

Proposed Variation No. 4 to the Limerick City Development Plan 2010 – 2016

- Incorporