the Limerick City Development Plan 2010-2016.

Section 2

Section 2 contains a full list of submissions received, a summary of the main issues raised in each submission, together with the Manager's Response and Recommendation.

Section 3

Section 3 of the Manager's Report highlights the proposed amendments to text, maps and figures in the draft LRFIP, based on the recommendations outlined in Section 2.

Section 4

Section 4 contains the SEA Screening of Proposed Amendments and an Environmental Report Addendum.

I.2 BACKGROUND

A public launch of the LRFIP by Ms. Jan O'Sullivan T.D., Minister of State for Housing and Planning, took place on the 27th September 2013, in Thomond Park Stadium, Limerick. Following the launch, the formal consultation public display period relating to the draft LRFIP commenced on Friday, 1st November 2013 and finished on Thursday, 5th December 2013. The formal consultation strategy included the following measures:

1. Two Press notices released:

Limerick Leader – Saturday, 2nd November 2013 (Saturday edition available on Thursday, 31st October 2013)
Limerick Post - Thursday, 31st October 2013

2. Draft LRFIP made available for physical viewing at:

- Main reception area, Limerick City Council, City Hall; Merchants Quay, Limerick;
- Main reception area, Limerick County Council, County Hall, Dooradoyle, Limerick;
- Office of Regeneration, Watch House Cross, Moyross, Limerick;
- Office of Regeneration, LEDP, Roxboro Rd, Southill, Limerick;
- Office of Regeneration, King's Island Community Centre, King's Island, Limerick;
- Watch House Cross Library, Moyross, Limerick;
- Roxboro Library, Roxboro, Limerick;
- Limerick City Library, The Granary, Michael St., Limerick;
- Dooradoyle Library, Dooradoyle, Limerick.

3. Draft LRFIP made available for online viewing at:

- Limerick City Council:
www.limerickcity.ie/Press/DraftLimerickRegenerationPlanNoticeOfPublicConsultation

- Limerick County Council:
www.lcc.ie/Public_Notices/draftplan.htm

- The Official Guide to Limerick:
<http://www.limerick.ie/regeneration/2013-11-01limerickregenframeworkimplementationplanpublicconsultation.html>

Interested parties were asked to express their views on the Draft LRFIP by making a written submission to the Office of Regeneration, Limerick City Council, City Hall, Limerick or an emailed submission to LRFIP@limerick.ie up until Thursday 5th December 2013.

In addition to the above, a summary information booklet for each of the four regeneration areas was delivered to each area to ensure maximum dissemination of information.

I.3 RESULTS FROM THE FORMAL CONSULTATION

A total of **274** submissions or observations were received. Of these submissions 267 no. were received 'on-time' and 7 submissions were received as 'late submissions'. Limerick City Council would like to take this opportunity to express its appreciation to those that made submissions. The submissions have been considered in detail in Section 2 of this report which summarises the issues raised in each submission and suggests a City Council response to each of these issues. Section 3 details the recommended amendments to the sections of the draft plan. In the event of typographical errors or discrepancies identified since the public display of the draft plan, these have been identified and amended accordingly. It is not necessary to itemise each typographical change in Section 3 of this report as they are considered minor in nature.

Generally there was a positive response to the draft Plan with most people considering that the broad strategy (vision) for the regeneration areas was appropriate and necessary to bring about an improvement to the areas and Limerick city as a whole.

I.4 NEXT STEPS

The Draft Framework Implementation Plan is not a statutory plan however, subject to the approval of the Elected Members, the LRFIP will become a Limerick City Council policy document. The LRFIP will also provide the basis for prioritising projects for delivery in the regeneration areas in alignment with the Implementation Strategy outlined in the plan. It is the intention of Limerick City Council to vary the Limerick City Development Plan 2010-2016 to secure the LRFIP's planning status. The variation will provide a statutory basis for the Limerick Regeneration Framework Implementation Plan. The variation process will commence in March 2014, after the draft LRFIP is adopted as a policy document.

SECTION 2: LIST OF SUBMISSIONS RECEIVED

SECTION 2

Reference No.	Submission From	Summary of Issues	Manager's Opinion	Manager's Recommendation
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ON-TIME SUBMISSIONS

I	Steering Group, Limerick Northside Age Friendly City Project (LNAFC), Limerick.	The submission indicates the following:		
		a) States support of the vision for Regeneration Areas as this is strongly reflected in the theme of an Age Friendly City which is 'to make the area a great place in which to grow old'.	a) Noted and agreed	a) No change to LRFIP
		b) States support for the concept outlined in the Social Framework Plan 'to improve the quality of life of residents in the regeneration communities, focused on improving health and well-being of the population', and 'to improve the coherence of service provision across the statutory and voluntary/community sector, with a view to improving effectiveness in responding to needs of the population'.	b) Noted and agreed	b) No change to LRFIP
		c) States support for the inclusion of the objective to 'promote improvement in mental health and well being' in Section 2.1.3.2 Priority 2: Health and Well-being and suggests that there is a role for a multi-agency approach to dealing with isolation including organisations such as. the Regeneration Company, HSE and Moyross Community Companions for example.	c) Noted and agreed	c) No change to LRFIP
		d) States support for the inclusion of Section 2.1.3.3 Priority 3:Ageing Well – Health and Well-being of Older People which states that a priority for the Local Authority is to promote Limerick City as and Age-Friendly City with Age-Friendly neighbourhoods and communities. This section reflects the core aim of the LNAFC project which is to create 'a great place in which to grow old' and the Moyross Regeneration Area forms part of this.	d) Noted and agreed	d) Change to LRFIP, to reference LNAFC and its core aim at Section 2.1.3.3 under "Experience to Date", page 130.
		e) States that in relation to Moyross, based on the work carried out thusfar, the community have identified that it is imperative to link both the LNAFC and LRFIP more closely and develop a partnership that promotes the inclusion and well-being of Older Adults in Moyross and avoid duplication of effort which could ultimately be damaging to both projects by creating confusion and a perception that resources are being wasted.	e) Noted and agreed	e) Change to LRFIP, to reference the links between LNAFC and LRFIP and potential for a partnership approach at Section 2.1.3.3. A. Planning for an Age-Friendly City and Neighbourhoods under "Key Agencies", page 130.
		f) Suggests the inclusion of an additional sentence to paragraph A. Planning for an Age Friendly City and Neighbourhoods as part of the Scope of Action heading would also ensure the work carried out under the LNAFC would form part of the strategic outlook for the Moyross Regeneration Area:	f) Noted and agreed	f) Change to LRFIP. Section 2.1.3.3.under "A. Planning for an Age-Friendly City and Neighbourhoods", "Scope of Action" to state the work of LNAFC can inform the work of the Alliance and the strategic outlook for Moyross. Insertion at the end of point 1), p. 130. Please refer to Section 3: Proposed Amendments
		g) '5) Build on the existing work carried out with Older Adults as part of the Limerick Northside Age Friendly City Programme in which the Moyross Regeneration Area forms part of'.	g) Noted and agreed	g) No change to LRFIP
		h) States support for paragraph B. Specific Actions to support Health & Well-being of Older People, the goal outlined to address the identified needs of Older Adults and social connectedness is also welcome.	h) Noted and agreed	h) No change to LRFIP
		i) States support for Section 2.4.1 Movement and Connection Strategy the objective of upgrading the existing Moyross Avenue to prioritise pedestrians is widely welcomed by the Older Adults of the area. Also, the objective to improve access from Watch House Cross to Ballynanty is important for Older Adults and, in general, accessibility for all.	i) Noted and agreed	i) No change to LRFIP

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Reference No.	Submission From	Summary of Issues	Manager's Opinion	Manager's Recommendation
		j) States support for the enhancement of traffic calming and crossing at the major junction of Moyross Avenue and the Ballygrennan Road is to be commended. The LRFIP must also be cognisant of the pedestrian 'desire line' that emanates from Cosgrave Park towards Watch House Cross.	j) Noted. It is recognised that movement by pedestrians and cyclists should be as easy, direct, attractive and as safe as possible. The existing informal desire line from Cosgrave Park to Watch House Cross sets up a basic structure which is critical to the movement of both pedestrians and cyclists to both avail of facilities but also to animate and self police the area. Informal desire lines in grassed areas, such as the existing line in Cosgrave Park should be protected and enhanced as part of public realm improvements in the area.	j) Change LRFIP with regard to Issue number 1j to include an additional objective to protect and enhance the existing desire lines within Moyross as part of section 2.4.4 Open Space and Public Realm Strategy (page 184) after point 11. Please refer to section 3: Proposed Amendments
		j) States support for Section 2.4.1 Movement and Connection Strategy, an objective to support the upgrade of existing bus stops in the area.	k) Noted and agreed	k) No change to LRFIP
		k) States that it was noted during consultation that there is no GP practice within the Moyross area and this can put additional strain on Older Adults who are in poor health. The active promotion of compatibility of the Land Use Strategy for Moyross and a potential health/medical use is an objective that must be built upon.	l) Objective 3 and 4 of section 2.4.2 Land Use Strategy of the draft LRFIP sets out a key objectives in relation to promoting appropriate uses such as GP practices and medical facilities in Watch House Cross District Centre and Moyross Community Centre. GP clinics are generally directed to district and community centres where they can link in with other local services, including pharmacies and other shops and services, in order to reduce the need to travel and to help support a range of local services in each area. Furthermore, under the Limerick City Development 2010-2016 (LCDP), medical facilities is a 'permitted in principle' use under the District Centre zoning at Watch House Cross and an 'Open in Principle' use under the Educational, Cultural & Community zoning at the existing Moyross Community Centre. The LRFIP supports this objective of promoting a GP practice in Moyross in line with the statutory LCDP.	l) No change to LRFIP
		m) States support for the promotion of the 'Bays' site to include an equine element to promote the education and care for horses in the community is to be applauded.	m) Noted and agreed	m) No change to LRFIP
2	Alex McPartland 40 Aherlow Close Old Cratloe Road Limerick	The submission indicates the following in relation to the Moyross Physical Framework Plan:		
		a) Supports the development of a high profile site at the existing entrance to Moyross.	a) Noted. The Office of Regeneration notes that this objective was part of a redevelopment proposal of a preferred option presented at the public consultation open days in March/April 2013. When drafting the LRFIP, during the summer of 2013, the Office of Regeneration considered on closer examination of the site in question, that placing development at this high profile site such as a residential use in a greenfield site designated within Flood Risk Zone A (high risk) in the Limerick City Development Plan 2010-2016 would be contrary to	a) No change to LRFIP

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			the proper and sustainable planning of the area. For these reasons, in the physical framework plan of Moyross developed as part of the draft LRFIP in September 2013 omitted this particular objective as part of its land-use strategy.	
		b) Does not support the strengthening of Watch House Cross as a mixed-use District Centre with improved access from Ballynanty.	b) Noted. It is a specific objective within the adopted statutory Limerick City Development Plan 2010-2016 to promote and improve Watch House Cross as a district centre in accordance with the Mid-West Retail Strategy. This means that a mix of uses with a primary retail function as well as other uses, including commercial, leisure, libraries, personal and medical services and residential uses, will be permitted uses at this location. The Office of Regeneration supports this objective and reinforces the objective in the LRFIP.	b) No change to LRFIP
		c) Does not support the creation of a new link between LIT and the District Centre at Watch House Cross.	c) Noted. It is a specific objective within the adopted statutory Limerick City Development Plan 2010-2016 to promote and improve Watch House Cross as a district centre for the area of Moyross, Kileely, Ballynanty and Parteen in accordance with the Mid West Retail Strategy. Furthermore, the LCDP states a key objective to provide for greater linkages between Moyross and the adjacent areas to the west including the educational institutions, such as LIT. The Office of Regeneration supports this objective and reinforces the objective in the LRFIP.	c) No change to LRFIP
		d) Does not support improved access from the civic heart of Moyross to Thomond Park/Cratloe Road.	d) As noted in part c) it is a specific objective within the adopted statutory Limerick City Development Plan 2010-2016 to provide for greater linkages between Moyross and the adjacent areas. The Office of Regeneration supports this objective and reinforces the objective in the LRFIP.	d) No change to LRFIP
		e) Does not support the provision of improved access between the civic heart of Moyross and Cratloe Road.	e) See response to Submission number 2(d) above	e) No change to LRFIP
		f) Does not support the provision of access between Moyross Avenue and Cratloe Road.	f) See response to Submission number 2(d) above	f) No change to LRFIP
		g) Supports the upgrade of the existing Moyross Avenue to include crossing facilities, landscaping, traffic calming measures and on-street parking.	g) Noted and agreed	g) No change to LRFIP
		h) Does not support improving the existing access from Moyross to Cratloe Road.	h) See response to Submission number 2(d) above	h) No change to LRFIP
		i) Supports the provision of well-designed housing that addresses current and future needs.	i) Noted and agreed.	i) No change to LRFIP
		j) Does not support the provision of a new entrance onto the proposed Coonagh-Knockalisheen Road to eliminate the existing cul-de-sac layout.	j) Noted. It is proposed to answer items j) and k) together as these objectives are interrelated. The Office of Regeneration wishes to offer more clarity on the proposal for creating a new entrance at Coonagh and eliminating the existing cul-de-sac layout of Moyross by extending Moyross Avenue to	j) No change to LRFIP

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			<p>meet the proposed distributor road alignment. It is a specific objective within the adopted statutory Limerick City Development Plan (LCDP) 2010-2016 to:</p> <ul style="list-style-type: none">• <i>complete the northern distributor road and to provide access from it to Moyross.</i> <p>Furthermore the LCDP states the following in relation to the Caherdavin area:</p> <ul style="list-style-type: none">• <i>To secure the completion of the northern relief road from Coonagh to Moyross.</i> <p>The Office of Regeneration supports the objectives above and reinforces these objectives in the LRFIP for the following reasons:</p> <ul style="list-style-type: none">• Provides a direct connection to the Coonagh-Knockalisheen distributor road from Moyross, increasing its accessibility to a range of retail and employment services.• Is compatible with the zoning objectives of the Limerick City Development Plan.• Enhances the streetscape and environmental quality of this key gateway to Moyross through the extension of the existing Moyross Avenue westwards to link the community of Moyross with its wider catchment. The new street will raise the profile of the community facilities in Moyross and potentially attract new users from a wider catchment, supporting its viability and vibrancy.• Increases the viability of the established uses in the District Centre at Jetland and the Mixed Use centre at Coonagh.• Supports the strategy for providing a suitable catchment for Moyross as established in the Development Plan and the draft Limerick Regeneration Framework Implementation Plan which will strengthen the prospect of attracting private sector investment and will improve the quality of life and strengthen the economic and social life of Moyross. <p>Phase I of the Coonagh Knockalisheen bypass which incorporates the construction of a new distributor road from Coonagh to the western end of Moyross with the extension of the existing Moyross Avenue westwards to meet the new road alignment was approved by An Bord Pleanala in September 2011 and its delivery as part of the regeneration programme is scheduled in the medium-term.</p> <p>Further consultation with local residents of Moyross and other stakeholders will be conducted prior to more detailed design work of Moyross Avenue to keep everyone fully informed of proposals that will affect their neighbourhood.</p>	

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		k) Does not support extending the existing Moyross Avenue to link to the proposed Northern Distributor Road.	k) Please refer to submission 2j	k) No change to LRFIP
		l) Does not support the proposed sites for housing identified in the physical plan.	l) The layout for the proposed sites for housing as part of the draft LRFIP considered carefully submissions received as part of the public consultation open days held in March/April 2013. Residents responded positively to this particular objective with 71% of the overall respondents (those who answered yes or no) in agreement with the proposed sites for housing. However, at the time of the open day in March 2013 there was a particular issue raised by the residents of Cliona Park relating to the proposed housing layout that affected their area. The Office of Regeneration amended the proposed housing layout at Cliona Park to show homes retained as part of the LRFIP given that there is an established community to the front of Cliona Park who do not wish to move. No other issues were raised by other residents regarding their respective neighbourhood proposals and the proposed sites for housing were deemed positive in light of the majority in favour of the proposal.	l) No change to LRFIP
		m) Supports the creation of safe pedestrian and cycle links from Sarsfield Gardens through existing bridge underpass to Moyross Avenue.	m) Noted and agreed	m) No change to LRFIP
3	Bedford Row Family Project (BRFP)	The submission indicates the following:		
		a) That the Bedford Row Family Project be included in a meaningful way in the consultation for determining priorities for Regeneration and ultimately the process of service delivery.	a) Noted and agreed, as far as possible in roll-out of LRFIP	a) No change to LRFIP
		b) That the Bedford Row Family Project be involved in discussions to initiate work to support a number of Level 3/4 families all of whom have children and all of whom have family members in prison, with thorough evaluations built in throughout.	b) Noted and agreed, as far as possible in roll-out of LRFIP	b) No change to LRFIP
		c) Supports the strengthening of the role of the Limerick Children Services Committee.	c) Noted and agreed	c) No change to LRFIP
		d) Supports the concept of enabling a 'critical mass' of families to be stable entities as this type of thinking is the basis for the BFP's Family Support Course.	d) Noted and agreed	d) No change to LRFIP
		e) Supports the investment in diverse learning for adults as it yields rich dividends in terms of community empowerment.	e) Noted and agreed	e) No change to LRFIP
		f) States that despite all the excellent work ongoing in the city BRFP has knowledge of many children in families involved in serious crime that do not avail of such activities, and/or only 'dip' into them for a short length of time.	f) Noted and agreed	f) No change to LRFIP
		g) States that early intervention starting at pre-school age is not possible without attending to holistic intervention with all the family, often the extended family.	g) Noted and agreed	g) Change to LRFIP to insert additional text regarding the need for holistic and whole family intervention to section 2.1.3.1 Education and Learning: Description of Activities (page 122) under point 1 of "Early Years Learning and School Readiness"

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		h) States that in relation to models implemented in the UK focussing on overcoming pupils barriers to learning that the Bedford Row project <u>and many other agencies</u> could provide 'guest speakers' who would be highly qualified to be role models and who have helped themselves.	h) Noted and agreed	h) Change to LRFIP, to insert additional text on the need to draw on relevant experiences, evidence-based best practice in Limerick and use role models as appropriate to section 2.1.3.1, under point 2. of "School Attendance and Readiness" Scope of Action, at end of point 3, page 123.
		i) States that whilst lessons are to be learnt from good work elsewhere, we should utilise the <i>tried and trusted evidence based methods already developed in Limerick</i> .	i) Noted and agreed	i) Change to LRFIP. Amendment reflected in recommendation h) above.
		j) States that in relation to Family Support to foster greater stability and personal development is more likely to happen if the family is empowered to come up with solutions themselves.	j) Noted and agreed. This is seen to be reflected in reference to the "strengths-based practice" referenced under 2.1.1 Objectives and Strategy, middle paragraph column 2, p. 119	j) No change to LRFIP
		k) States that it supports additional services to improve the reach and engagement with the target population in learning.	k) Noted and agreed.	k) No change to LRFIP
		l) States that it peer support – parent to parent and also states that to optimise chances for success with families the peer support element of parenting should be reinforced to ensure that the standards are high and emotional elements are attended to thoroughly in any peer support training.	l) Noted and agreed	l) Change to LRFIP to insert additional text regarding the scope for parent-to-parent and peer supported learning to section 2.1.3.1, "4 Adult Education and Community Learning", Scope of Action and Scope for Funding Support, at pages 124 and 125
		m) States that referring of individuals from agency to agency is not ideal and results in 'fragmentation' rather than 'integration'.	m) Noted and agreed	m) No change to LRFIP
		n) States that the delivery of the 'scope of actions' for the families is crucial and that considerable thought needs to be developed for this delivery model.	n) Noted and agreed	n) No change to LRFIP
		o) States that consideration needs to be given to long term staffing interventions to address adult mental, physical and emotional health.	o) Noted and agreed	o) Change to LRFIP, to insert additional text to emphasise the need for attention to be given to long-term staffing arrangements at section 2.1.3.2 Priority 2: Health and Well-Being, under C. Adult Mental and Physical Health and under Scope of Action (page 128).
		p) States that the education of community based learners who may have left formal education early is very challenging and placing an emphasis on priorities that are not really those that they started out with may be ambitious.	p) Noted and agreed	p) Change to LRFIP, to insert additional text regarding challenges faced by adult learners who left formal education early. At section 2.1.3.1 under 4 Adult Education and Community Learning, Scope of Action (page 125).
		q) States that in relation to pages 130 and 131 (addressing problems), BRFP is about optimising potential that people have within themselves (and their families and their communities) as well as solving problems.	q) Noted and agreed	q) No change to LRFIP
		r) States that in relation to pages 132 and 133 (addressing employment) that if people have high self-esteem and self-confidence they will generate activity and business and be creative around problems that seem insurmountable when they are depressed and/or in too much pain.	r) Noted and agreed	r) No change to LRFIP
		s) States that child protection may have the highest priority in national policy but there is not a lot of evidence to show that it has the highest priority in practice .	s) Noted. There is not a formal evidence-base that could be referenced for Limerick to indicate that child protection has not the highest priority in practice.	s) No change to LRFIP
		t) States that it supports the improvement of efficiency and effectiveness of service delivery to families with complex social problems, drawing on essential service characteristics to support better outcomes for children and families. B/Row	t) Noted and agreed.	t) No change to LRFIP

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		works hard to overcome disconnection.		
		u) States that in relation to the numerous services providing family support and services to children and young people focused on youth at risk, and targeting the population of the regeneration areas that coherence and integration is paramount to success.	u) Noted and agreed.This point is covered in strong focus on the need for integration specified in the social regeneration plan.	u) No change to LRFIP
		v) States that to make a statement ' <i>like HSE Social Workers being the key frontline service</i> ' is (unintentionally of course) a symbol of the disconnect that exists in our thinking.There are other key 'front line' individuals involved.	v) Noted and agreed.Reference to other frontline services added.	v) Change to LRFIP, to indicate that social worker are one of the key frontline statutory services and that other services are also relevant to section 2.1.4.5 Priority 5: Families and Youth at Risk, Experience to Date, (page 137)
		w) States that in relation to assessment and needs intervention pathways for Family support that LANS does not appear to assess how long a family might need intervention and believes that this is another aspect of disconnection.	w) Noted and agreed that it is important to assess to length of time a service is likely to be needed.	w) Change to LRFIP, to indicate that to indicate that the length of time for which services is available may not be assessed and to state the importance of this to section 2.1.4.5 Priority 5: Families and Youth at Risk,A. Assessment of Needs and Intervention Pathways for Family Support (page 139).
		x) States that the Bedford Row Family Project is developing an evidence-base with the recent ' Social Return on Investment ' Evaluation done. (Launched in 2013).	x) Noted and agreed.	x) Change to LRFIP, to indicate good practice in Limerick projects and the developing evidence base with reference to the work of Bedford Row Family Project to section 2.1.4.5 Priority 5: Families and Youth at Risk,A.Assessment of Needs and Intervention Pathways for Family Support (page 139).
		y) States that Bedford Row's aims, would be to engage before the onset of problems rather than 'as early as possible after the onset of problems' and we can point to many successes in this regard.	y) Noted and agreed.	y) Change to LRFIP to indicate engaging with youth at risk before problems of offending arise to section 2.1.4.5 Priority 5: Families and Youth at Risk, B. Improved Outcomes for Youth at Risk, Scope of Action, (page 140)
		z) States that it supports best practice in this area, i.e., development and reintegration plans and enhanced services for young offenders and using a holistic and 'whole family' approach and wishes that this approach be developed so that more children in very distressed families deeply involved in criminality of the most serious nature could be protected as they grow.	z) Noted and agreed.	z) Change to LRFIP to indicate importance of holistic whole family approach in particular to engage more children living in distressed families to section 2.1.4.5 Priority 5: Families and Youth at Risk, B. Improved Outcomes for Youth at Risk, Scope of Action, (page 140)
		aa) States that it supports Restorative Justice as this as one of the most important initiatives in Youth Justice ever developed and has huge potential for further development.	aa) Noted and agreed.	aa) No change to LRFIP.
		bb) States that in the 'Scope of Actions' from page140 onwards, there is nothing about offering hope, inspiration, engendering enthusiasm, excitement about a better life, etc. Offering people these elements is a major part of the 'how'.	bb) Noted and agreed.	bb)Change to LRFIP to state that "hope, inspiration, etc. are a major part of the approach for action with this group and for the regeneration communities generally" to section 2.1.4.5 Priority 5: Families and Youth at Risk, B. Improved Outcomes for Youth at Risk, Scope of Action, (page 140)

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		cc) States that it supports funding for additional services to improve the reach with the target population – targeted and more extensive outreach.	cc) Noted and agreed.	cc) No change to LRFIP
		dd) States that it supports the aspirations of social trust of people in the neighbourhood and extent of support from family, neighbours, friends, community participation and empowerment, reduced social isolation and changed expectations.	dd) Noted and agreed.	dd) No change to LRFIP
		ee) States that BRFP supports the Integration across the Priority Themes of the Social Programme.	ee) Noted and agreed.	ee) No change to LRFIP
		ff) States that in relation to formal assessments and an intervention pathway plan for family support that a departure from a 'medical model' approach will not tackle the emotional distress experienced.	ff) Noted. Point not fully understood?	ff) No change to LRFIP
		gg) States that in developing a capacity building programme to support progress with the community participation, empowerment, and civic engagement agenda needs to deal with anger, fear, and power . Building and <u>sustaining</u> relationships with very fearful, distressed, and angry people requires a high level of skill. Anger (which often manifests in a kind of apathy) is very detrimental to community development.	gg) Noted and agreed.	gg) Change to LRFIP to state that capacity building programme must address the issues identified to section 2.1.3.7 Priority 6: Community Participation, Empowerment and Civic Engagement, end of 1 st paragraph under heading B. Capacity Building: Community Participation, Empowerment and Civic Engagement (page 151).
4	Bernadette Fitzgerald	The submission indicates the following in relation to the Moyross Physical Framework Plan: a) Does not support improved access from the civic heart of Moyross to Thomond Park/Cratloe Road.	a) See response to Submission number 2(d) above	a) No change to LRFIP
		b) Does not support the provision of improved access between the civic heart of Moyross and Cratloe Road.	b) See response to Submission number 2(d) above	b) No change to LRFIP
		c) Does not support the provision of access between Moyross Avenue and Cratloe Road.	c) See response to Submission number 2(d) above	c) No change to LRFIP
		d) Does not support the upgrade of the existing Moyross Avenue to include crossing facilities, landscaping, traffic calming measures and on-street parking.	d) Noted. In developing the Limerick Regeneration Framework Plan the Office of Regeneration complies with, amongst other guidance documents, the best practice mandatory national guidance document the 'Design Manual for Urban Roads and Streets' (DMURS) which was published in 2013. Guidance contained within DMURS states that to create an appropriate streetscape for Moyross Avenue involves enclosing the street as much as possible to “define the streets as urban spaces, create a greater sense of intimacy and promote them as pedestrian friendly spaces that are overlooked” (p.69). This sense of intimacy has been found to have been a key component in creating a traffic calmed environment. For this reason Moyross Avenue will be designed to be as visually narrow as possible with a sufficient height of building to create an adequate sense of enclosure (between 1:2 and 1:3 (height: width) is recommended in the national mandatory guidance to achieve this sense of enclosure). Parallel street parking bays along the avenue in appropriate locations, are provided to allow as much activity on the avenue as possible as people come and go from their vehicles. The presence of people along the avenue will add to the vibrancy and vitality of Moyross, create more ‘eyes on the street’ and therefore reduce the likelihood of anti-social	d) No change to LRFIP

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			behaviour taking place.	
		e) Does not support the creation of a new linear park	<p>e) Noted. In relation to Moyross, it is a specific objective within the adopted statutory Limerick City Development Plan (LCDP) 2010-2016 to:</p> <ul style="list-style-type: none"> • <i>Protect the existing biodiversity of the area and to provide interpretation for the public.</i> • <i>Develop a large public park that connects the river Shannon, Moyross and Caherdavin for a range of active and passive recreational uses.</i> • <i>Create a civic area of suitable scale in Moyross that can act as a focal point for community, civic and educational facilities including a rail station.</i> <p>The Office of Regeneration supports the objectives above and reinforces these objectives in the LRFIP in the creation of a strategic linear park.</p>	e) No change to LRFIP
		f) Does not support improvements to the existing access from Moyross to Cratloe Road.	f) See response to Submission number 2(d) above	f) No change to LRFIP
		g) Does not support the creation of safe pedestrian and cycle links from Sarsfield Gardens through existing bridge underpass to Moyross Avenue.	<p>g) Noted. The proposed pedestrian and cycle link from Sarsfield Gardens, through the existing bridge underpass to Moyross Avenue, in close proximity to a designated Special Area of Conservation will offer an attractive leisure amenity for the residents of Moyross and the wider community. A Crime Prevention through Design (CPTD) Statement prepared by Sergeant Alan Roughneen, Crime Prevention through Design Officer, has considered the safety aspects of the framework plan proposals for Moyross.</p> <p>In considering the above objective, recommendations from the CPTD Officer in relation to safety of public open spaces/links considers that:</p> <ul style="list-style-type: none"> • The open space must be designed with due regard for natural surveillance. • Adequate mechanisms and resources must be put in place to ensure its satisfactory future management. • Care should be taken to ensure that a lone dwelling will not be adversely affected by the location of the amenity space. • Positioning amenity/play space to the rear of dwellings can increase the potential for crime and complaints arising from increased noise and nuisance. <p>The potential to design out the potential for crime, anti social behaviour and reduce the fear of crime will underpin any environmental improvements (leisure path design, seating and lighting) at detailed design stage and in further consultation with the</p>	g) No change to LRFIP

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			CPTD Officer and the wider Moyross community.	
5	Ballinacurra Weston Residents' Alliance and the Weston Gardens Residents' Association	a) States that the views of residents on the ground were not sought and the people that are currently involved in the existing consultative 'structures' are not representative of residents from the communities concerned, and they are not mandated to speak for the BWRA and the WGRA.	a) Noted, this is a reoccurring issue raised by BWRA / WGRA.	a) Change to LRFIP to specifically reference the view that methods of community representation are not considered satisfactory by some, and that this issue must be addressed to 2.1.3.7 Priority 6: Community Participation, Empowerment and Civic Engagement (page 150).
		b) States that in achieving effective consultation, the goal will not be realised unless the current policy of selective inclusion in the regeneration process and local Estate Management is ended as membership of the CSG and local Estate Management committee continues to be by invitation only.	b) Noted. The planned review of estate management / community structures should examine this issue.	b) Change to LRFIP to state that a review of the structures in place is being commissioned by Limerick City Council to 2.1.3.7 Priority 6: Community Participation, Empowerment and Civic Engagement, A. Community organization / Estate Management / Local Service Delivery (page 151). Proposed Amendments.
		c) States that arrangements should be immediately made by the Office of Regeneration to organise community elections so that residents can elect representatives onto empowered local regeneration and estate management committees.	c) Noted. The planned review of estate management / community structures should examine this issue.	c) Change to LRFIP. Addressed under b) above.
		d) States that the draft LRFIP was officially launched in September and that a mini-version of the plan was produced for the individual areas and given to residents in November, leaving a short-time for residents to make submissions before it is presented to the Council for approval. It is noted in the joint submission that the proposals for community participation on pages 151-153 of the LRFIP were not included in the edited plan for Ballinacurra Weston that was left outside resident's homes.	d) Noted.	d) No change to LRFIP.
		e) States the negative impact of boarding-up of individual houses has on the neighbouring occupied homes as it encourages residents to leave and it facilitates anti-social and criminal behaviour, which caused a domino effect that hastened the depopulation of the area.	e) Noted and agreed that this is a reoccurring issue raised in consultations / reviews involving the communities. The Local Authority is currently in the process of arranging the refurbishment of vacant Local Authority owned houses, scheduled for retention, in the designated regeneration area of Ballinacurra Weston. The refurbishment of these vacant properties will be carried out in 2014.	e) Change to LRFIP to state the community perspective on the impact of the boarding up of houses to section 2.1.3.8 Priority 7: Policing, Justice and Community Safety (page 153).
		f) States that there is evidence of land-grabbing in Clarina Park where depopulation and demolition has taken place.	e) The Local Authority will take all legal remedies available to deal with these issues as they arise.	f) No change to LRFIP
		g) States that the CCTV cameras need to be monitored as a matter of urgency, particularly as joyriding has once again become a feature of life in Ballinacurra Weston.	g) The Garda Síochána have access to the CCTV monitoring facilities for the Ballinacurra Weston area. The current arrangements will be reviewed in terms of a wider CCTV strategy for the City to be prepared.	g) No change to LRFIP
		h) States that 31 houses are identified for demolition on the maps on pages 257 and 259 of the LRFIP, while the plan text states that a total of 27 houses are being	h) Noted. The Office of Regeneration notes an error to framework plan shown on page 254 and would like to provide the following clarification with regard to text and	h) Change LRFIP to amend tables and maps to Volume 2, Appendix 3 and Appendix 7 as follows:

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		targeted. Clarification requested on this discrepancy.	<p>maps. As at the end of December 2013, the following 28 homes are scheduled for demolition in Ballinacurra Weston:</p> <p>BYRNE AVENUE 29-29 Byrne Avenue (odd numbers): 6 homes 33-43 Byrne Avenue (odd numbers): 6 homes</p> <p>BEECHGROVE AVENUE 7-8 Beechgrove Avenue: 2 homes</p> <p>CRECORA AVENUE 2 Crecora Avenue: 1 home 15 Crecora Avenue: 1 home 29-33 Crecora Avenue (odd numbers): 3 homes</p> <p>CLARINA AVENUE 17-27 Clarina Avenue (odd numbers): 6 homes 41 Clarina Avenue: 1 home</p> <p>HYDE AVENUE 17-19 Hyde Avenue: 2 homes</p>	
		i) States that none of these residents were contacted by the Office of Regeneration for negotiations to agree to the demolition of their home prior to the publication of this plan, which “Assumes occupied homes proposed for demolition will decant into unoccupied proposed for refurbishment” (page 247)	l) Noted. The Office of Regeneration has a core objective to regenerate Ballinacurra Weston to improve homes, build strong communities and create areas where people want to live with a phased programme developed for the short, medium and long term. The OoR recognises that many people will have strong attachments to their homes and that they may not wish to move at this moment in time. Therefore, the OoR will not interrupt or interfere with your right to peacefully live in your home. In this scenario, it is an objective for existing homes to be refurbished to a BER energy rating of C. Those residents who are in agreement to have their home demolished will have a choice to relocate to a new replacement home developed in Ballinacurra Weston and adjacent areas this policy will remain over the course of the regeneration programme.	i) No change to LRFIP
		j) Supports the proposals in the LRFIP to refurbish homes to a ‘C’ energy rating, which will only involve works that need to be done. However, the submission states that the Office of Regeneration should consider carrying out alternative works on the homes of residents that don’t require refurbishment.	j) Noted. This current programme is to thermally upgrade homes to a 'C' energy rating. It is not part of the scope of works, at present, to carry out other works to houses that do not require refurbishment. The Office of Regeneration is currently working toward a vision of creating 'decent homes' for all residents in the regeneration areas, in line with the LRFIP's vision statement.	j) No change to LRFIP
		k) States that houses proposed for refurbishment as part of the pilot scheme were not picked based on resident's needs, they were chosen primarily because "... they are on a main access road into the city they would have a high profile, being a highly visible example of the works which will be carried out." (page 256).	k) Noted. There were many factors that determined the selection of pilot blocks for each of the regeneration areas. The pilot blocks in Hyde Road and St Mary's Park consist of those in great need, which would be visible to the whole community and give a wide variety of house types to define the	k) No change to LRFIP

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			scope of works required for the area-wide refurbishments. In Moyross and Southill they were selected again based on blocks in need, visibility and that gave a wide variety of house types so that as much information could be collated to further roll out of the remaining thermal upgrades in the regeneration areas.	
		l) States that while residents are happy to houses refurbished, many are concerned about the possibility of anti-social elements being moved in next door to them.	l) All housing allocations will be consistent with the current allocations policy. All applicants are subject to Garda vetting procedures and other relevant background checks.	l) No change to LRFIP
		m) States that most of the new housing shown is for private development and that some of the homes on Clarina Ave identified for demolition on page 257 are retained with the back gardens halved.	m) Noted. Please refer to submission no. 5(h) above. The proposed houses in question are scheduled for demolition as shown on the refurbishment strategy map and replacement housing strategy map on page 257 and 259 respectively.	m) Change LRFIP to amend tables and maps.
		n) Supports the objectives for strengthening community gardens contained within the LRFIP.	n) Noted.	n) No change to LRFIP
6	Department of Agriculture, Food and the Marine	a) States that the SEA Environmental Report and the HDA Natura Impact Report provides a comprehensive analysis of the likely impacts of the LRFIP during its development and that there are no outstanding issues of concern	a) The submission is noted.	a) No change to LRFIP
7	Department of Communications, Energy and Natural Resources, Geological Survey of Ireland, Beggars Bush, Haddington Road, Dublin 4.	a) A generic response relating to the online availability of geological heritage data. Limerick has not yet been audited and thus there is only provisional data available comprising potential Geological Heritage Sites with no defined boundaries. No specific action is required.	a) There are no known Geological Heritage Sites within the regeneration areas. The SEA already contains detailed information relating to Soils & Geology (section 4.6) and Surface Water & Groundwater (section 4.3) with appropriate mitigation measures relating to surface water and groundwater detailed in section 9.3.	a) No change to LRFIP
8	Diane Quigley, 10 Aherlow Close Caherdavin Limerick	The submission indicates the following in relation to the Moyross Physical Framework Plan:		
		a) Does not mind the creation of a new street between Cosgrave Park and the Maintenance Depot to eliminate the existing cul-de-sac layout.	a) Noted	a) No change to LRFIP
		b) Does not mind the creation of a high profile site at the existing entrance to Moyross.	b) Noted	b) No change to LRFIP
		c) Does not mind the strengthening of Watch House Cross as a mixed-use District Centre with improved access from Ballynanty.	c) Noted	c) No change to LRFIP
		d) With regards to the creation of a new link between LIT and the District Centre at Watch House Cross, the submission states that this intervention would be dependent on whether or not there will be an access road through Galtee Avenue or somewhere else in Glenmore. The submission would be in favour of	d) See response to submission 2c above	d) No change to LRFIP

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		the link road if this only involved the original access proposed from Delmege Park to the proposed Northern Distributor Road.		
		e) Does not support improved access from the civic heart of Moyross to Thomond Park/Cratloe Road if it involves a link road between Delmege Park and Galtee Avenue.	e) See response to submission 2d above	e) No change to LRFIP
		f) Supports the provision of improved access between the civic heart of Moyross and Cratloe Road only if it involves road access between Moyross and the Old Cratloe Road along the Northern Distributor Road.	f) Noted	f) No change to LRFIP
		g) Supports the provision of access between the Moyross Avenue and the Cratloe Road only if it involves road access between Moyross and the Old Cratloe Road along the Northern Distributor Road.	g) Noted	g) No change to LRFIP
		h) Does not mind the upgrade of the existing Moyross Avenue to include crossing facilities, landscaping, traffic calming measures and on-street parking.	h) Noted	h) No change to LRFIP
		i) Does not support improving the existing access from Moyross to Cratloe Road as there would be a substantial increase in in the traffic volumes in a 'residential' road and there would also be a likely increase in the amount of loose horses and sulkeys.	i) Noted	i) No change to LRFIP
		j) Supports the provision of well-designed housing that addresses current and future needs.	j) Noted	j) No change to LRFIP
		k) Supports the provision of a new entrance onto the proposed Coonagh-Knockalisheen Road to eliminate the existing cul-de-sac layout.	k) Noted	k) No change to LRFIP
		l) Supports extending the existing Moyross Avenue to link to the proposed Northern Distributor Road.	l) Noted	l) No change to LRFIP
		m) Does not mind the creation of safe pedestrian and cycle links from Sarsfield Gardens through existing bridge underpass to Moyross Avenue.	m) See response to submission 4g above	m) No change to LRFIP
		n) Does not mind reinforcing the existing community hub by improving the quality and extending the choice of uses available.	n) Noted	n) No change to LRFIP
		o) Supports reinforcing the existing employment and enterprise uses at Moyross Enterprise Centre.	o) Noted	o) No change to LRFIP
9	Elizabeth Costello, 1A Galtee Close, Caherdavin, Limerick	The submission indicates the following: a) Does not support the provision of access from the civic heart of Moyross to the Cratloe Road.	a) See response to submission 2d above	a) No change to LRFIP
		b) Does not support the provision of access between Moyross Avenue and the Cratloe Road.	b) See response to submission 2d above	b) No change to LRFIP
		c) Does not support the upgrade of the existing Moyross Avenue to include crossing facilities, landscaping, traffic calming measures and on-street parking.	c) See response to submission 4d above	c) No change to LRFIP
		d) Does not support the creation of a new linear park.	d) See response to submission 4e above	d) No change to LRFIP
		e) Does not support improving the existing access from Moyross to Cratloe Road.	e) See response to submission 2d above	e) No change to LRFIP

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10	Environmental Protection Agency	The submission acknowledges a number of positive initiatives including the objectives for implementing SUDs measures and returning areas of land to natural parkland adjoining designated areas. At a broad level it is requested that consideration be given to:		
		a) including a section outlining the extent to which the SEA has influenced the plan.	a) Section 2.6 of the LRFIP already makes reference to the Environmental Policy Context with specific reference to SEA in section 2.6.1 and how it influences the Plan and it is not considered necessary to include additional reference.	a) No change to LRFIP
		b) the need for Climate Adaptation Plans.	b) Under the National Climate Change Adaptation Framework all local authorities are asked to publish Draft Climate Adaptation Plans by mid 2014 and this will be undertaken by Limerick City & County Councils for its functional area. The LRFIP which is not an appropriate plan to implement such a strategy.	b) No change to LRFIP
		c) including a timeframe for the Plan and associated objectives (suggested timeframe of 2022 for the Plan).	c) A lot of the objectives within the LRFIP have an associated short, medium or longterm timeframe and the specific period of the timeframe is clarified in Volume 3 Section 1.4.	c) No change to LRFIP
		d) Need to reference additional policy including the Energy Performance of Buildings Directive.	d) The LRFIP details the extent to which existing policy and guidance has influenced the framework of the LRFIP. Whilst the review is not exhaustive it focuses on key strategic policy documents and guidance. It is not considered necessary to specifically reference aspects of the Building Regulations or Planning legislation as the LRFIP is already prepared in the context of these frameworks.	d) No change to LRFIP
		e) Clarification required regarding the extent of the regeneration boundary / area for St. Mary's Park (section 4.2)	e) Section 1.2 of the LRFIP already clarifies the statutory boundaries of the Regeneration Areas and makes reference to the use of statutory boundaries as well as focused study boundaries.	e) No change to LRFIP
		f) The types of development proposed regarding the waterways, including any infrastructure projects, should be clarified and assessed in the SEA (section 2.2.2). Clarification regarding major infrastructural projects including roads and bridges should be assessed for potential effects (section 2.3.4)	f) The extent or exact nature of waterways infrastructure and other associated infrastructure is not known at this stage and therefore can not be further assessed. It will require further detailed specific consideration and study and will be subject to detailed environmental consideration at that stage. It is reasonable however to make reference to the development of the waterways subject to environmental considerations.	f) Change LRFIP to insert additional wording to Section 2.2.2 (page 159/160) and section 2.6.2 Land Use Strategy (page 226)
		g) Need an overarching environmental objective within the Plan (section 2.1, 2.2 & 2.3) including reference to environmental matters relating to specific objectives including the development of a linear park (Section 2.4.4)	g) The Framework Vision already includes an objective to achieve Sustainable Growth (section 1.1) and Table 1.1 pp. 113 includes landscape/environmental protection	g) Change LRFIP to insert additional wording to Section 2.3.9 (page 174)

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			and management under the Physical Pillar. Also under section 2.3 Physical Framework one of the strategic objectives seeks to conserve and enhance the natural environment. Additional wording could be inserted under section 2.3.9.	
		h) Require a clear numbering system within the Plan including the numbering of objectives which can then be translated onto associated mapping.	h) It is considered that the layout and configuration of the material as presented is adequate.	h) No change to LRFIP
		i) A phasing strategy for new build projects to meet the need for replacement housing should be further clarified (section 2.4.5.3)	i) The Replacement Housing Strategy within the LRFIP has an associated short, medium or long term timeframe and the specific period of the timeframe is clarified in Volume 3 Section 1.4.	i) No change to LRFIP
		j) The provision of housing, including private housing within the regeneration areas should comply with the Limerick City DP core strategy.	j) Appendix 3 within the LRFIP clearly demonstrates that the LRFIP is in compliance with the core strategy as set out in the Limerick City Development Plan 2010 – 2016.	j) No change to LRFIP
		k) The Housing Strategy for St. Mary's Park (section 2.6.3) should include an objective requiring a finished floor level of 5.75m for all new dwellings, as recommended by the detailed Flood Risk Assessment for St. Mary's Park.	k) This point is noted and it is recommended that specific reference should be made to finished floor levels within St. Mary's Park.	k) Change LRFIP to insert additional wording to Section 2.6.3 (page 228)
		<u>Volume 3</u> l) A commitment to environmental monitoring and reporting in tandem with Plan monitoring and reporting should be included in the Plan (section 1.3)	l) The Environmental Report puts forward proposals for monitoring the likely significant effects of implementing the LRFIP. Reference can be made to this in section 1.3.	l) Change LRFIP to insert additional wording to Volume 3: Section 1.3 (page 272)
		m) The table of objectives included in Section 1.4 should include the relevant objectives set out in Volume 2	m) Section 1.4 contains a table of key projects and does not necessarily comprise of key objectives.	m) No change to LRFIP
		<u>Appendices</u> n) Household Need should refer to the Limerick City DP core strategy (section 1.7.5)	n) This section refers to existing household demand only within the regeneration areas and is focused on replacement homes and need arising from over-crowding. Future housing demand is based on demographic and household formation change. Core strategy compliance is dealt with in Appendix 3.	n) No change to LRFIP
		o) Include reference to the Statement of Community Involvement within the Scoping Section of the Environmental Report.	o) It is considered reasonable to reference the Community Involvement within the Scoping Section of the Environmental Report.	o) Change Environmental Report to insert additional wording to Section 3.2.1 (page 23)
		p) Rename the Executive Summary as the Non-Technical Summary and include details on the evolution of the environment in the absence of the Plan.	p) The Executive Summary can be renamed as the Non-Technical Summary and details included as requested.	p) Change Environmental Report to rename the Executive Summary as the Non-Technical Summary to pages 2,5,6,8 and 10 and include details on the evolution of the environment in the absence of the Plan by inserting a new section 6.0 on page 49 and renumbering subsequent sections. Insert additional text to section 5.4 Cultural Heritage to elaborate on the number of

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				protected structures in the regeneration areas.
		q) Additional detail should be provided on the specific objectives of the Plan including provision of infrastructure to ensure that commitments in the Plan are not in conflict with the relevant environmental legislation.	q) The extent or exact nature of infrastructure proposed in the LRFIP has not been clearly established at this stage and therefore can not be further assessed. It will require further detailed specific consideration and study and will be subject to detailed environmental consideration at that stage. It is proposed however that Section 2.3.9 of the LRFIP does contain a generic environmental statement relevant to all infrastructure projects which should adequately address this issue.	q) No change to LRFIP
		r) Recommendation to include additional plans into Table 2.3 showing the inter-relationship between other plans and programmes.	r) Table 2.3 makes reference to 20 no. Plans which are considered to be of relevance to regeneration in Limerick City. Specifically reference is made to the Draft Shannon CFRAMS in terms of flooding and thus it is not considered necessary to refer to the Floods Directive. Similarly reference is made to the Mid West Climate Change Strategy which is more relevant than the National Climate Change Strategy. Thus the interrelation between other plans and programmes as presented is considered relevant and pertinent. Section 5 Environmental Protection Objectives also makes reference to extensive legislation and Directives.	r) No change to LRFIP
		s) Scoping should identify where the key issues raised during consultation were taken into account in the Plan.	s) This request is considered reasonable and it is proposed to make amendments to the Environmental Report accordingly.	s) Change Environmental Report to insert additional wording to Section 3.2.1 (page 23)
		t) Detail how the alternatives were developed.	t) As detailed in section 3.2.3 of the Environmental Report the alternatives were discussed at Senior Management Level in the first instance followed by detailed consideration of the Steering Group Project Team at several initial meetings	t) No change to LRFIP
		u) Ensure each of the other regeneration areas were properly considered in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities and that the recommendations and outputs of the CFRAMS will be included when finalised.	u) The issue of Flood Risk has been comprehensively dealt within the Environmental Report addressing each of the regeneration areas as detailed in section 4.3.5, section 8.2.2 and again in detail in Appendix 2 Flood Risk Identification for LRFIP and Justification Test for St. Mary's Park.	u) No change to LRFIP
		v) Water Supply should include details regarding leakage and water conservation in the Regeneration Areas (Section 4.3.3)	v) It is agreed that details of water leakage and conservation should be included in the Environmental Report and it is proposed to add detail accordingly.	v) Change Environmental Report to insert additional wording to Section 4.3.3 (page 28)
		w) Wastewater Network and Treatment should include the most up to date data regarding waste water treatment plant (WVTP) capacity (Section 4.3.4).	w) The information provided in the Environmental Report is accurate. The City & County Council Annual Report confirms that in 2012 the plant operated	w) No change to LRFIP

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			extremely efficiently to ensure a quality discharge to meet the EPA Discharge License Requirements.	
		x) Noise should refer to potential noise impacts arising from demolition and construction and should request the preparation of Environmental Management Plans for proposals for demolition, including waste management aspects in particular (Section 4.8).	x) Section 8.2.7 already references temporal noise impacts that may arise during demolition and construction but it highlights that these can be mitigated against through the control of hours of work. Appendix I Evaluation of LRFIP Measures against the EPO's notes that Demolition Waste Management Plans are required to facilitate recycling of demolition waste and it is also highlighted in section 9.8 of the Environmental Report.	x) No change to LRFIP
		y) Under the Environmental Protection Objectives water should include a section on the Urban Waste Water Treatment Regulations (Section 5.3)	y) This request is noted and it is proposed to insert additional text in the Environmental Report to address the issue.	y) Change Environmental Report to insert a new section 5.3.5 Treatment of Wastewater and renumber subsequent section 5.3.5 EPOs Indicators and Targets (page 44)
		z) Further detail should be provided on Alternative Scenarios including densities, layouts, use of technologies, and design (chapter 6).	z) The evaluation of alternative scenarios in chapter 7 are considered adequate. Several iterations of the detailed layout and design for all regeneration areas were produced for consideration by the residents. It is considered that detailed analysis of each and every iteration would be unwieldy and cumbersome and contribute little to the overall Environmental Report. Dealing with this issue at a strategic level is considered more appropriate.	z) No change to LRFIP
		aa) Consideration should be given to include the overlay maps used to evaluate the alternatives.	aa) Chapter 4 Environmental Baseline is particularly detailed and already contains a number of relevant maps which contributed to producing the overlay maps. It is thus not considered necessary to reproduce such maps in Chapter 7.0.	aa) No change to LRFIP
		ab) Describe existing flood protection measures on King's Island and install flood protection measures as part of the refurbishment works (chapter 8).	ab) Relevant and appropriate flood protection measures are proposed within the Environmental Report in section 9.3 and the LRFIP throughout but particularly in Volume 2 section 2.6.4(13). It is proposed to refer to existing flood protection measures within the Environmental Report. It is also proposed to detail proposed flood protection measures as part of the refurbishment works in St. Mary's Park 2.6.5 Refurbishment Strategy (page236)	ab) Change Environmental Report to insert insert additional wording to Section 8.2.2 (page 57) Change LRFIP to insert insert additional wording to 2.6.5 Refurbishment Strategy (page236) Change LRFIP to insert additional wording to Volume 2 section 2.6.4 (13) to consider the upgrade of Thomond/Eel's Weir to facilitate safe access and egress during flood events in St. Mary's Park (page 232)
		ac) Review the potential for interrelationships between the environmental components included in Table 8.2 –	ac) Review the potential for interrelationships between the environmental components included in Table 8.2 –	ac) Change Environmental Report to <u>Table 8.2 (page 59)</u>
		ad) Details should be included on the alternative mitigation measures considered in regeneration approaches and included in Chapters 6 and 7.	ad) The SEA Directive requires that reasonable alternatives <u>taking into account the objectives and the geographical extent and scope of the LRFIP</u> are identified, described and evaluated for their likely significant effects on the environment. This was done	ad) No change to LRFIP

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			taking into account higher level objectives as it was not considered practical or reasonable to evaluate unreasonable alternatives including total demolition.	
		ae) It is noted that the Plan will be incorporated into the Limerick City DP during the review of the CDP. Consideration should be given to clarifying the lifetime of Limerick City Development Plan, its review timeframe and any impacts arising from the amalgamation of the City and County Councils	ae) Clarification can be provided in this regard and additional information provided accordingly. There are unlikely to be any significant issues arising from the amalgamation of the City and County Councils in relation to the adoption of a new plan for the City.	ae) Change Environmental Report to section 9.1 (page 62)
		af) Recommended mitigation measures should be incorporated directly into the Plan and the requirement for demolition waste management plans and dust minimisation plans for demolition projects within the regeneration areas should be included as a specific objective.	af) A number of the proposed additional mitigation measures within the LRFIP are already contained within the Framework Plan. It is proposed to incorporate the remaining recommended mitigation measures from the Environmental Report into the LRFIP.	af) Change LRFIP to section 2.6.1 (page 224), Section 2.6.4(page 232), 2.6.6 (page 238),2.3.8a (page 173) and Section 2.3.8(b) (page 174)
		ag) Consideration should be given to assigning the role of monitoring to a specific position within the Office of Regeneration.	ag) Implementation and monitoring of the LRFIP will be continuous and ongoing as detailed in Volume 3 of the LRFIP.	ag) No change to LRFIP
II.	Gerard Quigley, Glenmore Lawn Caherdavin Limerick	The submission indicates the following in relation to the Moyross Physical Framework Plan: a) Does not mind the creation of a new street between Cosgrave Park and the Maintenance Depot to eliminate the existing cul-de-sac layout.	a) Noted	a) No change to LRFIP
		b) Does not mind the creation of a high profile site at the existing entrance to Moyross.	b) Noted	b) No change to LRFIP
		c) Does not mind strengthening of Watch House Cross as a mixed-use District Centre with improved access from Ballynanty.	c) Noted	c) No change to LRFIP
		d) With regards to the creation of a new link between LIT and the District Centre at Watch House Cross, the submission states that this intervention would be dependent on where the proposed access points will be.	d) See response to submission 2c above	d) No change to LRFIP
		e) Does not support improved access from the civic heart of Moyross to Thomond Park/Cratloe Road if it involves a link road between Delmege Park and Galtee Avenue.	e) See response to submission 2d above	e) No change to LRFIP
		f) Does not support the provision of improved access between the civic heart of Moyross and Cratloe Road.	f) See response to submission 2d above	f) No change to LRFIP
		g) Does not support the provision of access between the Moyross Avenue and the Cratloe Road.	g) See response to submission 2d above	g) No change to LRFIP
		h) Does not mind the upgrade of the existing Moyross Avenue to include crossing facilities, landscaping, traffic calming measures and on-street parking.	h) Noted	h) No change to LRFIP
		i) With regards to the creation of a new linear park, the submission states that it would be in favour of using green space in Moyross that would improve employment/training and educational opportunities.	i) Noted	i) No change to LRFIP
		j) Does not support improving the existing access from Moyross to Cratloe Road if it involves constructing an access between Delmege Park and Galtee Road.	j) Noted	j) No change to LRFIP
		k) Supports the provision of well-designed housing that addresses current and future needs.	k) Noted	k) No change to LRFIP

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		l) Supports the provision of a new entrance onto the proposed Coonagh-Knockalisheen Road to eliminate the existing cul-de-sac layout.	l) Noted	l) No change to LRFIP
		m) Supports extending the existing Moyross Avenue to link to the proposed Northern Distributor Road.	m) See response to submission 2d above	m) No change to LRFIP
		n) Does not mind the proposed sites for housing identified in the plan.	n) Noted	n) No change to LRFIP
		o) Does not mind the creation of safe pedestrian and cycle links from Sarsfield Gardens through existing bridge underpass to Moyross Avenue.	o) Noted	o) No change to LRFIP
		p) Supports reinforcing the existing community hub by improving the quality and extending the choice of uses available in an effort to change the culture of people who live in Moyross and provide the area with more opportunities.	p) Noted	p) No change to LRFIP
		q) Supports reinforcing the existing employment and enterprise uses at Moyross Enterprise Centre.	q) Noted	q) No change to LRFIP
12	Resident Old Cratloe Road Caherdavin Limerick	The submission indicates the following in relation to the Moyross Physical Framework Plan: a) Does not support the creation of a new street between Cosgrave Park and the Maintenance Depot to eliminate the existing cul-de-sac layout.	a) The Maintenance Depot, in its existing condition consists of high blank walls on three sides and presents a focus for anti-social behaviour in the area. By relocating this depot elsewhere, and opening up a parcel of land to develop replacement housing onto a new street will create more overlooking and therefore less likelihood of anti-social behaviour taking place. The street proposed through Cosgrave Park will eliminate the existing cul-de-sac layout and will be designed to slow cars down by the creation of a homezone ensuring optimum street safety and a pleasant environment for residents. Furthermore, residents responded positively to this particular objective, as part of the public consultation open days held in March/April 2013 with 87% of the overall respondents (those who answered yes or no) in agreement with the creation of a new street at this location.	a) No change to LRFIP
		b) Does not support the creation of a high profile site at the existing entrance to Moyross.	b) See response to submission 2a above	b) No change to LRFIP
		c) Does not support strengthening of Watch House Cross as a mixed-use District Centre with improved access from Ballynanty.	c) See response to submission 2b above	c) No change to LRFIP
		d) Does not support the creation of a new link between LIT and the District Centre at Watch House Cross.	d) See response to submission 2c above	d) No change to LRFIP
		e) Does not support improved access from the civic heart of Moyross to Thomond Park/Cratloe Road.	e) See response to submission 2d above	e) No change to LRFIP
		f) Does not support the provision of access between the civic heart of Moyross and Cratloe Road.	f) See response to submission 2d above	f) No change to LRFIP
		g) Does not support the provision of access between Moyross Avenue and the Cratloe Road.	g) See response to submission 2d above	g) No change to LRFIP
		h) Does not support the upgrade of the existing Moyross Avenue to include crossing facilities, landscaping, traffic calming measures and on-street parking.	h) See response to submission 4d above	h) No change to LRFIP
		i) Does not support the creation of a new linear park.	i) See response to submission 4e above	i) No change to LRFIP
		j) Does not support improving the existing access from Moyross to Cratloe Road.	j) See response to submission 2d above	j) No change to LRFIP

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		k) Does not support the provision of well-designed housing that addresses current and future needs.	<p>k) Noted. New replacement homes will seek to ensure that residents will enjoy the benefits of high quality living conditions in a healthy, accessible and visually attractive environment. As such, new homes will comply with national guidelines and local statutory objectives and standards contained within the Limerick City Development Plan 2010-2016. National best practice guidance will be adhered to in the design of new homes contained within the following documents:</p> <ul style="list-style-type: none"> • Delivering Homes, Sustaining Communities 2007 • Quality Housing for Sustainable Communities 2007 • Sustainable Residential Development in Urban Areas 2008 • Urban Design Manual – A Best Practice Guide 2008 • Design Manual for Urban Roads and Streets 2013 	k) No change to LRFIP
		l) Does not support the provision of a new entrance onto the proposed Coonagh-Knockalisheen Road to eliminate the existing cul-de-sac layout.	l) See response to submission 2j above	l) No change to LRFIP
		m) Does not support extending the existing Moyross Avenue to link to the proposed Northern Distributor Road.	m) See response to submission 2j above	m) No change to LRFIP
		n) Does not support the proposed sites for housing identified in the plan.	n) See response to submission 2l above	n) No change to LRFIP
		o) Does not support the creation of safe pedestrian and cycle links from Sarsfield Gardens through existing bridge underpass to Moyross Avenue.	o) See response to submission 4g above	o) No change to LRFIP
		p) Does not support reinforcing the existing community hub by improving the quality and extending the choice of uses available.	<p>p) Noted. The existing community hub at Moyross is zoned 'Educational, Cultural & Community' in the Limerick City Development Plan 2010-2016 with a specific objective to facilitate the provision of educational, cultural and community facilities to support local communities. All communities need social infrastructure to support itself with childcare, healthcare, education and community centres etc. These facilities provide a local focus for community activity and in turn supporting the development of sustainable communities. The Office of Regeneration supports this objective and reinforces the objective in the LRFIP.</p>	p) No change to LRFIP
		q) Does not support reinforcing the existing employment and enterprise uses at Moyross Enterprise Centre.	<p>q) Noted. Moyross Enterprise Centre is zoned 'Mixed Use' in the Limerick City Development Plan 2010-2016 with a specific objective to promote the development of mixed uses including employment and enterprise uses to ensure the creation of a vibrant urban area, working in tandem with the principles of sustainable development, transportation and self-sufficiency. The Office of Regeneration supports this objective and reinforces the objective in the LRFIP.</p>	q) No change to LRFIP

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13	Jack Downey 5 Shanrath Old Cratloe Road	The submission indicates the following in relation to the Moyross Physical Framework Plan: a) Supports the creation of a new street between Cosgrave Park and the Maintenance Depot to eliminate the existing cul-de-sac layout.	a)See response to submission 12a above	a) No change to LRFIP
		b) Supports the creation of a high profile site at the existing entrance to Moyross.	b)Noted.	b) No change to LRFIP
		c) Supports strengthening of Watch House Cross as a mixed-use District Centre with improved access from Ballynanty.	c)Noted.	c) No change to LRFIP
		d) Does not support the creation of a new link between LIT and the District Centre at Watch House Cross, as the submission states that it cannot see what benefit it would have.	d)See response to submission 2c above	d) No change to LRFIP
		e) Does not support improved access from the civic heart of Moyross to Thomond Park/Cratloe Road as the submission states that there is a sufficient pedestrian access.	e)See response to submission 2d above	e) No change to LRFIP
		f) Does not support the provision of access between the civic heart of Moyross and Cratloe Road.	f)See response to submission 2d above	f) No change to LRFIP
		g) Does not support the provision of access between Moyross Avenue and the Cratloe Road.	g)See response to submission 2d above	g) No change to LRFIP
		h) Supports the upgrade of the existing Moyross Avenue to include crossing facilities, landscaping, traffic calming measures and on-street parking.	h) Noted	h) No change to LRFIP
		i) Supports the creation of a new linear park.	i) Noted	i) No change to LRFIP
		j) Does not support improving the existing access from Moyross to Cratloe Road.	j)See response to submission 2d above	j) No change to LRFIP
		k) Supports the provision of well-designed housing that addresses current and future needs and queries whether local people can gain employment on these construction projects.	k)Noted	k) No change to LRFIP
		l) Supports the provision of a new entrance onto the proposed Coonagh-Knockalisheen Road to eliminate the existing cul-de-sac layout.	l)Noted	l) No change to LRFIP
		m) Supports extending the existing Moyross Avenue to link to the proposed Northern Distributor Road.	m)Noted	m) No change to LRFIP
		n) Supports the proposed sites for housing identified in the plan and queries why houses proposed for demolition should not be refurbished instead.	n)Noted	n) No change to LRFIP

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		o) Does not support the creation of safe pedestrian and cycle links from Sarsfield Gardens through existing bridge underpass to Moyross Avenue.	o) See response to submission 4g above	o) No change to LRFIP
		p) Supports reinforcing the existing community hub by improving the quality and extending the choice of uses available.	p) Noted	p) No change to LRFIP
		q) Supports reinforcing the existing employment and enterprise uses at Moyross Enterprise Centre.	q) Noted	q) No change to LRFIP
14	Limerick Community Education Network (LCEN) C/o Northside FRC, Ballynanty, Limerick	The submission indicates the following: a) States that the work of the LCEN, as a “key agency” has been acknowledged in the LRFIP and the LCEN appreciates that the plan has committed to “additional support for adult education including support for coordinators in the regeneration areas and local education committees”.	a) Noted and agreed	a) No change to LRFIP
		b) Details further the ways in which it can support the aims of the Social Framework Implementation and Delivery Plan focusing on five main areas in the LRFIP in which the LCEN can play an effective role: <ul style="list-style-type: none"> Addressing barriers to participation in education. Qualification and progression. Community Empowerment. Improvement in health and well being. Integration of services to avoid duplication. 	b) Noted and agreed	b) Change to LRFIP to acknowledge the role LCEN can play. at section 2.1.3.1 under 4 Adult Education and Community Learning, Scope of Action (page 124).
15	Limerick City Children’s Services Committee	The submission indicates the following: a) States that the Limerick City Children’s Services Committee very much welcomes the publication of the Limerick Regeneration Framework Implementation Plan stating that most of the named actions concerning children and families are very much in line with the agreed priorities of the Children’s Services Committee.	a) Noted and agreed	a) No change to LRFIP
		b) States that the Limerick City Children’s Services Committee would welcome the opportunity to work closely with Limerick City Council and other relevant bodies to develop a Framework for Children and Family Support.	b) Noted and agreed. LCCSC has a key coordinating role	b) No change to LRFIP
		Further detailed comments are provided in the submission relating to Social Framework Plan as follows: Child and Youth Mental Health and Adult Mental Health. c) States that during the Limerick City CSC’s planning process following the publication of “How are Our Kids?: Experiences and Needs of Children and Families in Limerick City with a Particular Emphasis on Limerick’s Regeneration Areas, the issue of mental health (both child and parent) was identified as a key issue that had a significant impact on outcomes for children. During this time, the Jigsaw Project was in a significant planning and consultation phase. The CSC decided that it would support this process where possible and would not	c) Noted and agreed	c) Change to LRFIP to delete text and insert additional text.

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		priorities mental health initiatives as it would be in danger of duplicating the Jigsaw process. As there has been a delay in progressing the Jigsaw project, the CSC would recommend re-prioritising child and youth mental health and parental mental health initiatives.		
		Parenting. d) States that in order to significantly improve child outcomes, there is a need to ensure that all parents, and particularly vulnerable parents, have access to appropriate, timely and high quality supports. <i>Parenting Limerick</i> , the newly established network of parent and family support organisations, is working to develop a Framework of Parenting Supports and a Population (Public Health) approach to parenting support. The CSC recommends that priority is given to supporting and enhancing high-quality parenting supports to meet the needs of all parents at different levels of need and during different phases of childhood.	d) Noted and agreed	d) Change to LRFIP to delete text and insert additional text.
		City-wide Early Intervention and Prevention. e) States that evidence very strongly suggests that early childhood early intervention and prevention programmes have the greatest impact in improving child outcomes. <i>Start Right</i> has made significant progress in the south side of the city and is named in the Limerick Regeneration Plans. The CSC would recommend that the Start Right approach would be considered as a city-wide programme and that investment in early intervention and prevention initiatives for the years is prioritised.	e) Noted and agreed	e) Change LRFIP to insert additional wording to 2.1.3.2 Priority 2: Health and Well-Being under B. Child and Youth Mental Health Scope of Action (page 127)
		Families and Young People with Complex Needs. f) States that there are a small number of families and young people with very complex needs that are challenging to address. There are increasing numbers of young pregnant women presenting with heroin addictions. There are increasing numbers of people presenting with drug and alcohol addictions who have a range of complex social and emotional needs. There are families at serious risk of homelessness. There is a small cohort of young people with extremely challenging behaviour who also have complex social and emotional needs. In order to address this, a very intensive, multi-agency approach is required. The CSC recommends that this is made a priority and the CSC would work with Limerick Regeneration and all relevant partners to identify the work that is ongoing to address these issues, and to support or develop new initiatives as appropriate.	f) Noted and agreed	f) Change LRFIP to insert additional wording to 2.1.4.5 Priority 5: Families & Youth At Risk (page 137) regarding characteristics of groups with complex needs.
16	Limerick City Community Development Project Garryglass House, 4 Garryglass Ave, Ballinacurra Weston, Limerick.	The submission indicates the following: a) States that in the Executive Summary (pg. 10) under the heading 'Social', community development, empowerment and capacity building were identified as starting points for the regeneration of the City. LCCDP considers itself well equipped to achieve the challenges outlined in LRFIP (2013: 10) and would like to be considered by Limerick Regeneration to carry out this task by outlining the following: <ul style="list-style-type: none"> The work of LCCDP has and continues to be involved in building the capacity and confidence of residents and community groups. As an organisation the LCCDP have a proven track record in facilitating engagement and building trust, especially among those who are often marginalised, disenfranchised and without a voice in society. LCCDP already plays a pivotal role in supporting residents and 	a) Noted and agreed. Reference added to work of LCCDP.	a) Change LRFIP to insert additional wording to 2.1.3.7 Priority 6: Community Participation, Empowerment and Civic Engagement (page 150).

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		<p>community groups, through its efforts it actively engages residents in fora and committees and fosters efforts at democratic participation.</p> <ul style="list-style-type: none"> As stated LCCDP have been immersed in disadvantaged communities in Limerick City since 1990s. In that time we have been an agent of social capital development. acting as a source of intra- community integration and extra-community linkage. Through its work LCCDP already makes a contribution to personal and community transformation, therefore LCCDP has much to offer the task of regeneration in Limerick City. 		
17	Liz Coughlan 9 Aherlow Close Glenmore Lawn Caherdavin Limerick	<p>The submission indicates the following in relation to the Moyross Physical Framework Plan:</p> <p>a) Does not supports the creation of a new street between Cosgrave Park and the Maintenance Depot to eliminate the existing cul-de-sac layout as the submission states that it would cause too much traffic congestion causing accidents, too much noise and health and safety issues.</p>	a) See response to submission 12a above	a) No change to LRFIP
		b) Does not support the creation of a high profile site at the existing entrance to Moyross.	b) See response to submission 2a above.	b) No change to LRFIP
		c) Supports the creation of a new link between LIT and the District Centre at Watch House Cross.	c) See response to submission 2d above.	c) No change to LRFIP
		d) Does not support improved access from the civic heart of Moyross to Thomond Park/Cratloe Road.	d) See response to submission 2d above	d) No change to LRFIP
		e) Does not support the provision of access between the civic heart of Moyross and Cratloe Road.	e) See response to submission 2d above	e) No change to LRFIP
		f) Does not support the provision of access between Moyross Avenue and the Cratloe Road.	f) See response to submission 2d above	f) No change to LRFIP
		g) Does not support the upgrade of the existing Moyross Avenue to include crossing facilities, landscaping, traffic calming measures and on-street parking.	g) See response to submission 4d above	g) No change to LRFIP
		h) Does not support the creation of a new linear park.	h) See response to submission 4e above	h) No change to LRFIP
		i) Does not support improving the existing access from Moyross to Cratloe Road.	i) See response to submission 2d above	i) No change to LRFIP
		j) Does not support the provision of well-designed housing that addresses current and future needs.	j) See response to submission 12k above	j) No change to LRFIP
		k) Does not support the provision of a new entrance onto the proposed Coonagh-Knockalisheen Road to eliminate the existing cul-de-sac layout as the submission states that there would be too much traffic causing disturbance and safety concerns.	k) See response to submission 2j above	k) No change to LRFIP
		l) Does not support extending the existing Moyross Avenue to link to the proposed Northern Distributor Road.	l) See response to submission 2j above	l) No change to LRFIP
		m) Does not support the proposed sites for housing identified in the plan.	m) See response to submission 2l above	m) No change to LRFIP
		n) Does not support the creation of safe pedestrian and cycle links from Sarsfield Gardens through existing bridge underpass to Moyross Avenue.	n) See response to submission 4g above	n) No change to LRFIP
		o) Does not support reinforcing the existing community hub by improving the quality and extending the choice of uses available.	o))See response to submission 12p above	o) No change to LRFIP
		p) Supports reinforcing the existing employment and enterprise uses at Moyross Enterprise Centre.	p) Noted.	p) No change to LRFIP

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18	Tom Daly Moyross Residents Alliance	The submission indicates the following in relation to the Physical Framework Plan for Moyross: a) Concern with the proposed demolition of the Community Memorial Garden in Delmege Park.	a) Noted. The Community Memorial Garden is Delmege Park is an excellent initiative made by and for the residents of Moyross. The Gardens provide an inclusive space for young and old, for learning, meeting and socialising. The proposed layout for Delmege Park, as detailed in the draft LRFIP, envisages a neighbourhood park at the current location of the Memorial Park. It would be an objective to maintain the function of the Memorial Park as part of the larger neighbourhood park and this would not present a problem with the current location of the Garden. To facilitate the creation of a viable neighbourhood park, various activities such as the Memorial Garden as well as a playground and seating areas will be pooled together on one site, that will be well overlooked by housing to enhance the gain to the existing and future residents of Moyross.	a) No change to LRFIP
		b) Concern with the creation of new community gardens which will be an empty green area and a haven for anti-social behaviour such as motorbikes, horses and robbed cars.	b) Noted. Our key objective for the neighbourhood park is to create a well used, overlooked and ultimately a safe public open space. This objective is reinforced by the National Crime Prevention Officer, Sergeant Alan Roughneen in a report that forms part of the LRFIP in Appendix 4: Crime Prevention Through Design Report. The Crime Prevention through Design Officer specifically states that: • The open space must be designed with due regard for natural surveillance. • Adequate mechanisms and resources must be put in place to ensure its satisfactory future management. • Care should be taken to ensure that a lone dwelling will not be adversely affected by the location of the amenity space. • Positioning amenity/play space to the rear of dwellings can increase the potential for crime and complaints arising from increased noise and nuisance. The objective is to design out the potential for crime, anti social behaviour and reduce the fear of crime, taking into consideration the recommendations of the CPTD Report. This objective will underpin any proposal for a neighbourhood park at detailed design stage. The proposed neighbourhood park will be developed in further consultation with the CPTD Officer and the wider Moyross community.	b) No change to LRFIP
		c) Wishes to see the extension of Moyross Avenue to Coonagh Cross started as	c) Noted. The extension of Moyross Avenue to	c) No change to LRFIP

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		soon as possible.	Coonagh received An Bord Pleanala approval in September 2011. Volume 3: Implementation and Delivery states on Page 283 the programme for delivery for the project and that it has been prioritised for delivery in the medium (3 years).	
19	Residents Representatives on Moyross Regeneration Committee Moyross Community Enterprise Centre Moyross Limerick	The submission indicates the following in relation to the Physical Framework Plan and the Social and Economic Framework Plan for Moyross: a) States that the Residents Representatives on Moyross Regeneration Committee welcome the publication of the Limerick Regeneration Draft Framework Implementation Plan and the opportunity presented through this consultation process to input into the final implementation plan.	a) Noted	a) No change to LRFIP
		b) States that successful regeneration of the Moyross Community as it currently stands in late 2013, requires a significant population increase that will add to the diversity of household profile and structure.	b) Noted	b) No change to LRFIP
		c) A physical regeneration plan that takes account of housing need in Moyross as it stands in 2013 ignores the strain placed on community cohesion by the policy of de-population and such a policy will not deliver the vision as set out in the Framework Document.	c) Noted. The LRFIP does not support a policy of de-population from the regeneration areas. The land use, housing, movement and connectivity and open space and public realm strategies put forward for each regeneration area contains specific objectives to ensure a repopulated, vibrant and sustainable neighbourhood with a social mix, balance, a wide range of incomes and household types representing a cross section of society more broadly. This is in line with national, regional and local development policy. The Core Strategy, contained within Appendix 3 of the LRFIP articulates a medium to longer term strategy for the spatial development of the regeneration areas ensuring that policies and objectives of the LRFIP and the Limerick City Development Plan relating to private housing demand and tenure mix are entirely consistent with national and regional development objectives. As such sites have been identified in Moyross for non-replacement housing (i.e., private/voluntary) to repopulate the regeneration areas to become more balanced. Furthermore, section 1.7 Tenure Diversity Strategy of Volume 3 (page 299 onwards) outlines how the delivery of balanced communities can be achieved by outlining mechanisms for a diversity and fluidity of tenure in Moyross to make the area a more attractive place to live and work.	c) No change to LRFIP

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		d) The area and a policy which only addresses current housing need will mitigate against neighbourhood sustainability in the medium to long-term.	d) The LRFIP does not solely address current housing need in the regeneration areas. The Office of Regeneration uses the best available evidence base which includes CSO statistics and the Limerick City Council housing database, to assess the current and future housing need of the regeneration areas. Appendix 1, section 1.7.5 outlines in detail the basis for which we formulated the housing strategy for Moyross. The Housing strategy table described on page 182 of the LRFIP outlines: <ul style="list-style-type: none"> existing housing need in the regeneration areas (based on strategic demolitions and those in existing overcrowded households). This is described in the table with reference to 'Overall Replacement Housing Need' future internally generated housing need based on demographic and household formation data from the CSO. This is described in the table with reference to 'Net Gain in Replacement Homes' 	d) No change to LRFIP
		e) Replacement units are being built on the basis of existing unit demand and the size of replacement units being proposed is causing significant concern with over 75% of replacement units aimed at 1-3 persons.	e) The Office of Regeneration is fully aware that housing need is ever-changing and will be intrinsically related to the population change and new household formation types based on the best available evidence base (CSO data). Emerging household formations in Limerick City between 2002-2011 concentrate to three main household types: <ul style="list-style-type: none"> One person households. Co-habiting couple with children. Lone parent and children. <p>This trend in the City has undoubtedly influenced the existing housing type demand for replacement housing within the regeneration areas with the vast majority of need arising for smaller dwelling types (one bed/two person houses/apartments). Furthermore, as described in Table 1.6 of Appendix 1, need is emerging from elderly households, whose housing requirements may range from standard dwellings but more than likely housing options more typically associated with elderly sheltered housing schemes (1-2 bed houses/apartments). Larger family households are also set to increase, with such households likely to require family homes. There is a sufficient buffer built in ('Net Gain in Replacement Homes') to the housing strategies proposed for each area to accommodate future internally generated housing need as part of the housing strategies proposed for each area.</p> <p>Notwithstanding the above, household formations will need to be carefully monitored and planned for throughout the regeneration programme to ensure that the need arising is accommodated sufficiently. As such a detailed local housing assessment will be carried out annually for the regeneration areas, based on the most up-to-date and available evidence base.</p>	e) No change to LRFIP

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		f) States that it is essential that the statement in the framework plans that “ <i>no new social housing tenants from outside the regeneration areas will be introduced into the regeneration areas</i> ” is removed and that there is a strong commitment to renewal and regeneration of tenancies in the area.	f) Noted. It is an objective of the LRFIP to create mixed, balanced communities, with a wide range of incomes and household types representing a cross section of society in line with national, regional and local housing policy. The replacement housing provision outlined in the LRFIP is designed to meet the internally generated need. As casual vacancies arise over time these will be allocated in accordance with the scheme of letting priorities and it is anticipated will introduce new social housing tenants in the area. The LRFIP supports the policy of accommodating those families to move back to the regeneration areas who were displaced out of the areas at the beginning of the regeneration process.	f) Change LRFIP to insert additional wording to footnote at end of housing strategy tables at end of page 182, 208, 229 and 247.
		g) Replacement units in Moyross need to reflect the reality of family size and makeup including combined family units, intergenerational family units and families of larger than average size and states that the aims of the Regeneration Plan for Moyross will fail unless at least 10% of all new builds will be tenanted from the housing list.	g) Noted. Please refer to submission 19d and 19f above. The LRFIP has considered in detail the household formations in Moyross to determine the percentage mix for replacement homes. Furthermore, it should be noted that 16% (48 out of 295) of replacement housing in Moyross has been allocated to those who currently are considered in overcrowded situations in Moyross (i.e., those with an existing address within Moyross who have applied to the general housing waiting list with a specific desire for housing in Moyross). It is a specific objective of the LRFIP to support those tenants who wish to remain in a regeneration area where they have lived for some time and have a strong kinship. This strong social capital, amongst other variables, will assist in stabilising the regeneration areas.	g) No change to LRFIP
		h) States that it is crucial to the success of the regeneration plan for the commitment to the development of the road infrastructure in Moyross. Access and connectivity to other areas of the city and to services is essential to the success of the plan. To that end clear and measurable timeframes need to be written into the plan in relation to the delivery of the Coonagh/Knockalisheen linkage with the Moyross interchange. In addition the delivery of the Moyross/Mayorstone interconnector must be detailed and prioritised within the plan with clear timeframes for delivery.	h) Noted. The Physical Regeneration Framework will be delivered in short (<3 years), medium (3-6 years) and long term phases (6 years +). Volume 3: Implementation and Delivery states on Page 283 the programme for delivery for the following objectives for Moyross: <ul style="list-style-type: none"> Support the construction of the Coonagh-Knockalisheen bypass, providing NRA/Limerick City Council a new western entrance to Moyross to eliminate existing cul-de-sac layout – Medium term (3-6 years) Extend the existing Moyross Avenue to link with the new western entrance NRA/Limerick City Council of the Coonagh-Knockalisheen bypass – Medium term (3-6 years) Please also refer to submissions 2j and 18c above for supporting information.	h) No change to LRFIP

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Reference No.	Submission From	Summary of Issues	Manager's Opinion	Manager's Recommendation
		<p>Further detailed comments are provided in the submission relating to the Physical Framework Plan as follows:</p> <p>Movement & Connectivity</p> <p>i) (page 177): States that access into Castle Park and Respond Housing Estate from Sarsfield Gardens needs to be retained.</p>	i) Agree. It is proposed to amend maps on pages 177, 179, 183, 185, 187, 188, 189 and 195 to retain access into Castle Park and Respond Housing Estate from Sarsfield Gardens.	i) Change LRFIP to amend maps and text.
		j) (page 176): States that there is concern that a pedestrian /cycle link from Sarsfield Gardens through existing underpass to Moyross presents a challenge for security and community safety and this access should be provided as an overpass.	j) Noted. See response to submission 4g above	j) No change to LRFIP
		k) (page 199): States that the demolition of Pineview and Craeval Park will impact significantly on the residents of Delmege Park who will find themselves isolated from the services of Moyross. The development and the design of the new Linear Park needs to facilitate a connection between Delmege and the rest of Moyross as well as to the wider community. (See note 6).	k) Noted. See response to submission 2c and 2d above Noted.	k) No change to LRFIP
		l) Railway Station – States that the Railway Station previously discussed for the Moyross area should be reconsidered and included as a means of further developing the linkages and connectivity to Limerick City and the broader Region.	<p>l) The Limerick Regeneration Masterplan was published in October 2008 and outlined future physical proposals for Moyross with the inclusion of a rail stop at the time. The principles outlined in the Masterplan proposed the demolition of all housing in Moyross and its replacement with new and much higher density neighbourhoods to support the viability of a rail-stop. The LRFIP has refocussed the Masterplan, with the principle of full or large scale demolition reassessed and a revised framework plan devised for the retention and refurbishment of existing housing units in tandem with creating new connections with natural surveillance, functional public open spaces and a more consolidated urban structure refocussed around the existing community hub and District Centre.</p> <p>The standards set out by the Department of Environment, Heritage and Local Government's "Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas" highlight that, "The State has committed very substantial investment in public transport under the</p>	l) No change to LRFIP

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Reference No.	Submission From	Summary of Issues	Manager's Opinion	Manager's Recommendation
			<p>Transport 21 capital programme. To maximise the return on this investment, it is important that land use planning underpins the efficiency of public transport services by sustainable settlement patterns – including higher densities – on lands within existing or planned transport corridors”. The Department Guidelines are national standards and state that, “In general, minimum net densities of 50 dwellings per hectare, subject to appropriate design and amenity standards, should be applied within public transport corridors, with the highest densities being located at rail stations / bus stops, and decreasing with distance away from such nodes”. When the Department refers to minimum standards this is the lowest desirable density and not a maximum density. The Department Guidelines clearly emphasise that subject to appropriate safeguards, “there should, in principle, be no upper limit on the number of dwellings that may be provided within any town or city centre site” adjacent to rail nodes.</p> <p>The planned regeneration programme for Moyross, now refocussed on a retention and refurbishment strategy does not envisage densities in excess of 50 units per hectare. Therefore, at this moment in time, providing a rail stop would not be deemed viable for its operation and would not be consistent with the recommendations of the “Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas”.</p> <p>Notwithstanding the above, the LRFIP supports the protection of the existing alignment of the Limerick/Galway rail line, as stated in the Limerick City Development Plan 2010-2016, to allow for the provision of a railway station in the future. The proposed Coonagh-Knockalisheen Distributor Road includes space for the provision of double tracks on the line and greater clearance at bridge structures.</p>	
		<p>Land Use Strategy</p> <p>m) 2.2.1 (page 199): States that Moyross Residents Regeneration Committee request that the Office of Regeneration would consider increasing the availability of small micro enterprise units within the Moyross areas so as to provide essential employment opportunities within the community. In addition to micro-enterprise units, provision should be made for the development of light industrial/warehouse units for existing or new services in the area such as mechanics, carpentry or other trades and service providers.</p>	<p>m) Noted. Moyross Enterprise Centre is zoned 'Mixed Use' in the Limerick City Development Plan 2010-2016 with a specific objective to promote the development of mixed uses including employment and enterprise uses to ensure the creation of a vibrant urban area, working in tandem with the principles of sustainable development, transportation and self-sufficiency. Warehousing is an 'open for consideration use' under this zoning. The Office of Regeneration supports this objective and reinforces the objective in the LRFIP. Furthermore, in other parts of Moyross, enterprise uses are a 'permitted in principle use' under the District Centre zoning at Watch House Cross and the Educational, Cultural and Community zoning at the Moyross community hub. Enterprise uses are 'open for consideration use' under the Neighbourhood Centre zoning along the Kileely Road. under It is therefore deemed that there is sufficient statutory zoning provisions for the further development of enterprise units and light industrial/warehouse units in Moyross.</p>	m) No change to LRFIP

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		n) 2.2.2: States that consideration should also be given to the allocation of land to the development of facilities to meet the future social, health and well being needs in the community.	n) Please refer to submission 12p above.	n) No change to LRFIP
		<p>Open Space Strategy</p> <p>o) 2.3.1 (page 192): States that the detail of the proposed new Linear park from the river Shannon, through the heart of Moyross as set out in the plan has not been fully outlined within the implementation plan and while residents would welcome the creation of a publically accessible park and sports facilities, there is concern that the plans as currently laid out are not overlooked by housing” eyes on the street” and may provide a security or safety threat. The design of this facility, its accessibility and connections internally and externally will be crucial to the success of the regeneration plans in Moyross.</p>	o) Agree. It is proposed to amend maps on pages 179, 183, 185, 187, 188, 189, 192, 193, 199 and 463 to provide a frontage of housing overlooking the linear park at Craeval and Pineview Gardens. It is proposed to amend tables 8, 9 and 10 to Appendix 3: Core Strategy Compliance to update number of private units. A detailed public realm and design code is in preparation for the regeneration areas and has formulated detailed guidelines for the proposed physical character of the linear park in terms of planting, materials and facilities.	<p>o) Change LRFIP to amend maps to Moyross. Please refer to 19i above.</p> <p>Change LRFIP to amend tables 8, 9 and 10 to Appendix 3: Core Strategy Compliance to update number of private units.</p>
		p) 2.3.2: States that the current housing layout in Moyross has many gable ends backing onto public green areas. This is a security and safety concern for residents. Moyross Residents Regeneration Committee request, that the replacement and refurbishment process include a plan to extend residents boundaries beyond the gables with appropriate enclosures to secure the residences.	p) As described above in submission 19(o) a detailed public realm and design code is in preparation for the regeneration areas and has formulated detailed guidelines for the gable ends to existing housing to provide adequate overlooking and ensure optimum safety and security. It is the intention to place the Public realm and Design Code on public display to invite feedback on the detailed proposals with the intention to adopt the Code as a policy document of Limerick City and County Council.	p) No change to LRFIP
		q) 2.3.3 (page 468) Housing Design: States that the Crime prevention through design strategy is a hugely important aspect of the regeneration process particularly in relation to surveillance opportunities, shared access routes and the development of appropriate pedestrian networks.	q) Noted	q) No change to LRFIP
		<p>Housing strategy</p> <p>r) 2.4.1 (page 461): States that the goal of changing the tenure mix in the Moyross area to a ratio of 17:83 (Local Authority: Private Occupied) by 2022 is ambitious. In order to achieve this goal, Moyross Residents request that development of private housing in the Moyross area should be on a phased basis in tandem with the replacement and refurbishment of existing housing in Moyross. Regeneration Areas in the city should be incentivised and prioritised in terms of the zoning of lands for private development. Existing zoned lands should have priority over any new zoning.</p>	r) Noted. All lands outlined in Appendix 3 for private housing are suitably zoned to facilitate residential use under the Limerick City Development Plan 2010-2016. The LRFIP notes, as part of the replacement housing strategy on page 199 that should an uplift in market conditions occur, the phasing strategy will allow for the development of private housing in tandem with replacement housing and the refurbishment programme. Limerick City Council are actively	r) No change to LRFIP

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Reference No.	Submission From	Summary of Issues	Manager's Opinion	Manager's Recommendation
			supporting tenure diversification. The regeneration areas is heavily incentivised by the Limerick City Council Development Contribution Scheme 2013-2016 which sought a significant reduction in contributions for the construction of private dwellings in the regeneration areas. Furthermore, no new lands have been rezoned for residential as part of the LRFIP.	
		s) 2.4.2 (page 461): States that Moyross Residents Regeneration Committee require clarity: In relation to the ratio of 17:83 (Local Authority: Private Occupied) What proportion of Private Occupied units envisaged will be provided by voluntary housing sectors.	<p>s) Noted. Out of the four Regeneration Areas, Moyross is the only area with any significant level of voluntary housing activity with 3% of all housing in the area rented from a housing body. The rate of rental in other areas from such bodies is less than 1%. A marked feature of the voluntary housing sector is that many associations also offer non-housing services such as group meals, social activities and welfare advice, thereby providing an additional level of support to communities in the Regeneration Areas.</p> <p>The Housing Policy Statement 2011 recognises the constrained funding available for local authority construction programme and promotes the objective of housing provision by approved housing bodies (i.e, voluntary) into the future. The Office of Regeneration agrees with this aim as it has the potential to promote the evolution of mixed tenure communities. There is significant potential for approved housing bodies in the regeneration areas and it is an objective of the OoR improve the current percentage of 3% over the course of the regeneration programme. In answer to the submission request for a proportion, it is impossible to determine a suitable answer at this moment in time as the 17:83 ratio is related to a target level to be achieved by 2022 in line with the Core Strategy of the LCDP.</p>	s) No change to LRFIP
		t) 2.4.3: States that the position of tenants remaining in the Moyross area and the scheme for tenant purchase of houses replacement or refurbished needs to be clearly outlined to residents at this stage.	t) Noted. While the 1995 tenant purchase scheme for existing local authority houses closed for new applications on 31 December 2012, two incremental purchase schemes, one for newly-built local authority houses and the other for local authority apartments, remain in operation. It is intended that the Government will advance the necessary legislative proposals as soon as practicable in order to underpin an incremental purchase scheme for existing local authority houses. The precise terms of the new scheme will be set out in regulations when the necessary legislation is enacted.	t) No change to LRFIP
		u) 2.4.4 (page 182): States that the statement “Therefore, no new social housing tenants from outside the regeneration areas will be introduced into the regeneration areas” is of concern as it will not support the development of sustainable communities and will be contrary to the guiding principals of the plan.	u) Please refer to submission no 19f above	u) No change to LRFIP

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		<p>v) 2.4.5 (page 196): States that replacement units are being built on the basis of existing unit demand and the size of replacement units being proposed is causing some concern with over 75% of replacement units aimed at 1-3 persons. Moyross Residents Regeneration Committee request that the commitment to building a sustainable future for Moyross is reflected in a significant proportion of new units aimed at 5-6 person being provided so that families will have access to housing units in Moyross into the future.</p>	<p>v) Please refer to submission no 19e above</p>	<p>v) No change to LRFIP</p>
		<p>w) 2.4.6: States that residents living in houses planned for demolition in the medium to long term must have their existing housing maintained to an acceptable standard in line with building norms pending their re-housing. Clarity also needs to be given in relation to the demolition and re-housing plan for residents of Pineview and Craeval Pk as these areas are to be demolished and not rebuilt and a commitment that families will be relocated pending replacement housing within the Moyross area should be given. Where relocation is required to deliver parts of this plan i.e. Cliona Park, or any area, new builds should be provided in consultation with the effected tenants/residents in advance.</p>	<p>w) Noted. The Vision Statement, contained within the LRFIP, enshrines the objective for residents to live in a decent home. The LRFIP supports the objective of maintaining and strengthening the existing communities and the Office of Regeneration will continue the consultation process in particular related to the detailed design of housing schemes as they advance.</p>	<p>w) No change to LRFIP</p>

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Reference No.	Submission From	Summary of Issues	Manager's Opinion	Manager's Recommendation
		<p>Social & Economic Framework Strategy</p> <p>x) States that a key challenge is the inadequacy of the Social Integration budget overall. It is therefore essential that the Social Integration budget is at a minimum maintained and protected from future erosion in the medium term.</p>	<p>x) Noted. Indicated in the text that additional funding for social regeneration is only a small part of the funding. It is stated that the main funding must come from mainstream budgets in social policy.</p>	<p>x) No change to LRFIP</p>
		<p>y) States that Corpus Christ NS has yielded positive results in terms of primary education in Moyross including improved school performance and increased enrolments over the Regeneration period. This investment needs to be expanded to incorporate a full service school as part of the Civic Hub project. We strongly suggest amendments required to the Framework document on specific pages that refer to declining enrolments in primary schools (EXAMPLE PAGE 54) to specify that in recent years Corpus Christi Primary School has in fact registered significant increased enrolments and has in 2013 been granted an additional teaching post on the basis that the school is in a 'developing school' status.</p>	<p>y) Noted and agreed in part. While school outcomes might have shown improved performance in Corpus Christi, data on pupil attainment / school outcomes are not available from public information sources for primary schools in general in Limerick. Note that data on enrolments for all schools for the year 2013/14 are not available from DES publicly-available datasets, as yet, to allow for comment on how the situation has changed for the current academic year. Nonetheless, changes in terms of increased enrolment at CC Moyross, as outlined in the submission, is now referenced in the Plan.</p>	<p>y) Change LRFIP to insert additional wording to Appendix I (page 325-326).</p> <p>Change LRFIP to insert additional wording to Volume I (page 54) under Educational Attainment.</p> <p>Change LRFIP to insert additional wording to 2.1.3.1 Priority I: Education and Learning, Experience to date (page 121).</p>
		<p>(z) States that the document needs to include reference to specific projects and key agencies that are omitted in the draft plan. Reference need to be made to the new Limerick area based childhood programme announced by the Department of Children and Youth Affairs in November 2013. This programme has the potential to deliver major impact on early years and school readiness in the Moyross area as it will focus intensely on 0-3 YEAR OLD. (AMEND PAGE 291 OF DRAFT PLAN).</p>	<p>z) Noted and agreed. The amendment made outlines the situation with regard to the current status of the Limerick proposal (i.e., approval for the design phase of a project, with the LCCSC to act as the lead agency</p>	<p>z) Change LRFIP to insert additional wording to 2.1.3.1. Priority I: Education and Learning, I. Early Years Learning and School Readiness, Scope of Action (page 122)</p>
		<p>(aa) States that page 283 of the draft plan needs to be amended under the section that refers to priority 2 health and well being to include as a key project Corpus Christi full services extended school model with integrated Moyross Civic Hub as a specific project.</p>	<p>aa) Noted. See c) above. No change to p. 293. Already referenced that good practice in the full extended school model to be extended to other areas.</p>	<p>aa) No change to LRFIP. References added to full service extended school model added elsewhere</p>

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		ab) States that the strong leadership role of the Department of the Environment in the Regeneration Process is to be acknowledged. Social Regeneration requires a particular set of expertise and experience which extends beyond the scope of Local Government. It is therefore imperative that investment of financial and human resources extend to include other government departments, statutory agencies, local development initiatives and community and voluntary organisations.	ab) Noted and agreed. Consider this point is covered in Priority 8: Whole of Government Approach.	ab) No change to LRFIP
		ac))States that interagency models and collaboration do not supersede the belief of the Residents Representatives on Moyross Regeneration Committee that a community lead rather than agency driven approach is key to unravelling the tangled web of social exclusion. Specific detail is required as to how “Multi-Agency work,” “integrative plans” and “quality assurance frameworks” are going to create meaningful societal change in Moyross and the role of the local community in this process.	ac) Noted. A significant role for community is envisaged in the plans, for instance, with community / voluntary sector partners mentioned under the heading “key agencies” in describing each of the priorities and in the implementation and local service delivery arrangements.	ac) No change to LRFIP
		ad)) States that action on the ground must be underpinned by trust and strong relationships if we are serious about tackling social exclusion in Moyross. For the community to be in a position to take a lead role in Social Regeneration there needs to be a commitment from public bodies to make community engagement an integral part of how it plans, delivers and evaluates its services. Local communities require access to independent information, support and training to be in a position to participate fully. The community in Moyross should play a key role in prioritising issues of importance and should not just be reacting to an agenda set by public bodies and other agencies.	ad) Noted and agreed. Consider this is addressed in Priority 6: Community Participation, Empowerment and Civic Engagement.	ad) Change LRFIP to insert additional wording to 2.1.3.7 Priority 6: Community Participation, Empowerment and Civic Engagement, B. Capacity Building: Community Participation, Empowerment and Civic Engagement, under Scope of Action, (page 152).
		ae) States that high standards and expectations need to be set not just for agencies and services but also for this community and our residents. There is a need for the community to be held accountable to these standards and expectations whilst also supporting and scaffolding the community as they learn. This requires that in addition to support there is a rigorous monitoring, management and enforcement strategy in relation to both the development and management of the physical infrastructure and the social integration elements in this framework.	ae) Noted and agreed. Monitoring / evaluation framework developed as part of LRFIP No change to LRFIP	ae) No change to LRFIP

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Reference No.	Submission From	Summary of Issues	Manager's Opinion	Manager's Recommendation
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		af) States that Residents Representatives on Moyross Regeneration Committee are seeking the development of a fully resourced housing management unit to oversee the upkeep of property and the development of families as required.	af) Noted. Review being commissioned by LCCC of estate management and community organization / representation / management arrangements.This will also examine the issue of estate maintenance.	af) No change to LRFIP
		ag) States that the inclusion of “Social Clauses” in the “Limerick Regeneration Framework Implementation Plan” is a very welcome development. Residents Representatives on Moyross Regeneration Committee would welcome the use of Local Labour Agreements (LLAs) as a mechanism for identifying suitable job seekers, providing the necessary training and skills and facilitating a relationship between job seekers and the construction firm.	ag) Noted. Details of implementation of social clauses to be further developed over implementation	ag) No change to LRFIP
	19ah	Further Clarifications ah) Open Space Provision (page 69) – States that with regards to Active Play Facilities for those under the age of 15, a number of active play facilities for young people were left out of the Framework Plan including: <ol style="list-style-type: none"> Moyross Playground. Moyross United. LIT Sarsfields. Community Enterprise Afterschools facilities. 	Noted. It is proposed to add an additional paragraph to section ah) 4.1.14 Open Space Provision to include reference to the existing active play facilities in Moyross.	ah) Change LRFIP to add text.
		ai) Page 357: Requests clarification on attendance at the open day was 145 people.	ai) Noted. It is proposed to amend Appendix 2: Statement of Community Involvement to indicate that 155 persons were in attendance at the open days.	ai) Change LRFIP to amend text.

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Reference No.	Submission From	Summary of Issues	Manager's Opinion	Manager's Recommendation
20	Moyross Residents Regeneration Committee	<p>The submission indicates the following in relation to the Physical Framework Plan and the Social and Economic Framework Plan for Moyross:</p> <p>a) (page 177): States that access into Castle Park and Respond Housing Estate from Sarsfield Gardens needs to be retained. Submission queries what is the rationale.</p>	a) Please refer to submission no. 19i above	a) No change to LRFIP
		b) (page 176): States that there is concern that a pedestrian /cycle link from Sarsfield Gardens through existing underpass to Moyross presents a challenge for security and community safety and this access should be provided as an overpass.	b) Please refer to submission no. 4g above	b) No change to LRFIP
		c) (page 199): States that the demolition of Pineview and Craeval Park will impact significantly on the residents of Delmege Park who will find themselves isolated from the services of Moyross. The development and the design of the new Linear Park needs to facilitate a connection between Delmege and the rest of Moyross as well as to the wider community. (See note 6)	c) Please refer to submissions no. 2c and 2d above	c) No change to LRFIP
		d) (page 199): States that Moyross Residents Regeneration Committee request that the Office of Regeneration consider increasing the availability of small micro enterprise units within the Moyross areas so as to provide essential employment opportunities within the community	d) Please refer to submission 19m above	d) No change to LRFIP
		e) (page 192): States that the detail of the proposed new Linear park from the river Shannon, through the heart of Moyross as set out in the plan has not been fully outlined within the implementation plan and while residents would welcome the creation of a publically accessible park and sports facilities, there is concern that the plans as currently laid out are not overlooked by housing" eyes on the street" and may provide a security or safety threat. The design of this facility, its accessibility and connections internally and externally will be crucial to the success of the regeneration plans in Moyross.	e) Please refer to submission 19o above	e) No change to LRFIP
		f) States that the current housing layout in Moyross has many gable ends backing onto public green areas. This is a security and safety concern for residents. Moyross Residents Regeneration Committee request, that the replacement and refurbishment process include a plan to extend residents boundaries beyond the gables with appropriate enclosures to secure the residences.	f) Please refer to submission 19p above	f) No change to LRFIP
		g) (page 468) Housing Design: States that the Crime prevention through design strategy is a hugely important aspect of the regeneration process particularly in relation to surveillance opportunities, shared access routes and the development of appropriate pedestrian networks.	g) Noted	g) No change to LRFIP
		h) (page 461): States that the goal of changing the tenure mix in the Moyross area to a ratio of 17:83 (Local Authority: Private Occupied) by 2022 is ambitious. In	h) Please refer to submission 19r above	h) No change to LRFIP

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		order to achieve this goal, Moyross Residents request that development of private housing in the Moyross area should be on a phased basis in tandem with the replacement and refurbishment of existing housing in Moyross. Regeneration Areas in the city should be incentivised and prioritised in terms of the zoning of lands for private development. Existing zoned lands should have priority over any new zoning.		
		i) (page 461): States that Moyross Residents Regeneration Committee require clarity: In relation to the ratio of 17:83 (Local Authority: Private Occupied) What proportion of Private Occupied units envisaged will be provided by voluntary housing sectors.	i) Please refer to submission 19s above	i) No change to LRFIP
		j) States that the position of tenants remaining in the Moyross area and the scheme for tenant purchase of houses replacement or refurbished needs to be clearly outlined to residents at this stage.	j) Please refer to submission 19t above	j) No change to LRFIP
		k) (page 182): States that the statement “Therefore, no new social housing tenants from outside the regeneration areas will be introduced into the regeneration areas” is of concern as it will not support the development of sustainable communities and will be contrary to the guiding principals of the plan.	k) Please refer to submission 19f above	k) No change to LRFIP
		l) (page 196). States that the replacement units are being built on the basis of existing unit demand and the size of replacement units being proposed is causing some concern with over 75% of replacement units aimed at 1-3 persons. Moyross Residents Regeneration Committee request that the commitment to building a sustainable future for Moyross is reflected in a significant proportion of new units aimed at 5-6 person being provided so that families will have access to housing units in Moyross into the future.	l) Please refer to submission 19e above	l) No change to LRFIP
		m) States that residents living in houses planned for demolition in the medium to long term must have their existing housing maintained to an acceptable standard in line with building norms pending their re-housing. Clarity also needs to be given in relation to the demolition and re-housing plan for residents of Pineview and Craeval Pk as these areas are to be demolished and not rebuilt. And a commitment that families will be relocated pending replacement housing within the Moyross area. Where relocation is required to deliver parts of this plan i.e. Cliona Park, or any area, new builds should be provided in consultation with the effected tenants/residents in advance.	m) Please refer to submission 19w above	m) No change to LRFIP
		n) States that Moyross Regeneration Committee firmly believes that a new method of thinking which is community lead rather than agency driven is key to unravelling the tangled web of social exclusion.	n) Noted. A significant role for community is envisaged in the plans, for instance, with community / voluntary sector partners mentioned under the heading “key agencies” in describing each of the priorities and in the implementation and local service delivery arrangements.	n) No change to LRFIP
		o) States that it is the Committee’s opinion that the plan for Social Regeneration of this city is laden down with theory and is bereft of detail as to the mechanisms that will turn the theoretical insights into tangible results on the ground.	o) Noted.	o) No change to LRFIP
		p) Open Space Provision (page 69) – States that regarding active Play Facilities for those under the age of 15, a number of active play facilities for young people were left out of the Framework Plan including: Moyross Playground. Moyross United. LIT Sarsfields. Community Enterprise Afterschools facilities (not active play?).	p) Noted. Please refer to submission 19ah above	p) Change LRFIP to amend text.
		q) Page 357: States that it requests clarification on attendance at the open day of	q) Noted. Please refer to submission 19ai above	q) Change LRFIP to amend text.

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Reference No.	Submission From	Summary of Issues	Manager's Opinion	Manager's Recommendation
		100 persons		
21	Mid West Regional Authority Friars Court Abbey Street, Nenagh Co.Tipperary	<p>The submission indicates the following:</p> <p>a) States that in accordance with the Fitzgerald report the Regional Authority recognises the need for substantial investment in the development of the City Centre and adjoining social housing to overcome legacy issues as identified in the Limerick Regeneration Framework Implementation Plan (LRFIP). The LRFIP provides a common shared vision for the provision of sustainable communities within the City and its Environs. The Regional Authority supports such vision which focuses on the integration of Social, Economic, and Physical environments through targeted investment in regeneration of, private and public housing and infrastructure provisions in existing established neighbourhoods.</p>	a) Noted	a) No change to LRFIP
		b) States that the Regional Authority supports the revised focus of the LRFIP to prioritise and promote the retention, refurbishment and the promotion of mixed tenure infill development of established housing estates and the City Centre.	b) Noted	b) No change to LRFIP
		c) States that the aims and objectives of the LRFIP to address and promote an improved quality of life for all, through physical, economic, social, community development and community safety dimensions which promote social and economic inclusivity and attractive neighbourhoods are supported. The Authority supports the development of “Brownfield, green field and in-fill sites”, to facilitate and promote the revitalisation and regeneration of the City and the existing regeneration areas. Such policy is consistent with the requirements of the Mid-West Regional Planning Guidelines 2010-2022.	c) Noted	c) No change to LRFIP
		d) States that the Limerick and Clare Joint Housing Strategy 2011-2016 and the Mid-West Area Strategic Plan (MVASP) 2012-2030 which identify the need to prioritise and redirect population growth in the region into Limerick City and the Limerick/Shannon Gateway.	d) Noted	d) No change to LRFIP
		e) States that the Authority notes that Limerick City and the regeneration areas have experienced significant population decline over the last decade, which levels are well below the planned population and housing accommodation targets set for the City. While the LRFIP proposals are intended to address this issue, it is noted that the LRFIP proposals as currently constituted need to be consistent with the Limerick City Development Plan Core Strategy Variation No 1. Further variations to the City and Development Plan Core Strategy 2010-2016 as set out in Appendix 3 (Core Strategy Compliance) of the plan, to facilitate the revised population and housing targets, residential land-use and mixed tenure of 80:20 public/private housing formulated under this plan, may be required to meet the RPG targets for the plan area and the MWRA will assist the Council in this regard.	e) Noted	e) No change to LRFIP
		f) States that due regard should be paid to the provision of detailed flood risk assessments and ongoing monitoring of flood events in terms of the policies and guidelines contained in Sections 7.5 of the RPG's, the provisions of “The Planning system and Flood Risk Management Guidelines DoECLG 2009” and any Flood Risk mapping emanating out of the current Shannon CFRAM study. Particular cognisance should be taken of the flood risk potential of the St Mary's Park and Kings Island areas which lies within a Flood Zone A flood risk assessment area.	f) Noted. Please refer to submission 10k, 10u and 10ab above.	f) No change to LRFIP
		g) States that ongoing monitoring as reflected in Section 3 (Implementation and Delivery) is essential for the ongoing evaluation of the performance of the range of objectives, strategies as set out in this framework plan. The proposed ongoing monitoring, collation and statistical analysis of quantitative and qualitative data is considered to be an essential component for the successful and timely delivery of this framework plan, and resources should be ring fenced to support such	g) Noted	g) No change to LRFIP

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		initiative.		
		h) States that the Regional Authority welcomes this initiative and submits the above observations for the consideration by the Limerick City and County Local Authorities and will assist the Council in this regard.	h) Noted	h) No change to LRFIP
22	Pat Casey 34 Aherlow Close Glenmore Lawn Caherdavin	The submission indicates the following in relation to the Moyross Physical Framework Plan: a) Does not support the creation of a new linear park.	a) See response to submission 4e above	No change to LRFIP
		b) Does not support improving the existing access from Moyross to Cratloe Road.	b) See response to submission 2d above	No change to LRFIP
		c) Does not support the provision of a new entrance onto the proposed Coonagh-Knockalisheen Road to eliminate the existing cul-de-sac layout.	c) See response to submission 2j above	No change to LRFIP
23	Sean Leahy 12 Aherlow Close Glenmore Caherdavin	The submission indicates the following in relation to the Moyross Physical Framework Plan: a) Does not support improved access from the civic heart of Moyross to Thomond Park/Cratloe Road.	a) See response to submission 2d above	a) No change to LRFIP
		b) Does not support the provision of access between the civic heart of Moyross and Cratloe Road.	b) See response to submission 2d above	b) No change to LRFIP
		c) Does not support the provision of access between Moyross Avenue and the Cratloe Road.	c) See response to submission 2d above	c) No change to LRFIP
		d) Does not support improving the existing access from Moyross to Cratloe Road	d) See response to submission 2d above	d) No change to LRFIP
		e) Does not support extending the existing Moyross Avenue to link to the proposed Northern Distributor Road.	e) See response to submission 2j above	e) No change to LRFIP
		f) Reiterates opposition to any road providing access between Moyross and the Old Cratloe Road as there are concerns for personal safety and safety of living environment.	f) See response to submission 2d above	f) No change to LRFIP
24	St. Mary's AID	The submission states the following: a) States that St. Mary's AID welcomes the Framework Implementation Plan supported by the Minister, the Mayor and the City and County Manager.	a) Noted	a) No change to LRFIP
		b) States that it endorses the vision statement of 'safe and sustainable communities of opportunity where people of all ages enjoy a good quality-of-life, a decent home and a sense of pride about their place. Well services and attractive neighbourhoods, physically connected and integrated the social, economic and cultural life of Limerick.	b) Noted	b) No change to LRFIP
		c) States that new housing with a mix of unit types to address housing need as expressed by residents through consultation.	c) Noted	c) No change to LRFIP
		d) States that refurbishment of existing housing should be to an acceptable current standard.	d) Noted	d) No change to LRFIP
		e) States that refurbishing existing social and educational infrastructure in the area and building further capacity should be carried out in consultation with community groups and residents.	e) Noted	e) No change to LRFIP

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		f) States that environmental protection and attractive landscaping and environmental improvements should be in sympathy with the natural environment.	f) Noted	f) No change to LRFIP
		g) States that clarification required on issue of temporary relocation whilst refurbishment is being carried out.	g) The refurbishment programme currently underway involves thermal upgrade works that do not require the occupant to relocate home on a temporary basis. However, in exceptional circumstances, the Office of Regeneration will require the temporary relocation from homes where the works being carried out would exacerbate a particular medical condition the occupant may have.	g) No change to LRFIP
		h) States that priorities should be established to ensure the absolute need is addresses.	h) The replacement housing strategies for the regeneration areas outlines the key priorities to meet replacement housing need in the short (0-3 years) to medium term (3-6 years). Strategies are also proposed to meet additional private housing need in the long term (6 years +). However, should an uplift in market conditions occur, the priorities will allow for the development of private housing in tandem with replacement housing programme.	h) No change to LRFIP
		i) States that upgrade to water infrastructure is noted.	i) Noted	i) No change to LRFIP
		j) States that proposed protection of the natural environment around St. Mary's Park is welcomed.	j) Noted	j) No change to LRFIP
		k) States that there is a welcome recognition that open space is under-resourced in terms of active play facilities.	k) Noted	k) No change to LRFIP
		l) States a call for the development of a pre-school age playspace.	l) Noted. The LRFIP contains a specific objective in 2.6.4 Open Space and Public Realm Strategy (page 232) to upgrade active recreation facilities within St. Mary's Park. A detailed public realm and design code is in preparation for the regeneration areas and has formulated detailed guidelines for the proposed physical character of neighbourhood parks in terms of planting, materials and play space facilities.	l) No change to LRFIP
		m) States a call for the development of a clubhouse and changing rooms as part of the all-weather pitch.	m) Noted. The LRFIP contains a specific objective in 2.6.4 Open Space and Public Realm Strategy (page 232) to retain and upgrade the active recreation facilities within St. Mary's Park including those at Star Rovers Football Club. The Office of Regenerations supports the development of a clubhouse and changing room facilities at this location.	m) No change to LRFIP
		n) States that it notes the planning context in relation to St. Mary's Park under the Limerick City Development Plan 2010-2016 and that zoning is flexible to facilitate development of the Implementation Plan.	n) Noted	n) No change to LRFIP
		o) States that it notes other objectives under the LCDP 2010-2016 to include: Development of a strategy to integrate King's Island into the city core. Redevelopment of the Medieval Quarter and the riverside area.	o) Noted	o) No change to LRFIP

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		Promotion of maritime heritage. Redevelopment of King John's Castle and Nicholas Street.		
		p) States that it notes the land use strategy in relation to employment generating uses to include the upgrade of sites, development of key strategic sites at Nicholas and Bridge Street, support development of Nicholas Street, temporary development of land and buildings, National Social Innovation Hub at Nicholas Street, waterway development training employment and tourism potential, employment associated with Opera Centre site.	p) Noted	p) No change to LRFIP
		q) States that it seeks the development of a strategic employment plan to be developed focussed on the existing skills and potential of St Mary's Park.	q) Noted	q) No change to LRFIP
		r) States that it notes objective of a multi-use community centre with accommodation to meet varied community needs and states that this is a top priority for St. Mary's Park.	r) Noted. The LRFIP contains a specific objective in section 2.6.2 Land Use Strategy (page 226) in support of an upgrade to the existing Community Centre as follows: <ul style="list-style-type: none"> Support the provision of an extended multi-use community centre at St Mary's Park Community Centre to provide flexible and accessible spaces adaptable to the communities' needs. The provision of an extended centre at this location, within easy access to the city core will ensure that the centre is used not only by residents of St Mary's Park but the wider community also. Ensure that the delivery of community facilities are brought forward in tandem with housing development (replacement, refurbishment and new-build housing development) in King's Island and St. Mary's Park 	r) No change to LRFIP
		s) States that it notes the delivery of community facilities in tandem with refurbishment of houses.	s) Noted	s) No change to LRFIP
		t) States that St. Mary's AID is willing and able to contribute to the development of community infrastructure and facilities centred around King's Island Community Centre.	t) Noted	t) No change to LRFIP
		u) States that it notes the formal and informal educational infrastructure in St. Mary's Park.	u) Noted	u) No change to LRFIP
		v) States that it seeks to develop greater community involvement in support and engagement with the existing infrastructure.	v) Noted	v) No change to LRFIP
		w) States that it seeks to develop a connection with the University of Limerick given their stated commitment to a revitalised city and as such welcome projects included under 'Education and Community' on page 89.	w) Noted	w) No change to LRFIP
25	St. Mary's Park Community Group	The submission states the following: a) States that it notes that refurbishment work has commenced on Mary's Park since the launch of the Plan.	a) Noted	a) No change to LRFIP
		b) States that the community is in the process of building good working relationship with the Council and that this will be strengthened over time.	b) Noted	b) No change to LRFIP
		c) States that the Framework Implementation Plan marks an important stage of a	c) No change to LRFIP	c) No change to LRFIP

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		once neglected community into a symbol of renewal and hope.		
		Further detailed comments are provided in the submission as follows: d) States that it seeks timeframe for build /renovation to be limited to two years.	d) The refurbishment programme, which is currently underway, encompasses works to the 4 regeneration areas in tandem which requires a timescale of 5 years to deliver approximately 1500 refurbishments in total.	d) No change to LRFIP
		e) States a minimum of 10% of workforce to be employed in construction projects.	e) Noted.The programme of new build, rebuild and refurbishment will be subject to the adoption of social clauses to enhance the prospects of local employment and training during the physical regeneration process. This policy was adopted by Limerick City and County Council in June 2013. Limerick City Council is taking guidance from the recent social clause being piloted on the NDFA Devolved Schools Build Programme on behalf of the Department of Education and Skills in relation to recommended percentages of the workforce being recruited from the long-term unemployed.	e) No change to LRFIP
		f) States that moss needs to be removed from roofs of houses being renovated.	f) Noted.As part of the scope of works for the refurbishment programme the repair and cleaning of existing soffits and fascias will be required and this will also include for the cleaning and refurbishing of rainwater goods to include removal of moss.	f) No change to LRFIP
		g) States that all houses to be renovated block by block.	g) Noted.All refurbishment works will be carried out on a block by block basis to ensure consistency to the external elevations and to the public realm.	g) No change to LRFIP
		h) States that the community centre is in need of a major overhaul to include a gym, dance hall, meeting room and employment hub.	h) The LRFIP contains a specific objective in section 2.6.2 Land Use Strategy (page 226) in support of an upgrade to the existing Community Centre as follows: <i>Support the provision of an extended multi-use community centre at St Mary's Park Community Centre to provide flexible and accessible spaces adaptable to the communities' needs.The provision of an extended centre at this location, within easy access to the city core will ensure that the centre is used not only by residents of St Mary's Park but the wider community also. Ensure that the delivery of community facilities are brought forward in tandem with housing development (replacement, refurbishment and new-build housing development) in King's Island and St. Mary's Park</i>	h) No change to LRFIP
		i) States the requirement for an office for Gardai to replace the closed Garda Station.	i) Noted.The Gardai have provided an administrative service on a part time basis from the Kings Island Youth & Community Centre since the closure of the Marys Street Garda Station.This service is constantly reviewed by local garda management with a view to facilitating the local community.	i) No change to LRFIP
		j) States that water infrastructure is required to be upgraded immediately.	j) Please refer to submission no. 24r above.	j) No change to LRFIP

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		k) States that the road from Moyross to Corbally via St. Mary's Park should be omitted from the plan as there isn't enough traffic to warrant such a road.	<p>k) Noted. It is the objective of the physical framework plan to promote connections to the wider city for economic and social reasons as well as physical reasons. It is a specific objective of the Limerick City Development Plan 2010-2016 to:</p> <ul style="list-style-type: none"> • <i>Develop a strategy to integrate Kings Island into the city centre core through selective site redevelopment and improved connections.</i> • <i>Examine the potential of improved/new multi modal connections to the adjacent area.</i> <p>These objectives are further reinforced with specific roads and cycleway objectives to open up access through St. Mary's Park from Moyross to Corbally. All options as to where the proposed connections will be located will ensure that the integrity of the environmentally designated sites (SACs) are protected. The OoR supports the statutory objectives outlined in the LCDP and reinforces them in the LRFIP.</p>	k) No change to LRFIP
		l) States that St. Mary's Boys and Girls School and St. Mary's secondary school do not have any GAA paying facilities. Reiterates that there are no GAA facilities in St Mary's Parish and requests that GAA pitches be considered in the revised plans within a suitable walking catchment of St. Mary's Park.	<p>l) Noted. The LRFIP contains a specific objective in section 2.6.4 Open Space and Public Realm Strategy (page 232) in support of the provision of active play facilities such as a GAA pitch.</p> <p><i>11. Provide for active playspace facilities, based on the existing and expected child population projections generated by the existing and future need.</i></p> <p>Furthermore, the Limerick City Development Plan 2010-2016 has zoned an extensive area of land as 'Public Open Space' around the island which is at present primarily used for passive and informal recreation. However, lands zoned 'public open space' may also incorporate sports facilities and grounds, subject to the requirements of the Habitats Directive. The LRFIP and the LCDP allow for the provision of a GAA pitch and therefore development of a GAA pitch should be addressed through a planning application process.</p>	l) No change to LRFIP
		m) States that a review of Estate Management be carried out with proactive people involved to carry out good customer service and deliver a coherent plan.	m) Note and agreed. Please refer to submission 5b above. The City Council proposes to carry out such a review in early 2014 & notification of the review has issued to the organizations that are funded to promote estate management in the city. The purpose of the review will be to map out and review the activities of the various structures in regeneration areas in Limerick, examine relevant experience from elsewhere in this area and compare the activities and set-up of these community structures and initiatives in regeneration areas in Limerick with wider best practice. This can be used to inform drawing conclusions on effectiveness & efficiency of the set up in Limerick and any recommendations for change.	m) Change to LRFIP to state that a review of the structures in place is being commissioned by Limerick City Council to 2.1.3.7 Priority 6: Community Participation, Empowerment and Civic Engagement, A. Community organization / Estate Management / Local Service Delivery (page 151).

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		n) Believes that persons with a disability and long-term illnesses should be made a priority by Limerick City Council.	n) Noted.This statement is consistent with the City Council's housing allocations policy & national housing policy.It is also addressed under Priority Health and Well-Being	n) No change to LRFIP
26	Southill Area Centre	The submission indicates the following in relation to the Framework Plan for Southill: a) States that the Draft Framework Implementation Plan for Regeneration is a good starting point for creating a positive future for the communities of limerick. However the challenges cannot be underestimated, deep level change will be required, both of local residents and local institutions and groups.	a) Noted and agreed	a) No change to LRFIP.
		b) States that the one of the key points to note in reimagining, reforming and regenerating the Southill community is that key work undertaken in recent years is not lost.Whilst national budgets become constrained there is a worrying move back to high intervention projects receiving funding at the loss of more universal and wider reaching programmes.This system led to a build up of resentment, of division and isolation of functioning family units from the community sector.	b) Noted and agreed. LRFIP builds on experience of regeneration and in regeneration areas to date.	b) No change to LRFIP.
		c) States that a key challenge will be generating belief and interest that hope and a new future is possible, beyond bricks and mortar and that will require each person in the area coming on board, standing together and saying no to the anti social behaviour, to lack of acknowledgment by state institutions and services and pushing forward for a new Southill, a place where it will be even better to grow up and grow old.	c) Noted and agreed.	c) Change to LRFIP to state that “hope, inspiration, etc. are a major part of the approach for action with this group and for the regeneration communities generally” to 2.1.4.5 Priority 5: Families and Youth at Risk, B. Improved Outcomes for Youth at Risk, Scope of Action (page 140)
		d) States that the placing of this project, Southill Area Centre, within and as part of Limerick Youth Service, is incorrect. This means the work of the centre as a community facility, serving all ages was not looked at, as an assumption was inaccurately made that it was a youth work facility.	d) Noted and agreed.	d) Change to LRFIP to state the Southill Area Centre is a multi-purpose centre which includes youth services amongst its activities (and is not exclusively a youth service provider) to 2.1.4.5 Priority 5: Families and Youth at Risk, Experience to Date (page 138).
		e) States that there are also errors in relation to projects mentioned which are no longer operating in the community. The Southill Domestic Abuse Project no longer operates from the CDP as it did previously.	e) Noted and agreed.	e) Change to LRFIP to state that Southill Domestic abuse project, up until recently operated out of Southill. Amendment to 2.1.4.5 Priority 5: Families and Youth at Risk, Experience to Date (page 138).
		f) States that there are errors in locations in maps, e.g. mention of developing a roadway behind the centre and in front of Southill Junior School. However under the environment section, the trees located along this route are reserved for special mention as to the importance of maintaining them in their current location for biodiversity/ scenic purposes.	f) Noted.The objective is to retain the tree group located at Southill Junior School for screening purposes.This tree group is located within the curtilage of the school and therefore will not be affected by any new streets proposed in the area. Furthermore, it is a specific objective of the Open Space and Public Realm Strategy for Southill on page 208 to: 6. Promote the retention of existing trees on proposed sites for development	f) No change to LRFIP.
		g) States that the trees are incorrectly located on some of the maps that accompany the report.	g) Agree.It is proposed to amend Figure 1.34 on page 102 to reposition the tree group associated with Southill Junior School inside the curtilage.	g) Change LRFIP to amend text. Please refer to section 3: Proposed Amendments.
		h) States that in relation to the schools, there is an insufficient amount of information regarding the closure of Southill Junior School and the development/ design and plan for the new school to be located on the old St. Kieran's site. There is no adequate discussion for suggestion round the use of the site or indeed it plans are in place for the handing over of this school site from the	h) Noted.The language of the physical framework plan reflects strategic objectives for the regeneration areas. In this regard, it seeks to strike a balance between high level policy and the prescriptive nature of detailed operational issues.The incorporation of detailed issues, specific to St Kieran's and	h) No change to LRFIP.

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		<p>diocese to the local authority for community purposes. This will be key for the community hub area in the future. If the diocese retains ownership of the land without clear purpose or without a partnership approach, an opportunity to develop and enhance a community hub of activity in the heart of Southill will be lost. Whist there are suggestions available locally on the possibilities for developing this space, it is something which should be dealt with in a wide and open consultation process.</p>	<p>Southill Junior School, will be considered in further consultation with the key stakeholders. As such, in relation to Southill Junior School it is considered sufficient to state the following strategic objective, as described in section 2.5.2 Land Use Strategy for Southill (page 204) to:</p> <ul style="list-style-type: none"> <i>12. Consider alternative uses for Southill Junior School. Uses to combat the extremely high rates of unemployment in Southill and the increased demand for further education and training could be accommodated within the existing complex.</i> <p>St. Kieran's Integrated Campus, was the subject of a grant of planning permission in August 2013 (planning reference: 1358). The details of the scheme are available for public viewing online and at the Planning Department in Limerick City Council. The LRFIP, supports the development of and integrated campus and states the following strategic objective, as described in section 2.5.2 Land Use Strategy (page 204) which seeks to:</p> <ul style="list-style-type: none"> <i>9. Promote an integrated educational campus with shared facilities in one location at Roxboro Cross. Declining numbers of school goers and uncertainties in relation to the long term feasibility of the existing educational facilities within Southill has highlighted the need for an alternative 'neutral' location, equally accessible and acceptable to the residents of both Southill, and also other surrounding neighbourhoods.</i> 	
		<p>Projects Currently meeting Priority targets/ Areas for Development and Project enhancement:</p> <p>i) States that the broad focus on social health would be a very useful goal and would cut across all the priority areas. The issue of mental health, physical wellbeing and access to information and education on food/ nutrition/ lifestyle choices, etc. is a key factor in generating a healthier community. The impact of a healthier community in terms of cost savings to the state, higher concentration levels in schools/ lower incidents of illness, etc. are all key factors in creating a successful future. There is need to develop and enhance social health projects already in existence and to recognise the importance of a healthier community as a sustainable one with fewer of the difficult factors causing negative behaviour being addressed.</p>	<p>i)Noted and agreed. Consider this is incorporated into Priority 1: Health and Well-Being.</p>	<p>I) No change to LRFIP</p>
		<p>j) States that to note is the importance of maintaining appropriate services for a reduced community size. As discussed, a return to high level intervention projects only will further stigmatise and ghettoise the community and those within it who require such services. Families should not be labelled as difficult or high need, they should be supported to access all services and to have additional supports as required. By mainstreaming access and services with additional supports as necessary, the barriers of stigma and labelling are targeted and removed, with families in need becoming included in wider society.</p>	<p>j) Noted and agreed</p>	<p>j) Changes to LRFIP –see under specific points below – on the importance of maintaining open access to services for those who need them, and for services to be available in community settings.</p>

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		k) States that the lack of acknowledgment of arts and culture as a tool for supporting communities, for dealing with issues and for creating positive change is also an issue in the draft. There are groups developing citywide initiatives to support regeneration communities to deal with changes in innovative and exciting ways. The fact that some of these are 'different approaches' does not invalidate them, indeed groups, such as Creative Communities and PLAN are bringing new people from across communities together and creating learning and healing opportunities for change. Key work already undertaken by such groups has included bringing Shakespearean workshops to DEIS schools for exam classes, supporting the Make a Move Hip Hop festival with particular work on linking young people from regeneration communities.	k) Noted and agreed. Consider this is addressed in the social programme draft with many references to supportive interventions related to music, arts, etc. and the need for cross-city initiatives in these spheres.	k) No change to LRFIP
		l) States that the in order for the revitalisation of the community to be successful, particularly in light of issues like social health, national policy changes need to be advocated for. The ease of access to and sharing of prescription medication amongst the community is startling. However in order to tackle the addiction, the medical profession needs to be on board and alternatives to deal with mental health issues, including stress, coping skills, etc. need to be put in place. While small scale local projects can tackle some of these issues, the level of change required must come from a national level.	l) Noted and agreed. The whole of government approach (Priority 8) and reactivation of the Programme Delivery Group of senior civil servants from relevant government departments and agencies (under Implementation) are seen as important parts of the approach and structures to promote national policy reforms as appropriate.	l) No change to LRFIP
		m) States that the maintaining the national willingness to support policing in the communities is also a key. Whilst crime figures for the regeneration communities have gone down, we should not be so short sighted as to presume the reduction in garda numbers will allow for this to be maintained. To remove this now would result in a slide back to previous misconceptions on both sides.	m) Noted and agreed. This point is addressed in Priority 7: Policing, Justice and Community Safety	m) No change to LRFIP
		n) States that the push towards higher FETAC level courses and constant progression through education systems does not meet the needs of all community learners and this push can be a negative experience. Indeed some learners have expressed that it feels like being back in the school system which failed them initially. Adults who return to education often require support and 'early wins' for them to regain their confidence and sense of achievement, as well as the belief that they can be part of a learning culture.	n) Noted and agreed. This point is addressed by arguing in favour of additional supports for this group of adult learners.	n) Change to LRFIP, to insert additional text regarding challenges faced by adult learners who left formal education early. At section 2.1.3.1 under 4 Adult Education and Community Learning, Scope of Action (page 125).
		o) States that similarly, with employment programmes, such as the TUS scheme, communities are in a position to gain staff, but without resources to offer training and skills development. However, the selection process of this programme often results in people who are not keen on working in the community sector being forced into roles they do not want. Whilst there are gems to be found in terms of unearthing new skills, a more appropriate matching of those from an area who wish to get involved should be developed.	o) Noted and agreed. Consider this point on need for additional supports to assist unemployed people with appropriate work placements is addressed in Priority 5: Work and Employability.	o) No change to LRFIP
		p) The submission states that Southill Area Centre is already engaged in a range of activities which support and meet the objectives outlined in the draft plan including Southill Club2gether, the centre's mainstream community youth work project. Programmes include: Music Generation. Attainment through programmes. Gaisce. Southill Area Centre has been a partner in the Local Education Network for the past 4 years, offering community education courses. Support to families.	p) Noted and agreed.	p) Change to LRFIP, to insert additional text regarding challenges faced by adult learners who left formal education early. At section 2.1.3.1 under 1 Education and Learning, Experience to Date, Scope for Funding (page 125).
		q) States that included in the 2014 work plan for Southill Club2gether is an information programme on accessing financial support for education. This issue was clearly highlighted this year, as many young people and families were making decisions/ being poorly advised in some areas around their options or supports available. The centre is developing a short course for parents and young people to participate in coming up to college deadlines, to ensure young people don't face some of the hurdles we have supported them through this year.	q) Noted and agreed.	q) Change to LRFIP to include reference to support for access to third level education. Under 2.1.3.1 Priority 1: Education and Learning, Experience to Date, last bullet point, p. 122.
		r) States to further develop the parent bonding elements of the Southill Area Centre Under 10s programme. SAC has recently collaborated with Blue Drum, the national community arts group to support Family Resource Centres, to create a new programme	r) Noted. Support for parenting strengthened in various amendments – see under Children's Services Committee above.	r) No further changes to LRFIP.

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		focused on supporting family structures in the community. Whist this has not yet been rolled out due to lack of funding, the template for enhancing the space for parents to learn and support each other together is key to creating new ways of learning in the community.		
		s) The submission states that there is scope to develop the social health model for the community that can generate impact on a broad basis. Currently there are projects running and completed which link into this model: Couch to km. Women's Tag Rugby. Community Ed Fitness Class. Occupational Therapy/ Physiotherapy Placements. Club2gether staff have undertaken youth mental health training 'MindOut' and run Mindout programmes with young people. The Hill Cafe have run and supported the running of health food cookery classes to young people, men's groups, general community education groups etc. Southill Area Centre provided a counsellor to talk to parents and teens about suicide following the death of a young women from the community in 2013. This was run in partnership with Southill Youth Intervention project(Limerick Youth Service). Healthy Eating cookery programme has been developed by Southill Area Centre staff and has been rolled out to some local groups.	s)Noted and agreed	s)Change to LRFIP to include references to "health eating", "physical fitness" to 2.1.3.2 Priority 2: Health and Well Being and references added to "community gardens" and "physical exercise" under Experience to date (page 126)
		t) Broader community wide Social Health Initiative: States that increased partnership across groups to create a healthier community e.g. local schools engaging with community gardens to increase knowledge of food in young people, running Cookery programme for all ages, increased number of community cookery classes.	t) Noted and agreed	t)No further changes to LRFIP.
		u) States that there is an opportunity to train volunteers locally to run and develop PALs fitness for older people programme. SAC can provide space for this to take place but ideally this will be community led and supported.	u)Noted and agreed	u)No further changes to LRFIP.
		v) States that there is an opportunity for local groups working with older people to link to the community garden. States that Studies in the UK have highlighted benefit of gardening for older people, in terms of mental wellbeing. SAC can provide expertise and space for the programme to take place.	v)Noted and agreed	v)No further changes to LRFIP.
		w) The submission highlights the following supports for older people in the community – Intergenerational projects, Annual Tea Dances: Local community social evening with food and music, OT/ Physio students, transport for groups working with older people several times a week, Community and Adult Education classes open to all ages and Community Bingo.	w) Noted and agreed. Scope for, and desirability of inter-generational projects specifically mentioned in Social Plan, under P. 3 Ageing Well and P5. Families and Youth at Risk.	w) Change to LRFIP to include specific reference to community gardens to 2.1.3.3 Priority 3 Ageing Well – Health and Well-Being of Older People, B. Specific Actions to Support Health & Well-Being of Older People, under Scope of Action (page 131)
		x) States that there is a need for existing groups to challenge existing programmes and think outside the box, be more open to partnership and new ideas and ways of working.	x)Noted and agreed	x)No further changes to LRFIP.
		y)States that there is a focus on potential to offer new programmes or new models of existing successful structures, e.g. meals in the cafe at a reduced rate for pensioner, etc.	y)Noted and agreed	y)Change to LRFIP to include specific reference to community gardens to 2.1.3.3 Priority 3 Ageing Well – Health and Well-Being of Older People, B. Specific Actions to Support Health & Well-Being of Older People, under Scope of Action (page 131)
		z) States that there needs to link social programmes of activity into the new Older Person Units, need to ensure that those who move in remain part of the wider community and do not become isolated.	z) Noted and agreed	z) No further changes to LRFIP.
		aa) States that SAC can develop and run programmes in partnership with other groups to support this.	aa) Noted and agreed	aa)No further changes to LRFIP.
		ab) States that SAC operates a Community Services Programme which tackles some of the barriers noted in the draft plan regarding access for vulnerable groups.	ab) Noted and agreed	ab) Change to LRFIP to reference the enterprise and job-related activities pursued by Community/ Enterprise/Action Centre to 2.1.3.4 Priority 4: Work and

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				Employability, Objectives (page 132)
		ac)States that SAC offers a range of placement options for work experience, e.g., second level placements of varying duration. From week long to month long placements.Also, FAS placements have been catered for up to 20 weeks. TUS programme for one year. Third level students have also received work placement, from 3 months to 6 month durations.	ac)Noted and agreed	ac)Change to LRFIP incorporated in points ab) above.
		ad)States that another Young Persons Facilities and Services funded programme on the Southside of Limerick, the West End Youth Centre, has developed an innovative Apprentice Programme to train local young people in Youth and Community Work, providing education and on the ground experience to support them to access employment in the future. Projects like this are of huge benefit to areas like Southill and Weston, as well as the city overall.	ad)Noted and agreed	ad)Change to LRFIP to reference specifically the West End Youth Centre Apprenticeship Programme (page 133)
		ae) States that there is a challenge in recognising the pre development work that is taking place across a range of communities and groups. In order to develop self esteem necessary to take on programmes, much support work needs to be carried out in advance. There needs to be space for this to take place and to be recognised.	Noted and agreed	Change to LRFIP to refer to the need for pre-development work to 2.1.3.4 Priority 4: Work and Employability, Objectives (page 132)
		af) Creation of employment opportunities: States that there is a requirement for local employment clauses in all contracts to foster increased ownership and generate local income.	Noted and agreed	No change to LRFIP
		ag) States that there are a range of local projects with key expertise in this area.	Noted and agreed	No change to LRFIP
		ah)The submission states that one of the key challenges facing the community is the very definition of the term 'at risk' and states that all young people and families are at risk in a community where drugs are traded, criminals live and intimidate local community members and the community as a whole is considered disadvantaged.	Noted and agreed	Change to LRFIP to state that there are challenges in defining the terms "at risk" in the environment of regeneration communities to 2.1.4.5 Priority 5: Families and Youth at Risk (page 137)
		ai)The submission further states that a key element in ensuring whole community change and long term sustainability of a successful regeneration project, is maintaining open access to services and not returning to a model seen as rewarding negative behaviour. Not all families will require support for addiction services, but all families should be aware of such services and advised they can access them should they need to.	Noted and agreed.	Change to LRFIP to assert the importance of maintaining open access to services to Priority 5: Families and Youth at Risk (page 137)
		aj) The Strengthening Families programme has run very successfully in Southill and is currently being undertaken again. This programme provides learning space for family units to come together and has proven extremely successful in its first roll out. Southill Area Centre has run and continues to run an under 10s programme which offers provision for 6-9 years olds and focuses on creating bonding time with a parent. The child attends some sessions individually, some with the parent and parents attend some support sessions alone. Feedback from the programme has been very positive, especially around the space created for parent and child to spend time together in a supportive environment. Southill Club2gether has carried out much work in supporting families' and linking with them around their young people. The team engage in regular outreach work to family homes to support parents as well as young people, recognising that young people do not exist in isolation from families or their wider community. All centre staff focus on engaging in a partnership approach to support the community and its members. A focus on generating further partnership working is key for all services in the future, e.g. sharing resources and knowledge can only benefit the community. The voice of young people in the community is actively engaged and heard through Club2gether Youth Committee. Made up of young people from the area, the committee come up with projects and ideas they would like to see happen and that would support their area.	Noted and agreed. Under point (4), "voice of young people" specifically addressed in C. Supporting Youth: Connecting and Participating in Community and Society	Change to LRFIP to add examples of programmes run at SAC to Priority 1: Education and Learning, under Experience to Date (page 121). Reference to "Strengthening Families" programme added to 3. Literacy, Numeracy and Educational Attainment in School under Scope for Funding Support (page 125)
		ak) States that there is a need to maintain whole community support and prevent the stigmatising of families in difficulty.	Noted and agreed	No change to LRFIP
		al) States that there is a need to create a community where everyone is equal and treated with respect, an idealistic notion but a core principal for any success to be achieved.	Noted and agreed	No change to LRFIP

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		am) States that recognising that 'at risk' is not a defined phrase and that there are ranges of risk faced by all young people and all families in this community.	Noted and agreed.Addressed above in submission related to Priority 5, (a) above.	No change to LRFIP
		an) States that there is a need for genuine partnership and linked in working.	Noted and agreed	No change to LRFIP
		ao) States that there is a lack of naming of community centres as key community partners in the plan is a concern, particularly given the involvement of the local authority in terms of ownership, etc. of the Southill Area Centre.	Noted. However, this is not the case. Community Centres named throughout the text of the social programme.	Change to LRFIP to make reference made to community centres as partners to 2.1.3.7 Priority 6: Community Participation, Empowerment and Civic Engagement, A. Community Organisation / Estate Management / Local Service Delivery under Key Agencies (page 151).
		ap) States that a key for success is ensuring key indicators are met. That the community feel listened to, feel empowered, have faith in state engagement in their area, feel supported by justice system and gardai and have a sense of ownership over their future.	Noted and agreed	No change to LRFIP.
		aq)States that ongoing engagement of young people in structures such as the youth committee, links to Community and Voluntary sector fora e.g. Southill Four Parks Forum, Community Consultative Forum and Regeneration Committees are important. Horizontal and vertical information sharing needs to take place on a more formal and frequent basis.	b) Noted and agreed	Change to LRFIP to add reference to participation of young people in community structures to 2.1.3.7 Priority 6: Community Participation, Empowerment and Civic Engagement, B. Capacity Building: Community Participation, Empowerment and Civic Engagement, under Scope of Action (page 152)
		ar)States that there is a need to develop a Restorative Communities Project, engaging residents and community groups to work together to make Southill a restorative community.	a) Noted and agreed	Change to LRFIP to add reference to roll out of restorative justice and scope for further development in community settings to 2.1.3.8 Policing Justice and Community Safety, Experience to Date (page 134)
		as)States that there is a need to develop genuine engagement that is meaningful and honest. Local people need to feel involved in the process, whilst there are only so many ways one can be asked one's opinion, all avenues should be exhausted to include as many as possible.	Noted and agreed	No change to LRFIP.
		at)States that there is a need maintain current garda levels.	Noted and agreed.Addressed in the text	No change to LRFIP.
		au)States that there is a need to advocate nationally for resolution to problems of gardai being taken off community policing roster for prison escort duty.	Noted	No change to LRFIP
		av) States that there is a need to advocate to maintain garda levels in the communities	Noted and agreed	No change to LRFIP.
		aw) States that there is a need to develop a community wide restorative practices project and embedding the principles in the work of local groups.	Noted and agreed	No change to LRFIP.
		ax) States that all key players in this development having an eye on a long term vision of a changed community: look to create solutions to that prevent the re-occurrence of current difficulties. This will involve the entire community and will be lengthy process but key steps, such as embedding restorative practices should be taken now.	Noted and agreed	No change to LRFIP.
		ay) States that there is a need to restore faith in the institutions of the state. Community members need to feel valued as full citizens and believe the state will support them in Southill as much as it will support a middle class family in Raheen or Annacotty.This is a major challenge, as this faith does not exist at the moment. Honesty, integrity and challenging institutional prejudices are steps in the right direction.	Noted and agreed	No change to LRFIP.
27	Suamhneas 29 Ballygrannan Close Moyross Limerick	The submission states the following: a) That Suamhneas has been situated in 29 Ballygreennan Close for the past 11 years providing emergency accommodation for homeless women and children.	a) Noted.	a) No change to LRFIP
		b) Is concerned at the physical framework plan for Moyross as there is no connecting route from the RESPOND housing scheme to the Moyross community hub and Watch House Cross and this will have a negative impact on	b) Agree. Please refer to submission 19i above	b) Change LRFIP to amend maps. Please refer to submission 19i above

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		the service so they provide and the accessibility to the services by residents of Suaimhneas.		
28.	Therese Kearns 23 Aherlow Close Glenmore Lawn, Caherdavin, Limerick's	The submission indicates the following in relation to the Moyross Physical Framework Plan: a) Does not support the provision of access between the civic heart of Moyross and Cratloe Road.	a) See response to submission 2d above	a) No change to LRFIP
		b) Does not support the provision of access between Moyross Avenue and the Cratloe Road.	b) See response to submission 2d above	b) No change to LRFIP
		c) Does not support improving the existing access from Moyross to Cratloe Road.	c) See response to submission 2d above	c) No change to LRFIP
		d) Does not support extending the existing Moyross Avenue to link to the proposed Northern Distributor Road.	d) See response to submission 2j above	d) No change to LRFIP
		e) Does not support the proposed sites for housing identified in the plan.	e) See response to submission 2l above	e) No change to LRFIP
		f) Does not support the creation of safe pedestrian and cycle links from Sarsfield Gardens through existing bridge underpass to Moyross Avenue.	f) See response to submission 4g above	f) No change to LRFIP
		g) Does not support reinforcing the existing community hub by improving the quality and extending the choice of uses available.	g) See response to submission 12p above	g) No change to LRFIP
		h) Supports reinforcing the existing employment and enterprise uses at Moyross Enterprise Centre.	h) Noted	h) No change to LRFIP
29	Ursula Hehir 4 Craeval Park Moyross Limerick	The submission indicates the following: a) States objection to all of the Limerick Regeneration Framework Implementation Plan for Moyross.	a) Noted.	a) No change to LRFIP
		b) States that the submission author lives in a privately owned house which the Plan seeks to demolish and raises objection to the demolition of the house as it is privately owned.	b) Noted. The Office of Regeneration has a core objective to regenerate Moyross to improve homes, build strong communities and create areas where people want to live with a phased programme developed for the short, medium and long term. The OoR recognises that many people will have strong attachments to their homes and that they may not wish to move at this moment in time. Therefore, the OoR will not interrupt or interfere with your right to peacefully live in your home. Those residents who are in agreement to have their home demolished will have a choice to relocate to new replacement homes developed in Moyross and this policy will remain over the course of the regeneration programme.	b) No change to LRFIP
		c) States objection to creation of a linear park.	c) See response to submission 4e above	c) No change to LRFIP
		d) States objection to Moyross Avenue being extended and linked to the proposed Limerick Northern Distributor Road.	d) See response to submission 2j above	d) No change to LRFIP
30	William Lyons 14 Shanrath Old Cratloe Road Limerick	The submission indicates the following in relation to the Moyross Physical Framework Plan: a) Supports the creation of a new street between Cosgrave Park and the Maintenance Depot to eliminate the existing cul-de-sac layout. Further states that this is badly needed for residents to integrate and get to know and help people.	Noted	No change to LRFIP

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		b) Supports the creation of a high profile site at the existing entrance to Moyross.	Noted	No change to LRFIP
		c) Supports strengthening of Watch House Cross as a mixed-use District Centre with improved access from Ballynanty. Further states that easy access for people is needed.	Noted	No change to LRFIP
		d) Supports the creation of a new link between LIT and the District Centre at Watch House Cross, as the submission states that it cannot see what benefit it would have.	Noted	No change to LRFIP
		e) Support improved access from the civic heart of Moyross to Thomond Park/Cratloe Road.	Noted	No change to LRFIP
		f) Supports the provision of access between the civic heart of Moyross and Cratloe Road.	Noted	No change to LRFIP
		g) Supports the provision of access between Moyross Avenue and the Cratloe Road.	Noted	No change to LRFIP
		h) Supports the upgrade of the existing Moyross Avenue to include crossing facilities, landscaping, traffic calming measures and on-street parking. Further states that crossing areas need to be improved.	Noted	No change to LRFIP
		i) Supports the creation of a new linear park.	Noted	No change to LRFIP
		j) Supports improving the existing access from Moyross to Cratloe Road.	Noted	No change to LRFIP
		k) Supports the provision of well-designed housing that addresses current and future needs.	Noted	No change to LRFIP
		l) Supports the provision of a new entrance onto the proposed Coonagh-Knockalisheen Road to eliminate the existing cul-de-sac layout.	Noted	No change to LRFIP
		m) Supports extending the existing Moyross Avenue to link to the proposed Northern Distributor Road.	Noted	No change to LRFIP
		n) Supports the proposed sites for housing identified in the plan.	Noted	No change to LRFIP
		o) Supports the creation of safe pedestrian and cycle links from Sarsfield Gardens through existing bridge underpass to Moyross Avenue.	Noted	No change to LRFIP
		p) Supports reinforcing the existing community hub by improving the quality and extending the choice of uses available.	Noted	No change to LRFIP
		q) Supports reinforcing the existing employment and enterprise uses at Moyross Enterprise Centre.	Noted	No change to LRFIP
31	Hamill Family 7 Weston Gardens Rosbrien Limerick	The submission indicates the following: a) States concern over the new road linking Byrne Avenue to Clarina Avenue as the submission believes this will bring a greater level of anti-social behaviour and a greater level of traffic causing increased noise.	a) Noted. Our key objective for Ballinacurra Weston is to create well used, overlooked and ultimately safe streets. This objective is reinforced by the National Crime Prevention Officer, Sergeant Alan Roughneen in a report that forms part of the LRFIP in Appendix 4: Crime Prevention Through Design. By introducing more direct pedestrian friendly streets from Clarina Park to Byrne and Lenihan Avenue will ensure more pedestrian activity and thus more 'eyes on the street' and therefore less likelihood of anti-social behaviour taking place. The connection proposed through Clarina Park to Byrne Avenue will be designed as a street as opposed to a road with the key aim to slow cars down by the introduction of sideways realignments known as chicanes (horizontal deflections). The national mandatory guidance document Design Manual for Urban Street and Roads 2013 elaborates	a) No change to LRFIP

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			on the detail of what is required to create safe and attractive streets and all of the above features in combination are proven to slow traffic down ensuring optimum street safety.	
		b) States concern with the proposed units on Burkes Boreen and requests further information on the type of accommodation being planned.	b) It is the recommendation of the National Crime Prevention Officer, Sergeant Alan Roughneen, that public spaces such as streets and laneways should “allow supervision from nearby dwellings”.The Office of Regeneration insists that without adequate overlooking by the proposed development block to Burkes Boreen there is a risk that the level of existing anti-social behaviour taking place will remain. The housing strategy, as described on page 259, of the draft LRFIP, seeks to deliver replacement housing and refurbishments of existing units in the short to medium term. Future phases of housing development will also be allocated to the voluntary and private housing sectors (such as the block at Blakes Boreen) in order to achieve a sustainable social mix within the Ballinacurra Weston area. Private housing can happen at any time in tandem with replacement housing and the refurbishment programme.	b) No change to LRFIP
32	Our Lady of Lourdes Community Services Group Ltd (OLOLCSG)	The submission indicates the following: a) Commends the Office of Regeneration in developing the Framework Implementation Plan and for requesting feedback as part of the consultation process.	a) Noted	
		b) States that, based on a report commissioned by OLOLCSG in 2012, the centre is a hive of activity but contains a lack of services for the elderly, highlights quiet times towards the end of the week as well as a lack of advertising and marketing	b) Noted. Social Plan, particularly, P 3:Ageing Well suggests scope for further development of this area in local communities.	
		c) States that a further study will be commissioned in 2014.	c) Noted	
		d) States that the centre has a healthy working relationship with Limerick City Council.	d) Noted	
		e) States that the refurbishment of the community centre has allowed the development of a community food initiative and employment.	e) Noted	
		f) States that the development of an all-weather pitch has been fulfilled but has had management issues with anti-social behaviour.	f) Noted	
		g) States that the regeneration programme has funded the Westend Apprentice Scheme which involved the training of 2 local people to become youth workers.	g) Noted	g) Change to LRFIP to add reference to the West End Youth Centre Apprenticeship Programme, 2.1.3.4 Priority 4:Work and Employability, under Objectives, point 3), p. 132. Further reference added to this under A. Labour Market Intervention Programme (i) Northside and (ii) Southside, Scope of Action, point 1), p. 134. Please refer to Section 3: Proposed Amendments.
		h) Funds a range of courses including culinary skills and security, one to one support for adult learners and have worked closely with 4 local people who have undertaken the Access to University programme with OLOLCSG's assistance.	h) Noted	h) Change to LRFIP to add reference to training in culinary skills, security to A. Labour Market Intervention Programme (i) Northside and (ii) Southside, Scope of Action (page 134)

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		i) States that more street lighting and security cameras as requested by the residents should be a priority.	i) Noted. Please refer to submission 5g above.	No change to LRFIP
		j) States that consider of a holistic approach to regeneration that goes beyond the statutory boundary. For example, Hyde Road a significant approach road into the city has burnt out hoses on both sides of the road. The submission seeks to upgrade both sides of this key arterial road.	j) Noted. Please refer to submission 32p below.	No change to LRFIP
		k) States that the centre is need of a facelift with a more attractive facade and suitable signage.	k) Noted. Please refer to submission 32p below.	No change to LRFIP
		l) States that plans have been developed for a physical extension to include more training rooms and lift access to the centre and OLOL seeks to engage with the Office of Regeneration to realise these plans.	l) Noted. Please refer to submission 32p below.	No change to LRFIP
		m) States that the provision of a primary health care centre is supported to the west of the all weather pitch as the current condition of the underutilised site presents an eyesore to the street. It is recommended that a multiuse facility is built with would host training rooms, community gym, play areas for children and other revenue generating services.	m) Noted. Please refer to submission 32p below.	No change to LRFIP
		n) States that the OLOL through the Siolta and Aistear programmes, has an individual learning programme for each child which supports them to entry to school age. OLOL crèche wishes to develop an afterschools service and wishes to work with the Office of Regeneration to ensure these vital services are retained.	n) Noted. Please refer to submission 26aj above.	Change to LRFIP to add text. Please refer to submission 26aj above.
		o) States that the OLOL run an Apprentice Programme in an effort to combat youth employment through a unique blend of mentoring, work experience and third level qualifications. The OLOL state that this programme could be supported through the National Social Innovation Hub and that it could be rolled out nationally.	o) Noted	Change to LRFIP to add text. Please refer to submission 32g above.
		p) States that the West End Youth Centre, which opened in 2009, is successful but faces physical limitations that curtails programme development: poor insulation, dearth of storage, unreliable CCTV, facade needs a repaint.	p) Noted. The existing community hub at Ballinacurra is zoned 'Local Centre' in the Limerick City Development Plan 2010-2016 with a specific objective to protect, provide for and/or improve the retail function of local centres and provide a focus for local centres. The LRFIP supports the objective of upgrading the West End Youth Centre in the land use strategy as follows: <i>1. Promote potential enterprise development in Ballinacurra Weston through the reuse of underutilised sites at the existing local centre, Our Lady of Lourdes Community Centre and lands associated with the ESB Depot and Adapt House.</i> <i>2. Upgrade sites at the Local Centre and existing Our Lady of Lourdes Community Centre for employment uses.</i>	No change to LRFIP
		q) States that the provision of a playground for Weston is required.	q) Noted. The LRFIP supports the objective of providing active recreation facilities for Ballinacurra Weston in the open space and public realm strategy	No change to LRFIP

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			as follows: <i>5. Retain and improve the active recreation facilities located at Our Lady of Lourdes Community Centre.</i>	
		r) States that Literacy, healthcare and computer programmes are offered at the OLOL and the centre seeks to augment access to the internet through the provision of an internet cafe.	r) Noted. The LRFIP supports the objective of literacy, healthcare and computer programmes in the land use strategy as follows: <i>5. Support the provision of multifunctional spaces at Our Lady of Lourdes Community Centre to provide flexible and accessible spaces adaptable to communities' needs. The support for the Community Centre at this location, within easy access to the city core will ensure that the centre is used not only by residents of Ballinacurra Weston but the wider community also.</i>	No change to LRFIP
		s) States that OLOL wishes to develop FETAC accredited training in the following key areas: childcare, customer care, retail skills, hospitality skills, office and industrial hygiene training, culinary skills course and a security training programme.	s) Noted. The LRFIP supports the objective for developing training programmes in the land use strategy as follows: <i>Based on the demographic profile of the regeneration areas, the hospitality service industry remains a key focus for employment. Consider the provision of hospitality industry training within the existing Our Lady of Lourdes Community Centre for local jobs in hotels and restaurants.</i>	Change to LRFIP to add text. Please refer to submission 32g above.
		t) States that OLOL seeks to develop and implement a business plan for the Community Centre and seeks to develop a number of units on the ground floor and wish to work with the office of Regeneration in this regard.	t) Noted. The Office of Regeneration supports the development of a business plan for Our Lady of Lourdes Community Centre and welcomes further consultation with OLOL on its development.	No change to LRFIP
33	Group Submission on behalf of the <ul style="list-style-type: none"> Ballinacurra Weston Residents Alliance (107 submissions) Carew and Kincora Parks Concerned Residents Action Group (127 submissions) Thomas Daly: On behalf of Moyross Residents Association (1 submission) 	Postcard Submission outlining the following: <ul style="list-style-type: none"> a) Calls on Limerick City and County Council and the Office of Regeneration to immediately reform the structures of community participation and local estate management. States that they support the holding of community elections to directly elect resident representatives onto reformed regeneration and estate management committees. States that the present policy of participation by invitation only must be replaced by a democratic and accountable system. 	Noted. The recommendations put forward in relation to the reform of regeneration and estate management committees are welcomed by Limerick City Council. The Council, in partnership with the Community Consultative Forum and Paul Partnership is currently undertaking a joint programme of work to strengthen civic engagement processes in the areas included in the Regeneration Programme (and beyond), following the recommendations of the Nexus Report, <i>Viable Management Structure for Housing Estates in Regeneration Areas</i> : options for community based structures to facilitate enhanced community participation, involvement and partnership with statutory organizations. Steps 4 & 5 of this work programme will involve the identification, review and modification (where they exist), or establishment (where they do not) of appropriate community based structures, with terms of reference, delegated responsibilities and mechanisms for accountability. This review process will examine all aspects of current structures and explore options for their improvement with a view to ensuring maximum democracy and accountability and the widest possible community participation in on-going community based planning and review.	Change to LRFIP to add text. Please refer to submission 5 a) and b) above.

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LATE SUBMISSIONS				
I	Brendan Lyons and Associates	<p>The submission indicates the following:</p> <p>a) States a desire to see a better Limerick, from many aspects – physical, economic, commercial and particularly from a social perspective which is deemed as key to achieving success in the other aspects.</p>	a) Noted and agreed	a) No change to LRFIP
		<p>b) States that the social pillar embraces so many aspects of regeneration that must be achieved if the positive effects of <u>total</u> regeneration plan are to be achieved e.g. Community Development, Elderly Care, Youth Development and the many elements this pillar embraces.</p>	b) Noted and agreed	b) No change to LRFIP
		<p>c) States that it is important that the planning arm of the regeneration process is revisited. Its role and expectations need to be re-examined and restated in order that the integration of <u>all</u> aspects of the plan are connected and progress on all elements and their results are achieved in a timely fashion.</p>	c) Noted and agreed	c) No change to LRFIP
		<p>d) States that the production of the latest regeneration plan demonstrates how important it is to revisit the basics of management (daily reviewing of project planning, communication skills, co-ordinating and organising) to insure that what needs to be delivered is delivered and more importantly that progress on delivery is properly communicated (a fundamental weakness of your implementation process) to all interested parties so that they and the public are constantly motivated and engaged.</p>	d) Noted and agreed	d) No change to LRFIP
		<p>e) States that the latest plan while reasonably inclusive of the many elements of regeneration to be considered is deemed to be too complex, lacks clarity, has too much focus on physical regeneration (albeit very important) and its lack of focus on specifics of other key aspects of regeneration e.g. social (education, youth, community development and governance).</p>	e) Noted. Consider the plan is reasonably balanced across physical, social, economic	e) No change to LRFIP
		<p>f) States that the plan is more of an academic tome or consultants work that fails in a basic objective of identifying its target audience – the people of the regeneration areas. While I welcome the concept and need for Regeneration of our city, I am also disappointed with the end result in that the plan has failed in its communication objectives of giving real hope, positiveness of attitude and motivation to the residents of the regeneration areas and because of its lack of user friendly interaction has unfortunately alienated them. The plan has failed to recognise the SMART approach to setting objectives and to tabulate clearly, specifically and succinctly the essential sub pillars necessary to underpin the entire plan.</p>	f) Noted	f) No change to LRFIP
		<p>g) States that while the three key pillars Social, Economic and Physical are addressed, the integration of sub pillars both vertically and horizontally with the core pillars and Regeneration Areas is still unclear and a direction that people working at the coalface of the first two pillars are awaiting to get direction.</p>	g) Noted	g) No change to LRFIP
		<p>h) States that Volume 3 captures the general thrust of the three key pillars but while they are strong on aspirations they are disappointingly weak on specifics which leads to the view that the plan is a triumph of volume over content. One can't measure aspirations but one can measure specific objectives (particularly SMART ones).</p>	h) Noted. However, consider there is a measurement framework for the plan.	h) No change to LRFIP
2	Chris Duhig	<p>The submission indicates the following:</p> <p>a) Refers to section “2.1.3.4 Priority 4:Work and Employability” of the plan and states that the sentiments are admirable but has concerns with regards to the implementation of this section.</p>	a) Noted	a) No change to LRFIP

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		b) States that the organisations that have presided over employability or employment have been an expensive failure.	b) Noted opinion	b) No change to LRFIP
		c) States that some of these organisations are statutorily required to take part in this section of the plan, and some that are voluntary organisations and questions how these organisations without radical reform and monitoring can be charged with their continuation.	c) Noted	c) No change to LRFIP
		d) States that the constant publicity of organisations seeking funding has left employers with the impression that people from regeneration areas are incapable or unwilling to work.	d) Noted	d) No change to LRFIP
		e) States that funding appears to be about “empire building” for the organisations rather than alleviating the situation for the residents as it would appear that the situation of employment and employability has deteriorated under their stewardship.	e) Noted	e) No change to LRFIP
		f) States that that these organisers are not from the areas and are more interested in their career paths than any improvement in the residents of regeneration areas.	f) Noted	f) No change to LRFIP
		g) States that the loyalty of these organisers is primarily to their employers’ organisation rather than the community.	g) Noted	g) No change to LRFIP
		h) States that the loyalty of these organisers is primarily to their employers’ organisation rather than the community.	h) Noted and agreed in the case of some	h) No change to LRFIP
		i) States that the training of young people from regeneration areas is perceived to be more difficult than other areas.	i) Noted	i) No change to LRFIP
		j) States that most “Public Procurement” contracts were not awarded on the basis of the “Most Economically Advantageous Tender”.	j) Noted. Agreed few training / employability projects under regeneration programme 2007-2012	j) No change to LRFIP
		k) States that there are a number of projects of what is considered to provide scope for excellent training, education that have not been acted on by organisations.	k) Noted	k) No change to LRFIP
		l) States that organisations (voluntary in particular) are not interested in any project unless they are in a position to manipulate results to ensure their continued funding.	l) Noted	l) No change to LRFIP
3	Department of Arts Heritage and the Gaeltacht	a) General guidance is provided by the Department relating to proposed development in proximity to archaeological monuments.	a)Noted.	a)No change to LRFIP
		Environmental Report b) It requests that a detailed archaeological assessment of all potential impacts on known and potential underwater cultural heritage is undertaken.The UNESCO Convention on the Protection of the Underwater Cultural Heritage should be included in relevant sections of the SEA relating to Directives and conventions.	b)Section 4.5 of the SEA provides baseline information on cultural heritage in the regeneration areas. Specific reference has not been made to underwater archaeology and in this regard it is appropriate to input relevant material. However a detailed underwater archaeological assessment is not considered necessary at this stage in the process as it would be more appropriate at site specific development stage.	b)Change Environmental Report to insert additional wording to Chapter 4: Environmental Baseline (page 34)

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		Plan d) The Plan should include, as part of its cultural heritage section, details on the significance and potential of its underwater cultural heritage.	c)The strategic objectives set out under section 2.3 of the LRFIP under the Physical Framework Plan includes an objective to conserve and enhance the historic environment. Unlike the other nine objectives this strategic objective has not been explored in detail and it is proposed that this includes a section on underwater cultural heritage. There are no known recorded maritime sites in Limerick and the Shipwreck Inventory of Ireland does not cover the city of Limerick.	c)Change LRFIP to insert an additional paragraph after section 2.3.9 to describe the strategic objective to conserve and enhance the Historic Environment (page 174)
4	Mary Moran	The submission indicates the following: a) Objects to the church wall being taken down and camera put up as there is a concern over privacy. States that the wall should be left as is as the proposed connection is not wanted in the community.	a) Noted. It is proposed to answer parts a) and b) as they are interlinked. The Office of Regeneration understands this concern and wishes to offer more clarity on the proposal to provide a new physical and visual link to the Church. The draft LRFIP considered carefully submissions received as part of the open days held in March and April 2013. Residents responded positively to the particular objective of removing the community wall to the side of the Church to allow for an easier physical connection to the Church and the Community Hub. 88% of the overall respondents (those who answered yes or no) were in agreement with the proposed objective. The reason for the overwhelming positive response, is that Ballinacurra Weston, at present, feels quite cut off from the Church and the Community Centre, so it can be difficult for local residents to get from the estate to the Community hub. Creating a new link such as this with overlooking provided by proposed replacement housing to the rear of those existing houses fronting onto Hyde Road (please refer to page 259 of the draft LRFIP) the existing streets will become easier to navigate and a safer environment. The Office of Regeneration will consult with any residents affected by proposals for new CCTV cameras to ensure that their existing privacy is maintained. The overall objective of creating a safer environment for Ballinacurra Weston is vital and measures such as improved CCTV providing positive activities for young people, alongside neighbourhood policing and lighting, can help tackle the issue of anti-social behaviour that exists in the area.	a) No change to LRFIP
5	Deborah and Gus McNamara	The submission indicates the following: a) Objects to the church wall being taken down and camera put up as there is a concern over privacy.	a) Noted. A response to parts a) and b) of this submission is provided in late submission 4a above.	a) No change to LRFIP
		b) States that they would feel more safer with fencing surrounding their property.	b) Noted.	b) No change to LRFIP

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		c) Concern that there would be increased number of cars to the rear of their property where the proposed connection is being proposed.	c) Noted. The proposal at Crecora Avenue is to create a new street to service the proposed replacement housing blocks backing onto the existing houses fronting onto Hyde Road. It is intended that a pedestrian link only will facilitate a connection through the church wall to the existing community facilities. The new streets measures a short distance to service those proposed replacement homes and will not be designed as a rat-run or main traffic thoroughfare. It will be a new street that is pedestrian friendly with the possibility of a 'homezone' type treatment to create a pedestrian friendly environment. Any future proposals will be explored further in consultation with the Crime Prevention through Design Officer, Alan Roughneen and with residents of Ballinacurra Weston.	c) No change to LRFIP
6	Tracy Lynch	<p>The submission indicates the following:</p> <p>a) States concern both as an organisation (Tait House) and also as an output of the Creche Parents Committee with the issue of speeding along Collins Avenue and requests that traffic calming measures be put in place.</p>	<p>a) The concern amongst the majority of residents in Southill, raised at the open days in March and April 2013, is that Collins Road is unsafe and unfriendly to pedestrians. The Office of Regeneration agrees with this concern and has described a key objective relating to Collins Avenue in the draft LRFIP as follows:</p> <p><i>It is the objective of the Framework Plan to improve strategic connections throughout Southill as follows:</i></p> <p><i>I c) Transform the Roxborough Road, the main access road dividing O'Malley Park, Keyes, Kincora and Carew Parks, from a route that is predominantly designed for the movement of vehicles to a traffic calmed street where the needs of pedestrians, cyclists and public transport users are prioritised. Measures to slow down traffic, for example the narrowing of carriageways, the redesign of the major junction at Roxboro roundabout and sideroad entry treatments to Keyes and Kincora Parks, will be incorporated to improve safety for all road users. The Roxborough Road is also a designated Smarter Travel route with an opportunity to establish a 'safe route to school' making the street safer for parents and children to use.</i></p>	a) No change to LRFIP
		b) States that there is one vehicular access point and no pedestrian walkway into the facility that experiences a minimum of 250 clients a day and that there is potential to widen the entrance to allow for two way traffic and better visibility.	b) It is recognised that Tait House is a valuable community resource and its provision may need to expand to accommodate demand that already exists, as well as from the housing growth proposed over the lifetime of the regeneration programme. This will have a likely impact on traffic generation in the area. The Office of Regeneration considers that the most appropriate solution to the immediate issue of access to Tait House is to consider widening the vehicular entrance and improve visibility splays to Collins Avenue as part of a planning application process accompanied by a robust Traffic Impact Assessment (TIA). The TIA will appraise the existing and likely traffic generation into the future, the availability of alternative modes of transport and the likely impact on the overall road network.	b) No change to LRFIP

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			Alternative proposals for pedestrian and cycle access from Kincora and Carew Parks to Tait House is already a key objective of the draft LRFIP and this can be progressed in the short-term. The provision of this objective may reduce car dependency and encourage staff and visitors to Tait House to use alternative means of travel, or more efficient use of the car. Furthermore, Southill House is listed as a protected structure in the Limerick County Development Plan 2010-2016. It would be important that any proposed works to the entrance does not negatively impact on the setting and curtilage of Tait House.	
		c) States that Tait House at present is closed off from the community with high walls and one vehicular access point. As such, the facility needs to be accessed from the Carew and Kincora side of the four parks and requests that a connection be made in the short-term to facilitate this.	c) This concern was also raised by residents of Kincora and Carew Parks in the open day sessions in March/April 2013. The Office of Regeneration agrees with this concern and has described the following key objective in the draft LRFIP as follows: <i>2. It is the objective of the Framework Plan to improve local connections within Southill as follows:</i> <i>2c) Create a new east-west connection from Maigue Way in Carew Park, south of Southill House, to the Roxborough Road</i>	c) No change to LRFIP
7	Mary Danford on behalf of Verdant Crescent Residents	a) States that Verdant Crescent Residents are opposed to the proposed link to Verdant Place as outlined in the proposal for redevelopment in the King's Island Regeneration Plan.	By introducing a more direct pedestrian friendly street from Verdant Place to Island View Terrace will ensure more activity and thus more 'eyes on the street' and therefore less likelihood of anti-social behaviour taking place. The connection proposed will be designed to slow cars down with different material surfaces, street trees and on street parking bays. All these features in combination are proven to slow traffic down ensuring optimum street safety. Our key objective for St. Mary's Park and King's Island is to create well used, overlooked and ultimately safe streets. This objective is reinforced by the National Crime Prevention Officer, Alan Roughneen. Further consultation with local residents of St. Mary's Park and adjoining areas will be conducted prior to more detailed design work of these connections.	d) No change to LRFIP

SECTION 3: PROPOSED AMENDMENTS

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ON-TIME SUBMISSIONS			
I	Steering Group, Limerick Northside Age Friendly City Project (LNAFC), Limerick.	Id	<p>Change to LRFIP, to reference LNAFC and its core aim at Section 2.1.3.3 under “Experience to Date”, page 130.</p> <p>2.1.3.3 Priority 3: Ageing Well – Health and Well-Being of Older People Experience to Date There is considerable experience in the disadvantaged communities in the city of addressing needs and supporting the well-being of older people. Services comprise a mix of statutory (public health nursing, home help, housing adaptations) and voluntary services (day centres, meals, social activities, sport and recreation, transport, emergency call / security, repair and care) with funding support from Government and other sources. Community centres, Family Resource Centre, Community Development Programme offices are important providers. Private services (care, nursing home care) are also available to varying extents. Recently, the Limerick Northside Age Friendly City Project (LNAFC) has been established. This includes the Moyross estate. A core aim of the Project is to create “a great place in which to grow old”.</p>
		Ie	<p>Change to LRFIP, to reference the links between LNAFC and LRFIP and potential for a partnership approach at Section 2.1.3.3. A. Planning for an Age-Friendly City and Neighbourhoods under “Key Agencies”, page 130.</p> <p>Priority 3: Ageing Well – Health and Well-Being of Older People A. Planning for an Age Friendly City and Neighbourhoods Key Agencies / Partners The local authority will take the lead on the broader agenda of “ageing well”, drawing on the model of the “Age-Friendly Counties Programme” involving an Alliance of stakeholders, as described below. On the northside of the city, links between the Limerick Northside Age Friendly City Project and the LRFIP can also support a partnership approach and the inclusion of older people.</p>
		If	<p>Change to LRFIP at Section 2.1.3.3 under “A. Planning for an Age-Friendly City and Neighbourhoods”, “Scope of Action” to state that the work of LNAFC can inform the work of the Alliance and the strategic outlook for Moyross. Insert additional text at end of point I), page 130/131.</p> <p>Priority 3: Ageing Well – Health and Well-Being of Older People A. Planning for an Age Friendly City and Neighbourhoods Key Agencies / Partners Scope of Action 1) Development of the programme for the age friendly city and age-friendly neighbourhoods, drawing on the Age-friendly County Initiative, i.e.,: (i) setting up an Alliance of senior managers across the local authority, health services, Gardaí, business community, voluntary organisations, academic institutions and representatives of older people; (ii) consultations with older people and their representative organisations, formation of an older person’s forum and the development of a draft strategy reflecting the priorities of older people and the key stakeholders; (iii) finalisation of the draft strategy, setting up a process to support and review implementation and affiliation to the “WHO Global Network of Age Friendly Cities and Communities”. An initiative along these lines is being advanced in the city (with support from SSIRL to the Older People’s Consortium under the Programme Innovation and Development Fund), focused on the needs of older people in the most disadvantaged areas of the city. This initiative aims to bring the voice of older people into decision-making on infrastructure and services development in the city and on issues that they consider important to their well-being and autonomy (e.g., safety and security, public transport connections to key services, retention of services used by older people, etc.). The work undertaken by the Limerick Northside Age Friendly City Project can also inform the work of the Age-friendly programme Alliance, bringing to the Alliance a strategic outlook for the Moyross regeneration area.</p>
		Ij	<p>Insert additional objective to enhance the existing desire lines within Moyross to section 2.4.4 Open Space and Public Realm Strategy (page 184) after point II as follows:</p> <p>Volume 2, Section 2: Framework Strategy Insert additional objective to section 2.4.4 Open Space and Public Realm Strategy (page 184) after point II as follows:</p> <p>2.4.4 Open Space and Public Realm Strategy It is the objective of the Framework Plan to:</p> <ol style="list-style-type: none"> 1. Protect and enhance the special landscape character and setting of Delmege Estate; 2. Explore the potential for an ecologically sensitive leisure uses as part of a strategic linear park from the river Shannon, through the heart of Moyross to Caherdavin; 3. Promote the development of job opportunities around the area of sports ground maintenance and local sports facility development; 4. Provide opportunities for increased community interaction by encouraging local management of open space; 5. Promote the retention of existing trees on proposed sites for development; 6. Implement a programme of street tree-planting within the private curtilage of homes to ensure better management of the tree stock; 7. Minimise run-off to the existing drainage infrastructure through the integration of Sustainable Urban Drainage System (SUDS) technologies on a site-by-site basis as appropriate, i.e., swales, porous paving, etc; 8. Enhancing biodiversity through habitat improvements, compensatory habitat and native planting strategies within Moyross; 9. Retain the existing active playing pitches associated with LIT, St. Nessan’s Community College and Thomond Park RFC as sporting facilities; 10. Restrict development of the landfill sites at Long Pavement Road. It is a requirement to monitor the site and monitor in accordance with EPA Landfill Management Guidelines; 11. Provide for active playspace facilities, based on the existing and expected child population projections generated by the existing and future need. Moyross is under resourced in terms of active play facilities for children below the age of 15 years. <p>12. Protect and enhance existing desire lines within Moyross and integrate as part of public realm improvements within the area.</p>

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3	Bedford Row Family Project (BRFP)	3g	<p>Change to LRFIP to insert additional text regarding the need for holistic and whole family intervention to section 2.1.3.1 Education and Learning: Description of Activities (page 122) under point 1 of “Early Years Learning and School Readiness”</p> <p>Change in LRFIP under Experience to Date to highlight that Bedford Row FP supports prisoner families and children (page 139)</p>	<p>Education & Learning: Description of Activities Four types of activity, to be supported under this programme, are identified below.</p> <p>1. Early Years Learning and School Readiness The evidence suggests that it is very important to intervene as early as possible in the life of a child to ensure that children achieve the normal developmental milestones and are ready to engage with learning when they start school. Difficulties in terms of oral language acquisition and emotional, behavioural and social problems are serious impediments to normal progression. The evidence indicates that early intervention, starting at the pre-school stage, shows the best return on investment. Early intervention, starting at pre-school age, requires holistic interventions which focus on the whole family, often the extended family.</p> <p>Types of activities and programmes in family support and youth at risk supported to date by the regeneration programme (2007-2011) in partnership with other players include:</p> <ul style="list-style-type: none"> • The Local Assessment of Needs System (LANS), a strategic project of Limerick City Children's Services Committee, which promotes multi-agency work addressed to children with needs at levels 2-3 on the Hardiker scale. It is an “early warning” / preventive system; it has integrated a Common Assessment Framework and is developing an information / data sharing system. • Extension of capacity of family support programmes managed by voluntary bodies. These include Extern, receiving a grant to double its capacity, the North Star Family Support Project and Sophia Housing. • Support for new universal services in regeneration areas which include support for families (Moyross Community Companions, Limerick Social Services Centre Southill and Weston Family Support Initiatives). • Funding to existing community-based voluntary organisation to develop new or enhanced services such as outreach in Céim ar Chéim; Bedford Row Family Project (prisoner / prisoner families and children focused), Southill Domestic Abuse and Family Resource Centres.
		3h	<p>Change to LRFIP, to insert additional text on the need to draw on relevant experiences, evidence-based best practice in Limerick and use role models as appropriate to section 2.1.3.1, under point 2. of “School Attendance and Readiness” Scope of Action, at end of point 3, page 123.</p>	<p>2. School Attendance and Retention Scope of Action 1) Improved access to services to address emotional and behavioural difficulties and other problems in pupils. These include community-based services, delivered by organisations mainly funded by the HSE, as well as mainstream services in health, located in Primary Care. The local delivery model here can draw on the concept and practice under the Full Service Extended School model, being developed on the southside of the city (St. Kieran's project). Such initiatives are especially appropriate where primary care and education services are co-located on the same site or are adjacent to each other (Moyross / Ballynanty Health Centre and Corpus Christi School, King's Island Primary Care Centre and the amalgamating boys and girls school, St. Mary's.</p> <p>2) Services / programmes to improve parenting of school-age children and strengthening home school liaison strategies and practices addressed to promoting good behaviour and emotional well-being in children. An example here is the Incredible Years programme where there has been investment in training, implementation and evaluation under the Limerick Regeneration Programme (2007-2011) and which has shown good results.</p> <p>3) Additional learning support to improve attainment in school and support for those at risk of poor attainment and school drop-out. This includes after-school / out-of-school provision to support learning matched to needs, and collaborative programmes with voluntary sector and educational bodies / schools in the planning and delivery of such programmes. There are examples in the city of projects implemented by many agencies that are working to overcome pupils' barriers to learning. It will be important to draw on these experiences, relevant role models and evidence-based methods of what has worked in Limerick.</p> <p>4) Education and well-being programmes including music in schools (Music Generation Limerick City) and sport / physical activity in schools. Such programmes can add value in terms of learning and also lead to personal and social development, improved self-esteem, sense of achievement and community.</p>
		3i	<p>Change to LRFIP to insert additional text regarding the scope for parent-to-parent and peer supported learning to section 2.1.3.1, “4 Adult Education and Community Learning”, Scope of Action and Scope for Funding Support, at pages 124 and 125</p>	<p>4. Adult Education and Community Learning Scope of Action</p> <ol style="list-style-type: none"> 1. Community-based outreach (including non-formal) in order to engage with the target group - i.e., adult learners with low education and specific sub-groups that face additional disadvantaged, e.g., members of the Traveller community, people with disabilities, lone parents especially young lone parents with low-level education. A specific initiative could be developed for young mothers for instance, working with this group to bring them into a pathway of learning and qualification. Raising the educational level in this group and their orientation towards learning is likely to have a positive impact on the capacity of mothers to support their children in education and aspirations for their children in education as well as orientation towards the labour market. 2) Guidance and counselling service to support adults at greatest risk of social exclusion to engage with education and training and support return to education and qualification. Goal-setting and planning for achievement of education, personal development and, where

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				<p>appropriate, career development outcomes are part of the service.</p> <p>3) Participation in education leading to qualification by adult learners. For those most excluded, the focus of qualification could be at QQI / FETAC 1-4 level (from basic up to Junior Cert level) and 5-6 (up to Leaving Cert). Progression is also part of the approach involving pathways to further education and training, further qualification and acquisition of skills in new areas of market demand (ICT, technology, healthcare and social care, tourism, sport and recreation, digital and multimedia, horticulture, etc.). For instance, in an initiative targeting young mothers (as suggested above), this could include education and training on information and communication / digital technologies. It could be developed with a strong practical focus to bring “parents on-line” such that they can progress into “blending” learning options more easily, assist and supervise their children’s use of the internet and their accessing of information online to support them in various aspects of everyday life, for instance, on health, parenting etc. Parent-to-parent or a peer support learning could enhance on-going support and ensure that emotional elements are addressed in education or training.</p>
		3o	Change to LRFIP, to insert additional text to emphasise the need for attention to be given to long-term staffing arrangements at section 2.1.3.2 Priority 2: Health and Well-Being, under C. Adult Mental and Physical Health and under Scope of Action (page 128).	<p>C. Adult mental and physical Health Adult health and well-being are affected by many factors. Drawing on a social determinants of health approach, these include poverty, long exposures to social deprivation, emotional and family stress often linked to lack of economic resources, social isolation, lifestyle factors and environmental (e.g., poor housing and quality of the physical environment) and social conditions of the neighbourhood. This includes exposures to anti-social behaviour, fear and lack of community safety. In order to significantly improve child outcomes, there is a need to ensure that all parents, and particularly vulnerable parents, have access to appropriate, timely and high quality support.</p> <p>Key Agencies / Partners The key agency is the HSE, Primary Community and Continuing Care, with the particular focus on primary care / local health centres and access to specialist services (e.g., in chronic illness management, palliative care, psychiatric services). As there are many determinants of health (including social, economic and environmental factors), other agencies have a role including the local authority in relation to the physical and social environment of neighbourhood, the Gardaí (community safety), public transport and voluntary / community sector organisations engaged in delivery of social and community services in health, welfare and social care. Social Protection (NEES / Intreo offices) as part of a more integrated labour market activation services (with LCETB and SOLAS, formerly FÁS) also have a role linked to supplementary welfare entitlements. In addition, a significant proportion of the staffing of social and community services comes from active labour market schemes in Community Employment and TÚS. Potentially, addressing needs in the communities in social care may offer training and employment opportunities to unemployed people (and links to the Employability and Work priority, below). Parenting Limerick is a newly established network of parent and family support organisations in the city, promoted by the Children’s Services Committee in the framework of the Children’s Programme Innovation and Development Fund (assisted by SSIRL). This network is developing a framework of parenting supports and a population (public health) approach to parenting support.</p> <p>Scope of Action The scope of the social regeneration programme is mainly in a supportive role (influencing and advocacy) and indirectly promoting improved health and wellbeing. For instance, action to build capacity of the community to “have a voice” and engage in decision-making is relevant to improving service provision in primary care to match local needs (see Priority 3 below in relation to Ageing Well); environmental improvements including improved housing, open space and facilities for recreation are likely to have a positive impact on health including mental health; action to improve community safety and estate management, impacting to reduce fear of crime and anti-social behaviour, are likely to have a positive impact on adult health including mental health; interventions to support families with multiple problems are likely to impact positively on health, particularly mental health. Interventions to support families and youth at risk are addressed mainly below under Priority 5. In the interest of developing and sustaining high quality services, attention needs to be given to long-term staffing for interventions in community settings to address adult mental, emotional and physical health. This is in keeping with government’s primary care policy agenda. Actions that could be supported under the social regeneration programme include: 1) Activities involving cooperation with health professionals, especially in Primary Care, and community-based and voluntary organisations to build awareness of services in health (primary care and specialist health services), social care and social support and to provide information and advice, if appropriate, on how to access such services. 2) Activities, also in cooperation with health professionals (especially in Primary Care) and community-based and voluntary organisations to support people and families living with disabilities, chronic illnesses and mental ill-health to better manage their conditions – for instance, supporting the development and tracking of care plans and pathways to recovery in community settings. It could also include setting up / participation in support groups related to management of, and coping with, specific health conditions (e.g., cancer, diabetes, caring for people with dementia). The approach is to work towards empowerment, supporting people to live as full and productive lives as possible while living with illness. 3) High-quality parenting supports to meet the needs of all parents at different levels of need and during different phases of childhood. This links with initiatives of the Limerick City CSC under Parenting Limerick. 4) 3) Actions to improve educational opportunities and qualification in healthcare and social care in the community and amongst staff / volunteers of</p>

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				<p>community-based organisations. This could include use of new technologies in health care management and education / training to support better management of specific health conditions.</p> <p>54) Capacity building and partnership in community-based settings, as identified above under Public Health, to promote input of communities and groups (e.g., women's health, men's health) to delivery in health in local communities.</p> <p>Scope for Funding Support The social regeneration programme can provide for the following types of expenditure:</p> <ul style="list-style-type: none"> • Additional funding for the start-up (e.g., planning, partnership-building) of programmes to support improved infant, child and adolescent mental health and parent health delivered in cooperation with the mainstream services in health and child and family support. • Funding for additional services to improve the reach and engagement with target populations in the regeneration areas – i.e., young people, groups at higher risk such as men living alone, and young single parents. • Small-scale funding for the development and delivery of targeted health promotion activities, delivered in community settings. • Funding to improve community-based support to manage ill health for people and families living with disabilities and chronic health conditions. • Local partnership and capacity building (planning, monitoring, training, community participation) in health promotion and service delivery in the community including support for parents.
		3p	<p>Change to LRFIP, to insert additional text regarding challenges faced by adult learners who left formal education early. At section 2.1.3.1 under 4 Adult Education and Community Learning, Scope of Action (page 125).</p> <p>Change to LRFIP to include full reference to Bedford Row Family Support Project, under 2.1.3.4 P4: Work and Employability, B. Addressing Additional Barriers to Economic Inclusion: Most Vulnerable Groups, end of paragraph (page 134)</p>	<p>4. Adult Education and Community Learning Scope of Action Changes are being introduced in the delivery of adult education and training, as outlined in the Policy Review, some of which may present difficulties for the target population. Changes are linked to the challenges presented by the large increase in the numbers unemployed who require up-skilling / reskilling. Additional places are created on programmes in further education and training and capacity increased in part by offering shorter and more intensive programmes and making greater use of “blended” learning options. There is also a stronger focus on qualification and progression, operating from a higher base of qualification (e.g., from level 5-6 on the Quality and Qualifications Ireland (QQI) framework / FETAC)2. However, people who are at the lowest levels of education and skills require more rather than less intensive support. Education of community based learners who may have left formal education early is challenging. Priorities, as reflected in government policy (linked to the employability agenda and bringing unemployed into work), may be ambitious for this group. Adults who return to education often require support and “early wins” for them to regain their confidence and sense of achievement, as well as the belief that they can be part of a learning culture.</p> <p>Working more effectively to integrate residents with this profile is an important part of the strategy to stabilise the communities. However, being effective here will require special skills to build connections with, to engage with the target population and to work to support improved employability (education, training, work). This is likely to be a slow process. It will require links with key players including: Probation Services; Young Person's Probation community-based projects (Céim ar Chéim, Southill Outreach, Probation and Linkage in Limerick Scheme, PALLS); Garda Diversion Projects; the Prison Service; Prisoner support programmes (Bedford Row Family Support Project, LEDP's Prisoner Support Programme); the Gardai (Community Gardai) and, depending on needs, other services in family support, mental health, addiction etc. The wider needs of these groups will be addressed under Priority 5 (Families and Youth at Risk) below.</p>
		3v	Change to LRFIP, to indicate that social workers are one of the key frontline statutory services and that other services are also relevant to section 2.1.4.5 Priority 5: Families and Youth at Risk, Experience to Date (page 137)	<p>2.1.4.5 Priority 5: Families & Youth At Risk Experience to Date There are numerous services providing family support and services for children and young people focused on youth at risk, and targeting the population of the regeneration areas. Targeting is effected either by services being located in regeneration areas or because of the large caseloads of families drawn from the regeneration areas.</p> <p>The mainstream agency is HSE, Children and Family Services, with social workers being one of the key frontline statutory services. Other services are also relevant here including frontline workers in Probation Services, Gardai and education. Voluntary organisations are important providers of services to children and families at risk. Their role has evolved linked to their capacity to reach the target population; and, typically they have better rapport and there is less mistrust of voluntary compared with statutory organisations with responsibility for child protection and child welfare.</p> <p>Family support services provided by voluntary and community sector organisations typically operate via referrals from HSE and are (part)-funded by HSE operating under local service agreements.</p>
		3w	Change to LRFIP, to indicate that to indicate that the length of time for which services is available may not be assessed and the importance of this to section 2.1.4.5 Priority 5: Families and Youth at Risk, A. Assessment of	<p>2.1.4.5 Priority 5: Families & Youth At Risk A. Assessment of Needs & Intervention Pathways for Family Support</p>

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			Needs and Intervention Pathways for Family Support (page 139).	Criticisms of services in child and family support are that they are too fragmented; they reach too few children and families in need, they intervene too late in the life-cycle (children are older) and too late after the on-set of problems, they do not assess how long a family might need intervention ; and there is a lack of follow-up to monitor and sustain outcomes through appropriate after-care. There are also criticisms that family support and children and youth services including services in education settings can “take over the parenting role” and may not pay enough attention to developing responsible parenting and empowering parents. Actions under this theme must be structured to respond better to the complex needs of the target group and to address these criticisms. Working in a multi-agency context within the coordination structure of the Limerick City CSC, investment has been made in developing the Local Assessment of Needs System (LANS). This has included training of personnel in relevant statutory and voluntary / community organisations in the Common Assessment Framework (CAF) and a data management system. However, engagement with the LANS and the CAF is voluntary. The test of the LANS will be improved capacity in the service infrastructure to support children and families at risk, including having services in place for as long as they are needed , and produce better outcomes.
		3x	Change to LRFIP, to indicate good practice in Limerick projects and the developing evidence base with reference to the work of Bedford Row Family Project to section 2.1.4.5 Priority 5: Families and Youth at Risk, A. Assessment of Needs and Intervention Pathways for Family Support (page 139).	2.1.4.5 Priority 5: Families & Youth At Risk A. Assessment of Needs & Intervention Pathways for Family Support Criticisms of services in child and family support are that they are too fragmented; they reach too few children and families in need, they intervene too late in the life-cycle (children are older) and too late after the on-set of problems, and there is a lack of follow-up to monitor and sustain outcomes through appropriate after-care. There are also criticisms that family support and children and youth services including services in education settings can “take over the parenting role” and may not pay enough attention to developing responsible parenting and empowering parents. There are examples of good practice in projects in Limerick including early / preventive interventions, applied before the onset of problems and there is a developing evidence-base on outcomes of practice (e.g., an evaluation based on a Social Return on Investment methodology, undertaken by Bedford Row Family Project and launched in 2013). Actions under this theme must be structured to respond better to the complex needs of the target group and to address these criticisms. Working in a multi-agency context within the coordination structure of the Limerick City CSC, investment has been made in developing the Local Assessment of Needs System (LANS). This has included training of personnel in relevant statutory and voluntary / community organisations in the Common Assessment Framework (CAF) and a data management system. However, engagement with the LANS and the CAF is voluntary. The test of the LANS will be improved capacity in the service infrastructure to support children and families at risk and produce better outcomes.
		3y	Change to LRFIP to indicate engaging with youth at risk before problems of offending arise to section 2.1.4.5 Priority 5: Families and Youth at Risk, B. Improved Outcomes for Youth at Risk, Scope of Action, (page 140)	2.1.4.5 Priority 5: Families & Youth At Risk B. Improved Outcomes for Youth at Risk Scope of Action 1) Additional / new methods of outreach to improve effectiveness in the reach of young people at risk. This includes “out of hours” outreach activities (evenings and weekends) when problem behaviour may be more likely to occur. Outreach should be directed to bringing children at risk into diversion activities if they are considered at risk of offending (i.e., before problems arise) , or as early as possible after the on-set of problems – linked to the “early warning” system which is a key objective of the Local Assessment of Needs System (LANS) / Common Assessment Framework (CAF). Outreach needs to work in tandem with the referral systems which apply across statutory and voluntary organisations, as outlined above. Consent and engagement with the parents / the family needs to be addressed and the model of the integrated pathway of care applied with on-going risk assessment and tracking applied, as outlined above.
		3z	Change to LRFIP to indicate importance of holistic whole family approach in particular to engage more children living in distressed families to section 2.1.4.5 Priority 5: Families and Youth at Risk, B. Improved Outcomes for Youth at Risk, Scope of Action, (page 140)	2.1.4.5 Priority 5: Families & Youth At Risk B. Improved Outcomes for Youth at Risk Scope of Action 2) Support to apply best practice in the development of re-integration plans and enhanced services for young offenders. These should include behaviour modification programmes, social and personal development to help young people make positive choices, working in group settings and on a one-to-one basis. An holistic approach to re-integration is required and this will take different pathways depending on individual characteristics (age) and profile (history, type and intensity of problems), the wider family situation and social relationships with friends and in the community. A whole family approach, similarly, should be taken if appropriate. Other care options should be applied if this is not appropriate in the interest of child protection / child welfare. This holistic and the whole family approach needs to be developed further so that more children in distressed families including those involved in criminality can be protected as they grow. A strong focus on education should be applied in all re-integration plans to support re-engagement with learning in school or other settings depending on needs including age. For those in their older teens and early twenties, employability (training, orientation to work, work experience, placements) is a key element of reintegration. Enhanced aftercare provision, to help prevent re-offending and support positive reintegration into community and society are further elements. This could include commitment on the part of the young person / parent to engage with specific universal services, for instance, to develop learning, manage health, improve parenting, and engage with sport / leisure / arts / music. This should, in turn, help to re-engage with positive peer networks

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				and in the community. On-going mentoring could support aftercare.
		3bb	Change to LRFIP to state that “hope, inspiration, etc. are a major part of the approach for action with this group and for the regeneration communities generally” to section 2.1.4.5 Priority 5: Families and Youth at Risk, B. Improved Outcomes for Youth at Risk, Scope of Action, (page 140)	<p>2.1.4.5 Priority 5: Families & Youth At Risk</p> <p>B. Improved Outcomes for Youth at Risk</p> <p>Scope of Action</p> <p>2) Support to apply best practice in the development of re-integration plans and enhanced services for young offenders. These should include behaviour modification programmes, social and personal development to help young people make positive choices, working in group settings and on a one-to-one basis. An holistic approach to re-integration is required and this will take different pathways depending on individual characteristics (age) and profile (history, type and intensity of problems), the wider family situation and social relationships with friends and in the community. A whole family approach, similarly, should be taken if appropriate. Other care options should be applied if this is not appropriate in the interest of child protection / child welfare. A strong focus on education should be applied in all re-integration plans to support reengagement with learning in school or other settings depending on needs including age. For those in their older teens and early twenties, employability (training, orientation to work, work experience, placements) is a key element of reintegration. Enhanced aftercare provision, to help prevent re-offending and support positive reintegration into community and society are further elements. This could include commitment on the part of the young person / parent to engage with specific universal services, for instance, to develop learning, manage health, improve parenting, and engage with sport / leisure / arts / music. This should, in turn, help to re-engage with positive peer networks and in the community. On-going mentoring could support aftercare. Offering hope, inspiration, engendering enthusiasm and possibilities for a better life are a major part of the approach for actions with this group, but also generally for the regeneration communities.</p>
		3gg	Change to LRFIP to state that capacity building programme must address the issues identified to section 2.1.3.7 Priority 6: Community Participation, Empowerment and Civic Engagement, end of 1 st paragraph under heading B. Capacity Building: Community Participation, Empowerment and Civic Engagement (page 151).	<p>2.1.3.7 Priority 6: Community Participation, Empowerment and Civic Engagement</p> <p>B. Capacity building: community participation, empowerment and civic engagement</p> <p>Drawing on conclusion of reviews, especially the most recent review of estate management undertaken by NEXUS (2012), and recent consultations with the communities, a capacity building programme is required in local communities. The purpose of the programme is to strengthen the involvement of local communities in regeneration areas to participate fully in, and contribute to, decision-making on planning and developing their area; and to strengthen the ability and willingness of mainstream services to engage with the communities. The capacity building programme needs to deal with issues of anger, fear and power from the perspective of local communities. Building and sustaining relationships with people in communities that are fearful, distressed and angry requires a high level of skill while anger (which often manifests in a kind of apathy) is detrimental to community development.</p>
5	Ballinacurra Weston Residents' Alliance and the Weston Gardens Residents' Association	5a	Change to LRFIP to specifically reference the view that methods of community representation are not considered satisfactory by some, and that this issue must be addressed to 2.1.3.7 Priority 6: Community Participation, Empowerment and Civic Engagement (page 150).	<p>2.1.3.7 Priority 6: Community Participation, Empowerment and Civic Engagement</p> <p>Reviews of estate management over the years (2005, 2012) have identified issues and challenges to be addressed in order to improve effectiveness. These centre on: a lack of clarity on what is meant by estate management, lack of “real buy-in” by the local authority, poor flows of information / or lack of information on key issues that affect residents, not a sufficient focus on working with the communities by key agencies to identify community needs, lack of opportunity for residents to contribute to the debate and influence decision-making, inadequate resources, and insufficient attention to review and feedback to the communities (NEXUS, <i>Regeneration and Local Estate Management</i>, 2012).</p> <p>There is a sense amongst some community activists that the views of residents on the ground are not sought in decisions on representation of the community in structures set up as part of the regeneration programme; that existing consultative “structures” are not representative of residents from the communities concerned and, as such, are “not mandated to speak” on behalf of the residents. The issue of representation of the community in decision-making and information structures will need to be examined and modified where required. This is important in the interest of developing good working relationships with the communities and community empowerment.</p>
		5b	Change to LRFIP to state that a review of the structures in place is being commissioned by Limerick City Council to 2.1.3.7 Priority 6: Community Participation, Empowerment and Civic Engagement, A. Community organization / Estate Management / Local Service Delivery (page 151).	<p>2.1.3.7 Priority 6: Community Participation, Empowerment and Civic Engagement</p> <p>A. Community organisation / estate management / local service delivery</p> <p>The community development infrastructure on the estates is essential to enable the delivery of services into the community and to operate outreach services (e.g., “trusted” centres, familiar settings, known / trusted personalities) into specific parts of the communities of the regeneration areas. Community-based organisations are key partners in the delivery of services funded by statutory agencies across all areas of social policy (children and families, youth justice, labour market, social care, youth services). This infrastructure also acts as a hub for information provision on a wide range of issues including service directories and referrals. It also provides access to the population to obtain their views and manage feedback to statutory agencies on local services and policies. These operations or centres also play an important role in supporting community safety,</p>

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				<p>providing links for the communities and residents to work in partnership with the Garda Síochana and the local authority.</p> <p>Key Agencies</p> <p>Limerick City Council, An Garda Síochana, the PAUL Partnership and community organisations including the various community / enterprise and action centres operating in the regeneration areas. Depending on the range of service provision, other agencies have a key interest and role particularly, the HSE, LCETB / SOLAS, formerly FÁS.</p> <p>Scope of Action</p> <p>1. In the interest of responding to issues regarding community representation, effective and efficient community management and estate management, a review of the structures in place is being commissioned by Limerick City and County Council Regeneration Office. The purpose of the review is to map out and review the activities of the various structures in regeneration areas in Limerick, examine relevant experience from elsewhere in this area and compare the activities and set-up of the community structures in regeneration areas in Limerick with wider best practice.</p> <p>2. 1. Support for Estate Management structures / organisation and the operation of the Community Consultative Forum, taking into account the conclusion and any recommendations for change arising from the review (1, above).</p> <p>3. 2. Operation of Local Regeneration Committees involving community and statutory representation in each of the estates. The purpose here is to provide a forum for the exchange of information on service delivery, forward planning / proposals, and feedback to statutory agencies on issues of concern to the communities and on needs. Again, the precise arrangements here will take into account the findings, conclusion and any recommendations for change arising from the review (1, above).</p> <p>4 3. Enhancing capacity of community-based services to respond to the needs of residents in the communities. This could include improvement to facilities, extended reach of services and / or an overall increase in the community service provision. These activities should relate to specific areas of need addressed under the priority themes (pillars) of this programme, e.g. children, young people, adults under Education and Learning, activities under Health and Well-being etc.</p>
		5e	Change to LRFIP to state the community perspective on the impact of the boarding up of houses to section 2.1.3.8 Priority 7: Policing, Justice and Community Safety (page 153).	<p>2.1.3.8 Priority 7: Policing, Justice and Community Safety</p> <p>Fitzgerald (2007) argued that the intensity and nature of criminality and anti-social behaviour was destabilising, not just for these estates, but also for the city. He concluded that intensive policing intervention is required in the short to medium term “to allow other interventions an opportunity to work” with policing needing “to be more consistently concentrated and regular”. He went on to recommend that “dealing with the issue of criminality” should form one of three strands of the strategy to deal with the problems of the estates. This strand was seen “as fundamental to creating the conditions for other interventions to be successful, and for restoring the confidence of local communities”. Following through on this, the regeneration programme (2008-2010) brought additional garda resources to the city and a new focus to the policing strategy. There is consensus and evidence that this strategy has had a major positive impact on crime, particularly on serious crime in the city. This is reflected in the statistics on crime and policing (2007-2010), as presented in the Socio-economic analysis, showing reductions in all types of serious crime. Higher levels of police search in relation to drug-related crime and issue of anti-social behaviour orders are also reported. Notwithstanding these achievements, problems of crime including gangland crime have “not gone away” and, as such, the policing strategy and resources linked to this need to be maintained to continue to stabilise the situation. This focus is important to under-pin a successful regeneration strategy for the estates. This is also an important foundation for the wider physical, economic, social and cultural development of the city, losing the association between Limerick city and its reputation for crime.</p> <p>The negative impact of boarding-up of individual houses on estates is highlighted by the community. In particular, this has a negative impact on neighbouring occupied homes; it can encourage residents to leave and create an environment for anti-social and criminal behaviour. Low-level criminality and anti-social behaviour, as highlighted by Fitzgerald in 2007, continue to be major concerns reflected, for instance, in joyriding, damage to property, harassment and intimidation on the estates. Involvement of young people and children in such activities is regarded as a specific problem. Solutions to this problem can be difficult to effect and require a multifaceted approach including engagement of parents as well as various services outside of policing and the wider criminal justice system. Community safety, to be effective in the longer-term term, must include a focus on preventive actions, which is a key theme and developed in the various priorities across the social programme. Attention to the social and economic factors as well as physical aspects of design of the estates and housing letting policies, associated with creating conditions for crime, is also needed in framing longer-term solutions.</p>
		5h	Change LRFIP to amend tables and maps to Volume 2, Appendix 3 and Appendix 7 as follows:	

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Amend the table to section 2.7.3 Housing Strategy (page 247) to update the number of occupied and boarded homes to be demolished to 28.

Volume 2, Section 2: Framework Strategy
2.7.3 Housing Strategy

Housing Deliverables	Total	Private	LA				
Current numbers of Occupied and Unoccupied Homes in Ballinacurra Weston (as at 31.12.2012) ¹	232					A	
Total number of Occupied Units ¹	200					B	
Total number of Occupied Homes ²	198	142	56			C	(A-B)
Total number of Unoccupied Homes ²	32					D	
Demolition						E	
Number of Occupied Homes to be demolished ³	26 19	13 16	5 3			F	
Number of Boarded Homes to be demolished	7 9	4	3 5			G	(E+F)
Total number of Occupied and Boarded Homes to be demolished				23 28			
Refurbishment						H	(B-E)
Number of Existing Private and Local Authority Occupied Homes to be refurbished	180	129	51			I	(D-F)
Number of Private and Local Authority Unoccupied homes to be refurbished	25	8	17			J	(H+I)
Total number of Occupied and Boarded Homes to be refurbished	205	137	68	205	205		
Replacement Housing						K	
Number of Private and Local Authority Unoccupied homes to be refurbished	25	8	17			L	
Number of Occupied Homes to be demolished	26 19	13 16	5 3			M	(K-L)
Total number of Replacement Housing Need		5 -8	10 14	5 6			
Estimated additional need due to additional overcrowding (as at May 2013)				34		N	
Overall Replacement Housing Need ⁴				39 40		O	(M+N)
New Homes under consideration	4					P	
Total new homes proposed	36					Q	
				40	40	R	(P+Q)
Net Gain in Replacement Homes				4 0		S	(R-O)
Final Number of Homes in the Study Area ⁵					245	T	(R+J)

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		5h	<p>Amend the Housing Strategy Map on page 248 to show:</p> <ul style="list-style-type: none">a) Replacement housing (pink colour) to 41 Clarina Avenueb) Non-replacement housing (blue colour) to 17,19,21,23,25 and 27 Clarina Avenuec) Existing housing (grey colour) to 48 Clarina Avenued) Replacement housing (pink colour) to 46 Clarina Avenuee) Existing housing (grey colour) to 25 Crecora Avenue
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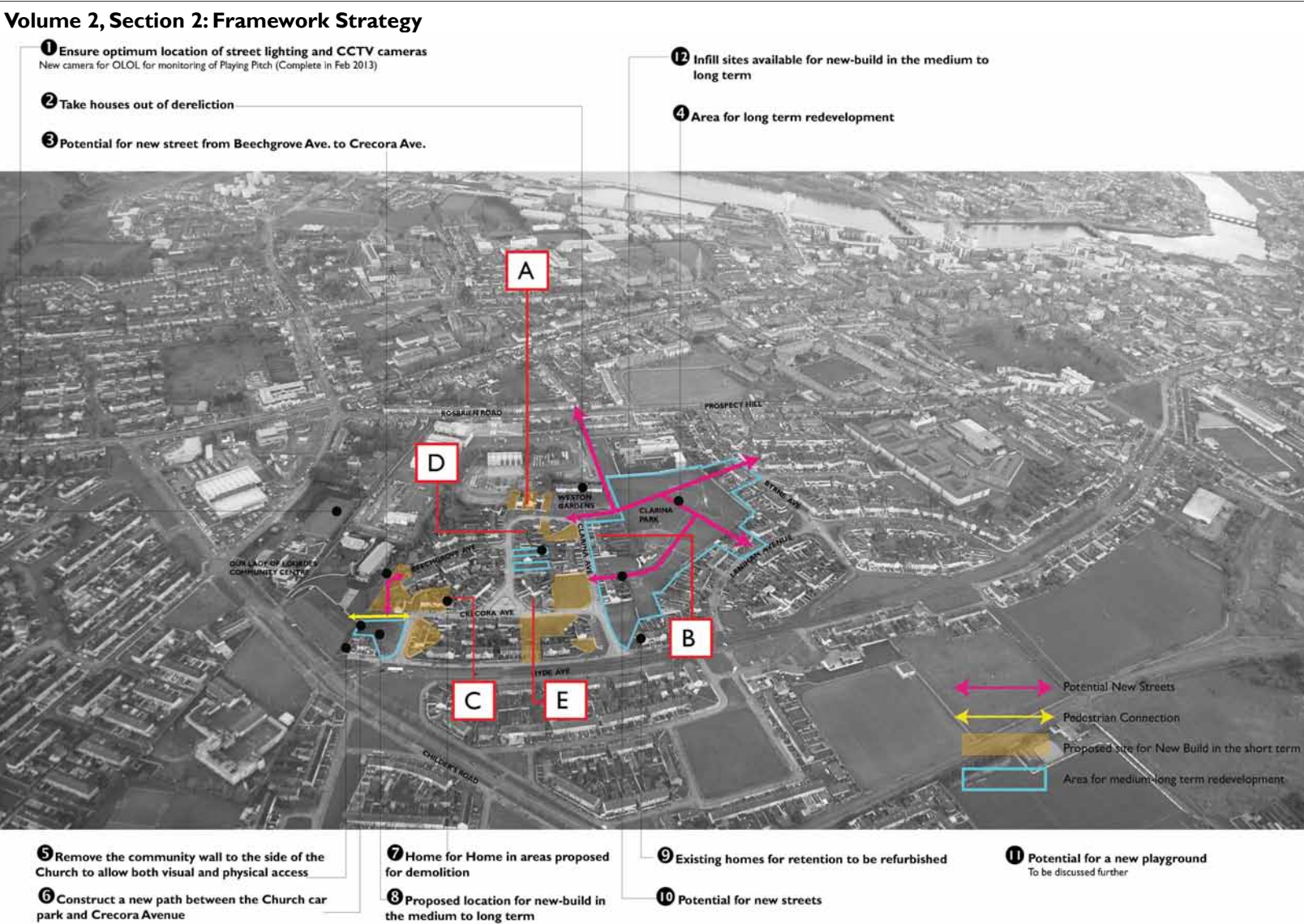
Volume 2, Section 2: Framework Strategy



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5h	Amend aerial photograph on page 252 to show:
	a) Proposed site for new-build in the short term (orange colour) amended to include 41 Clarina Avenue
	b) Boundaries describing medium-long term redevelopment (blue line) amended to include 17,19,21,23,25,27 and 15 Clarina Avenue
	c) Proposed site for new-build in the short term (orange colour) amended to exclude 25 Crecora Avenue
	d) Boundaries describing new-build in the short term (orange colour) amended to exclude to 36 and 38 Clarina Avenue
	e) Boundaries describing new-build in the short term (orange colour) amended to exclude 64 Clarina Avenue



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		5h	<p>Amend framework plan on page 254 to show:</p> <p>a) Proposed units (blue colour) amended to include 17,19,21,23,25 and 27 Clarina Avenue</p>
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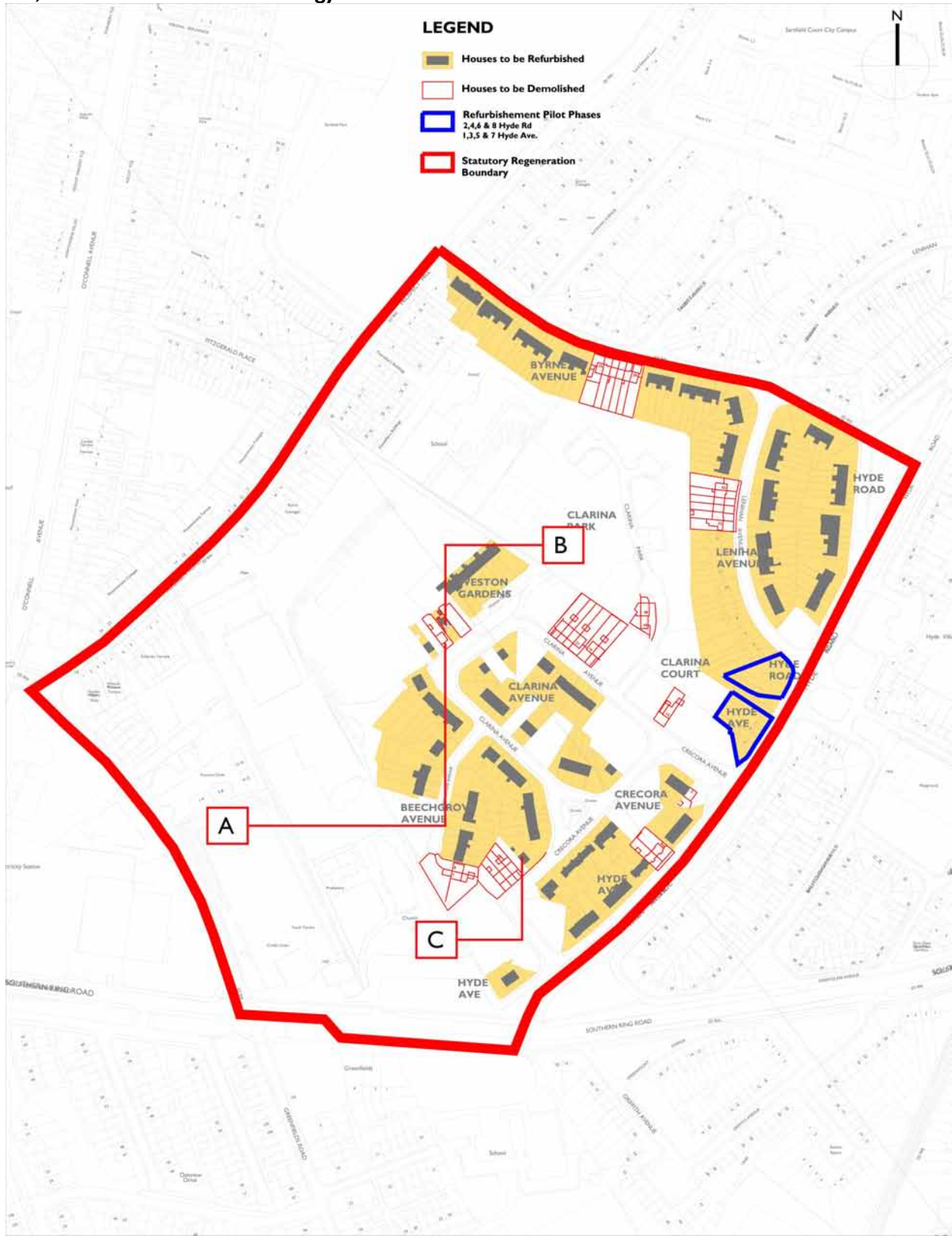
a)

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		5h	<p>Amend refurbishment strategy on page 257 to show:</p> <ul style="list-style-type: none">a) House to be demolished (red dashed outline) to 41 Clarina Avenueb) House to be retained (grey fill and yellow outline) to 39 Clarina Avenuec) House to be retained (grey fill and yellow outline) to 25 Crecora Avenue
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		5h	Amend Appendix 7 Table 20: Ballinacurra Weston - Existing Situation as at December 31st 2012 (page 500) to take account of revised figures to table to section 2.7.3 Housing Strategy (page 247):
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Appendix 7: Existing Situation

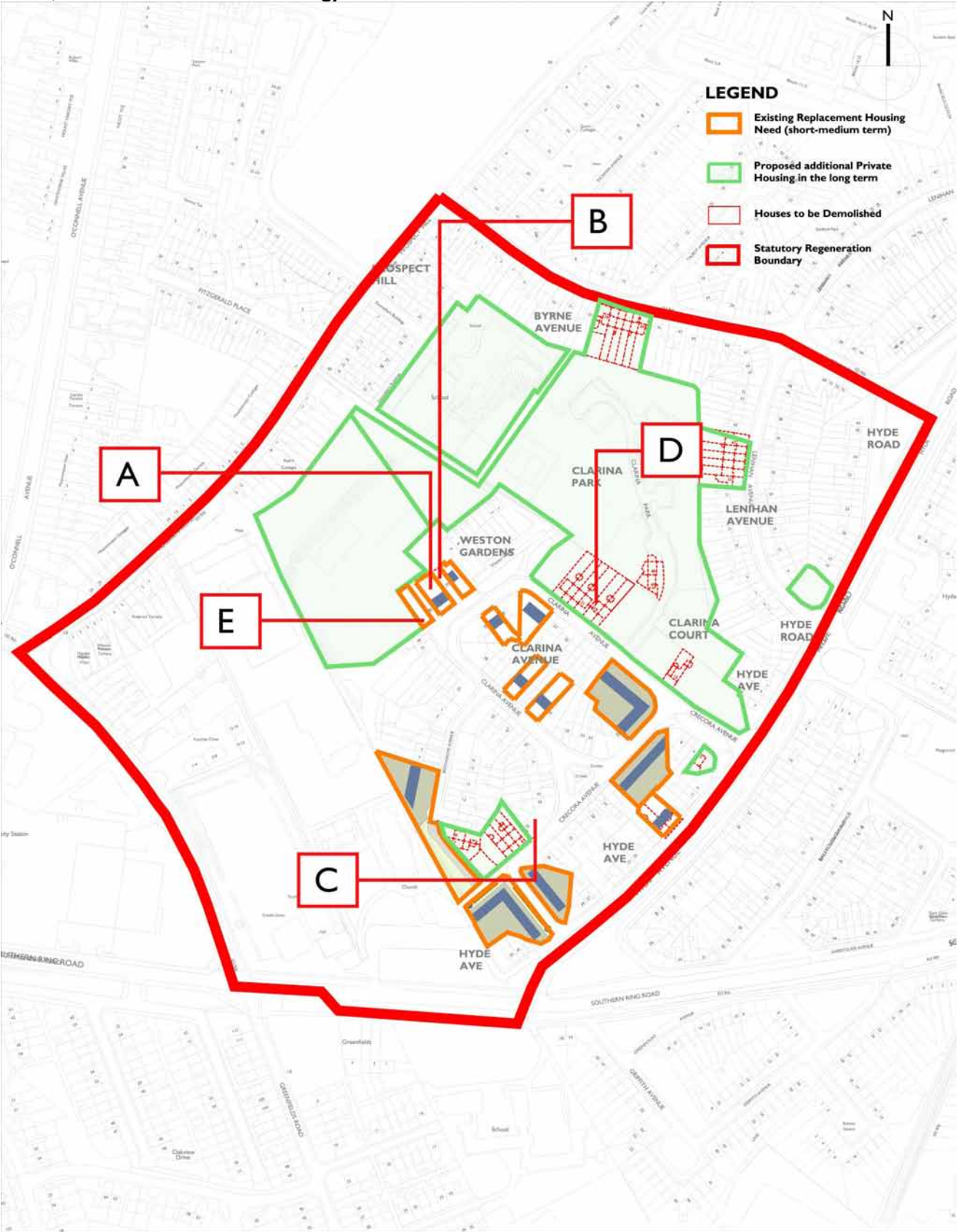
Ballinacurra Weston: Existing Situation as at December 31st 2012												
	Beechgrove Avenue	Clarina Avenue	Clarina Court	Clarina Park	Crecora Avenue	Lenihan Avenue	Byrne Avenue	Hyde Avenue	Hyde Road	Weston Gardens	Prospect Hill	Total
Demolished	0	26	5	42	30	2	0	0	0	0	0	105
LA	2	12	0	0	7	15	10	9	1	0	0	56
LA Unoccupied	2	3	0	0	3	6	3	0	0	3	0	20
Private	11	35	0	0	6	27	22	10	20	6	5	142
Private Unoccupied	1	0	0	0	2	2	3	3	1	0	0	12
Community Use	0	0	0	2	0	0	0	0	0	0	0	2
Total Number of Houses to be Accounted for	16	76	5	44	48	52	38	22	22	9	5	337
Number of Houses boarded as at 31st December 2012	3	3	0	0	5	8	6	3	1	3	0	32
Remaining as at December 31st 2012	13	47	0	2	13	42	32	19	21	6	5	200
Proposed Demolitions												
LA	1	1 0	0	0	0	2	1	0	0	0	0	5 4
LA Unoccupied	0 1	0 2	0	0	1	1	1	0	0	0	0	3 6
Private	1	5	0	0	0 1	3	4	0	0	0	0	13 14
Private Unoccupied	0	0	0	0	2	0	0	2	0	0	0	4
Community Use	0	0	0	2	0	0	0	0	0	0	0	2
Total	2 3	6 7	0	2	3 4	6	6	2	0	0	0	27 30
Number of LCC and Private Boarded Houses to be Demolished	0 1	0 2	0	0	3	1	1	2	0	0	0	7 10
Number of LCC Boarded Houses to be Refurbished and Re-Let	2	3	0	0	2	5	2	0	0	3	0	17
Number of Private Boarded Houses where Owners Intention is Unknown	1 0	0 2	0	0	0	2	3 2	1	1	0	0	8
Number of Private and LCC Occupied Houses to be Demolished	2	6 5	0	2 0	0 1	5	5	0	0	0	0	20 18
St. Mary's Park Overall Totals												
Total number of houses to be accounted for												337
Number of houses demolished as at 31st December 2012												105
Number of houses boarded as at 31st December 2012												32
Remaining houses as at December 31st 2012												200
Number of LCC and private boarded houses to be demolished												7 10
Number of LCC boarded houses to be refurbished and Re-Let												17
Number of private boarded houses where owners intention is unknown												8
Number of private and LCC occupied houses to be demolished												20 18
Table 20: Ballinacurra Weston - Existing Situation as at December 31st 2012												

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		5h	<p>Amend refurbishment strategy on page 259 to show:</p> <ul style="list-style-type: none">a) House to be demolished (red dashed outline) to 41 Clarina Avenue. This site is designated for short-term replacement housing need.b) House to be retained (grey fill and yellow outline) to 39 Clarina Avenuec) House to be retained (grey fill and yellow outline) to 25 Crecora Avenued) Boundary describing proposed additional housing in the long term (green line) amended to include 17,19,21,23,25 and 27 Clarina Avenuee) Boundary describing proposed additional housing in the long term (green line) amended to exclude 47 Clarina Avenue. This house is designated for short-term replacement housing need.
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		5h	<p>Amend Appendix 3 Table 5: Tenure mix as envisaged as part of the regeneration programme until 2022 and Table 6: Tenure mix as at December 31 2012 to show updated calculations in light of the following map and text changes:</p> <p>a) Boundary amended to include 17,19,21,23,25 and 27 Clarina Avenue and 2 and 4 Lenihan Avenue This has increased the capacity of additional private units.</p> <p>b) Revised figures to the breakdown of local authority and private replacement housing units</p>
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Appendix 3: Core Strategy Compliance

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Ballinacurra Weston: Final Tenure Mix as Envisaged as Part of the Regeneration Programme			
	Local Authority	Private	Total Units
Number of occupied units to be refurbished	68	137	205
Number of new replacement units required	35 36	5 4	40
Proposed new private units	0	254.7 262.5	254.7 262.5
Final number of homes within study area	103 104	306.7 403.5	409.7 507.5
Final Tenure Mix Percentage	20.6 20%	70.30 80%	

Table 5: Tenure mix as envisaged as part of the regeneration programme until 2022

Ballinacurra Weston: Tenure Mix as at December 31 2012			
	Local Authority	Private	Total Units
Number of occupied units*	56	142	198
Tenure Mix Percentage	28.	71.72	
*Excludes 2 community use buildings			
Ballinacurra Weston: Final Tenure Mix as Envisaged as Part of the Regeneration Programme			
	Local Authority	Private	Total Units
Number of occupied units	103 104	306.7 403.5	409.7 507.5
Tenure Mix Percentage	20.6 20%	70.30 80%	

Table 6: Tenure mix as at December 31 2012 and envisaged as part of the regeneration programme until 2022

B

SECTION 3: PROPOSED AMENDMENTS

Ref. No.	Submission From	Manager's Recommendation	Proposed Amendment
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		5h	Amend Table 7: Minimum and maximum yields of additional private housing in Ballinacurra Weston a) Boundary amended to include 17,19,21,23,25 and 27 Clarina Avenue.This has increased the capacity of additional private units. b) Boundary amended to include 2 and 4 Lenihan Avenue (Area Name '6').This has increased the capacity of additional private units.
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Appendix 3: Core Strategy Compliance

A

Ballinacurra Weston: Additional Private Housing							
Area Name	Zoning Objective under Limerick City Development Plan 2010-2016	Proposed Land Use as Part of the LRFP	Overall Area in Hectares	Density (Minimum Range of 35 Units per Hectare - Residential Only	Density (Maximum Range of 50 Units per Hectare - Residential Only	Capacity (Minimum Yield in Units)	Capacity (Maximum Yield in Units)
1	2A Residential	Residential	1.235	35	50	43.225	61.75
2	2A Residential	Residential	0.825	35	50	28.875	41.25
3	2A Residential	Residential	0.156	35	50	5.46	7.8
4	2A Residential	Residential	2.055 2.959	35	50	99.925 103.57	142.75 147.95
5	2A Residential	Residential	0.023	35	50	0.805	1.15
6	2A Residential	Residential	0.052	35	50	1.8	2.6
Totals						183.73	262.5

Table 7: Minimum and maximum yields of additional private housing in Ballinacurra Weston

B

		5h	Amend the following text to sections 3.3.1 Core Strategy and 3.3.2 (page 458) Tenure Mix to update values to additional private housing capacity, overall numbers of homes for Ballinacurra Weston, tenure breakdown and tenure mix percentages.
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Appendix 3: Core Strategy Compliance

3.3. Ballinacurra Weston

3.3.1 Core Strategy

Within the boundary for Ballinacurra Weston, lands have been identified that will contribute towards the Core Strategy requirements for new additional private housing (i.e. additional to replacement housing) and an improved tenure base. Map 2: Identification of lands for additional private housing capacity, describes the location of these lands in the context of the physical framework plan for Ballinacurra Weston, proposed as part of the draft Limerick Regeneration Framework Implementation Plan.

To meet the Core Strategy's target of 4400 units (2000 in Phase 1 and 2400 in Phase 2), approximately ~~255~~ 262 new additional private units are proposed in Ballinacurra Weston in addition to the number of occupied units due for refurbishment (205 units) and the amount of new replacement units required (40 units) to accommodate those units proposed for demolition to make way for strategic connections and a coherent urban form.This equates to an approximate total of ~~500~~ 507 units.

3.3.2 Tenure Mix

Within Ballinacurra Weston, approximately 500 units (~~103~~ 104 Local Authority occupied and ~~397~~ 403 private occupied) equates to a percentage ratio of ~~21:79~~ 20:80 (Local Authority occupied: private occupied).This is an improvement from the tenure mix ratio of occupied units recorded at December 31 2012; 28:72 (Local Authority occupied: private occupied).

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Ref. No.	Submission From		Manager's Recommendation	Proposed Amendment
		5m	Change LRFIP to amend tables and maps.	Please refer to submission no. 5(h) above. The proposed houses in question are scheduled for demolition as shown on the refurbishment strategy map and replacement housing strategy map on page 257 and 259 respectively.
10	Environmental Protection Agency	10f	Change LRFIP to insert additional wording to Section 2.2.2 (page 159/160) and section 2.6.2 Land Use Strategy (page 226)	<p>2.2.2 Economic Development Critical Success Factors</p> <ul style="list-style-type: none"> Opening up of communities through additional Waterways Infrastructure development to complement new road access into regeneration areas that will integrate Limerick City with Moyross / St. Marys Park subject to detailed environmental considerations and requirements. This will generate training and employment opportunities adopting a maritime and tourism theme incorporated into the extended Limerick City Economic & Spatial Planning Strategy. <p>2.6.2 Land Use Strategy</p> <p>6. Promote the development of the waterways, subject to detailed environmental considerations and requirements to include St. Mary's Park, Moyross to Grove Island and the city as a flagship project with training, employment and tourism potential.</p>
		10g	Change LRFIP to insert additional wording to Section 2.3.9 (page 174)	<p>2.3.9 Conserve and Enhance the Natural Environment</p> <p>The Framework Implementation Plan has a key aim to contribute to and enhance the natural environment in the regeneration areas by:</p> <ul style="list-style-type: none"> Protecting and enhancing environmentally designated landscapes minimising impacts on biodiversity and providing net gains in biodiversity where possible Remediating, mitigating and monitoring contaminated and unstable land, where appropriate in line with EPA guidance Ensuring that any projects and developments arising out of the Limerick Regeneration Framework Plan will not be in conflict with the requirements of the Habitats, Birds, SEA, EIA, Water Framework and Floods Directives
		10k	Change LRFIP to insert additional wording to Section 2.6.3 (page 228)	<p>2.6.3 Housing Strategy</p> <p>13. Consider the existing housing need (replacement housing and need arising due to overcrowding) of St. Mary's Park, in determining the type and size of replacement and additional housing provision in order to sustain a mixed and sustainable neighbourhood.</p> <p>14. Consider the future housing need required over the regeneration programme in relation to overcrowding, emerging household types and elderly housing. It is prudent to plan for a net gain in replacement homes which will act as a sufficient buffer over the lifetime of the regeneration project.</p> <p>15. Ensure that all new dwellings constructed within St. Mary's Park shall have a finished floor level of 5.75m as recommended in the detailed Flood Risk Assessment for St. Mary's Park and that all development shall comply with the requirements of the Guidelines on the Planning System and Flood Risk Management.</p>
		10l	Change LRFIP to insert additional wording to Volume 3: Section 1.3 (page 272)	<p>1.3 Monitoring the Regeneration Programme</p> <p>It is intended that data collection methods would encompass both qualitative and quantitative research methods and include household surveys, secondary and administrative data (CSO, Council statistics), focus groups and statistical analysis. Statistical analysis (regression/multiple analysis) will be used to unpick factors explaining why any given group of residents is more likely to experience a particular condition than another group. Qualitative assessment will be used to measure attitudes and awareness levels and this form of survey is particularly useful in establishing residents perceptions of overall change in their area in tandem with more quantitative assessments.</p> <p>The SEA Directive requires that the significant environmental effects of the implementation of plans and programmes are monitored. The Environmental Report accompanying the LRFIP puts forward proposals for monitoring the likely significant effects of implementing the Plan and therefore should be read in conjunction with this section.</p>
		10o	Change Environmental Report to insert additional wording to Section 3.2.1 (page 23)	<p>3.2.1 Scoping</p> <p>A written submission was received from Limerick City Council on the 22nd May 2013 clarifying the following points:</p> <ul style="list-style-type: none"> The LRFIP will be incorporated into the Limerick City Development Plan by way of a variation.

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Ref. No.	Submission From		Manager's Recommendation	Proposed Amendment
				<ul style="list-style-type: none"> • The extent of demolition work proposed will need to be carefully addressed given the scale of demolition work already taken place. • Flooding in Kings Island will need to be carefully considered. • Kings Island and Moyross should be treated in as much as possible as a single entity <p>In addition to consulting with the relevant authorities extensive consultation was undertaken with the residents within the regeneration areas as specifically detailed in the LRFIP Appendix 2 Statement of Community Involvement. The residents have ultimately influenced and guided the evolution of the LRFIP to its current state, including the omission / reconsideration of proposals with implications for the environment. The information provided in the written responses to the SEA scoping notice by environmental authorities, the information provided at meetings with these authorities and public consultation feedback was taken into account during the preparation of the Environmental Report and throughout the process to date.</p>
		10p	Change Environmental Report to rename the Executive Summary as the Non-Technical Summary to pages 2,5,6,8 and 10 and include details on the evolution of the environment in the absence of the Plan by inserting a new section 6.0 on page 49 and renumbering subsequent sections.	<p>Executive Summary – Non – Technical Summary</p> <p>5.4 Cultural Heritage The Records of Monuments and Places Map for Limerick shows that there is a significant amount of archaeology located within the Zone of Archaeological Potential in St. Mary's Park that there are three recorded monuments in Moyross, and that there are a large number of recorded monuments alongside the southern boundary of the M7 in Southill. St. Mary's Park which is located mostly within a Zone of Archaeological Potential is located within the oldest part of the city and today is commonly referred to as its 'medieval core'. There are no recorded monuments in Ballinacurra Weston. There are no protected structures located within the defined regeneration areas. There are two protected structures within the regeneration areas, namely Southill House located within Limerick County at the edge of Southill and Ballygrennan House located at the edge of Moyross in Castle Park.</p> <p>Section 6.0 ENVIRONMENTAL PROTECTION OBJECTIVES NON IMPLEMENTATION OF THE LRFIP In the absence of the LRFIP there would be no coordinated response to the physical, social, community safety and economic problems within the communities and it is likely that the quality of life of individuals currently residing in those areas would not improve. An integrated approach to development would not be supported and it is likely that physical improvements would proceed with little integration into the wider socio economic improvements that are required to support the wider population. Physical improvements to the area would be facilitated on an ad hoc basis and it is likely that increasing conflicts with environmental designations and flooding constraints on Kings Island would arise. However there would also be fewer new projects with potential environmental effects</p> <p>6-7.0 ENVIRONMENTAL PROTECTION OBJECTIVES</p> <p>7-8.0 DESCRIPTION OF ALTERNATIVE SCENARIOS</p>
		10s	Change Environmental Report to insert additional wording to Section 3.2.1 (page 23)	<p>3.2.1 Scoping</p> <p>A written submission on the scope of the SEA was received from the EPA dated 10th May 2013. This submission highlighted four main points and these points have been addressed within the LRFIP as detailed below. The four main points included including:</p> <ul style="list-style-type: none"> • Consideration should be given to ensuring that key significant higher level Plans such as the Shannon International River Basin Management Plan (and associated Programme of Measures), Mid-West Regional Planning Guidelines and the Draft Shannon CFRAMS are integrated into the Plan – see Volume 1.0 Section 2.0 Policy Context in the LRFIP with specific reference to sections 2.2 and 2.6. • The Plan in particular should ensure that land use / development are appropriate to the level of flooding identified. Vulnerable land uses (such as residential) should be avoided in areas of significant flood risk (Flood Zones A & B). The Flood Risk Management Guidelines should be fully integrated as appropriate into the preparation of the Plan – see Volume 1.0 Section 4.0 Physical Overview and Analysis in the LRFIP with specific reference to sections 4.2.6 and Volume 2 Section 2.0 Vision & Framework Strategy with specific reference to section 2.3.8 and the individual Housing Strategies proposed in each of the regeneration areas in sections 2.4.3; 2.5.3; 2.6.3 and 2.7.3. • The Plan should also provide for the protection of designated conservation sites of national and international importance (NHA's and Natura 2000 sites) adjacent to the Plan area. The protection of key ecological linkages / corridors should also be incorporated into the Plan

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Ref. No.	Submission From		Manager's Recommendation	Proposed Amendment
				<p>– see Volume 2 Section 2.0 Vision & Framework Strategy with specific reference to section 2.3.9 and the individual Open Space and Public Realm Strategies proposed in each of the regeneration areas in sections 2.4.4; 2.5.4; 2.6.4 and 2.7.4.</p> <ul style="list-style-type: none"> The Agency's previous submissions in relation to the Moyross Framework Plan & Implementation Report (26th May 2011) should also be taken into consideration in the preparation of the Plan as issues raised in this Plan may be also relevant and should be taken into account – these issues have been addressed in Volume 2 Section 2.0 Vision & Framework Strategy with specific reference to section 2.4. <p>A written submission was received from Limerick City Council on the 22nd May 2013 clarifying the following points: These points have been addressed within the LRFIP as detailed below.</p> <ul style="list-style-type: none"> The LRFIP will be incorporated into the Limerick City Development Plan by way of a variation – this matter has been addressed within Volume 3 Section 1.8. The extent of demolition work proposed will need to be carefully addressed given the scale of demolition work already taken place – see Volume 2.0 Section 2.3 Vision & Framework Strategy with specific reference to the Demolition, New Build and Refurbishment Strategy for each of the regeneration areas. Flooding in Kings Island will need to be carefully considered - see Volume 1.0 Section 4.0 Physical Overview and Analysis in the LRFIP with specific reference to sections 4.2.6 and Volume 2 Section 2.0 Vision & Framework Strategy with specific reference to section 2.3.8; the Housing Strategy proposed for St. Mary's Park in section 2.6.3 and section 2.6.4(13) Open Space and Public Realm Strategy. Kings Island and Moyross should be treated in as much as possible as a single entity – see Volume 2 Section 2.0 Vision & Framework Strategy with specific reference to section 2.6.1 Movement & Connectivity Strategy.
		I0v	Change Environmental Report to insert additional wording to Section 4.3.3 (page 28)	<p>4.3.3 Water Supply Sourced from the River Shannon, some 11,388,000m³ of all drinking water, produced annually by Limerick City Council at the Clareville treatment plant in Castleconnell, is delivered to Limerick City. The treatment plant has undergone significant refurbishment and upgrade works in recent years at an investment cost of in excess of €26m. In addition to the treatment of water there is also an ongoing programme of leakage detection and repair in an effort to promote water conservation. There are currently over 4,200 houses in Limerick that are currently serviced by combination loops of one inch lead service pipe. The level of unaccounted for water in the city is at 46 per cent with the level of unaccounted water in St. Mary's Park in excess of 200 per cent. The desired level within the city is to reduce water leakage to below 30 per cent thereby ensuring that the Council can meet its obligations under the Drinking Water Directive.</p>
		I0y	Change Environmental Report to insert a new section 5.3.5 Treatment of Wastewater and renumber subsequent section 5.3.5 EPOs Indicators and Targets (page 44)	<p>Section 5.3.5 Treatment of Wastewater The objective of the Urban Wastewater Treatment Regulations is to protect the environment from the adverse effects of urban waste water discharges and discharges from certain industrial sectors and concerns the collection, treatment and discharge of domestic waste water, mixture of waste water and waste water from certain industrial sectors. Four main principles are laid down in the legislation including Planning, Regulation, Monitoring and Information and Reporting. There is a requirement for pre-authorisation of all discharges of urban wastewater, of discharges from the food-processing industry and of industrial discharges into urban wastewater collection systems; for monitoring of the performance of treatment plants and receiving waters; and for the control of sewage sludge disposal and re-use, and treated waste water re-use whenever it is appropriate.</p> <p>b)</p> <p>5.3.5-6 EPOs Indicators and Targets</p>
		I0ab	Change Environmental Report to insert insert additional wording to Section 8.2.2 (page 57) Change LRFIP to insert insert additional wording to 2.6.5 Refurbishment Strategy (page 236)	<p>Section 8.2.2 Water</p> <p>In the case of St. Mary's Park, which is presently defended by an embankment it is proposed to demolish, refurbish and provide infill housing within this regeneration area.</p> <p>2.6.5 Refurbishment Strategy Refurbishment Strategy St Mary's Park</p> <p>The extent of works to be carried out on private houses will be limited to the above thermal upgrade works, some cosmetic works to the front elevation and garden walls. However in the Local Authority houses this work may be extended to incorporate the removal or remodelling of rear extensions and internal remodelling to best reflect the current housing typology demand as well as more general decorative upgrades where</p>

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Ref. No.	Submission From		Manager's Recommendation	Proposed Amendment																																																																																																				
			Change LRFIP to insert additional wording to Volume 2 section 2.6.4 (13) to consider the upgrade of Eel's Weir to facilitate safe access and egress during flood events in St. Mary's Park (page 232)	<p>necessary.Where required this may include changes to individual dwellings to facilitate increased passive surveillance and to improve the overall visual amenity.</p> <p>Furthermore, as outlined in section 2.3.4 Open Space and Public Realm Strategy, consideration will be given to incorporating flood resistant (removable barriers) and resilient measures (wall and floor materials that can be cleaned and dried easily, electrics and other appliances raised above floor level) in combination with other measures to manage future flood risk to St. Mary's Park and King's Island.</p> <p>13. Manage the existing and future flood risk to St Mary's Park by:</p> <ul style="list-style-type: none">Protecting the integrity of the existing flood defences and embankmentsIncorporate flood resistant and flood resilient measures appropriatelyUtilise sustainable urban drainage systems (SUDS)Establish flood warning and emergency procedures.Consider the potential to upgrade Eel's Weir to facilitate safe access and egress during flood events in St. Mary's Park and ensure that any works proposed does not have a negative impact on habitats																																																																																																				
		10ac	Change Environmental Report to amend table 8.2 (page 59)	<table><tr><th>Component</th><th>Biodiversity, Flora and Fauna</th><th>Water</th><th>Population</th><th>Cultural Heritage</th><th>Soils & Geology</th><th>Air & Climatic Factors</th><th>Noise</th><th>Landscape & Amenity</th><th>Material Assets</th></tr><tr><td>Biodiversity, Flora and Fauna</td><td></td><td>Yes</td><td>No Yes</td><td>No</td><td>Yes</td><td>Yes</td><td>No Yes</td><td>Yes</td><td>No</td></tr><tr><td>Water</td><td></td><td></td><td>Yes</td><td>No</td><td>Yes</td><td>No Yes</td><td>No</td><td>No</td><td>No</td></tr><tr><td>Population</td><td></td><td></td><td></td><td>No</td><td>Yes</td><td>Yes</td><td>Yes</td><td>Yes</td><td>Yes</td></tr><tr><td>Cultural Heritage</td><td></td><td></td><td></td><td></td><td>No</td><td>No Yes</td><td>No</td><td>Yes</td><td>No</td></tr><tr><td>Soils & Geology</td><td></td><td></td><td></td><td></td><td></td><td>No Yes</td><td>No</td><td>Yes</td><td>No</td></tr><tr><td>Air & Climatic Factors</td><td></td><td></td><td></td><td></td><td></td><td></td><td>No</td><td>No Yes</td><td>Yes</td></tr><tr><td>Noise</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>No</td><td>Yes</td></tr><tr><td>Landscape & Amenity</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>No</td></tr><tr><td>Material Assets</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr></table> <p>Table 8.2 Significant Interrelationships between Environmental Components</p>	Component	Biodiversity, Flora and Fauna	Water	Population	Cultural Heritage	Soils & Geology	Air & Climatic Factors	Noise	Landscape & Amenity	Material Assets	Biodiversity, Flora and Fauna		Yes	No Yes	No	Yes	Yes	No Yes	Yes	No	Water			Yes	No	Yes	No Yes	No	No	No	Population				No	Yes	Yes	Yes	Yes	Yes	Cultural Heritage					No	No Yes	No	Yes	No	Soils & Geology						No Yes	No	Yes	No	Air & Climatic Factors							No	No Yes	Yes	Noise								No	Yes	Landscape & Amenity									No	Material Assets									
Component	Biodiversity, Flora and Fauna	Water	Population	Cultural Heritage	Soils & Geology	Air & Climatic Factors	Noise	Landscape & Amenity	Material Assets																																																																																															
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		10ae	Change Environmental Report to section 9.1 (page 62)	<p>9.1 INTRODUCTION</p> <p>Ultimately it is proposed that the LRFIP will be adopted as a document into the Limerick City Development Plan 2010 - 2016 as part of the development plan review process and thus will be implemented under the provisions of that Development Plan. The review of the development plan will commence in 2014 and a new development plan for the area will be adopted by 2016. There are already extensive policies and objectives within the development plan that seek to minimise potential environmental impacts arising from certain projects and actions and once the LRFIP is integrated into the development plan these policies will also act as mitigatory measures for projects within the LRFIP. Thus in order to avoid duplication of policies and objectives it is proposed to highlight existing policies and objectives within the Limerick City Development Plan 2010 – 2016 that will directly influence and mitigate proposals within the LRFIP.</p>																																																																																																				

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Ref. No.	Submission From		Manager's Recommendation	Proposed Amendment
		10af	Change LRFIP to section 2.6.1 (page 224), Section 2.6.4(page 232), 2.6.6 (page 238),2.3.8a (page 173) and Section 2.3.8(b) (page 174)	<p>Volume 2 Section 2.6.1(b)</p> <p>From the northwest of St. Mary's Park to the New Road, Thomond Park and beyond. The route of the new connection from St. Mary's Park over the River Shannon shall be selected to ensure no significant impacts on the integrity of the SAC site. Restricted working areas will be imposed to ensure minimal disturbance to sensitive habitats.</p> <p>Volume 2 Section 2.6.4</p> <p>(9) Explore the potential to upgrade Eel's Weir to provide a cycle, pedestrian and vehicular link to the New Road and beyond and ensure that any development proposed does not have a negative impact on habitats.</p> <p>Volume 2 Section 2.6.6</p> <p>The strategy will take place over a number of phases and will run in tandem with the refurbishment strategy. A precautionary approach is promoted such that development within Flood Zone C should occur in the first instance and no development should occur in Flood Zone B or A until such a time as the CFRAMS have been published and the potential impacts of development in these zones are reassessed. Once the replacement housing has been complete any future phases of housing development will be allocated to the voluntary and private housing sectors.</p> <p>Volume 2 Section 2.3.8(a)</p> <p>Buildings and the public realm should be designed and delivered to a high standard, using durable materials, appropriate technology and orientated in a manner that minimises energy usage. Development should enhance the environment and recognise the requirement for adaptable, flexible structures which can respond to changing environments over time. All suitable materials/soils that are stripped/excavated for construction purposes shall be re-used to the greatest possible degree as fill material where appropriately needed within developments, landscaping in the regeneration areas.</p> <p>Volume 2 Section 2.3.8(b)</p> <p>Physical – Strategic demolition _There are a number of strategic demolitions still planned due to strategic planning reasons. These can generally be characterised as being necessary due to improvements to and reshaping of the physical environment. Where demolition is necessary and required both Demolition Waste Management Plans and Dust Management Plans shall be prepared at development stage and implemented throughout the project. It is however our aim to minimise this level of demolition on a house-by-house basis with a view to retaining and refurbishing as many as possible.</p>
14	Limerick Community Education Network (LCEN) C/o Northside FRC, Ballynanty, Limerick	14b	Change to LRFIP to acknowledge the role LCEN can play. at section 2.1.3.1 under 4 Adult Education and Community Learning, Scope of Action (page 124).	<p>4. Adult Education and Community Learning Scope of Action</p> <p>Scope of action here is centred on offering full-time and part-time further (adult) education and learning support including information on opportunities and issues such as financial support for participation in education, guidance and counselling, rolled out in community-based settings. This is a core activity of the LCETB (e.g., part-time programmes in adult literacy and numeracy, community education, work place-based learning, Back to Education Initiative). Actions here draw on models developed in communities for adult learning including, for instance, the work of the Limerick Community Education Network (LCEN), targeting adults with low levels of educational attainment. Operating in the community setting, the structure of LCEN, for instance, can support objectives in a cross-cutting way including addressing barriers to participation in education; qualification and progression of adult learners; community empowerment; improving health and well-being; and integration of services to avoid duplication. Additional support will be required to enable the target population – adult learners with a profile of low education - to adapt to trends in current practice including the stronger focus on blended learning and engagement with new platforms for learning (web / ICT-based). Types of action that could be supported are as follows:</p>
15	Limerick City Children's Services Committee	15c	Change to LRFIP to delete text and insert additional text.	<p>2.1.3.2 Priority 2: Health and Well-Being Experience to Date</p> <p>Mainstream services in health located in or adjacent to the regeneration areas are delivered from the health centres / primary care services working out of Moyross / Ballynanty Health Centre and the new King's Island Primary Care Team / Health Centre on the northside and Southill Health Centre and Rixtown Health Centre (city</p>

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				<p>centre) on the southside. General Practitioners (GPs) and Public Health Nursing are the key universal services and also provide gateway services to specialist care. Health centres also house Community Welfare Officers (previously in HSE and now under the remit of the Department of Social Protection) providing access to supplementary Welfare Allowance and other services such as Adult Counselling, access to addiction services / counsellors, social care workers. Community centres including Family Resource Centre, Community Development Programme offices also provide facilities / services to promote improved health and well-being. Community arts, music and other types of programmes in community settings including community gardens, physical exercise classes, etc. also support improved health and well-being. Access to services in health does not only mean that services are located in or near communities but that the population can benefit from them.</p> <p>Types of activities and programmes in health and well-being supported to date by the Regeneration Programme in partnership with other players include:</p> <ul style="list-style-type: none">• Health Impact Assessment across the Regeneration Masterplans and a specific health impact assessment related to youth.• Small-scale funding to community and voluntary organisations and sports' clubs to support wider participation in sport and physical activities involving all age groups from young children, through teenagers, adults and older people.• Small-scale funding for social and recreational activities promoted by groups of older people (e.g., Senior Citizen's clubs).• Engagement in developing responses to the problem of youth mental health and planning for youth mental health provision (e.g., work in cooperation with Headstrong / Jigsaw).• Engagement in developing responses to the problem of youth mental health (e.g., drawing on the consultation and planning process for Headstrong / Jigsaw).• Support for additional workers and volunteers to respond to problems of social isolation, poor mental health, family problems through new outreach services (e.g. Moyross Community Companions and Limerick Social Services Centre Family Support Initiative in Southill and Weston).• Additional resources to provide counselling to adults, in partnership with the HSE.• Promotion of the roll-out of Primary Care and enhancement of Primary Care Teams in the regeneration areas.

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		Amend table on page 293 to exclude reference to Headstrong/Jigsaw	<div>I.6 Social Framework Implementation and Delivery Plan</div> <div>Priority Themes,Activities, Key Projects,Agencies Coordination and Timeframe for Implementation: Social Programme</div> <div>Page 293</div> <table><tr><th>Priority Theme and Activity</th><th>Key Projects Coordination</th><th>Key / Lead Agencies</th><th>Other Partners / Stakeholders</th><th>Coordination</th><th>Implementation Timeframe</th></tr><tr><td>Priority 2: Health & Well-being 2.1 Public Health</td><td></td><td>HSE / Health Promotion / Primary Care</td><td>LCC, Limerick Sports Partnership, PAUL Partnership, DES, Limerick Youth Services, community and voluntary organisations</td><td>HSE / Health Promotion</td><td></td></tr><tr><td></td><td>Health education and health promotion in community-based settings including Positive Mental Health promotion</td><td></td><td></td><td></td><td>Short-term</td></tr><tr><td></td><td>Sport and recreational activities (including music and dance) in community-based settings</td><td></td><td></td><td></td><td>On-going</td></tr><tr><td></td><td>Access to treatment programmes to address addiction problems</td><td></td><td></td><td></td><td>Short- to medium-term</td></tr><tr><td></td><td>Capacity building: strengthen partnerships and networks to promote and delivery better health & well-being</td><td></td><td></td><td></td><td>Short- to medium-term</td></tr><tr><td>Priority 2: Health & Well-being 2.2 Child & Youth Mental Health</td><td></td><td>HSE / Child and Family Support Agency</td><td>HSE Primary Care, DES, SSIRL, schools, voluntary and community organisations including Headstrong / Jigsaw</td><td>Children's Services Committee</td><td></td></tr><tr><td></td><td>Full Service Extended School Model (St. Kieran's), as above 1.1 and community "wrap around" Extend good practice to other areas</td><td></td><td></td><td></td><td>Planning & Development: On-going Implementation: Medium-term Extend practice: Medium-term / long-term</td></tr><tr><td></td><td>Accessible youth-focused and integrated service to support better youth mental health (eg. Headstrong / Jigsaw)</td><td></td><td></td><td></td><td>Planning & Development: On-going from 20 11/ 12 Implementation: Medium term (contingent on funding availability)</td></tr><tr><td></td><td>Capacity building: Strengthen partnerships and networks to promote better child and youth mental health</td><td></td><td></td><td></td><td>Short- to medium-term</td></tr></table>	Priority Theme and Activity	Key Projects Coordination	Key / Lead Agencies	Other Partners / Stakeholders	Coordination	Implementation Timeframe	Priority 2: Health & Well-being 2.1 Public Health		HSE / Health Promotion / Primary Care	LCC, Limerick Sports Partnership, PAUL Partnership, DES, Limerick Youth Services, community and voluntary organisations	HSE / Health Promotion			Health education and health promotion in community-based settings including Positive Mental Health promotion				Short-term		Sport and recreational activities (including music and dance) in community-based settings				On-going		Access to treatment programmes to address addiction problems				Short- to medium-term		Capacity building: strengthen partnerships and networks to promote and delivery better health & well-being				Short- to medium-term	Priority 2: Health & Well-being 2.2 Child & Youth Mental Health		HSE / Child and Family Support Agency	HSE Primary Care, DES, SSIRL, schools, voluntary and community organisations including Headstrong / Jigsaw	Children's Services Committee			Full Service Extended School Model (St. Kieran's), as above 1.1 and community "wrap around" Extend good practice to other areas				Planning & Development: On-going Implementation: Medium-term Extend practice: Medium-term / long-term		Accessible youth-focused and integrated service to support better youth mental health (eg. Headstrong / Jigsaw)				Planning & Development: On-going from 20 11/ 12 Implementation: Medium term (contingent on funding availability)		Capacity building: Strengthen partnerships and networks to promote better child and youth mental health				Short- to medium-term
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		Add text to B. Child and Youth Mental Health under Key Agencies/Partners (page 127)	<div>B. Child and Youth Mental Health</div> <div>Positive mental health and earliest possible intervention to address problems are crucial to normal child development, progression in education, participation in normal social life with peers, family, in the community and in society in general. Social deprivation, exposures to traumatic events, early exposures to aggressive behaviours and neglect increase the risks of emotional and behavioural problems in children and, if not addressed, lead to longer-term physical and mental health and other problems over the lifecourse.</div> <div>Key Agencies / Partners</div> <div>HSE is the main player. Certain services for children and families currently in the HSE (Public Health Nursing related to children and families, Speech and Language Therapy, Child and Adolescent Mental Health Services, Psychology Services) are expected to come under the remit of the Child and Family Support Agency (CFSA) as well as services currently in the realm of education (National Education and Welfare Board) and in the area of justice (Children's Detention Schools). This draws on recommendations of the Report on the Task Force on the Child and Family Support Agency (July 2012) – as outlined in the Policy Review.</div> <div>In Limerick regeneration areas, a community “wraparound” service for 0-3 year olds and a Full Service Extended School Model, focused on integrating early and primary education and services in health / primary care, as described above, are being developed on the southside of the city, with support from SSIRL Programme Innovation and Development Fund. Headstrong / Jigsaw, described as a youth-friendly service development model, based in the community, has completed a planning process for the setting up of a new service for Limerick. Features of the service model are:</div>																																																												

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				integration with primary care and the specialist mental health system and commitment from the local HSE; an inter-agency approach; a local assessment and systematic planning process; youth participation; and an information management system for monitoring and evaluation of outcomes drawing on an evidence-based practice approach. During the Limerick City CSC's planning process following the publication of “How are Our Kids?: Experiences and Needs of Children and Families in Limerick City with a Particular Emphasis on Limerick's Regeneration Areas”, child and parent mental health was identified as a key issue that has a significant impact on outcomes for children. During this time, the Jigsaw Project was in a planning and consultation phase. The CSC supported the Jigsaw consultation and planning process in the interest of avoiding any potential duplicating of effort. As there has been a delay in progressing the Jigsaw project, the CSC has re-prioritised child and youth mental health and parental mental health initiatives for Limerick City.
			Add text to B. Child and Youth Mental Health under Scope of Action to clarify current position with Jigsaw (page 127)	<p>B. Child and Youth Mental Health</p> <p>Scope of Action</p> <p>3) New methods to reach the youth population and the development of user-friendly community-based services to address the mental health needs and promote well-being of young people. This is based on a youth-focused integrated model of service provision such as, Headstrong / Jigsaw. As there has been a delay in progressing the Jigsaw / Headstrong proposed service since the planning and consultation process was completed, the Limerick City Children's Services Committee has prioritised child and youth mental health. The social regeneration programme can only act in a supporting role with the major input in terms of resources for operational costs and clinical posts coming from the HSE.</p> <p>4) Local partnership and capacity building (planning, training and professional development, support to embed practices, monitoring / tracking outputs and results) in child and youth mental health and well-being promotion.</p>
			Amend title “Adult Mental and Physical Health” to include focus on parental health on (page 128).	C. Adult mental and physical Health with a specific focus on parent health.

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			Amend table on page 294 to include additional text to Priority 2: Health & Well-being 2.3.Adult Mental and Physical Health	<table><tr><th>Priority Theme and Activity</th><th>Key Projects Coordination</th><th>Key / Lead Agencies</th><th>Other Partners / Stakeholders</th><th>Coordination</th><th>Implementation Timeframe</th></tr><tr><td>Priority 2: Health & Well-being 2.3.Adult Mental and Physical Health with a specific focus on parental health</td><td></td><td>HSE / Primary Care</td><td>HSE specialist care, community and voluntary organisations, Department of Social Protection, FAS / SOLUS (Community Employment), LCC</td><td>HSE / Primary Care</td><td></td></tr><tr><td></td><td>Information and support services to promote access to services, focused on Primary Care</td><td></td><td></td><td></td><td>On-going</td></tr><tr><td></td><td>Care plans and pathways to recovery for people with disabilities, chronic illness conditions and mental ill-health and support groups</td><td></td><td></td><td></td><td>Short to medium-term</td></tr><tr><td></td><td>Educational programmes and qualification for staff / volunteers in health care / social care in community-based settings (including new technologies in health)</td><td></td><td></td><td></td><td>Short- to medium-term</td></tr><tr><td></td><td>Capacity building: strengthen partnerships and networks to promote better adult physical and mental health</td><td></td><td></td><td></td><td>Short- to medium-term</td></tr><tr><td>Priority 3: Ageing Well: Health & Well-being of Older People 3.1 Planning for an Age Friendly City & Neighbourhoods</td><td></td><td>LCC</td><td>HSE Primary Care / Older People's Services, Social Protection, academic institutions, ETB / SOLUS, local development companies, community and voluntary organisations, businesses, Forum for Older People</td><td>LCC / Alliance of Ageing Well City</td><td></td></tr><tr><td></td><td>Partnership-based structures including representation of older people and strategy for an age-friendly city / neighbourhoods, support for "Get Vocal"</td><td></td><td></td><td></td><td></td></tr></table>	Priority Theme and Activity	Key Projects Coordination	Key / Lead Agencies	Other Partners / Stakeholders	Coordination	Implementation Timeframe	Priority 2: Health & Well-being 2.3.Adult Mental and Physical Health with a specific focus on parental health		HSE / Primary Care	HSE specialist care, community and voluntary organisations, Department of Social Protection, FAS / SOLUS (Community Employment), LCC	HSE / Primary Care			Information and support services to promote access to services, focused on Primary Care				On-going		Care plans and pathways to recovery for people with disabilities, chronic illness conditions and mental ill-health and support groups				Short to medium-term		Educational programmes and qualification for staff / volunteers in health care / social care in community-based settings (including new technologies in health)				Short- to medium-term		Capacity building: strengthen partnerships and networks to promote better adult physical and mental health				Short- to medium-term	Priority 3: Ageing Well: Health & Well-being of Older People 3.1 Planning for an Age Friendly City & Neighbourhoods		LCC	HSE Primary Care / Older People's Services, Social Protection, academic institutions, ETB / SOLUS, local development companies, community and voluntary organisations, businesses, Forum for Older People	LCC / Alliance of Ageing Well City			Partnership-based structures including representation of older people and strategy for an age-friendly city / neighbourhoods, support for "Get Vocal"				
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			Add text to I. Public Health under Scope of Action to include reference to “parents” (page 127)	<p>I. Public Health</p> <p>Scope of Action</p> <p>I) Health education and health promotion activities in the community with the key messages (lifestyle, harmful practices, substance misuse, risk behaviours, immunisation, health screening, exercise and nutrition) developed and delivered in ways that are appropriate to the target population. These activities should be addressed to different sections of the population (children, young adults, parents, expectant mothers, women, men, older people) and delivered in partnership with health professionals in community settings.</p>																																																
	15d	Change LRFIP to insert additional wording to 2.1.3.2 Priority 2: Health and Well-Being under I. Public Health. (page 126/127)	<p>Description of Activities</p> <p>Three types of activity will be supported, as follows:</p> <p>I. Public Health</p> <p>Public health is the “science and art of preventing disease, prolonging life and promoting health through organised efforts and informed choices” (Donald Acheson 1988).An effective public health strategy is most important “to help people live healthier and more fulfilling lives and to create social conditions that ensure good health, on equal terms for the entire population” (James O’Reilly 2011). It is characterised by a whole population (universal), preventive and early intervention approach.A public health strategy addresses: disease prevention including, for instance, immunisation take-up and participation in health screening; health promotion (positive choices relating to lifestyle including diet and physical exercise, breastfeeding, nutrition and negative factors that harm health including alcohol, drugs and violence); and assessment and planning to address the complex factors (social, economic, environmental) that affect health and reproduce health inequalities.</p> <p>Promoting positive mental health is a preventive strategy for good health and well-being. Many people suffer episodes of mental illness over their lives but recover and no longer have the symptoms. Promotion of the “recovery model” in mental health services means that people can live fulfilling and productive lives, living with mental ill-health conditions if they receive an appropriate mix of treatments and are supported and empowered in managing their illness3.</p>																																																	

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				Addressing health inequalities is connected with tackling complex problems of poverty and inequalities in society and, as such, includes interventions in many domains including raising employment, income and education levels in the population. As outlined in the socio-economic analysis of baseline conditions, the evidence shows strong inequalities in health between the population of the regeneration areas of the city and the average population and in all sections of the population – children, adults and older people. There is also considerable evidence that members of the Travelling community have poorer health status over the lifecourse, compared with the average population. Parenting support will include working with a population health approach (i.e., key messages and promotion via mass media and other tools to reach all parents).
			Add text to C:Adult Physical and Mental Health, sentence added on need to ensure that all parents, particularly vulnerable parents, have access to support. (page 128)	C.Adult mental and physical health Adult health and well-being are affected by many factors. Drawing on a social determinants of health approach, these include poverty, long exposures to social deprivation, emotional and family stress often linked to lack of economic resources, social isolation, lifestyle factors and environmental (e.g., poor housing and quality of the physical environment) and social conditions of the neighbourhood. This includes exposures to anti-social behaviour, fear and lack of community safety. In order to significantly improve child outcomes, there is a need to ensure that all parents, and particularly vulnerable parents, have access to appropriate, timely and high quality support.
			Add text to C:Adult Physical and Mental Health, section added on Parenting Limerick under “Key Agencies/Partners” (page 128)	C. Key Agencies / Partners The key agency is the HSE, Primary Community and Continuing Care, with the particular focus on primary care / local health centres and access to specialist services (e.g., in chronic illness management, palliative care, psychiatric services). As there are many determinants of health (including social, economic and environmental factors), other agencies have a role including the local authority in relation to the physical and social environment of neighbourhood, the Gardaí (community safety), public transport and voluntary / community sector organisations engaged in delivery of social and community services in health, welfare and social care. Social Protection (NEES / Intreo offices) as part of a more integrated labour market activation services (with LCETB and SOLAS, formerly FÁS) also have a role linked to supplementary welfare entitlements. In addition, a significant proportion of the staffing of social and community services comes from active labour market schemes in Community Employment and TUS. Potentially, addressing needs in the communities in social care may offer training and employment opportunities to unemployed people (and links to the Employability and Work priority, below). Parenting Limerick is a newly established network of parent and family support organisations in the city, promoted by the Children’s Services Committee in the framework of the Children’s Programme Innovation and Development Fund (assisted by SSIRL). This network is developing a framework of parenting supports and a population (public health) approach to parenting support.
			Add text to 2.1.4.5 Priority 5: Families & Youth At Risk under “Experience to Date” (page 138)	2.1.4.5 Priority 5: Families & Youth At Risk Experience to Date The Southill Domestic Abuse project, offer one-to-one support and peer support to women experiencing domestic abuse. Broader-based universal services in the communities which provide elements of family support (but not intensive specialist help) include Community Companions Moyross and the Limerick Social Service Centre, Southill and Weston Family Support Initiative. The recent initiative of the Limerick City Children’s Services Committee, Parenting Limerick, is a network of organisations in the statutory and voluntary sector providing parenting programmes, family support and specialist services in parenting. The Network includes organisations offering universal and targeted services. Amongst the parenting programmes on offer and delivered in community settings in Limerick are Strengthening Families, Parents Plus and Incredible Years.
		15e	Change LRFIP to insert additional wording to 2.1.3.2 Priority 2: Health and Well-Being under B. Child and Youth Mental Health Scope of Action (page 127)	Scope of Action 1) Roll-out of the southside projects (Full Service Extended School model; community “wrap-around” for early years) to contribute to improving the mental health and well-being and education and learning in children from the early years (0-6 years) into middle childhood (6-12 years). Positive infant mental health (0-3 year olds) is strongly connected with emotional attachment to the parent (especially the mother) and parental well-being. There are links here to the investment already made in implementation of the Incredible Years programme, delivered in schools and in other community-based settings. 2) Support to extend practice from the southside demonstration models into appropriate sites in other communities in regeneration and other areas of the city where there is a profile of severe social disadvantage and child poverty. This is especially appropriate where there are possibilities to co-locate/ or where there is close proximity to health centres with multi-disciplinary Primary Care Teams in Moyross / Ballynanty and King’s Island Health Centres. This approach is being developed in Moyross - i.e., a full service extended school model integrated with the proposed Moyross Civic Hub .The Limerick City Children’s Services Committee has prioritised that good practice from Start Right be developed, over time, as a city-wide programme. Investment in early intervention and preventive initiatives for infants and pre-school children in areas of social disadvantage is a priority. The inclusion of Limerick in the design phase of government’s new Area-based Childhood Programme may facilitate the wider roll-out of this strategy by the Children’s Services Committee.

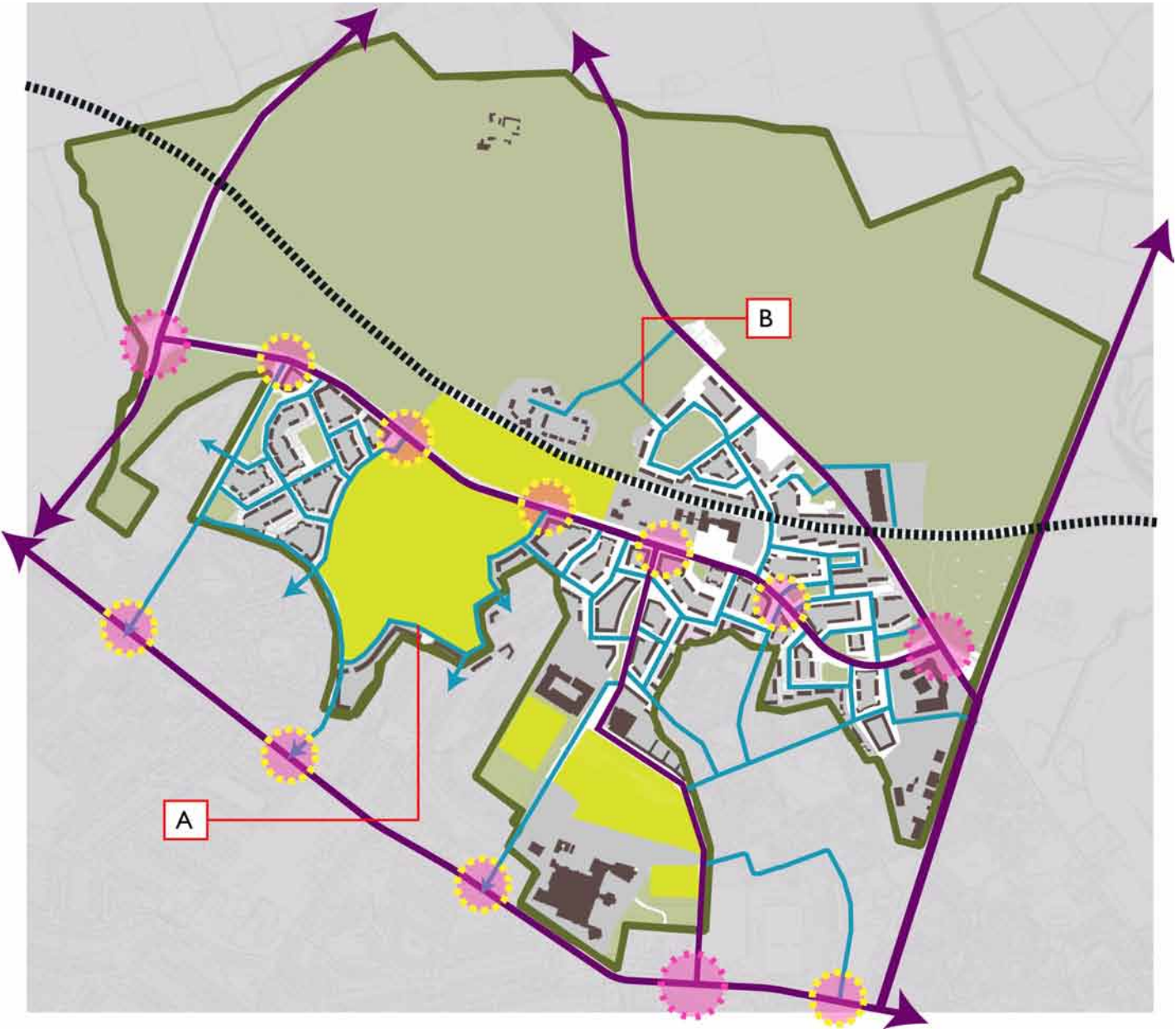
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		15f	Change LRFIP to insert additional wording to 2.1.4.5 Priority 5: Families & Youth At Risk (page137) regarding characteristics of groups with complex needs.	<p>2.1.4.5 Priority 5: Families & Youth At Risk</p> <p>This theme is addressed to family support and young people, focusing on families at higher levels of need and young people at risk. Early intervention and preventive action to promote positive outcomes for children and families are addressed in different ways under other priority themes of the programme – namely in Priority 1, Education and Learning and Priority 2, Health and Well-Being. Interventions under the Employability and Work priority are also relevant in that improved profile of education, skills and work for parents and young people can improve economic security and bring other benefits (structure to family life and role models). Interventions under the first two themes in particular are directed to strengthening universal services in accessible community-based settings – namely, schools, primary health care teams, crèches – which are “the critical interagency interfaces for services to children and families” (Report of the Task Force on the Child and Family Support Agency, 2012).</p> <p>A key challenge facing the communities is the definition of the term “at risk” in that there is greater “risk” for all young people and families in communities where drugs are traded and there is a history of criminality, intimidation and extremes of social disadvantage. Analysis of the experiences and needs of children and families in Limerick, as outlined in the socio-economic analysis, showed widespread problems of poverty and social exclusion and extensive gaps between families in the regeneration areas compared with the average population. These “gaps” apply across a range of outcome indicators (education, health, economic security, safety, environment). The analysis also showed a prevalence of families with complex problems. Families with complex problems / needs and young people at risk have proved to be a most difficult problem to address in social regeneration. Some families at risk are well-known to the services while others with serious difficulties of poverty, social isolation and finding it difficult to cope remain “under the radar”. For instance, there are increasing numbers of young pregnant women presenting with heroin addictions; there are increasing numbers of people presenting with drug and alcohol addictions who have a range of complex social and emotional needs; there are families at serious risk of homelessness; there is a small cohort of young people with extremely challenging behaviour who also have complex social and emotional needs. An intensive, multi-agency approach is required, prioritising this area, supporting on-going work to address these issues and / or to develop new initiatives as appropriate. Further factors are distrust of State services in general, particularly, services with responsibility for child protection and child welfare and a lack of confidence in the State authorities / agencies to deal effectively with these issues and the problem of anti-social behaviour on the estates.</p> <p>Families and young people targeted under this priority theme are those at the higher levels of need, using the Hardiker scale to define thresholds of needs and corresponding levels of service intervention (1=universal to 4, highest level of need requiring most intensive support). This priority theme also includes restorative justice and restorative practice interventions, comprising a preventive strand based on education / activities in schools (professional development of teachers and relevant agencies) and a targeted strand for young people who have come before the Courts. A Restorative Practice Demonstration programme, is promoted by the consortium of stakeholders in children’s services, supported under the Programme Innovation and Development Fund, SSIRL.</p> <p>The approach under this Priority is to respond to families in difficulties who are at high levels of need (remedial interventions) within a broader framework of preventive strategies in education, health, community-based recreation, leisure and universal child and youth services and early intervention (addressed in Priorities 1 and 2). Maintaining open access to services (universally available to the community / all people who need them) is an important principle, as reliance on a strongly targeted approach may be perceived as a model rewarding negative behaviour. In addition, not all families will require support for specific services, such as addiction services, but all families should be aware of such services and advised they can access them should they need them. In line with national policy, actions under this Priority will seek to address problems in families / children’s well-being based on a whole family / whole community approach. Child protection has the highest priority in national policy (Children First). Child protection may require temporary or longer-term placement in alternative care arrangements due to problems such as addiction, illness, lack of parenting capacity and abuse. Poverty and in some cases debt are further critical issues in child welfare.</p> <p>Dealing more effectively with problems in families at the highest level of need should help stabilise communities. Combined with other measures to support children and families which are universally available and preventive in their orientation and measures to build community engagement and capacity, successes here should generate more positive community social capital and a social context that enforces pro-social and civic behaviour. An important aspect here is to support improved community safety.</p>
16	Limerick City Community Development Project Garryglass House, 4 Garryglass Ave, Ballinacurra Weston, Limerick.	16a	Change LRFIP to insert additional wording to 2.1.3.7 Priority 6: Community Participation, Empowerment and Civic Engagement (page150).	<p>2.1.3.7 Priority 6: Community Participation, Empowerment and Civic Engagement</p> <p>This theme is addressed to community development and community participation, empowerment and civic engagement. The community dimension cuts across all aspects of the social programme, as well as the physical and economic framework plans for the regeneration areas.</p> <p>There is a long history of community development in the disadvantaged communities in Limerick. This is linked to the experience of local development in the city. Local development was given institutional expression with the setting up of the PAUL Partnership in the late 1980’s. PAUL was one of the first 12 local partnership companies in the state. Local development was later mainstreamed with the expansion of partnership companies throughout the state. Since the 1990’s the Community Development Programme (now Limerick City Community</p>

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				<p>Development Project) has been immersed in disadvantaged communities in Limerick City. With the consolidation of the two formerly separate programmes in 2009 – the Local Development and Social Inclusion Programme and the Community Development Programme - PAUL is now one of 51 Local Development Companies responsible for the delivery of the consolidated Local and Community Development Programme. The programme is delivered throughout the state with reference to four high level goals: (i) Promote awareness, knowledge and uptake of a wide range of statutory, voluntary and community services; (ii) Increase access to formal and informal education, recreational and cultural development activities and resources; (iii) Increase people's work readiness and employment prospects; and (iv) Promote active engagement with policy, practice and decision-making processes on matters affecting local communities. Historically and up-to-the present, PAUL targets most disadvantaged communities in the city by supporting the operation of Action Centres in these areas - in the regeneration areas, these are based at the Southill Area Centre, Moyross Enterprise Centre, St. Mary's AID and Our Lady of Lourdes Community Centre. The work of Limerick City Community Development Project (LCCDP) has also contributed to building the capacity and confidence of residents and community groups; facilitating engagement and building trust, especially among those who are marginalised and without a voice in society; supporting residents and community groups to engage in fora and committees and fostering efforts directed to democratic participation. With the roll out of the reform of local government and alignment of local government and local development, as outlined in the Policy Review, further institutional reforms will be implemented nationally and locally.</p>
19	Residents Representatives on Moyross Regeneration Committee Moyross Community Enterprise Centre Moyross Limerick	19f	Change LRFIP to insert additional wording to footnote at end of housing strategy tables at end of page 182, 208, 229 and 247.	<p>Note: For the purpose of the housing strategies proposed for each regeneration area, a household is considered overcrowded if a person with an existing address within a regeneration area applies to the housing waiting list with a specific desire for housing in the regeneration area to which they currently reside, with the exception of casual vacancies that arise and those former residents of the area who wish to return to the area. Therefore, no new social housing tenants from outside the regeneration areas will be introduced into the regeneration areas. It is a specific objective of the LRFIP to support those tenants who wish to remain in a regeneration area where they have lived for some time and have a strong kinship. This strong social capital, amongst other variables, will assist in stabilising the regeneration areas. This objective supports national policy guidance whereby “all households [have] access [to] good quality housing appropriate to household circumstances and in their particular community of choice” (Housing Policy Statement 2011). Furthermore, Limerick City Council supports a policy to accommodate those families to move back to the regeneration areas, who were displaced out of the areas at the beginning of the regeneration process.</p>

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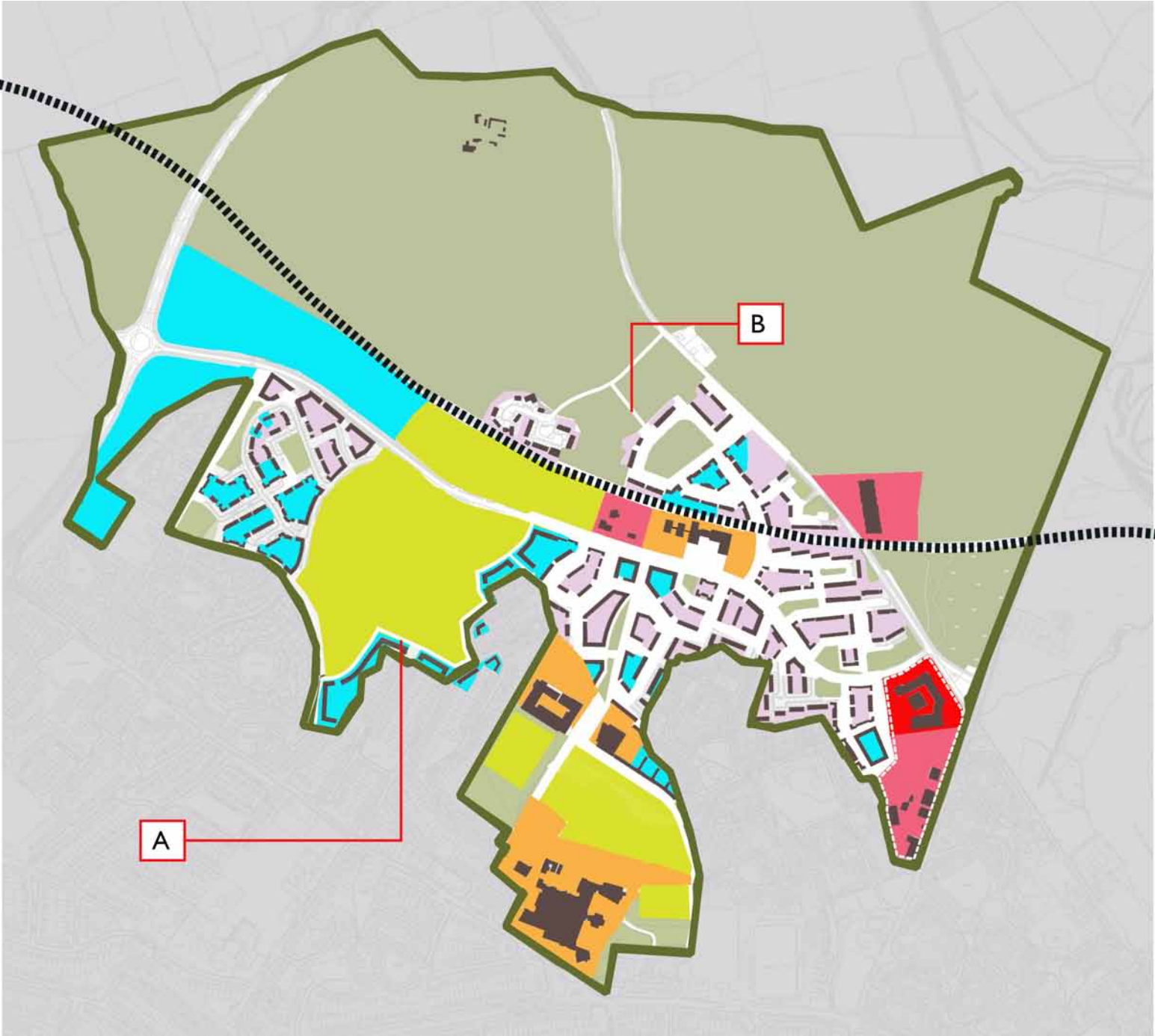
		<p>19i Change LRFIP to amend maps to Moyross</p> <p>Amend framework plan map on page 177 to show:</p> <p>a) To provide frontage of housing overlooking linear park at Craeval and Pineview Gardens</p> <p>b) To retain access from Castle Park/Respond Housing into Sarsfield Gardens</p>
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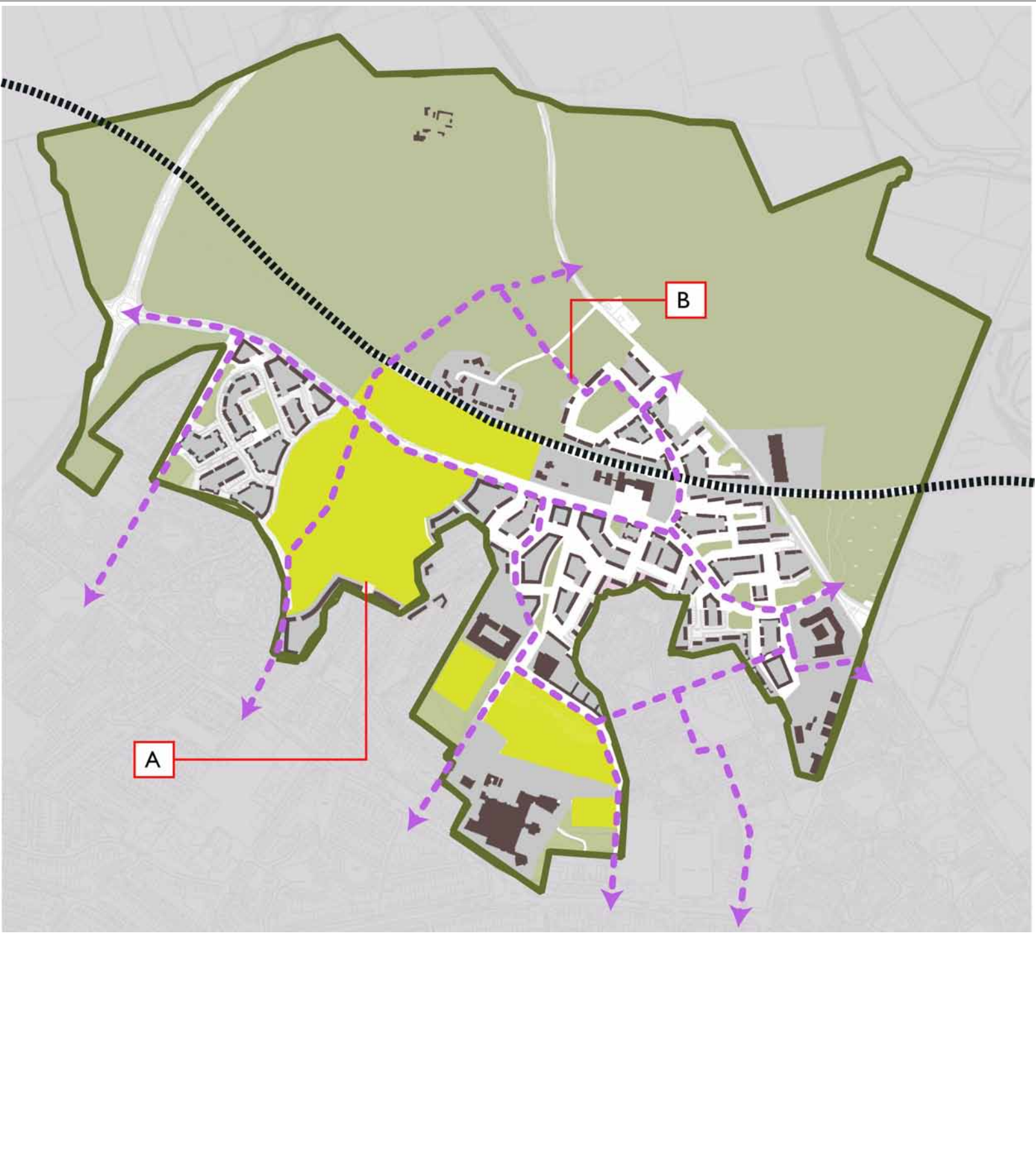
		<p>Amend Land Use map on page 179 to show:</p> <ul style="list-style-type: none">a) To provide frontage of housing (non replacement housing) overlooking linear park at Craeval and Pineview Gardensb) To retain access from Castle Park/Respond Housing into Sarsfield Gardens
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		<p>Amend Open Space and Public Realm map on page 185 to show:</p> <ul style="list-style-type: none">a) To provide frontage of housing (non replacement housing) overlooking linear park at Craeval and Pineview Gardensb) To retain access from Castle Park/Respond Housing into Sarsfield Gardens
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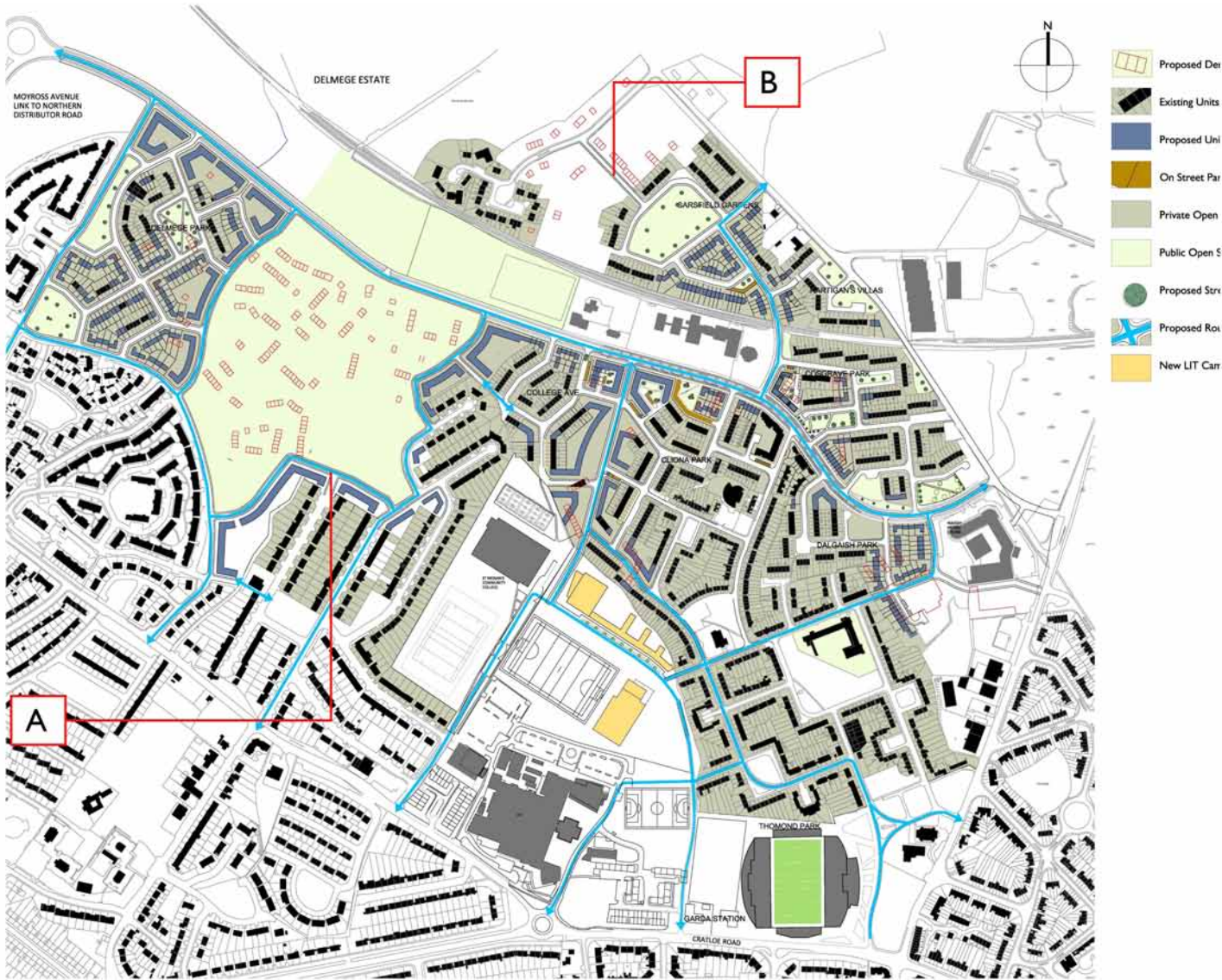


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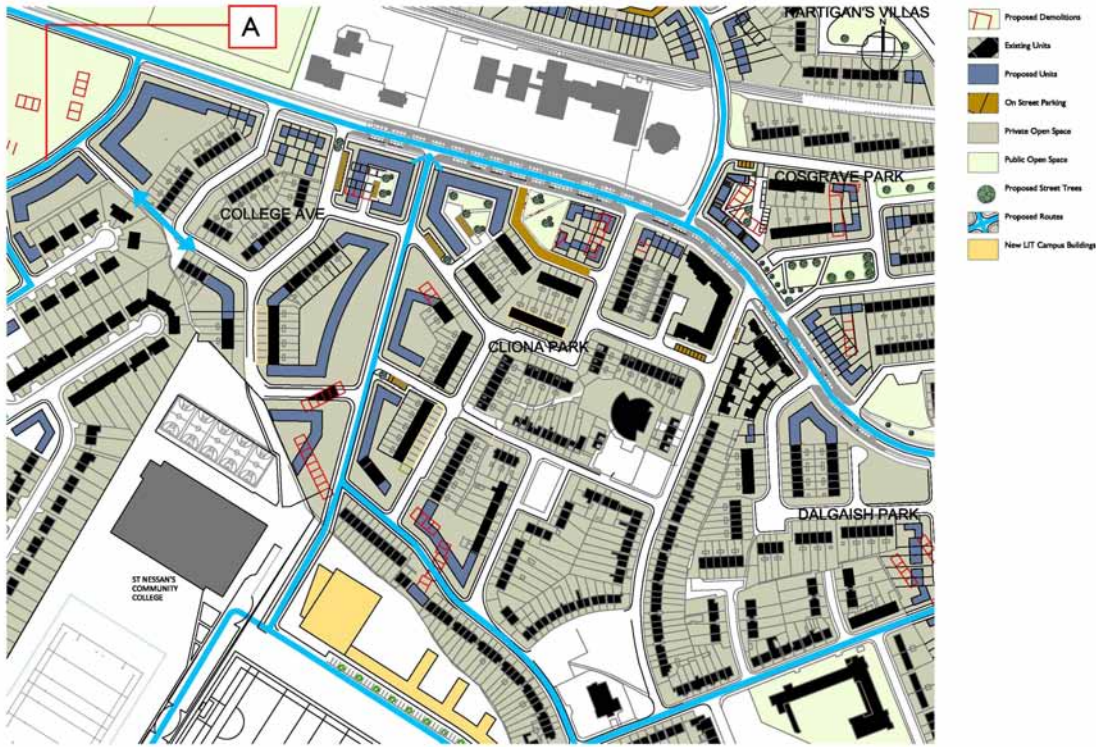
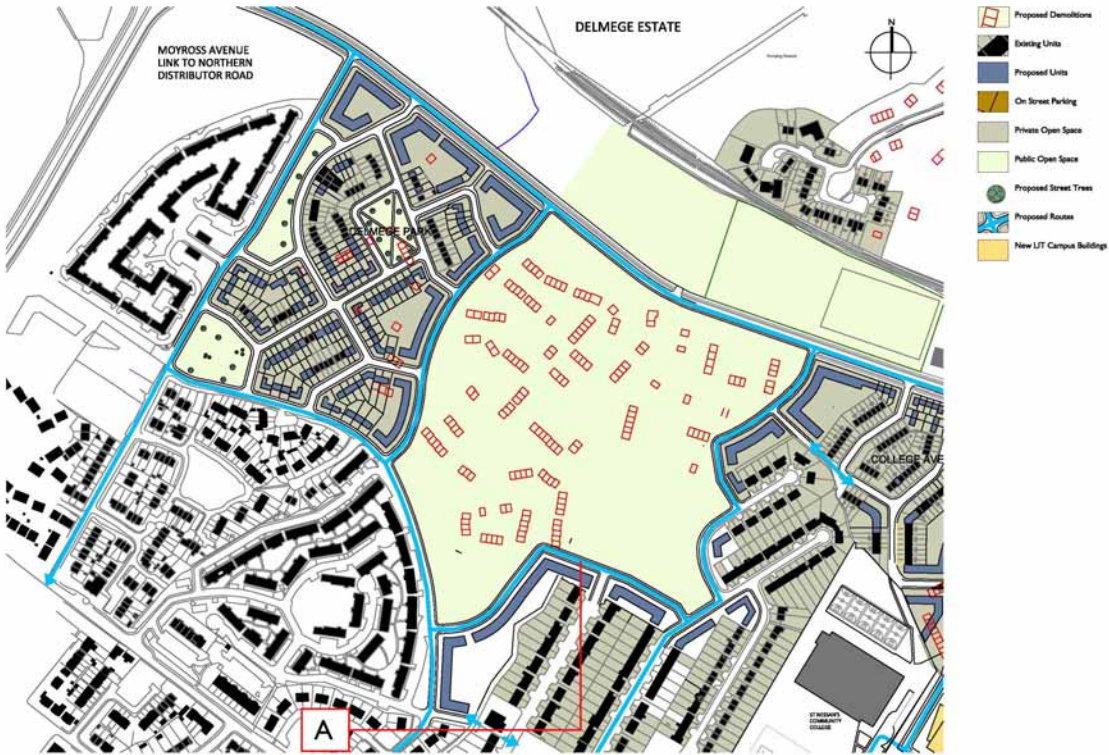
Amend map to page 189 and figures 1.7, 1.8 and 1.10 on pages 192 – 195 to show:

- a) To provide frontage of housing (non replacement housing) overlooking linear park at Craeval and Pineview Gardens
- b) To retain access from Castle Park/Respond Housing into Sarsfield Gardens



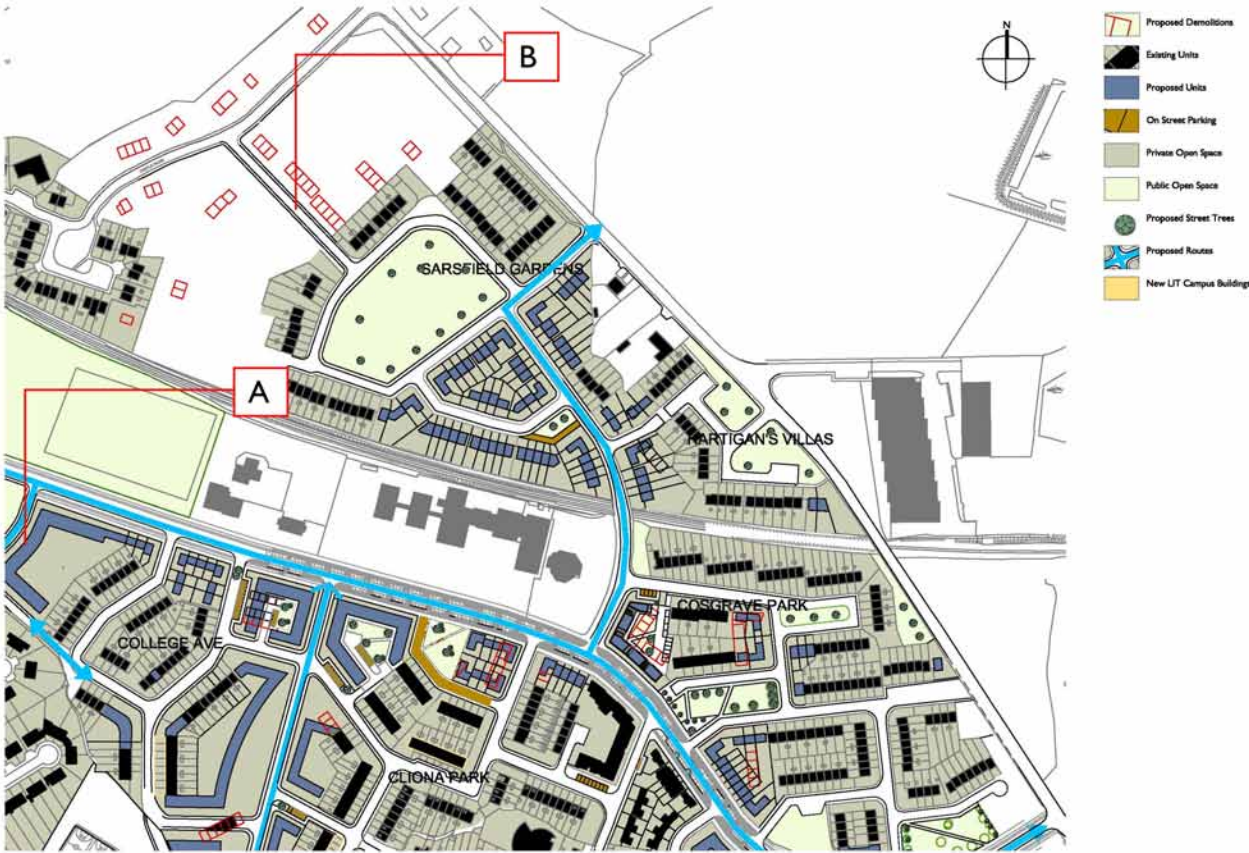
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19o Change LRFIP to amend maps to Moyross. Please refer to 19i above
Change LRFIP to amend tables 8, 9 and 1 and map on page 463, Appendix 3: Core Strategy Compliance to update number and location of private units.

Moyross: Final Tenure Mix as Envisaged as Part of the Regeneration Programme			
	Local Authority	Private	Total Units
Number of occupied units to be refurbished	178	273	451
Number of new replacement units required	242	53	295
Proposed new private units	0	4724.792 1872.29	4724.792 1872.29
Final number of homes within study area	420	2050.792 2198.29	2470.792 2618.29
Final Tenure Mix Percentage	17.00 16%	83.00 84%	

Table 8: Tenure mix as envisaged as part of the regeneration programme until 2022

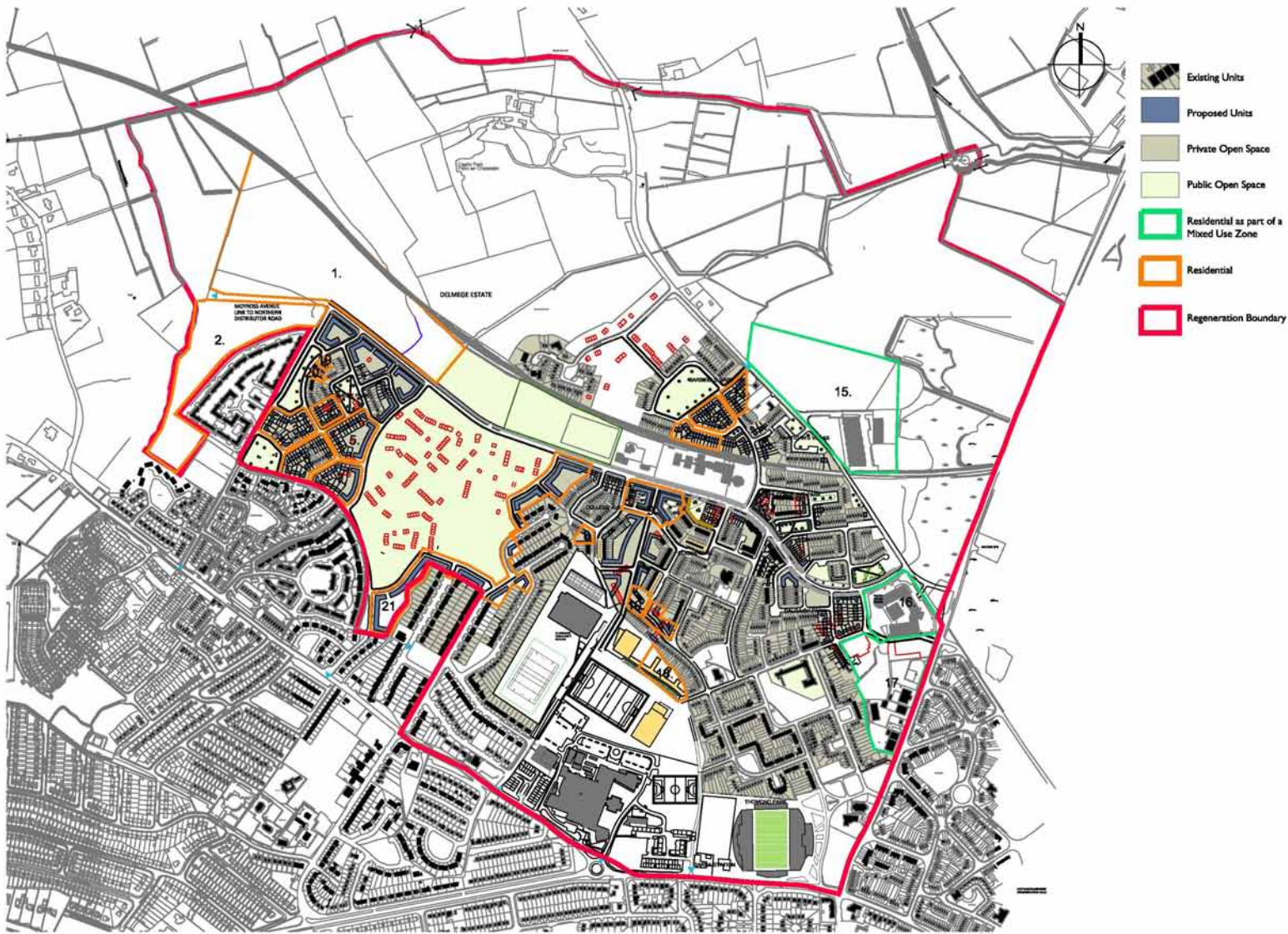
Moyross: Tenure Mix as at December 31 2012			
	Local Authority	Private	Total Units
Number of occupied units*	445	231	676
Tenure Mix Percentage	65.83	34.17	
*Excludes 15 community use buildings, 8 units at Shannabooley and 34 units at Ballygrennan as part of a Respond housing scheme			
Moyross: Tenure Mix as at 2022			
	Local Authority	Private	Total Units
Number of occupied units	420	2050.792	2470.792 2618.29

Moyross: Additional Private Housing									
Area Name	Zoning Objective under Unirad City Development Plan 2010-2016	Proposed Land Use as Part of the LRFIP	Overall Area in Hectares	Non Residential as Part of a Mixed Use /District Centre Zones Assume 50% of overall area as non-residential	Residential as Part of a Mixed Use /District Centre Zones Assume 50% of overall area as residential	Density (Minimum Range of 35 Units per Hectare - Residential Only and 70 units per Hectare as Part of Mixed Uses)	Density (Maximum Range of 50 Units per Hectare - Residential Only and 120 units per Hectare as Part of Mixed Uses)	Capacity (Minimum Yield in Units)	Capacity (Maximum Yield in Units)
1	2A Residential	Residential	9.854			35	50	344.89	492.7
2	2A Residential	Residential	3.9187			35	50	137.1545	195.935
3	2A Residential	Residential	0.7249			35	50	25.3715	36.245
4	2A Residential	Residential	0.2839			35	50	9.9365	14.195
5	2A Residential	Residential	0.8048			35	50	28.168	40.24
6	2A Residential	Residential	0.6988			35	50	24.458	34.94
7	2A Residential	Residential	0.6638			35	50	23.233	33.79
8	2A Residential	Residential	0.1217			35	50	4.2595	6.085
9	2A Residential	Residential	0.8836			35	50	30.926	44.18
10	2A Residential	Residential	0.2189			35	50	7.4865	10.695
11	2A Residential	Residential	0.2797			35	50	9.7895	13.985
12	2A Residential	Residential	0.3609			35	50	12.6315	18.045
13	2A Residential	Residential	0.4757			35	50	16.6495	23.785
14	2A Residential	Residential	0.3388			35	50	11.858	16.94
15	5A Mixed Use	Mixed Use	6.431	3.2155	3.2155	70	120	225.085	385.86
16	5B District Centre	District Centre	1.6864	0.8432	0.8432	70	120	59.024	101.184
17	5C Neighbourhood Centre Centre	Neighbourhood	3.08	1.54	1.54	70	120	10.78	18.48
18	2B Educational, Community, Cultural	LIT Campus - Residential	0.5549			70	120	38.843	66.588
19	2A Residential	Residential	0.054			35	50	1.89	2.7
20	2A Residential	Residential	0.05			35	50	1.75	2.5
	20		0.44795	0.22397	0.22397			14.1125	20.1725
21	2A Residential	Residential	2.95			35	50	103.25	147.5
Totals								1224.45	1872.29

Table 10: Minimum and maximum yields of additional private housing in Moyross

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Change LRFIP to amend the following text to sections 3.4.1 Core Strategy (page 461) and section 4.0 Conclusion (page 467)

Appendix 3: Core Strategy Compliance Section 3.4: Moyross

3.4. Moyross
3.4.1 Core Strategy

Within the boundary for Moyross, lands have been identified that will contribute towards the Core Strategy requirements for new additional private housing (i.e. additional to replacement housing) and an improved tenure base. Map 3: Identification of lands for additional private housing capacity, describes the location of these lands in the context of the physical framework plan for Moyross, proposed as part of the draft Limerick Regeneration Framework Implementation Plan.

To meet the Core Strategy's target of 4400 units (2000 in Phase 1 and 2400 in Phase 2), approximately ~~1725~~ **1872** new additional private units are proposed in Moyross in addition to the number of occupied units due for refurbishment (451 units) and the amount of new replacement units required (295 units) to accommodate those units proposed for demolition to make way for strategic connections and a coherent urban form. This equates to an approximate total of ~~2471~~ **2618** units.

3.4.2 Tenure Mix

Within Moyross approximately ~~2471~~ **2618** units (420 Local Authority occupied and ~~2051~~ **2198** private occupied) equates

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				<p>to a percentage ratio of 17:83 16:84 (Local Authority occupied: private occupied). This is an improvement from the tenure mix ratio of occupied units recorded at December 31 2012; 65:34 (Local Authority occupied: private occupied)</p> <p>Appendix 3: Core Strategy Compliance Section 3.4: Moyross</p> <p>Amend the following text to sections 4.0 Core Strategy (page 467) to update values to additional private housing capacity and tenure mix percentages for Moyross.</p> <p>4.0 Conclusion To achieve the Core Strategy's requirements of 4400 units by 2022, the refocussed framework plans envisages an additional 2593 new private units in Southill, 1725 1872 new units in Moyross, 98 new units in St. Mary's Park and King's Island and 255-262 new private units in Ballinacurra Weston. To achieve the planning policy objective of an 80:20 tenure split, within Southill, a total of 2963 private units and 366 local authority units equates to a 89:11 private: social mix. Within Moyross a total of 2051 2198 private units and 420 local authority units equates to an 83:17 84:16 private: social mix and within Ballinacurra Weston, a total of 397 403 private units and 103 104 local authority units equates to a 79:21 80:20 private: social mix. Finally, within St. Mary's Park and King's Island, a total of 302 private units and 166 local authority units equates to a 65:35 private: social mix. Due to the present and anticipated state of the housing market, the delivery of 4400 units by 2022 within the four regeneration areas may be challenging. However, from an analysis of the re-focused framework plans for Southill, Moyross, Ballinacurra Weston and St. Mary's Park there is sufficient land for additional private housing (approximately 4671 4825 additional private units) in these areas to begin the process of counteracting undue segregation and achieving a desirable tenure mix.</p> <p>Consideration of targeted economic, housing and land use policies will need to be put in place to ensure new private investment and paths to home ownership are delivered within the regeneration areas during the Strategy period.</p> <p>Table 14 below highlights the quantum of additional private units required for each of the regeneration areas and how the units can be delivered on a phased basis (phase 1 units by 2016 and phase 2 units by 2022).</p>
		19y	Change LRFIP to insert additional wording to Appendix I (page 325-326).	<p>1.5.2 Education: Schools, Children and Young People</p> <p>Focusing on the primary and post primary schools in the regeneration areas, there are 10 primary schools – five, northside and five, in southside regeneration areas - and three post-primary schools – two northside, one adjacent to Moyross and one adjacent to St. Mary's Park, and one, southside (Southill). It has been agreed in 2012 that the southside post primary school, St. Enda's Community School, will close from 2014-15 and pupils will transfer to other schools as secondary education is phased out of St. Enda's from 2015. Figure 2.15 presents the position on enrollments in these schools in aggregate for the school years from 2006-2007 to 2011-2012. The trend shows declining enrollment, in aggregate, in schools located in the regeneration areas. With the exception of one school located in / adjacent to a regeneration area, enrollment was lower in all regeneration area schools in the academic year 2006/07 compared with 2011/12. This has occurred over a period of significant population loss from regeneration areas, as outlined above. In 2011-2012, school enrollment in the primary and post primary schools in / adjacent to the city's regeneration areas northside and southside was approximately 1,900. The reasons for declining enrollments include demographic change, addition to the school infrastructure in the suburbs but also some parents exercising choice as to the school in which they enroll their children. Not all schools, however, are experiencing an on-going decline in enrollments. In the case of Corpus Christi Primary School Moyross, for instance, there has been an increase in enrollments in the most recent period (2012/13 and 2013/14) such that in 2013, it was granted an additional teaching post on the basis that the school is in a 'developing school' status.</p>
			Change LRFIP to insert additional wording to Volume I (page 54) under Educational Attainment.	<p>3.1.3 Educational Attainment</p> <p>The low level of educational qualification of the adult population in the most disadvantaged estates is a serious structural problem, affecting access to opportunities in many areas of social, civic and economic life including employment. Low education of parents also negatively impacts on aspirations and children's educational attainment as well as other outcomes including health.</p> <p>In direct contrast to the State figure of 16 per cent, over half the adult population in St. Mary's Park, (55%) has primary level education as their highest level of qualification while this is just under 50 per cent in O'Malley / Keyes Park, Southill. At the other end of the spectrum, the proportion of the adult population with third level education in the regeneration areas is extremely low – lowest in St. Mary's Park (1%) followed by O'Malley / Keyes Park Southill (4%) - and much lower than the average for the State (31%).</p>

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				<p>There are further specific problems in evidence in the school population and education of children and young people. The trend in the school population from 2006/07 to 2011/12 in DEIS schools located in / adjacent to regeneration areas shows declining enrollment, in aggregate. With the exception of one school located in / adjacent to a regeneration area, enrollment was lower in all regeneration area schools in the academic year 2006/07 compared with 2011/12. This has occurred over a period of significant population loss from regeneration areas, as outlined above. The reasons for declining enrollments include demographic change, addition to the school infrastructure in the suburbs and some parents exercising choice as to the school in which they enroll their children. Not all schools, however, are experiencing an on-going decline in enrollments. In the case of Corpus Christi Primary School Moyross, for instance, there has been an increase in enrollments in the most recent period (2012/13 and 2013/14) such that in 2013, it was granted an additional teaching post on the basis that the school is in a 'developing school' status. Similar to the national situation in urban Band 1 DEIS schools, relatively higher rates Declining enrollments, for instance, is a characteristic of schools in the most disadvantaged areas of the city (DEIS schools) along with high rates of absenteeism is also a characteristic of Limerick city's DEIS schools. Retention rates in school for young people to Junior Cert and Leaving Cert qualification are significantly lower in schools in Limerick City compared with Limerick County and all counties in the State. Progression rates to third level education post Leaving Cert from schools in the disadvantaged areas (DEIS schools) are also significantly lower than those from schools in average and more affluent areas of the city (non DEIS schools). Unless young people leaving school early transfer to alternative education and training options, these young people are most at risk of social exclusion.</p>
			Change LRFIP to insert additional wording to 2.1.3.1 Priority 1: Education and Learning, Experience to date (page 121)	<p>2.1.3.1 Priority 1: Education & Learning Experience to Date</p> <p>There is a developed educational infrastructure in the city /suburbs and within commuting distance of the city and in the disadvantaged communities of the city including the regeneration areas. A key issue with schools in the regeneration area and other DEIS schools in the city are declining enrollments, in aggregate across the DEIS school sector over the years from 2006/07 to 2011/12 linked to demographic change, loss of the population of families from the regeneration areas, parental choice and other factors affecting enrollment in city schools.</p>
		19z	Change LRFIP to insert additional wording to 2.1.3.1. Priority 1: Education and Learning, I. Early Years Learning and School Readiness, Scope of Action (page 122)	<p>Education & Learning: Description of Activities I. Early Years Learning and School Readiness</p> <p>Scope of Action The scope of action in Early Years involves mainly the roll-out and piloting of key initiatives and, drawing on the learning from these, transfer of good practice to other settings in the city where there is profile of social disadvantage and child poverty. 1) Start Right: this is providing an holistic demonstration model based on improved quality of practice in early years services and collaboration across service providers based on Local Child Support Teams. Start Right is one of eleven projects launched in 2011 and supported under the National Early Years Access Initiative (NEYAI). This is funded from a mix of sources including Government, philanthropic and other charitable sources and is managed by Pobal. The Limerick project is also supported by SSIRL (grant under the Programme Innovation and Development Fund for children, coordinated by the Limerick City CSC). There is an expected commitment to planning and funding for sustainability of the model. The focus of Limerick Start Right is: (i) training and supporting childcare staff to meet Síolta standards; (ii) intensive out-reach work with parents and children and (iii) on-going independent evaluation. With funding for the southside pilot covered from existing sources, good practice from the model can be developed and rolled out to northside regeneration areas including Moyross and St. Mary's Park and other parts of the city and county. Over time, successful models of practice can be rolled out more widely on a city-wide basis in areas of need. It may be possible to facilitate this under government's new initiative, the Area-Based Childhood (ABC) Programme, announced in November 2013. The Area-Based Childhood (ABC) Programme is adopting an area-based approach to child poverty in co-operation with philanthropic partners, drawing upon best international practice and existing services, to break the cycle of child poverty where it is most deeply entrenched. This initiative is building on and continuing the work of the Prevention and Early Intervention Programme (PEIP) which supported projects in Tallaght, Ballymun and Darndale. In November 2013, the Department of Children and the Office of the Tánaiste announced that an additional nine areas have been selected to enter the design stage of the Area-Based Childhood (ABC) Programme 2013-2016, bringing the total number of participating areas to 13. Limerick has been selected as one of the new areas with the Children's Services Committee acting as the lead partner. 2) A Full Service Extended School model is being developed on the southside (St. Kieran's school project). The Full Service Extended School in Limerick (St. Kieran's) involves school amalgamations and a new school build supported from mainstream Department of Education and Skills (DES) for the capital project and philanthropic sources. This is also a strategic project supported in the framework of the Programme Innovation Development Fund, SSIRL (Supporting Social Inclusion in Regeneration in Limerick) to the children's consortium, coordinated by the Limerick City</p>

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				<p>Children's Services Committee. The project is mainly centred on extended services provision on-site linked to the school. These include services to support early years development in health (primary care), childcare and education (pre-school) with links to parental education (adult learning) and well-being (health needs). In terms of wider experience, a Full Service Extended School (FSES) initiative was launched by the UK Department for Education and Skills (DfES) in 2003. Schools involved in this initiative provide a comprehensive range of services, including access to health services, adult learning and community activities as well as study support and 8am to 6pm childcare. The models implemented in the UK displayed the following common features: a focus on overcoming pupils' "barriers to learning"; a recognition that these were related to what were seen as family and community problems; the development of additional provision to overcome the barriers; the deployment of additional staff and partnerships to deliver the provision; the "bending" of multiple funding streams to support provision; and a tendency for schools to "go their own way" (i.e., responsive to local circumstances) in pursuing their aims. These are the key principles underlying the development of the model in the southside regeneration area. With the co-location of health, early years services and Corpus Christi school on the same site, there is potential to develop this model in Moyross, integrated with the proposed Moyross Civic Hub. Evaluation of the UK model showed benefits / relative successes including positive impact on pupils' attainment, engagement with learning, family stability and enhanced life chances, better relations with local communities and an enhanced standing of the school in its area. I Generally, they were "high costs / high benefits" projects.</p> <p>3) Support to develop stronger links between formal and non-formal early years' providers in regeneration areas. This should help roll-out and embed best practice models, address gaps in service provision and promote better outcomes for children and families.</p>
		19ad	Change LRFIP to insert additional wording to 2.1.3.7 Priority 6: Community Participation, Empowerment and Civic Engagement, B. Capacity Building: Community Participation, Empowerment and Civic Engagement, under Scope of Action, (page 152).	<p>B. Capacity Building: Community Participation, Empowerment and Civic Engagement</p> <p>Scope of Action</p> <p>Drawing on the recommendations of the NEXUS report (2012) and the needs confirmed by representatives of the communities, the following action could be supported under the social regeneration programme:</p> <ul style="list-style-type: none"> a) Development and negotiation of a <i>Civic Participation Charter</i>. It is considered necessary to develop a charter in order to present in detail an understanding of what it means for each of the agencies involved, the "rules" that should be followed in keeping the community informed and agreement from all about what is to be achieved. The recommendations state that the charter should be "signed up to" by all the agencies involved (e.g., HSE, Gardaí, LCETB, education providers etc.) and this should govern all working relationships into the future (NEXUS, 2012). b) Support to strengthen communities' capacity to engage in community organisation (broadening and deepening engagement and improve diversity of representation) and in local decision-making structures such as the Local Regeneration Committees. This is needed because residents and their representatives (organisations) require particular skills, and access to resources if they are to participate meaningfully. As the needs vary across the communities, an assessment of needs in each area (with residents' representatives fully involved in the assessment process) is required. Based on the needs assessment (e.g., for technical or professional assistance in planning, programmes to encourage wider involvement in the community), a Support Programme should be prepared. The capacity building support should be directed at helping communities to effectively fulfil their role in implementing the Charter (NEXUS, 2012). This process should also promote the participation of young people in local community decision-making structures. c) Support to develop a community-based planning and review system based on the Charter – with community organisations in each area supported to undertake their own community plans (on an annual and on-going basis) and to evaluate results, achievements, benefits and lessons on a yearly basis. It is envisaged that personnel from statutory agencies and services which are delivered into the communities should participate in this process based in, and facilitated / led by, the community. The support provided here into each regeneration community could include technical support / advice in designing the system, training and support for communities to access independent information and advice to inform their planning and reviews. Working with the same system in each community would allow for sharing of results and lessons, and joint review of progress. This, in turn, should help strengthen the potential for civic engagement (NEXUS, 2012).
		19ah	Change LRFIP to add text in relation to existing open space provision.	<p>4.1.14 Open Space Provision</p> <p>The 2008 Masterplan identified the River Shannon and its rich riparian and wetland habitats as a key strength of the Moyross area. There are significant areas along the River Shannon corridor, in close proximity to Moyross, which are designated as a proposed Natural Heritage Areas (pNHA) and Special Area of Conservation (SAC), including some of the wetlands that lie between Long Pavement Road and the Knockalisheen Road. There are also two landfill sites in the area, as previously discussed on either side of Long Pavement Road and much of this area is susceptible to flooding.</p> <p>The development of sport and recreation are important in encouraging a sense of wellbeing and social contact. Limerick City Council acknowledges the very important role that existing active recreational facilities such as Moyross playground, Moyross United, LIT Sarsfields and the Community Enterprise Afterschools facilities play in enhancing the social and recreational life of Moyross. Figure 1.10 shows the existing open space provision within Moyross. The regeneration areas contain large amounts of passive open space,</p>

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				much of which is underutilised and also open space that is not readily distinguishable as either public or private. There is also an under-provision of active play facilities for those under the age of 15.																																																												
		19ai	Change LRFIP to amend Appendix 2: Statement of Community Involvement to indicate that 155 persons were in attendance at the open days.	<div>Appendix 2. Statement of Community Involvement</div> <div><table><thead><tr><th>Kincora & Carew Park</th><th>Yes</th><th>Don't know/Don't mind</th><th>No</th><th>No Box Ticked</th><th>Total</th></tr></thead><tbody><tr><td>OVERALL PROPOSALS FOR REDEVELOPMENT</td><td>400</td><td>65</td><td>258</td><td>21</td><td>744</td></tr><tr><td>• 150 persons in attendance at open days</td><td>53%</td><td>9%</td><td>35%</td><td>3%</td><td>100%</td></tr><tr><td>• 62 questionnaires returned</td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>• Overall response rate: 41%</td><td></td><td></td><td></td><td></td><td></td></tr></tbody></table><table><thead><tr><th>Moyross</th><th>Yes</th><th>Don't know/Don't mind</th><th>No</th><th>No Box Ticked</th><th>Total</th></tr></thead><tbody><tr><td>OVERALL PROPOSALS FOR REDEVELOPMENT</td><td>772</td><td>156</td><td>133</td><td>163</td><td>1224</td></tr><tr><td>• 112 155 persons in attendance at open days</td><td>63%</td><td>13%</td><td>11%</td><td>13%</td><td>100%</td></tr><tr><td>• 72 questionnaires returned</td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>• Overall response rate: 11% 46%</td><td></td><td></td><td></td><td></td><td></td></tr></tbody></table></div>	Kincora & Carew Park	Yes	Don't know/Don't mind	No	No Box Ticked	Total	OVERALL PROPOSALS FOR REDEVELOPMENT	400	65	258	21	744	• 150 persons in attendance at open days	53%	9%	35%	3%	100%	• 62 questionnaires returned						• Overall response rate: 41%						Moyross	Yes	Don't know/Don't mind	No	No Box Ticked	Total	OVERALL PROPOSALS FOR REDEVELOPMENT	772	156	133	163	1224	• 112 155 persons in attendance at open days	63%	13%	11%	13%	100%	• 72 questionnaires returned						• Overall response rate: 11% 46%					
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20	Moyross Residents Regeneration Committee	20p	Change LRFIP to amend text.	Please refer to submission 19ah above																																																												
		20q	Change LRFIP to amend text.	Please refer to submission 19ai above																																																												
25	St. Mary's Park Community Group	25m	Change to LRFIP to state that a review of the structures in place is being commissioned by Limerick City Council to 2.1.3.7 Priority 6: Community Participation, Empowerment and Civic Engagement, A. Community organization / Estate Management / Local Service Delivery (page 151). Proposed Amendments. Please refer to submission 5b above	Please refer to submission 5b above																																																												
26	Southill Area Centre	26c	e) Change to LRFIP to state that “hope, inspiration, etc. are a major part of the approach for action with this group and for the regeneration communities generally” to 2.1.4.5 Priority 5: Families and Youth at Risk, B. Improved Outcomes for Youth at Risk, Scope of Action (page 140)	2.1.4.5 Priority 5: Families & Youth At Risk B. Improved Outcomes for Youth at Risk Scope of Action 1) Additional / new methods of outreach to improve effectiveness in the reach of young people at risk. This includes “out of hours” outreach activities (evenings and weekends) when problem behaviour may be more likely to occur. Outreach should be directed to bringing children at risk into diversion or as early as possible after the on-set of problems – linked to the “early warning” system which is a key objective of the Local Assessment of Needs System (LANS) / Common Assessment Framework (CAF). Outreach needs to work in tandem with the referral systems which apply across statutory and voluntary organisations, as outlined above. Consent and engagement with the parents / the family needs to be addressed and the model of the integrated pathway of care applied with on-going risk assessment and tracking applied, as outlined above. 2) Support to apply best practice in the development of re-integration plans and enhanced services for young offenders. These should include behaviour modification programmes, social and personal development to help young people make positive choices, working in group settings on a one-to-one basis. An holistic approach to re-integration is required and this will take different pathways depending on individual characteristics (age) and profile (history, type and intensity of problems), the wider family situation and social relationships with friends and in the community. A whole family approach, similarly, should be taken if appropriate. Other care options should be applied if this is not appropriate in the interest of child protection / child welfare. A strong focus on education should be applied in all re-integration plans to support reengagement with learning in school																																																												

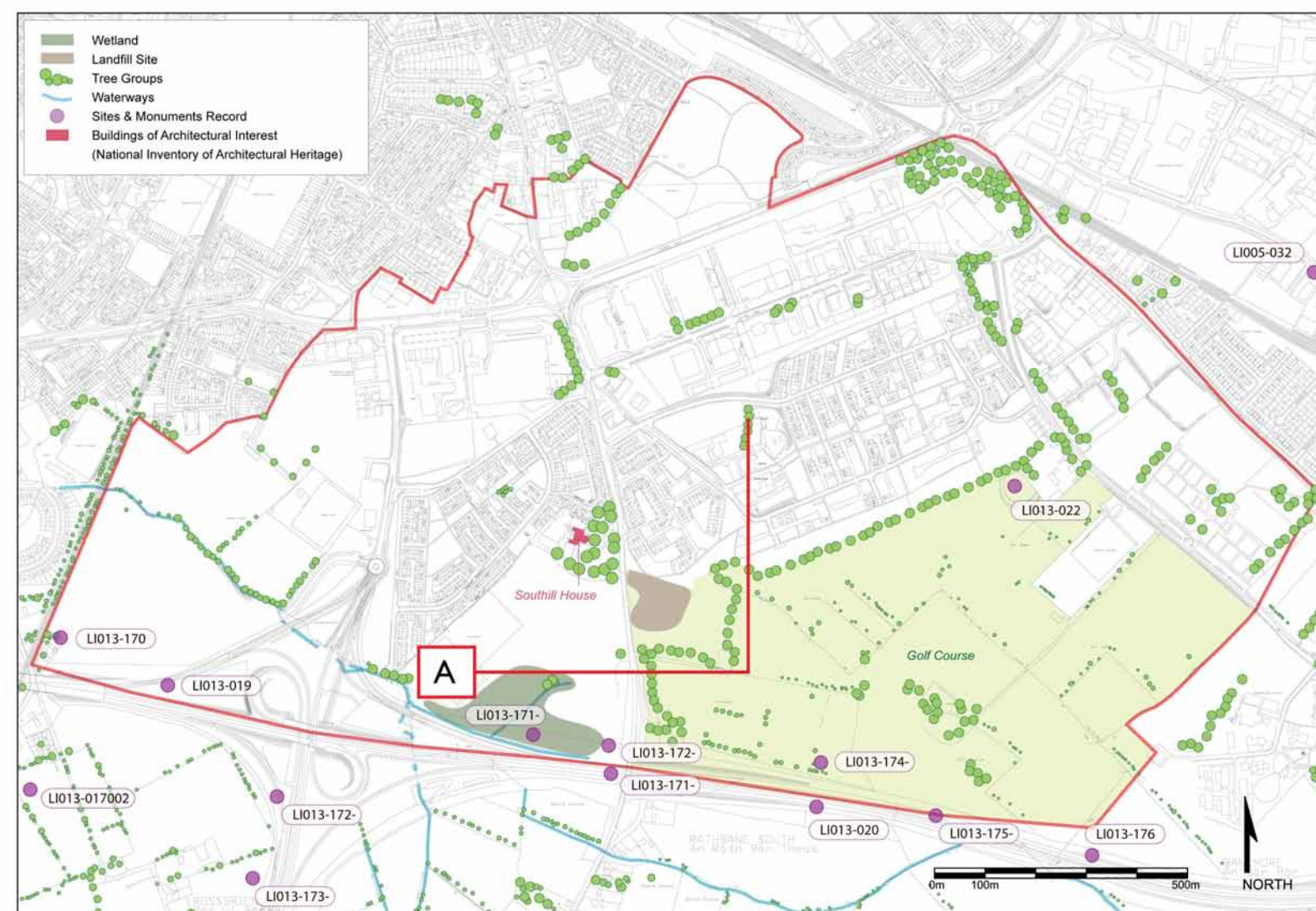
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				or other settings depending on needs including age. For those in their older teens and early twenties, employability (training, orientation to work, work experience, placements) is a key element of reintegration. Enhanced aftercare provision, to help prevent re-offending and support positive reintegration into community and society are further elements. This could include commitment on the part of the young person / parent to engage with specific universal services, for instance, to develop learning, manage health, improve parenting, and engage with sport / leisure / arts / music. This should, in turn, help to re-engage with positive peer networks and in the community. On-going mentoring could support aftercare. Offering hope, inspiration, engendering enthusiasm and possibilities for a better life are a major part of the approach for actions with this group, but also generally for the regeneration communities.
		26d	Change to LRFIP to state the Southill Area Centre is a multi-purpose centre which includes youth services amongst its activities (and is not exclusively a youth service provider) to 2.1.4.5 Priority 5: Families and Youth at Risk, Experience to Date (page 138).	<p>Priority 5: Families & Youth At Risk Experience to Date</p> <p>Focusing on young people at risk, the HSE again has a key role here, as outlined above. The Irish Youth Justice Service, working in cooperation with other stakeholders including the DES, HSE, An Garda Síochána and community-based organisations, is also a key player. A similar model of running services in cooperation with community / voluntary organisations applies to projects supported by the Irish Youth Justice Service and Young Person's Probation. The main method of access is through referrals from key agencies but sometimes through school, parents or self-referrals (e.g., to Garda Youth Diversion projects). Youth Forums have been set up in the city to provide a structure to support integration and information sharing across the key stakeholders in relation to young people at risk. In terms of key projects / services in place:</p> <ul style="list-style-type: none"> • There are five Garda Youth Diversion (GYD) Projects in Limerick, operated by An Garda Síochána and community-based organisations. Three are based in the regeneration areas: Corpus Christi Youth Development Group, Moyross; King's Island GYD; LSCYI Southill and two in other locations in the city (Ballynanty Youth and Irishtown Youth, St. John's Square). GYD projects offer diversionary activities for children drawn into the criminal justice system so that they will avoid this in the future. GYD projects have an enhanced employability dimension (access to education, training, personal development, job access). There is also a stronger focus on planning services based on an analysis of data on reported youth crime from the PULSE crime data analysis system in the locality they serve and a stronger partnership approach. • Young Person's Probation (YPP) projects in Limerick are as follows: – Céim ar Chéim in Moyross and Southill Outreach which are community-based organisations. Céim ar Chéim, Moyross offers qualification-based education and training programmes for young offenders referred from the Courts / Juvenile Liaison Officers, youth at risk identified by the Gardaí, schools, National Education and Welfare Board, HSE and early school leavers. It also offers a social education programme, behaviour modification, drug and alcohol awareness and other support services. Southill Outreach targets young people aged 12 to 18 years, working with referrals from YPP and residential institutions (highest level of support) and through outreach work on the street. • Le Chéile Restorative Justice Project is part of nationwide project working in cooperation with YPP. Le Chéile Limerick works with young offenders in the city, including the regeneration areas. In restorative justice, it brings together the offender, the victim and others as appropriate, supported by a facilitator. The restorative justice options are based on expressing the harm done and discussing / agreeing reparation. It is also developing a volunteer base and mentoring service. Probation and Linkage in Limerick Scheme (PALLS) is a new training centre for ex-offenders referred by the Probation Service and established in partnership with Limerick Regeneration. As well as training for employability and access to employment, services seek to address anti-social attitudes and behaviours. • Special schools for children at risk, often with a history of minor offending, are also part of the provision for this target group (St. Augustine's Sexton Street, St. Canice's Mulgrave Street). • Facilities and services in youth work including clubs, sports, art, dance, drama, and education facilities are available in the regeneration areas promoted by Limerick Youth Services and based in the communities. As well as the city centre location (Henry Street), services for youth in regeneration areas operate from: the Factory, Southside Youth Space (Fulflex), Westend Youth Services, Our Lady of Lourdes, Northside Youth Café and in King's Island (Nicholas Street). While these include mainstream / universal services for youth, linked to location in the regeneration areas and the profile of the young population, they also offer services targeted on young people with difficulties (e.g. counselling, homework support, links to Garda Youth Diversion etc.). They all have a strong volunteer base. Southill Area Centre is a multi-purpose community centre with services and facilities for all age groups and including a youth work service. Various programmes for families, children and young people are run out of community centres. For instance, Southill Area Centre has successfully run a Strengthening Families programme; it runs a programme for children under 10 years including activities with parents, creating the space for parent and child to spend time together in a supportive environment; runs Southill Club2gether which includes outreach, support to families, promotes linking families with young people as well as giving young people a voice.
		26e	Change to LRFIP to state that Southill Domestic abuse project, up until recently operated out of Southill. Amendment to 2.1.4.5 Priority 5: Families and Youth at Risk, Experience to Date (page 138).	<p>Priority 5: Families & Youth At Risk Experience to Date</p> <p>Focusing on family support, some services are run by specialist national charities including: Barnardos Family Support Project serving family experiencing difficulties throughout the city, operating on the northside (St. Mary's Park and Moyross) and the southside (Southill and Ballinacurra Weston); Sophia Housing, Southill offering intensive family support, tenancy sustainment and advocacy; RESPOND! Suimhneas, based in Moyross, offering sheltered accommodation for mothers and children who are homeless often due to domestic violence; Extern, based in Moyross but servicing a wider population, targeting children / young people up to age 17 years who are assessed at high levels of need and providing support programmes working with children and parents; Youth Advocate Programme Ireland targeting young people and their families at high risk living in</p>

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				<p>Limerick City and County. The model, similar to Extern, is described as a strengths-based and intensive support model which aims to keep young people in their community and out of care / custody. The Northstar Family Support project, operating at Watch House Cross, offers support services including information, counselling, peer support to families affected by a family member's addiction problem to drugs and / or alcohol.</p> <p>The Southill Domestic Abuse project which, until recently, operated out of Southill, offering one-to-one support and peer support to women experiencing domestic abuse. Broader-based universal services in the communities which provide elements of family support (but not intensive specialist help) include Community Companions Moyross and the Limerick Social Service Centre, Southill and Weston Family Support Initiative.</p>
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26g	<p>Change LRFIP to amend map to I.34 on page I02 to:</p> <p>a) Reposition the tree group associated with Southill Junior School inside the curtilage.</p>
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		26j	Changes to LRFIP to state the importance of maintaining open access to services for those who need them, and for services to be available in community settings.	Please refer to specific points below – on the importance of maintaining open access to services for those who need them, and for services to be available in community settings.
		26n	Change to LRFIP, to insert additional text regarding challenges faced by adult learners who left formal education early. At section 2.1.3.1 under 4 Adult Education and Community Learning, Scope of Action (page 125).	4. Adult Education and Community Learning Scope of Action Changes are being introduced in the delivery of adult education and training, as outlined in the Policy Review, some of which may present difficulties for the target population. Changes are linked to the challenges presented by the large increase in the numbers unemployed who require up-skilling / reskilling. Additional places are created on programmes in further education and training and capacity increased in part by offering shorter and more intensive programmes and making greater use of “blended” learning options. There is also a stronger focus on qualification and progression, operating from a higher base of qualification (e.g., from level 5-6 on the Quality and Qualifications Ireland (QQI) framework / FETAC)2. However, people who are at the lowest levels of education and skills require more rather than less intensive support. Education of community based learners who may have left formal education early is challenging. Priorities, as reflected in government policy (linked to the employability agenda and bringing unemployed into work), may be ambitious for this group. Adults who return to education often require support and “early wins” for them to regain their confidence and sense of achievement, as well as the belief that they can be part of a learning culture.
		26p	Change to LRFIP, to insert additional text regarding challenges faced by adult learners who left formal education early. At section 2.1.3.1 under 1 Education and Learning, Experience to Date, Scope for Funding (page 125).	Adult Education and Community Learning Scope for Funding Support The social regeneration programme can provide for the following types of expenditure: <ul style="list-style-type: none"> • Funding to support the roll out to communities of improved practice in early years learning and child development and for more intensive work with parents and children including peer support (e.g., parent-to-parent). • Additional funding for school-based and community-based services such as evidence-based parenting and behavioural / emotional well-being programmes such as Incredible Years and Strengthening Families.
		26q	Change to LRFIP to include reference to support for access to third level education at 2.1.3.1 Priority 1: Education and Learning, Experience to Date (page 122)	Priority 1: Education & Learning Experience to Date Types of activities / programmes in this area supported to date by the Regeneration Programme in partnership with other players include: <ul style="list-style-type: none"> • Retention of the local Department of Education and Skills office in Limerick City and the dedicated role of this office in coordinating the education response to regeneration; • The retention of additional teacher (ex-quota) in schools serving regeneration areas linked to the high level needs of this school population; • Opening up school premises for after-school activities, infrastructure improvements in schools, equipment and resources, assisted by funding from Dormant Accounts, led by the Department of Education and Skills (DES) into 22 DEIS schools in the city (now 21 with recent school amalgamations); • Support for literacy and numeracy initiatives in DEIS schools (of which there are many – such as Reading Recovery, Doodle Den) with evaluations showing very promising results in some cases; • Start Right Limerick, which is part of the National Early Years Access Initiative (NEYAI). Start Right aims to improve the capacity of parents, families and services to work collaboratively to improve the health and well-being of children, with a particular focus on learning and development; • Promotion of improved quality of practice in early pre-school education through the implementation of Síolta – the National Quality Framework for Preschool Education; • Small-scale funding for additional activities in schools in regeneration areas; • Support for homework clubs and learning infrastructure and services in the community / outside of school which extend the school day. This includes the Learning Hub, offering a range of learning opportunities using a variety of methods, events and providing a context where children and young people benefit from a socially-mixed environment; • Summer camps and activity programmes out- of-school; • Support for the Incredible Years programme. The Incredible Years (IY) programme is an international, early intervention programme targeting children, ranging in age from young infants to ten year olds, who are exhibiting social, emotional and behavioural difficulties. Incredible Years consists of three types of programmes aimed at parents / guardians, children and teachers. Each of the programmes aims to achieve long-term positive impacts on children's behaviour. Since 2007, IY programmes are being implemented in Limerick City through a multi-agency Strategic Steering

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				<p>Group, comprising representatives of the PAUL Partnership, the Health Service Executive (HSE), Department of Education and Skills (DES), Mary Immaculate College (MIC), Limerick Regeneration, National Educational Psychological Service (NEPS), Barnardos, St.Vincent de Paul (SVP), Limerick Social Services Centre (LSSC) together with local community groups, Family Resource Centres and DEIS primary schools.</p> <ul style="list-style-type: none"> • Alternative learning approaches (creative, vocational training skills) with integrated therapy (e.g., Blue Box Creative Learning) and support for interventions such as behaviour management for pupils with such difficulties (e.g. Cois Céim at LEDP), offered in cooperation with schools and home; • Additional support for adult education including support for coordinators in the regeneration areas and local education committees, access to third level education and courses in adult learning.
		26s	<p>Change to LRFIP to include references to “health eating”, “physical fitness” to 2.1.3.2 Priority 2: Health and Well Being and references added to “community gardens” and “physical exercise” under Experience to date (page 126)</p> <p>Change to LRFIP to include references to the role of community-based and voluntary organisations as partners in the delivery of public health initiatives, under Description of Activities, (I) Public Health, Key Partners / Agencies (page 127)</p>	<p>Priority 2: Health and Well-Being Objectives</p> <ol style="list-style-type: none"> 1.To promote improvement in the mental health and well-being of the target population. 2.To build the capacity of individuals, families and the community to improve and manage their health by promoting and supporting initiatives in lifestyle practices associated with better physical and mental health (diet / healthy eating, physical exercise and fitness, smoking, drinking, drug-taking and other risk behaviours). 3.To support early diagnosis of problems (mental and physical health problems, behavioural problems, addictions) by improving access to appropriate services mainly located in primary care and accessible in the community. 4.To support improved access to services for treatment of problems of addiction and physical and mental health issues and support to manage health.This includes a strong emphasis on the recovery model in mental health. 5.To build local capacity in the services in communities to support health and well-being including community participation in primary care. <p>Experience to Date Mainstream services in health located in or adjacent to the regeneration areas are delivered from the health centres / primary care services working out of Moyross / Ballynanty Health Centre and the new King's Island Primary Care Team / Health Centre on the northside and Southill Health Centre and Rixtown Health Centre (city centre) on the southside. General Practitioners (GPs) and Public Health Nursing are the key universal services and also provide gateway services to specialist care. Health centres also house Community Welfare Officers (previously in HSE and now under the remit of the Department of Social Protection) providing access to supplementary Welfare Allowance and other services such as Adult Counselling, access to addiction services / counsellors, social care workers. Community centres including Family Resource Centre, Community Development Programme offices also provide facilities / services to promote improved health and well-being. Community arts, music and other types of programmes in community settings including community gardens, physical exercise classes, etc. also support improved health and well-being.Access to services in health does not only mean that services are located in or near communities but that the population can benefit from them.</p> <p>Key Partners / Agencies Activities are located in health centres and in community settings including: community crèches, pre-schools, schools, community centres, day centres / rehabilitation centres, youth work settings, Family Resource Centres and youth justice projects. As such, many community-based and voluntary organisations are partners in local delivery of such services.</p>
		26w	Change to LRFIP to include specific reference to community gardens to 2.1.3.3 Priority 3 Ageing Well – Health and Well-Being of Older People, B. Specific Actions to Support Health & Well-Being of Older People, under Scope of Action (page 131)	<p>2.1.3.3 Priority 3:Ageing Well – Health and Well- Being of Older People B. Specific Actions to Support Health & Well-Being of Older People Scope of Action</p> <ol style="list-style-type: none"> 1) Activities to support the social connectedness of older people in local communities and across the city including social, leisure and recreational activities that involve older people from different types of neighbourhoods in Limerick City. 2) Activities to support the involvement of older people in education and learning including practical courses that can improve their quality of life (e.g., use of computers, email, internet, mobile ‘phones, healthy lifestyles, etc.), in health and well-being initiatives (as outlined above under Priorities 1 (Education and Learning) and 2 (Health and Well-being) and Priority 5 (Families and Youth at Risk). In the case of older people, these can relate to services that address needs such as use of technology in health care management, safety and security. In significant initiatives (e.g., projects identified from the strategy planning process under Activity 1), regeneration will act in a supportive role, and not as the main driver or funder of such initiatives. 3) Information, support and advice services, specifically developed to meet the needs of, and sensitive to information-seeking approaches applied by, older people (e.g., face-to-face, ‘phone, available in community settings). 4) Activities to promote /support inter-generational relationships and solidarity.These could include activities in the arts and culture, local history, music, community gardens and voluntary activity.

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		26y	Change to LRFIP to include specific reference to community gardens to 2.1.3.3 Priority 3 Ageing Well – Health and Well-Being of Older People, B. Specific Actions to Support Health & Well-Being of Older People, under Scope of Action (page 131)	<p>2.1.3.3 Priority 3:Ageing Well – Health and Well- Being of Older People</p> <p>B. Specific Actions to Support Health & Well-Being of Older People</p> <p>Scope of Action</p> <p>1) Activities to support the social connectedness of older people in local communities and across the city including social, leisure and recreational activities that involve older people from different types of neighbourhoods in Limerick City.</p> <p>2) Activities to support the involvement of older people in education and learning including practical courses that can improve their quality of life (e.g., use of computers, email, internet, mobile 'phones, healthy lifestyles, etc.), in health and well-being initiatives (as outlined above under Priorities 1 (Education and Learning) and 2 (Health and Well-being) and Priority 5 (Families and Youth at Risk). In the case of older people, these can relate to services that address needs such as use of technology in health care management, safety and security and new models of providing necessary services for older people in the community. In significant initiatives (e.g., projects identified from the strategy planning process under Activity 1), regeneration will act in a supportive role, and not as the main driver or funder of such initiatives.</p>
		26ab	Change to LRFIP to reference the enterprise and job-related activities pursued by Community/ Enterprise/Action Centre to 2.1.3.4 Priority 4: Work and Employability, Objectives (page 132)	<p>Priority 4:Work and Employability</p> <p>Objectives</p> <p>1) To promote improved employability of people of working age in the target population. This encompasses employability in the broadest sense covering pre-development that is especially necessary with people with no or little history of employment, personal development / improved motivation towards the labour market, key competencies and skills required in the labour market, and qualification.</p> <p>2) To develop labour market activation and access to employment initiatives for the target population.</p> <p>3) To promote stronger cooperation and collaborative partnerships between activation services (LCETB and SOLAS (formerly FÁS), LES, PAUL Partnership and Intreo offices) and community and voluntary organisations on-the-ground with capacity to reach groups distant from the labour market including targeted interventions for specific groups – in particular, young people who have left school early without qualification and are unemployed or not in employment, education or training (NEETS), long-term unemployed men; women with no or little experience of work including lone parents and who may be economically “inactive”. These organisations “on the ground” include the various community, enterprise and youth centres operating in the regeneration areas some of which have significant enterprise and employability-related experience (e.g., training, participation in active labour market schemes including work experience and placement and social enterprise). For instance, under the Young Persons Facilities and Services funded programme, the West End Youth Centre has developed an innovative Apprentice Programme to train local young people in youth and community work, providing education, work experience and support to access employment.</p> <p>4) To support people through employability pathways, through on-going access to continuing / further education, training and mentoring including support in employment settings.</p> <p>5) To link employability with jobs developing in the local labour market, including community services and new start-up enterprises, jobs in construction linked to the physical regeneration and other employment opportunities in the city, and support the target group to enter such jobs.</p> <p>6) To develop links and work pro-actively with enterprises / businesses and other sources of employment (public and voluntary bodies) within and outside of the target areas with a view to opening up access to work experience / work placements, internships and permanent job placements.</p> <p>Refers to Southill Area Centre submission, point (ac). “Change to LRFIP to reference the need for pre-development work for people with little or no history of employment, under Objectives, point (1), p. 132”</p>
		26ac	Please refer to submission 26ab above	Please refer to submission 26ab above
		26ad	Change to LRFIP to reference specifically the West End Youth Centre Apprenticeship Programme (page 133)	<p>A. Labour Market Intervention Programme – (i) Northside and (ii) Southside</p> <p>Scope of Action:</p> <p>The scope of action involves working effectively with the labour market activation system, Government’s Action Plan for Jobs, the “Pathways to Work” initiative and “youth guarantee” approach to better meet the needs and support employability of the target population - the long-term unemployed, young people not in employment, education or training (NEETs) – prioritising the regeneration areas or these target groups (long-term unemployed, NEETs) who, until relatively recently, were resident in the regeneration areas. Initiatives can draw on lessons from recent national evaluations⁴.</p> <p>The main action here is a labour market intervention programme with a northside and southside dimension, adopting “the pathways the work” approach and linked to the proposals for community-based training centres and support for employment initiatives under the economic pillar of the FIP, as well as new opportunities for training and work arising from implementation of the physical pillar of the LRFIP.</p> <p>Additional support and customisation of existing and new schemes will be provided under the social regeneration programme to help address the additional barriers to employment faced by the target groups. Such barriers could relate to aspects of eligibility for active employment schemes (e.g., a requirement to recruit people only aged 25 years and over). There are also strong links between actions under this theme to improve employability and those specified above related to adult education and community learning. In the case of lone parents, in particular, there are links to community-based childcare interventions (Priority 1 Education and Learning). Access to, and progression in, adult education can be an important</p>

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				<p>part of the pathways approach. There are connections here to the activity proposed above, focused on bringing young women lone parents into adult education and learning.</p> <p>Types of action to be supported under the social regeneration programme are as follows:</p> <p>1) Flexible training programmes which include core skills development, followed by vocational training (employable skills) with integrated literacy and numeracy and personal development components.</p> <p>The vocational component will include programmes with a specific sectoral / occupational focus and could include: green technologies, catering, tourism, healthcare and social care, sports and recreation, craft skills in construction and could involve new types of apprenticeships. For instance, new apprenticeships involving training combined with learning on the job could be particularly appropriate for young unemployed. The apprentice programme, offered by West End Youth Centre, reflects an effort to combat youth employment through a blend of mentoring, work experience and third level qualifications and, potentially, could be rolled out more widely.</p>
		26ae	Change to LRFIP to refer to the need for pre-development work to 2.1.3.4 Priority 4: Work and Employability, Objectives (page 132)	<p>2.1.3.4 Priority 4: Work and Employability</p> <p>Objectives Objectives are as follows:</p> <p>1) To promote improved employability of people of working age in the target population. This encompasses employability in the broadest sense covering pre-development that is especially necessary with people with no or little history of employment, personal development / improved motivation towards the labour market, key competencies and skills required in the labour market, and qualification.</p> <p>2) To develop labour market activation and access to employment initiatives for the target population.</p>
		26ah	Change to LRFIP to state that there are challenges in defining the terms “at risk” in the environment of regeneration communities to 2.1.4.5 Priority 5: Families and Youth at Risk (page 137)	<p>2.1.4.5 Priority 5: Families & Youth At Risk</p> <p>This theme is addressed to family support and young people, focusing on families at higher levels of need and young people at risk. Early intervention and preventive action to promote positive outcomes for children and families are addressed in different ways under other priority themes of the programme – namely in Priority 1, Education and Learning and Priority 2, Health and Well-Being. Interventions under the Employability and Work priority are also relevant in that improved profile of education, skills and work for parents and young people can improve economic security and bring other benefits (structure to family life and role models). Interventions under the first two themes in particular are directed to strengthening universal services in accessible community-based settings – namely, schools, primary health care teams, crèches – which are “the critical interagency interfaces for services to children and families” (Report of the Task Force on the Child and Family Support Agency, 2012).</p> <p>A key challenge facing the communities is the definition of the term “at risk” in that there is greater “risk” for all young people and families in communities where drugs are traded and there is a history of criminality, intimidation and extremes of social disadvantage.</p>
		26ai	Change to LRFIP to assert the importance of maintaining open access to services to Priority 5: Families and Youth at Risk (page 137)	<p>2.1.4.5 Priority 5: Families & Youth At Risk</p> <p>Dealing more effectively with problems in families at the highest level of need should help stabilise communities. Combined with other measures to support children and families which are universally available and preventive in their orientation and measures to build community engagement and capacity, successes here should generate more positive community social capital and a social context that enforces pro-social and civic behaviour. An important aspect here is to support improved community safety.</p>
		26aj	Change to LRFIP to add examples of programmes run at SAC to Priority 1: Education and Learning, under Experience to Date (page 121). Reference to “Strengthening Families” programme added to 3. Literacy, Numeracy and Educational Attainment in School under Scope for Funding Support (page 125)	<p>Priority 1: Education & Learning</p> <p>Experience to Date For younger children, there is an infrastructure of community-based childcare and pre-schools offering full day and sessional childcare throughout the disadvantaged areas of the city including the regeneration areas. New crèche facilities were developed on both the northside (Moyross, King’s Island) and southside (Southill) in recent years with capital investment under the Equal Opportunities Childcare Programme (managed by Pobal and with EU funding support). Childcare facilities and pre-schools are often co-located or in close proximity to primary schools, or located in community centres and Family Resource Centres. Many of the community centres in regeneration areas, including Our Lady of Lourdes Community Centre and Southill Action Centre run programmes for pre-schools children and after-schools (and are planning to further develop these activities). The Limerick City Childcare Committee has a role in the development of a comprehensive range of quality child-centred childcare services accessible to all.</p> <p>3. Literacy, Numeracy and Educational Attainment in School</p> <p>Scope for Funding Support The social regeneration programme can provide for the following types of expenditure:</p> <ul style="list-style-type: none"> • Funding to support the roll out to communities of improved practice in early years learning and child development and for more intensive work with parents and children including peer support (e.g., parent-to-parent). • Additional funding for school-based and community-based services such as evidence-based parenting and behavioural / emotional well-being programmes such as Incredible Years and Strengthening Families.

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				<ul style="list-style-type: none"> • Supplementary funding for after-school / out-of-school activities that extend the school day and services in schools which show evidence of success in supporting learning and improved attainment (literacy, numeracy, tuition in subjects). The social regeneration programme, however, is in a supportive role here.
		26ao	Change to LRFIP to make reference made to community centres as partners to 2.1.3.7 Priority 6: Community Participation, Empowerment and Civic Engagement, A. Community Organisation / Estate Management / Local Service Delivery under Key Agencies (page 151).	<p>A. Community organisation / estate management / local service delivery</p> <p>Key Agencies</p> <p>Limerick City Council, An Garda Síochana, the PAUL Partnership and community organisations including the various community / enterprise and action centres operating in the regeneration areas. Depending on the range of service provision, other agencies have a key interest and role particularly, the HSE, LCETB / SOLAS, formerly FÁS.</p>
		26aq	Change to LRFIP to add reference to participation of young people in community structures to 2.1.3.7 Priority 6: Community Participation, Empowerment and Civic Engagement, B. Capacity Building: Community Participation, Empowerment and Civic Engagement, under Scope of Action (page 152)	<p>Priority 6: Community Participation, Empowerment and Civic Engagement</p> <p>B. Capacity building: community participation, empowerment and civic engagement</p> <p>Scope of Action</p> <p>Drawing on the recommendations of the NEXUS report (2012) and the needs confirmed by representatives of the communities, the following action could be supported under the social regeneration programme:</p> <ul style="list-style-type: none"> d) Development and negotiation of a <i>Civic Participation Charter</i>. It is considered necessary to develop a charter in order to present in detail an understanding of what it means for each of the agencies involved, the “rules” that should be followed in keeping the community informed and agreement from all about what is to be achieved. The recommendations state that the charter should be “signed up to” by all the agencies involved (e.g., HSE, Gardaí, LCETB, education providers etc.) and this should govern all working relationships into the future (NEXUS, 2012). e) Support to strengthen communities’ capacity to engage in community organisation (broadening and deepening engagement and improve diversity of representation) and in local decision-making structures such as the Local Regeneration Committees. This is needed because residents and their representatives (organisations) require particular skills, and access to resources if they are to participate meaningfully. As the needs vary across the communities, an assessment of needs in each area (with residents’ representatives fully involved in the assessment process) is required. Based on the needs assessment (e.g., for technical or professional assistance in planning, programmes to encourage wider involvement in the community), a Support Programme should be prepared. The capacity building support should be directed at helping communities to effectively fulfil their role in implementing the Charter (NEXUS, 2012). This process should also promote the participation of young people in local community decision-making structures.
		ar	Change to LRFIP to add reference to roll out of restorative justice and scope for further development in community settings to 2.1.3.8 Policing Justice and Community Safety, Experience to Date (page 134)	<p>2.1.3.8 Priority 7: Policing, Justice and Community Safety</p> <p>Experience to Date</p> <p>The regeneration programme (2008-2011) secured additional resources to the city in order to bring the crime situation in Limerick within the bounds of normal policing. This involved the provision of 100 extra gardaí, most of which was sustained by the end of 2010. Additional gardaí were brought in at different levels of the police structure (Inspector, Sergeant, regular Gardaí) and there was a strong focus on community policing. This was with a view to bringing public order to the estates and creating confidence in the gardaí and the wider criminal justice system on the part of the community. New measures were also part of the strategy including the setting up of the Emergency Response Unit and a Regional Response Unit, operating out of Limerick. At the same time, new gangland legislation was introduced by government (but in practice, this was not used in achieving convictions). An important factor in achieving convictions has been the ability of the Director of Public Prosecutions to bring cases involving serious criminals to be heard in the Special Criminal Court, by three-person judges rather than utilisation of jury trials. This eliminates the potential for intimidation of juries, which was considered a problem in achieving convictions in Limerick. The combined impact of these measures was to bring the serious crime problem in Limerick under control with a large number of the most serious criminals convicted and now serving prison sentences. However, the problems of community safety and anti-social behaviour remain as very serious issues. Furthermore, the situation in communities in terms of safety, fear and vulnerability in the face of criminality can change very quickly – for instance, in advance of, or with release of, prisoners or with new sources of criminality emerging in the city.</p> <p>Additional interventions involving the policing and justice services supported under the regeneration programme 2008-2011 included:</p> <ol style="list-style-type: none"> 1. Support for CCTV (aspects of installation and monitoring) in regeneration areas; 2. Involvement of police and justice services in local community-based information and consultative structures including the Local Regeneration Committees, in coordinated planning structures in the city in particular the Limerick City Children’s Services Committee and in other partnership-based and community initiatives. 3. The Le Chéile Restorative Justice Project, the roll of out restorative practice (training of personnel in relevant services including teachers, gardaí and community, and development of restorative practice in schools) and the Probation and Linkage

SECTION 3: PROPOSED AMENDMENTS

Ref. No.	Submission From		Manager's Recommendation	Proposed Amendment
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				in Limerick Scheme (PALLS) (a training centre for ex-offenders), as described above, under the <i>Priority Families and Youth at Risk</i> . There is scope and proposals to develop restorative practice further to promote a restorative communities project, engaging residents and community groups working together.
27	Suamhneas 29 Ballygrennan Close Moyross Limerick	27b	Change LRFIP to amend text.	Please refer to submission 19i above
32	Our Lady of Lourdes Community Services Group Ltd (OLOLCSG)	32g	Change to LRFIP to reference specifically the West End Youth Centre Apprenticeship Programme (page 133)	Please refer to submission 26ad above
		32h	Change to LRFIP to add reference to training in culinary skills, security to A. Labour Market Intervention Programme (i) Northside and (ii) Southside, Scope of Action (page 134)	Priority 4: Work and Employability A. Labour Market Intervention Programme – (i) Northside and (ii) Southside Scope of Action: The scope of action involves working effectively with the labour market activation system, Government’s Action Plan for Jobs, the “Pathways to Work” initiative and “youth guarantee” approach to better meet the needs and support employability of the target population - the long-term unemployed, young people not in employment, education or training (NEETs) – prioritising the regeneration areas or these target groups (long-term unemployed, NEETs) who, until relatively recently, were resident in the regeneration areas. Initiatives can draw on lessons from recent national evaluations ⁴ . The main action here is a labour market intervention programme with a northside and southside dimension, adopting “the pathways the work” approach and linked to the proposals for community-based training centres and support for employment initiatives under the economic pillar of the FIP, as well as new opportunities for training and work arising from implementation of the physical pillar of the FIPs. Additional support and customisation of existing and new schemes will be provided under the social regeneration programme to help address the additional barriers to employment faced by the target groups. Such barriers could relate to aspects of eligibility for active employment schemes (e.g., a requirement to recruit people only aged 25 years and over). There are also strong links between actions under this theme to improve employability and those specified above related to adult education and community learning. In the case of lone parents, in particular, there are links to community-based childcare interventions (Priority 1 Education and Learning). Access to, and progression in, adult education can be an important part of the pathways approach. There are connections here to the activity proposed above, focused on bringing young women lone parents into adult education and learning. Types of action to be supported under the social regeneration programme are as follows: 1) Flexible training programmes which include core skills development, followed by vocational training (employable skills) with integrated literacy and numeracy and personal development components. The vocational component will include programmes with a specific sectoral / occupational focus and could include: green technologies, catering, tourism, healthcare and social care, sports and recreation, craft skills in construction, customer care and retail skills, and security and could involve new types of apprenticeships. For instance, new apprenticeships involving training combined with learning on the job could be particularly appropriate for young unemployed.
		32n	Change to LRFIP to add text.	Please refer to submission 26aj above.
		32o	Change to LRFIP to reference specifically the West End Youth Centre Apprenticeship Programme (page 133)	Please refer to submission 26ad above
		32s	Change to LRFIP to add text.	Please refer to submission 32h above.

SECTION 3: PROPOSED AMENDMENTS

Ref. No.	Submission From		Manager's Recommendation	Proposed Amendment
33	Group Submission on behalf of the Ballinacurra Weston Residents Alliance, Carew and Kincora Parks Concerned Residents Action Group, Thomas Daly: On behalf of Moyross Residents Association. (Detailed list of persons who made postcard submissions are detailed in Appendix A of this report)	33a, b, c	Change to LRFIP to add text. Please refer to submission 5 a) and b) above.	Change to LRFIP to add text. Please refer to submission 5 a and b above.

LATE SUBMISSIONS

3	Department of Arts Heritage and the Gaeltacht	3b	<p>Change Environmental Report to insert additional wording to Chapter 4: Environmental Baseline (page 34)</p> <p>Insert additional text to section 5.4 Cultural Heritage to elaborate on the number of protected structures in the regeneration areas.</p>	<p>Section 4.5.CULTURAL HERITAGE</p> <p>The architectural and archaeological heritage represents a finite resource and irreplaceable asset to the county city and contributes to the quality of the built and riverine environment. It is important that structures of architectural and archaeological merit including underwater archaeology are thus protected.</p> <p>Archaeological heritage is protected under the National Monuments Acts (1930–2004), Natural Cultural Institutions Act 1997, and the Planning Acts. Specifically Underwater Archaeology is protected by a comprehensive legal instrument to which Ireland is a signatory, namely the UNESCO Convention on the Protection of the Underwater Cultural Heritage. A primary source of information for known archaeological features is the Record of Monuments and Places (RMP) which was established under the National Monuments Acts 1930 to 2004. The Record of Monuments and Places (RMP) is an inventory, put on a statutory basis by amendment to the National Monuments Act 1994, of sites and areas of archaeological significance.</p> <p>4.5.1 St. Mary's Park</p> <p>The Records of Monuments and Places Map for Limerick (LI005-017) shows that there is a significant amount of archaeology located within the Zone of Archaeological Potential. In addition to the Medieval Core Monuments there are numerous sites located outside the Zone of Archaeological Potential in the outer suburbs of the City.</p> <p>St. Mary's Park, surrounded by water and located on an island is also likely to be of significant interest from an underwater heritage perspective. The nature and extent of the archaeological heritage that can be contained within such watercourses can include fishtraps, quays, stone steps, logboats, and wrecks as well as artefactual material either lost, deposited or directly associated with a site. There is a high probability of encountering riverine archaeology within the river courses of Limerick City and particularly around St. Mary's Park.</p> <p>There are no protected structures located within the defined regeneration area of St. Mary's Park. However there are currently twenty eight structures on the RPS in the wider Kings Island area. In addition, ten structures are currently on the National Inventory of Architectural Heritage (NIAH) of Limerick City, but are included under the existing RPS.</p>
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SECTION 3: PROPOSED AMENDMENTS				Proposed Amendment
Ref. No.	Submission From		Manager's Recommendation	
				<p>4.5.2 Moyross</p> <p>There are no structures within the regeneration area of Moyross on the Limerick City Record of Protected Structures (RPS). Ballygrennan House is the only protected structure in Moyross located at Castle Park. Similarly, none of the structures within the study area feature on the National Inventory of Architectural Heritage (NIAH) compiled for Limerick City.</p> <p>4.5.4 Southill</p> <p>There are a number of local sites of archaeological heritage within Southill most of which are located along the southern boundary of the M7 route and have been assessed as part of the M7 Environmental Impact Statement for the Southern Ring Road. One other site of archaeological interest is located on the northeast of the existing golf course. It should be noted that all monuments recorded have been encroached on to some degree by the M7. Southill House is listed on the NIAH survey. There are no structures within the regeneration area of Southill on the Limerick City Record of Protected Structures (RPS). The only protected structure within this regeneration area is Southill House located within Limerick County.</p>
		3c	Change LRFIP to insert an additional paragraph after section 2.3.9 to describe the strategic objective to conserve and enhance the Historic Environment (page 174)	<p>2.3.10 Conserve and Enhance the Historic Environment</p> <p>The architectural and archaeological heritage represents a finite resource and irreplaceable asset to the city and contributes to the quality of the built and riverine environment. It is important that structures of architectural and archaeological merit including underwater archaeology are thus protected. The Framework Implementation Plan has a key aim to contribute to and enhance the historic and cultural heritage environment.</p> <p>Underwater cultural heritage is particularly relevant to the regeneration areas, in particular St. Mary's Park, and it is important that notwithstanding proposed measures in the LRFIP that the historical and archaeological significance of the main watercourses that define Limerick city are protected and enhanced.</p>

SECTION 4: SEA SCREENING OF PROPOSED AMENDMENTS AND AN ENVIRONMENTAL REPORT ADDENDUM

Limerick Regeneration Framework Implementation Plan

SEA Screening of Proposed Amendments & Environmental Report Addendum

February 2014



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Practical environmental planning solutions

Limerick Regeneration Framework Implementation Plan

SEA Screening of Proposed Amendments & Environmental Report Addendum

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1307 SEA LRFIP/Environmental Report Addendum

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1.0 INTRODUCTION

1.1 Introduction

This report is an addendum to the Environmental Report (ER) of the Strategic Environmental Assessment (SEA) of the Limerick Regeneration Framework Implementation Plan (LRFIP).

This LRFIP is a practical and strategic framework plan detailing how the regeneration programme is intended to be implemented. It identifies the issues, objectives and associated programmes and actions that will need to be implemented to facilitate regeneration and deliver real change on the ground. Whilst not a land use plan per se, the LRFIP does contain very specific and detailed physical proposals and improvements to the area. The regeneration programme is a highly dynamic process heavily influenced through community involvement, the participation of public agencies, the availability of public funds and the statutory planning process. The programme therefore has significant cognisance of other funding programmes and spatial strategies.

The LRFIP in its current state sets the framework for future development but, crucially does not provide the framework for consent of projects listed. It is intended that the LRFIP will be adopted and given legal effect through a forthcoming review of the Limerick City Development Plan 2010 – 2016 as part of the development plan review process.

In accordance with EU legislation a Strategic Environmental Assessment (SEA) has run in parallel with the development of the LRFIP. Strategic Environmental Assessment is a systematic and effective process for ensuring that environmental issues are taken into account at every stage in the preparation, implementation, monitoring and review of plans, programmes and strategies. The objectives of the SEA are to consider the environmental constraints and opportunities within the city and specifically the regeneration areas and at a strategic level to look at the environmental consequences of choosing one option relative to the impact of choosing a reasonable alternative option.

A Scoping Report was undertaken as the initial stage of the SEA process in April 2013. It presented, in consultation with key stakeholders, initial understandings of key environmental issues within the study area. Submissions received were incorporated into the next phase of the SEA process - drafting of the Environmental Report (ER). The ER contains the findings of the assessment on the likely significant effects on the environment of the implementation of the LRFIP. Under the provisions of Article 6(3) of the Habitats Directive 92/43/EEC the LRFIP underwent a Habitat Directive Assessment (HDA). The draft LRFIP, SEA Environmental Report (ER) and Habitats Directive Assessment (HDA)/Natura Impact Report (NIR) were subsequently placed on public display from November 1st until December 5th 2013. Two hundred and seventy four submissions were received. All of these submissions were outlined in a Managers Report which includes recommendations on material alterations to the LRFIP following submissions received and was issued to the members of Limerick City Council in February 2013. Material alterations are presented in detail in Section 3.0.

This stage of the SEA process is to assess the likely significant effects on the environment of implementing the proposed material alterations to the LRFIP in light of the public consultation

phase. This Addendum should be read in conjunction with the SEA / Environmental Report and HDA/NIR produced in May 2012, for the LRFIP.

1.2 SEA Process and Progress to Date

SEA is governed by the European Directive 2001/42/EC on the Assessment of the Effects of Certain Plans and Programmes on the Environment (commonly known as the *SEA Directive*). It was transposed into Irish Law through the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (Statutory Instrument Number SI No. 435 of 2004) and the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (SI No. 436 of 2004). Both sets of Regulations became operational on 21 July 2004. The Regulations have been amended by the European Communities (Environmental Assessment of Certain Plans and Programmes) (Amendment) Regulations 2011 (SI No. 200 of 2011) and the Planning and Development (Strategic Environmental Assessment) (Amendment) Regulations 2011 (SI No. 201 of 2011).

The SEA process consists of a series of steps or stages that need to be undertaken. These are:

1. **Screening** of the LRFIP to establish whether it must undergo an SEA;
2. **Scoping** of the details to be provided in the Environmental Report, in consultation with environmental authorities;
3. **An Environmental Report** containing the findings of the assessment on the likely significant effects on the environment of the LRFIP;
4. **Consultation** on the LRFIP and associated Environmental Report;
5. **An SEA Statement** identifying how environmental considerations and consultations have been integrated into the LRFIP; and
6. **Monitoring Programme** of the significant environmental effects of the LRFIP

This report deals with step 4 of the above process, the incorporation of the public consultation phase of the draft Environmental Report (ER) of the LRFIP.

The ER, LRFIP and HDA/NIR were put on public display from November 1st until December 5th 2013. Two hundred and seventy four submissions were received. All of these submissions were outlined in a Managers Report which was issued to the members of Limerick City Council in February 2014. The Manager's Report lists the persons or bodies who made submissions or observations; summarises the issues raised by the persons or bodies and gives the response of the manager to the issues raised. The Manager's Report includes recommendations on material alterations to the LRFIP.

As part of the LRFIP public consultation exercise, submissions were received from the Environmental Protection Agency (EPA), the Department of Agriculture, Food and the Marine, Department of Communications, Energy and Natural Resources, and Department of the Arts, Heritage and the Gaeltacht (DAHG) regarding the inclusion of objectives for the protection of the environment. These have been incorporated into the proposed material alterations to the LRFIP, as appropriate, with a view to clarifying and strengthening the environmental objectives of the Plan. This addendum considers the likely significant impacts on the environment as a result of implementing the proposed material alterations to the LRFIP. The proposed material alterations are assessed against the environmental objectives set out in the Environment Report. Where a likely significant effect is identified, mitigation measures are proposed, where appropriate.

2.0 REVIEW OF PROPOSED MATERIAL ALTERATIONS TO THE LRFIP

2.1 Introduction

This section identifies the environmental consequences of relevant proposed amendments to the LRFIP. The proposed amendments to the LRFIP constitute a further stage in the process of finalising a framework plan for the four regeneration areas and this Addendum represents the next stage in the SEA process.

It can be considered as an addendum to the Environmental Report (October 2013). Consistent with the approach in the Environmental Report, this addendum document comprises the environmental assessment of the recommended amendments against a schedule of environmental protection objectives (EPOs). This environmental assessment of the proposed material alterations is carried out so as to determine whether the implementation of such alterations would be likely to cause significant impacts on the environment. It also raises awareness of the potential environmental impacts of any amendments to the LRFIP. Members therefore have the benefit of an environmental appraisal of proposed material alterations to inform and assist in their decision making.

Content of the LRFIP which does not comprise policies or objectives is not within the scope of the SEA and therefore was not evaluated in the initial Environmental Report. Consequently, proposed amendments to such content are generally not considered herein. Where supporting text that is referred to in policies is being amended, and where such amendments would change the evaluation provided in the Environmental Report, then such amendments are considered. In addition, changes which involve the renumbering of policies/objectives only or minor grammatical or formatting changes are not considered herein.

Where appropriate, mitigation measures are proposed so as to offset potential impacts on the environment. These recommended mitigation measures are summarised in Section 2.4.1 of this report.

2.2 Environmental Assessment of the Proposed Material Alterations

The environmental assessment of the proposed material alterations will be carried out in an analytical manner in three phases. The first phase will involve the screening of the proposed material alterations while the second phase will involve an analysis of the proposed objectives that conflict with Environmental Protection Objectives (EPOs). The third phase will consider proposed objectives that conflict with Environment Protection Objectives (EPOs) and which are unlikely to be mitigated.

The process of setting the Environmental Protection Objectives (EPOs) is set out in Section 5.0 of the Environmental Report. The objectives are essentially methodological measures against which the environmental effects of the LRFIP can be tested or evaluated. If the EPO's are compiled with in full, then the implementation of the LRFIP would result in an environmentally neutral impact. EPOs are compiled from a range of environmental factors relevant to the LRFIP and are listed below.

Table 1.0 Schedule of Environmental Protection Objectives

B1	To ensure compliance with the Habitats Directive with regard to the protection of Natura 2000 Sites and Annexed habitats and species.
B2	To effectively manage other environmental features and maintain wildlife corridors which are of major importance for wild fauna and flora and essential for the migration and dispersal of wild species.
B3	To avoid significant impacts on relevant habitats, species, environmental features or other sustaining resources in Wildlife Sites.
W1	To prevent impacts upon the status of any waters in line with the recommendations outlined in the Shannon River Basin Management Plan.
W2	To ensure an adequate supply of potable drinking water.
W3	To reduce and manage the risk of flooding.
PH1	To protect and enhance people's quality of life based on high quality residential, community, working and recreational environments and on sustainable travel patterns.
CH1	To avoid unauthorised impacts upon archaeological heritage (including entries to the RMP) and architectural heritage (including entries to the RPSs).
S1	To minimise effects upon the sustainable use of land, mineral resources or soils.
AC1	To assist and facilitate the achievement of higher level targets contained in the targets relating to the Kyoto Protocol.
N1	To maintain and, where possible, improve acoustical quality for the current and future residents of the regeneration area.
LA1	To conserve and enhance valued natural landscapes and features within them including those of geological value.
MA1	To reduce traffic levels by encouraging modal change from car to more sustainable modes of transport such as public transport, walking & cycling.
MA2	To reduce the generation of waste and adopt a sustainable approach to waste management.

2.3 Methodology for the Environmental Assessment of Proposed Material Alterations

Following the public consultation period material alterations to the LRFIP include amendments to text, several objectives and maps. A phased methodology for the screening of these material alterations will be undertaken in this addendum.

Phase One – Screening of the proposed material alterations

In the first phase the objectives that are contained in the proposed material alterations are evaluated against the EPO's which were created for the LRFIP. The first phase is therefore a screening process where new and modified policies and objectives are formally assessed by identifying whether the change(s) would be likely to have either:

- No likely interaction with the EPOs (they are likely to have no interaction with the status of the environment);
- Likely to improve the status of EPOs (they are likely to improve the status of the environment)

- A probable conflicting interaction with EPOs which is unlikely to be mitigated against (they are likely to significantly conflict with the status of the environment);
- A potentially conflicting interaction with EPOs which is likely to be mitigated against through compliance with the mitigation measures outlined in the Environmental Report (they are unlikely to significantly conflict with the status of the environment),
- An uncertain interaction with EPOs (the interaction with the status of the environment is uncertain).
- A neutral interaction with EPOs (the interaction with the status of the environment is considered neutral).

The amendments are listed on one axis and the Environmental Protection Objectives (EPOs) on the other with each assessed as to its potential effects. A summary of the results of this exercise are set out in a series of matrices in Section 2.4.1 of this report.

Phase Two – Analysis of proposed objectives that conflict with Environmental Protection Objectives

The second phase identifies only those proposed amendments that are in conflict with the EPOs, In relation to each proposed amendment, comments are made as to its potential effects on the EPOs and following on from this, potential mitigation measures have been identified and typically include:

- Changes to the wording of the objective
- The removal of the objectives that are unsustainable or which do not promote the SEA objectives
- The addition of new objectives
- The expansion on the wording of an objective

Phase Three - Analyses of proposed objectives that conflict with Environment Protection Objectives (EPOs) and which are unlikely to be mitigated

Having carried out an analysis through Phase 1 and Phase 2 as outlined above, significant issues will be addressed in more detail in Phase 3, where necessary.

2.4 Screening of the Proposed Material Alterations

As referenced earlier, the content of the LRFIP which does not comprise policies or objectives are not evaluated in the Environmental Report. A lot of the changes proposed to the LRFIP occur within the social programme and they are input to simply explain and clarify issues rather than introduce new policies or objectives. Thus, these changes are not assessed within this report. However, where supporting text that is referred to in policies is being amended, and where such amendments would change the evaluation provided in the Environmental Report, then such amendments are considered. In addition, changes which involve the renumbering of policies/objectives only or minor grammatical or formatting changes are not considered herein.

The text in black is the text as contained in the LRFIP and is not changing. The text in **red** is the text as contained in the LRFIP and is proposed to be deleted. The text in **blue** is proposed as amending/new text to the LRFIP. Responses with regard to the environmental consequences of the changes are shown in *italics*.

Table 1.0 Material Changes to Policies and Objectives

1.	<p>Volume 2, Section 2.1.3.2 Scope of Action</p> <p>Insert additional action that could be supported under the social regeneration programme: 3) High-quality parenting supports to meet the needs of all parents at different levels of need and during different phases of childhood. This links with initiatives of the Limerick City CSC under Parenting Limerick.</p>
2.	<p>Volume 2, Section 2.1.3.7 Priority 6: Community Participation, Empowerment and Civic Engagement, A Community Organization / Estate Management / Local Service Delivery Scope of Action</p> <p>1. In the interest of responding to issues regarding community representation, effective and efficient community management and estate management, a review of the structures in place is being commissioned by Limerick City and County Council Regeneration Office. The purpose of the review is to map out and review the activities of the various structures in regeneration areas in Limerick, examine relevant experience from elsewhere in this area and compare the activities and set-up of the community structures in regeneration areas in Limerick with wider best practice.</p> <p>2. 1. Support for Estate Management structures / organisation and the operation of the Community Consultative Forum, taking into account the conclusion and any recommendations for change arising from the review (1, above).</p> <p>3. 2. Operation of Local Regeneration Committees involving community and statutory representation in each of the estates. The purpose here is to provide a forum for the exchange of information on service delivery, forward planning / proposals, and feedback to statutory agencies on issues of concern to the communities and on needs. Again, the precise arrangements here will take into account the findings, conclusion and any recommendations for change arising from the review (1, above).</p>
3.	<p>Volume 2, section 2.2.2 Economic Development Critical Success Factors</p> <ul style="list-style-type: none"> • Opening up of communities through additional Waterways Infrastructure development to complement new road access into regeneration areas that will integrate Limerick City with Moyross / St. Marys Park subject to detailed environmental considerations and requirements . This will generate training and employment opportunities adopting a maritime and tourism theme incorporated into the extended Limerick City Economic & Spatial Planning Strategy.
4.	<p>Volume 2 Section 2.3.8(a)</p> <p>Buildings and the public realm should be designed and delivered to a high standard, using durable materials, appropriate technology and orientated in a manner that minimises energy usage. Development should enhance the environment and recognise the requirement for adaptable, flexible structures which can respond to changing environments over time. All suitable materials/soils that are stripped/excavated for construction purposes shall be re-used to the greatest possible degree as fill material where appropriately needed within developments, landscaping in the regeneration areas</p>
5.	<p>Volume 2 Section 2.3.8(b)</p> <p>Physical – Strategic demolition There are a number of strategic demolitions still planned due to strategic planning reasons. These can generally be characterised as being necessary due to improvements to and reshaping of the physical environment. Where demolition is necessary and required both Demolition Waste Management Plans and Dust Management Plans shall be prepared at development stage and implemented throughout the project. It is however our aim to minimise this level of demolition on a house-by-house basis with a view to retaining and refurbishing as many as possible.</p>
6.	<p>Volume 2, Insert an additional paragraph after section 2.3.9</p> <p>2.3.10 Conserve and Enhance the Historic Environment</p> <p>The architectural and archaeological heritage represents a finite resource and irreplaceable asset to the city and contributes to the quality of the built and riverine environment. It is important that structures of architectural and archaeological merit including underwater archaeology are thus protected. The Framework Implementation Plan has a key aim to contribute to and enhance the historic and cultural heritage environment.</p> <p>Underwater cultural heritage is particularly relevant to the regeneration areas, in particular St. Mary's Park, and it is important that notwithstanding proposed measures in the LRFIP that the historical and archaeological significance of the main watercourses that define Limerick city are protected and enhanced.</p>
7.	<p>Volume 2, section 2.3.9 Conserve and Enhance the Natural Environment</p> <p>The Framework Implementation Plan has a key aim to contribute to and enhance the natural environment in the regeneration areas by:</p> <ul style="list-style-type: none"> • Protecting and enhancing environmentally designated landscapes minimising impacts on biodiversity and providing net gains in biodiversity where possible • Remediating, mitigating and monitoring contaminated and unstable land, where appropriate in

	<p>line with EPA guidance</p> <ul style="list-style-type: none"> • Ensuring that any projects and developments arising out of the Limerick Regeneration Framework Plan will not be in conflict with the requirements of the Habitats, Birds, SEA, EIA, Water Framework and Floods Directives
8.	<p>Volume 2, Section 2.4.4 Open Space and Public Realm Strategy</p> <p>After objective 11, insert additional objective as follows:</p> <p>12. Protect and enhance existing desire lines within Moyross and integrate as part of public realm improvements within the area.</p>
9.	<p>Volume 2 Section 2.6.1(b)</p> <p>From the northwest of St. Mary's Park to the New Road, Thomond Park and beyond. The route of the new connection from St. Mary's Park over the River Shannon shall be selected to ensure no significant impacts on the integrity of the SAC site. Restricted working areas will be imposed to ensure minimal disturbance to sensitive habitats.</p>
10.	<p>Volume 2, section 2.6.2 Land Use Strategy</p> <p>6. Promote the development of the waterways, subject to detailed environmental considerations and requirements to include St. Mary's Park, Moyross to Grove Island and the city as a flagship project with training, employment and tourism potential.</p>
11.	<p>Volume 2, Section 2.6.3 Housing Strategy</p> <p>13. Consider the existing housing need (replacement housing and need arising due to overcrowding) of St. Mary's Park, in determining the type and size of replacement and additional housing provision in order to sustain a mixed and sustainable neighbourhood.</p> <p>14. Consider the future housing need required over the regeneration programme in relation to overcrowding, emerging household types and elderly housing. It is prudent to plan for a net gain in replacement homes which will act as a sufficient buffer over the lifetime of the regeneration project.</p> <p>15. Ensure that all new dwellings constructed within St. Mary's Park shall have a finished floor level of 5.75m as recommended in the detailed Flood Risk Assessment for St. Mary's Park and that all development shall comply with the requirements of the Guidelines on the Planning System and Flood Risk Management.</p>
12.	<p>Volume 2 Section 2.6.4</p> <p>(9) Explore the potential to upgrade Eel's Weir to provide a cycle, pedestrian and vehicular link to the New Road and beyond and ensure that any development proposed does not have a negative impact on habitats.</p>
13.	<p>Volume 2 Section 2.6.4</p> <p>(13) Manage the existing and future flood risk to St Mary's Park by:</p> <ul style="list-style-type: none"> ▪ Protecting the integrity of the existing flood defences and embankments ▪ Incorporate flood resistant and flood resilient measures appropriately ▪ Utilise sustainable urban drainage systems (SUDS) ▪ Establish flood warning and emergency procedures ▪ Consider the potential to upgrade Eel's Weir to facilitate safe access and egress during flood events in St. Mary's Park and ensure that any works proposed does not have a negative impact on habitats.
14.	<p>Volume 2, insert additional wording to 2.6.5 Refurbishment Strategy</p> <p>The extent of works to be carried out on private houses will be limited to the above thermal upgrade works, some cosmetic works to the front elevation and garden walls. However in the Local Authority houses this work may be extended to incorporate the removal or remodelling of rear extensions and internal remodelling to best reflect the current housing typology demand as well as more general decorative upgrades where necessary. Where required this may include changes to individual dwellings to facilitate increased passive surveillance and to improve the overall visual amenity.</p> <p>Furthermore, as outlined in section 2.3.4 Open Space and Public Realm Strategy, consideration will be given to incorporating flood resistant (removable barriers) and resilient measures (wall and floor materials that can be cleaned and dried easily, electrics and other appliances raised above floor level) in combination with other measures to manage future flood risk to St. Mary's Park and King's Island.</p>
15.	<p>Volume 2 Section 2.6.6</p> <p>The strategy will take place over a number of phases and will run in tandem with the refurbishment strategy.</p> <p>A precautionary approach is promoted such that development within Flood Zone C should occur in the first instance and no development should occur in Flood Zone B or A until such a time as the CFRAMS have been published and the potential impacts of development in these zones are reassessed. Once the replacement housing has been complete any future phases of housing development will be allocated to the voluntary and private housing sectors.</p>
16.	<p>Volume 2, Section 2.7.3 Housing Strategy</p>

	Amend the table to update the number of occupied and boarded homes to be demolished from 27 no. houses to 28 no. houses and associated mapping.
17.	Amendment to Moyross Maps pp177 a) To provide frontage of housing overlooking linear park at Craeval and Pineview Gardens b) To retain access from Castle Park/Respond Housing into Sarsfield Gardens

2.4.1 Phase 1: Screening of Material Alterations against EPOs

Material Alterations to the LRFIP	Likely to Improve Status of EPO's	Probable Conflict with EPO's – unlikely to be mitigated	Potential Conflict with EPO's – likely to be mitigated	Uncertain Interaction with EPO's	Neutral Impact with EPO's	No Likely Interaction with EPO's
Amendment 1 Insert additional action that could be supported under the social regeneration programme: 3) High-quality parenting supports to meet the needs of all parents at different levels of need and during different phases of childhood. This links with initiatives of the Limerick City CSC under Parenting Limerick.	PH1					B1; B2; B3; W1; W2; W3; CH1; S1; AC1; N1; LA1; MA1; MA2
Amendment 2 1. In the interest of responding to issues regarding community representation, effective and efficient community management and estate management, a review of the structures in place is being commissioned by Limerick City and County Council Regeneration Office. The purpose of the review is to map out and review the activities of the various structures in regeneration areas in Limerick, examine relevant experience from elsewhere in this area and compare the activities and set-up of the community structures in regeneration areas in Limerick with wider best practice. 2. 1. Support for Estate Management structures / organisation and the operation of the Community Consultative Forum, taking into account the conclusion and any recommendations for change arising from the review (1, above). 3. 2. Operation of Local Regeneration Committees involving community and statutory representation in each of the estates. The purpose here is to provide a forum for the exchange of information on	PH1					B1; B2; B3; W1; W2; W3; CH1; S1; AC1; N1; LA1; MA1; MA2

service delivery, forward planning / proposals, and feedback to statutory agencies on issues of concern to the communities and on needs. Again, the precise arrangements here will take into account the findings, conclusion and any recommendations for change arising from the review (1, above).						
Amendment 3 • Opening up of communities through additional Waterways Infrastructure development to complement new road access into regeneration areas that will integrate Limerick City with Moyross / St. Marys Park subject to detailed environmental considerations and requirements . This will generate training and employment opportunities adopting a maritime and tourism theme incorporated into the extended Limerick City Economic & Spatial Planning Strategy.	B1; B2; B3; LA1;				PH1; W1; W2; W3; CH1; S1; MA1	AC1; N1; MA2
Amendment 4 Buildings and the public realm should be designed and delivered to a high standard, using durable materials, appropriate technology and orientated in a manner that minimises energy usage. Development should enhance the environment and recognise the requirement for adaptable, flexible structures which can respond to changing environments over time. All suitable materials/soils that are stripped/excavated for construction purposes shall be re-used to the greatest possible degree as fill material where appropriately needed within developments and landscaping in the regeneration areas	MA2; S1			LA1	B2; B3; W1; W3; CH1; S1; LA1;	B1; W2; AC1; N1; MA1
Amendment 5 Physical – Strategic demolition There are a number of strategic demolitions still planned due to strategic planning reasons. These can generally be characterised as being necessary due to improvements to	B3; W1; PH1; S1; N1; MA2				B2; CH1; AC1; LA1	B1; W2; W3; MA1

and reshaping of the physical environment. Where demolition is necessary and required both Demolition Waste Management Plans and Dust Management Plans shall be prepared at development stage and implemented throughout the project. It is however our aim to minimise this level of demolition on a house-by-house basis with a view to retaining and refurbishing as many as possible.						
Amendment 6 2.3.10 Conserve and Enhance the Historic Environment The architectural and archaeological heritage represents a finite resource and irreplaceable asset to the city and contributes to the quality of the built and riverine environment. It is important that structures of architectural and archaeological merit including underwater archaeology are thus protected. The Framework Implementation Plan has a key aim to contribute to and enhance the historic and cultural heritage environment. Underwater cultural heritage is particularly relevant to the regeneration areas, in particular St. Mary's Park, and it is important that notwithstanding proposed measures in the LRFIP that the historical and archaeological significance of the main watercourses that define Limerick city are protected and enhanced.	PH1; CH1; LA1				B2; B3; W1; S1;	B1; W2; W3; AC1; N1; MA1; MA2
Amendment 7 The Framework Implementation Plan has a key aim to contribute to and enhance the natural environment in the regeneration areas by: <ul style="list-style-type: none"> • Protecting and enhancing environmentally designated landscapes minimising impacts on biodiversity and providing net gains in biodiversity where possible • Remediating, mitigating and monitoring contaminated and unstable land, where 	B1; B2; B3; W1; W2; W3				PH1; CH1; S1; LA1	AC1; N1; MA1; MA2

appropriate in line with EPA guidance • Ensuring that any projects and developments arising out of the Limerick Regeneration Framework Plan will not be in conflict with the requirements of the Habitats, Birds, SEA, EIA, Water Framework and Floods Directives						
Amendment 8 12. Protect and enhance existing desire lines within Moyross and integrate as part of public realm improvements within the area.	MA1		B2; B3; LA1	PH1	B1; W1; CH1; S1	W2; W3; AC1; N1; MA2
Amendment 9 From the northwest of St. Mary's Park to the New Road, Thomond Park and beyond. The route of the new connection from St. Mary's Park over the River Shannon shall be selected to ensure no significant impacts on the integrity of the SAC site. Restricted working areas will be imposed to ensure minimal disturbance to sensitive habitats.	B1; B2; B3; PH1; S1; LA1;				W1; W3; AC1; MA1; CH1; N1	W2; MA2
Amendment 10 6. Promote the development of the waterways, subject to detailed environmental considerations and requirements to include St. Mary's Park, Moyross to Grove Island and the city as a flagship project with training, employment and tourism potential.	B1; B2; B3; PH1; LA1				W1; W3; CH1; S1; MA1	W2; AC1; N1; MA2
Amendment 11 14. Consider the future housing need required over the regeneration programme in relation to overcrowding, emerging household types and elderly housing. It is prudent to plan for a net gain in replacement homes which will act as a sufficient buffer over the lifetime of the regeneration project. 15. Ensure that all new dwellings constructed within St. Mary's Park shall have a finished floor level of 5.75m as recommended in the detailed Flood Risk Assessment for St. Mary's Park and that all	W3; PH1		S1; LA1		B3; W1; CH1	B1; B2; W2; AC1; N1; MA1; MA2

development shall comply with the requirements of the Guidelines on the Planning System and Flood Risk Management.						
Amendment 12 (9) Explore the potential to upgrade Eel's Weir to provide a cycle, pedestrian and vehicular link to the New Road and beyond and ensure that any development proposed does not have a negative impact on habitats.	B1; B2; B3				W1; PH1; MA1; AC1	W2; W3; CH1; S1; N1; LA1; MA2
Amendment 13 (13) Manage the existing and future flood risk to St Mary's Park by: <ul style="list-style-type: none"> Protecting the integrity of the existing flood defences and embankments Incorporate flood resistant and flood resilient measures appropriately Utilise sustainable urban drainage systems (SUDS) Establish flood warning and emergency procedures Consider the potential to upgrade Eel's Weir to facilitate safe access and egress during flood events in St. Mary's Park and ensure that any works proposed does not have a negative impact on habitats. 	B1; B2; B3				W1; PH1; MA1; AC1	W2; W3; CH1; S1; N1; LA1; MA2
Amendment 14 The extent of works to be carried out on private houses will be limited to the above thermal upgrade works, some cosmetic works to the front elevation and garden walls. However in the Local Authority houses this work may be extended to incorporate the removal or remodelling of rear extensions and internal remodelling to best reflect the current housing typology demand as well as more general decorative upgrades where necessary. Where required this may include changes to individual dwellings to facilitate increased passive surveillance and to improve the overall visual amenity.	W3; PH1				W1; W2	B1; B2; B3; CH1; S1; AC1; N1; LA1; MA1; MA2

Furthermore, as outlined in section 2.3.4 Open Space and Public Realm Strategy, consideration will be given to incorporating flood resistant (removable barriers) and resilient measures (wall and floor materials that can be cleaned and dried easily, electrics and other appliances raised above floor level) in combination with other measures to manage future flood risk to St. Mary's Park and King's Island.						
Amendment 15 The strategy will take place over a number of phases and will run in tandem with the refurbishment strategy. A precautionary approach is promoted such that development within Flood Zone C should occur in the first instance and no development should occur in Flood Zone B or A until such a time as the CFRAMS have been published and the potential impacts of development in these zones are reassessed. Once the replacement housing has been complete any future phases of housing development will be allocated to the voluntary and private housing sectors.	W3; PH1				B3; W1; CH1; S1; LA1	B1; B2; W2; AC1; N1; MA1; MA2
Amendment 16 Amend the table to update the number of occupied and boarded homes to be demolished from 27 no. houses to 28 no. houses and associated mapping.	PH1; S1		AC1; N1; MA2		B1; B2; B3; W1; LA1;	W2; CH1; MA1
Amendment 17 a) To provide frontage of housing overlooking linear park at Craeval and Pineview Gardens b) To retain access from Castle Park/Respond Housing into Sarsfield Gardens	PH1; LA1 PH1; LA1; MA1				CH1 AC1	B1; B2; B3; W1; W2; W3; S1; N1; MA2 B1; B2; B3; W1; W2; W3; S1; N1; MA2

2.4.2 Phase 2: Analysis of Material Alterations that Conflict with EPOs

Material Alterations to the LRFIP	Probable Conflict with EPO's –likely to be mitigated	Uncertain Interaction with EPO's	Comments	Mitigation Recommended
<p>Amendment 4</p> <p>Buildings and the public realm should be designed and delivered to a high standard, using durable materials, appropriate technology and orientated in a manner that minimises energy usage. Development should enhance the environment and recognise the requirement for adaptable, flexible structures which can respond to changing environments over time.</p> <p>All suitable materials/soils that are stripped/excavated for construction purposes shall be re-used to the greatest possible degree as fill material where appropriately needed within developments and landscaping in the regeneration areas</p>		LA1	The importation of soil and material into established landscape areas may have potential negative impacts and could potentially lead to the distribution of foreign material	<p>No additional mitigation required.</p> <p>Compliance with LRFIP, SEA and HDA will ensure no significant effect on the environment.</p>
<p>Amendment 8</p> <p>12. Protect and enhance existing desire lines within Moyross and integrate as part of public realm improvements within the area.</p>	B2; B3; LA1	PH1	The existing desire lines largely occur on brownfield or existing unutilised sites and therefore potential conflict with environmental or landscape objectives would be minimal Whilst the enhancement of existing desire lines may be attractive to the general population they could have potential adverse impacts on residential amenity if in proximity to existing housing.	<p>No additional mitigation required.</p> <p>Compliance with LRFIP, SEA and HDA will ensure no significant effect on the environment.</p>

<p>Amendment 11</p> <p>13. Consider the existing housing need (replacement housing and need arising due to overcrowding) of St. Mary's Park, in determining the type and size of replacement and additional housing provision in order to sustain a mixed and sustainable neighbourhood.</p> <p>14. Consider the future housing need required over the regeneration programme in relation to overcrowding, emerging household types and elderly housing. It is prudent to plan for a net gain in replacement homes which will act as a sufficient buffer over the lifetime of the regeneration project.</p> <p>15. Ensure that all new dwellings constructed within St. Mary's Park shall have a finished floor level of 5.75m as recommended in the detailed Flood Risk Assessment for St. Mary's Park and that all development shall comply with the requirements of the Guidelines on the Planning System and Flood Risk Management.</p>	S1; LA1		<p>Raising the level of the land to 5.75m will most likely require the importation of soil which could be deemed to be unsustainable. However this factor needs to be balanced with recognition of the fact that most of St. Mary's Park is within Flood Zone A and existing housing will need to be protected. Raising the finished floor level of housing will also have a potential visual impact which will need to be assessed in the context of the existing landscape. Having regard to the existing environment such interference could be considered both positive and negative.</p>	<p>No additional mitigation required.</p> <p>Compliance with LRFIP, SEA and HDA will ensure no significant effect on the environment.</p>
<p>Amendment 16</p> <p>Amend the table to update the number of occupied and boarded homes to be demolished from 27 no. houses to 28 no. houses and associated mapping.</p>	AC1; N1; MA2		<p>Mainly positive to neutral long term impacts associated with demolition & rebuild. Obviously the positives arise from a much higher standard of residential development that increases quality of life. However there could also be impacts arising from the displacement of people out of their community and the breakdown of community structures. This uncertain impact needs to be evaluated further and monitored. There are also positive and negative impacts on soils and geology as the provision of replacement housing will occur on both infill and greenfield sites. The current landscape of the urban area is run down and neglected. The physical improvement of existing dwellings will have a visually positive impact on the existing urban landscape. Short-term negative impacts including noise may be felt by the population, however these will be temporary in nature.</p>	<p>No additional mitigation required.</p> <p>Monitoring of the social impacts associated with the demolition, replacement and new build housing programme should be initiated for future reference.</p> <p>The LRFIP already requires the preparation of demolition waste management and dust plans to facilitate recycling of demolition waste.</p> <p>It is noted the LRFIP proposes a number of environmental management standards during construction.</p>

2.4.3 Phase 3: Analysis of Material Alterations that Conflict with EPOs and which are Unlikely to be Mitigated

The LRFIP already contains a number of appropriate mitigation measures and relevant policies which will ensure that the proposed material alterations to the LRFIP will not have any long term adverse impact on the existing environment and specifically the EPO's as set out in Section 5.0 of the Environmental Report and summarized in this report in Table 1.0 Section 2.2. Furthermore the LRFIP will be incorporated into the review of the Limerick City Development Plan and thus will be implemented under the provisions of that Development Plan. There are already extensive policies and objectives within the development plan that seek to minimise potential environmental impacts arising from certain projects and actions and once the LRFIP is integrated into the development plan these policies will also act as mitigatory measures for projects within the LRFIP.

The assessment process which has been carried out on the proposed material alterations to the LRFIP has allowed for an early indication of the potential environmental effects but has resulted in no necessary changes. It is therefore not necessary to progress to Phase 3.

3.0 AMENDMENTS TO THE ENVIRONMENTAL REPORT ARISING FROM PUBLIC CONSULTATION

This is the addendum to the Environmental Report for the Limerick Regeneration Framework Plan hereafter referred to as the LRFIP. The addendum serves several purposes: a) to provide clarification and/or additional information following requests in the submissions received during the consultation period on the LRFIP and Environmental Report; and b) to identify where the Environmental Report has been updated in response to submissions received during the public consultation period, with the exception of minor amendments, minor clarifications and typographical corrections. It should be noted that this document supplements and should be read in conjunction with the Environmental Report.

It should also be noted that the clarifications and additional information contained herein (shown in *blue*) have been provided in order to increase the usefulness of the document for the public and decision makers but are not to such an extent that it will require changes to the content or outcome of the assessment contained within the Environmental Report. Any deletions are shown as *strikethrough*.

EXECUTIVE SUMMARY

~~EXECUTIVE SUMMARY~~ NON TECHNICAL SUMMARY

5.4 Cultural Heritage (Page 6)

The Records of Monuments and Places Map for Limerick shows that there is a significant amount of archaeology located within the Zone of Archaeological Potential in St. Mary's Park that there are three recorded monuments in Moyross, and that there are a large number of recorded monuments alongside the southern boundary of the M7 in Southill. St. Mary's Park which is located mostly within a Zone of Archaeological Potential is located within the oldest part of the city and today is commonly referred to as its 'medieval core'. There are no recorded monuments in Ballinacurra Weston. ~~There are no protected structures located within the defined regeneration areas.~~ There are two protected structures within the regeneration areas, namely Southill House located within Limerick County at the edge of Southill and Ballygrennan House located at the edge of Moyross in Castle Park.

6.0 ~~ENVIRONMENTAL PROTECTION OBJECTIVES~~ NON IMPLEMENTATION OF THE LRFIP (page 7)

In the absence of the LRFIP there would be no coordinated response to the physical, social, community safety and economic problems within the communities and it is likely that the quality of life of individuals currently residing in those areas would not improve. An integrated approach to development would not be supported and it is likely that physical improvements would proceed with little integration into the wider socio economic improvements that are required to support the wider population. Physical improvements to the area would be facilitated on an ad hoc basis and it is likely that increasing conflicts with environmental designations and flooding constraints on Kings Island would arise. However there would also be fewer new projects with potential environmental effects

~~6.0-7.0~~ Environmental Protection Objectives

~~7.0-8.0~~ Description Of Alternative Scenarios

1.0 INTRODUCTION AND TERMS OF REFERENCE

1.1 Introduction (page 11)

This is the **Draft** Environmental Report for the Draft Limerick Regeneration Framework Implementation Plan (LRFIP) Strategic Environmental Assessment (SEA). The LRFIP is intended as a practical expression of the framework for regeneration proposed across four distinct areas within Limerick City including Southill, Ballinacurra Weston, Moyross and St. Mary's Park

2.0 LIMERICK REGENERATION FRAMEWORK IMPLEMENTATION PLAN - A CONTEXT

2.4.5 Physical Objectives (page 18)

The LRFIP proposes different physical measures within each of the four regeneration areas as detailed in Table 2.2.

St. Mary's Park	Moyross	Ballinacurra Weston	Southill
Demolish 65 no. homes	Demolish 314 no. homes	Demolish 27 28 no. homes	Demolish 199 no. homes
Refurbish 321 no. homes	Refurbish 451 no. homes	Refurbish 205 no. homes	Refurbish 527 no. homes
Provide 49 no. replacement homes	Provide 295 no. replacement homes	Provide 40 no. replacement homes	Provide 209 no. replacement homes

Table 2.2 Specific Physical Measures in each Regeneration Area

3.0 SEA METHODOLOGY

3.2.1 Scoping (page 23)

A written submission on the scope of the SEA was received from the EPA dated 10th May 2013. This submission highlighted four main points **and these points have been addressed within the LRFIP as detailed below. The four main points included including:**

- Consideration should be given to ensuring that key significant higher level Plans such as the Shannon International River Basin Management Plan (and associated Programme of Measures), Mid-West Regional Planning Guidelines and the Draft Shannon CFRAMS are integrated into the Plan – see [Volume 1.0 Section 2.0 Policy Context in the LRFIP with specific reference to sections 2.2 and 2.6](#)
- The Plan in particular should ensure that land use / development are appropriate to the level of flooding identified. Vulnerable land uses (such as residential) should be avoided in areas of significant flood risk (Flood Zones A & B). The Flood Risk Management Guidelines should be fully integrated as appropriate into the preparation of the Plan – see [Volume 1.0 Section 4.0 Physical Overview and Analysis in the LRFIP with specific reference to sections 4.2.6 and Volume 2 Section 2.0 Vision & Framework Strategy with specific reference to section 2.3.8 and the individual Housing Strategies proposed in each of the regeneration areas in sections 2.4.3; 2.5.3; 2.6.3 and 2.7.3.](#)
- The Plan should also provide for the protection of designated conservation sites of national and international importance (NHA's and Natura 2000 sites) adjacent to the Plan area. The protection of key ecological linkages / corridors should also be incorporated into the Plan – see [Volume 2 Section 2.0 Vision & Framework Strategy with specific reference to section 2.3.9 and](#)

the individual Open Space and Public Realm Strategies proposed in each of the regeneration areas in sections 2.4.4; 2.5.4; 2.6.4 and 2.7.4.

- The Agency's previous submissions in relation to the Moyross Framework Plan & Implementation Report (26th May 2011) should also be taken into consideration in the preparation of the Plan as issues raised in this Plan may be also relevant and should be taken into account – these issues have been addressed in Volume 2 Section 2.0 Vision & Framework Strategy with specific reference to section 2.4.

A written submission was received from Limerick City Council on the 22nd May 2013 **clarifying the following points:** These points have been addressed within the LRFIP as detailed below.

- The LRFIP will be incorporated into the Limerick City Development Plan by way of a variation – this matter has been addressed within Volume 3 Section 1.8.
- The extent of demolition work proposed will need to be carefully addressed given the scale of demolition work already taken place – see Volume 2.0 Section 2.3 Vision & Framework Strategy with specific reference to the Demolition, New Build and Refurbishment Strategy for each of the regeneration areas.
- Flooding in Kings Island will need to be carefully considered - see Volume 1.0 Section 4.0 Physical Overview and Analysis in the LRFIP with specific reference to sections 4.2.6 and Volume 2 Section 2.0 Vision & Framework Strategy with specific reference to section 2.3.8; the Housing Strategy proposed for St. Mary's Park in section 2.6.3 and section 2.6.4(13) Open Space and Public Realm Strategy.
- Kings Island and Moyross should be treated in as much as possible as a single entity – see Volume 2 Section 2.0 Vision & Framework Strategy with specific reference to section 2.6.1 Movement & Connectivity Strategy.

4.0 ENVIRONMENTAL BASELINE

4.3.3 Water Supply (page 28)

Sourced from the River Shannon, some 11,388,000m³ of all drinking water, produced annually by Limerick City Council at the Clareville treatment plant in Castleconnell, is delivered to Limerick City. The treatment plant has undergone significant refurbishment and upgrade works in recent years at an investment cost of in excess of €26m. In addition to the treatment of water there is also an ongoing programme of leakage detection and repair in an effort to promote water conservation. There are currently over 4,200 houses in Limerick that are currently serviced by combination loops of one inch lead service pipe. The level of unaccounted for water in the city is at 46 per cent with the level of unaccounted water in St. Mary's Park in excess of 200 per cent. The desired level within the city is to reduce water leakage to below 30 per cent thereby ensuring that the Council can meet its obligations under the Drinking Water Directive.

4.5 Cultural Heritage

The architectural and archaeological heritage represents a finite resource and irreplaceable asset to the **county city** and contributes to the quality of the built **and riverine** environment. It is important that structures of architectural and archaeological merit **including underwater archaeology** are thus protected. Archaeological heritage is protected under the National Monuments Acts (1930–2004), Natural Cultural Institutions Act 1997, and the Planning Acts. **Specifically Underwater Archaeology is protected by a comprehensive legal instrument to which Ireland is a signatory, namely the UNESCO Convention on the Protection of the Underwater Cultural Heritage.** A primary source of information

for known archaeological features is the Record of Monuments and Places (RMP) which was established under the National Monuments Acts 1930 to 2004. The Record of Monuments and Places (RMP) is an inventory, put on a statutory basis by amendment to the National Monuments Act 1994, of sites and areas of archaeological significance.

4.5.1 St. Mary's Park

The Records of Monuments and Places Map for Limerick (LI005-017) shows that there is a significant amount of archaeology located within the Zone of Archaeological Potential. In addition to the Medieval Core Monuments there are numerous sites located outside the Zone of Archaeological Potential in the outer suburbs of the City. [St. Mary's Park, surrounded by water and located on an island is also likely to be of significant interest from an underwater heritage perspective. The nature and extent of the archaeological heritage that can be contained within such watercourses can include fishtraps, quays, stone steps, logboats, and wrecks as well as artefactual material either lost, deposited or directly associated with a site. There is a high probability of encountering riverine archaeology within the river courses of Limerick City and particularly around St. Mary's Park.](#) There are no protected structures located within the defined regeneration area of St. Mary's Park. However there are currently twenty eight structures on the RPS in the wider Kings Island area. In addition, ten structures are currently on the National Inventory of Architectural Heritage (NIAH) of Limerick City, but are included under the existing RPS.

4.5.2 Moyross (page 34)

~~There are no structures within the regeneration area of Moyross on the Limerick City Record of Protected Structures (RPS).~~ [Ballygreennan House is the only protected structure in Moyross located at Castle Park.](#) Similarly, none of the structures within the study area feature on the National Inventory of Architectural Heritage (NIAH) compiled for Limerick City.

4.5.4 Southill (page 35)

There are a number of local sites of archaeological heritage within Southill most of which are located along the southern boundary of the M7 route and have been assessed as part of the M7 Environmental Impact Statement for the Southern Ring Road. One other site of archaeological interest is located on the northeast of the existing golf course. It should be noted that all monuments recorded have been encroached on to some degree by the M7. Southill House is listed on the NIAH survey. ~~There are no structures within the regeneration area of Southill on the Limerick City Record of Protected Structures (RPS).~~ [The only protected structure within this regeneration area is Southill House located within Limerick County.](#)

5.0 ENVIRONMENTAL PROTECTION OBJECTIVES

5.3.5 Treatment of Wastewater (Page 44)

[The objective of the Urban Wastewater Treatment Regulations is to protect the environment from the adverse effects of urban waste water discharges and discharges from certain industrial sectors and concerns the collection, treatment and discharge of domestic waste water, mixture of waste water and waste water from certain industrial sectors. Four main principles are laid down in the legislation including Planning, Regulation, Monitoring and Information and Reporting. There is a requirement for pre-authorisation of all discharges of urban wastewater, of discharges from the food-processing industry and of industrial discharges into urban wastewater collection systems; for monitoring of the](#)

performance of treatment plants and receiving waters; and for the control of sewage sludge disposal and re-use, and treated waste water re-use whenever it is appropriate.

8.0 EVALUATION OF LFRIP PROVISIONS

8.2.2 Water (Page 56)

In the case of St. Mary's Park which is presently defended by an embankment it is proposed to demolish, refurbish and provide infill housing within this regeneration area.

8.4 Indirect And Cumulative Effects (Page 59)

Component	Biodiversity, Flora and Fauna	Water	Population	Cultural Heritage	Soils & Geology	Air & Climatic Factors	Noise	Landscape & Amenity	Material Assets
Biodiversity, Flora and Fauna		Yes	No Yes	No	Yes	Yes	No Yes	Yes	No
Water			Yes	No	Yes	No Yes	No	No	No
Population				No	Yes	Yes	Yes	Yes	Yes
Cultural Heritage					No	No Yes	No	Yes	No
Soils & Geology						No Yes	No	Yes	No
Air & Climatic Factors							No	No Yes	Yes
Noise								No	Yes
Landscape & Amenity									No
Material Assets									

Table 8.2 Significant Interrelationships between Environmental Components

9.0 MITIGATION MEASURES

9.1 Introduction (Page 62)

Ultimately it is proposed that the LRFIP will be adopted as a document into the Limerick City Development Plan 2010 - 2016 as part of the development plan review process and thus will be implemented under the provisions of that Development Plan. The review of the development plan will commence in 2014 and a new development plan for the area will be adopted by 2016. There are already extensive policies and objectives within the development plan that seek to minimise potential environmental impacts arising from certain projects and actions and once the LRFIP is integrated into the development plan these policies will also act as mitigatory measures for projects within the LRFIP. Thus in order to avoid duplication of policies and objectives it is proposed to highlight existing policies and objectives within the Limerick City Development Plan 2010 – 2016 that will directly influence and mitigate proposals within the LRFIP.

4.0 CONCLUSION

It is acknowledged that a planned and holistic approach to the orderly regeneration of the areas is required. Development is both necessary and desirable to achieve regeneration and economic growth within the areas and the purpose of the Strategic Environmental Assessment is to ensure that the guiding principals for development do not impact in an adverse manner on the environmental quality of the plan area.

In summary, the proposed material alterations put forward in the LRFIP were found to be acceptable in terms of protecting the environmental quality within the regeneration areas. Monitoring of the plan throughout its lifetime will ensure that any potential adverse environmental impacts, unforeseen at this stage will be identified early, so as to prevent any deterioration of the environment. The LRFIP, as currently presented, balances regeneration and economic growth with environmental protection and conservation and encompasses fully the ethos of sustainability.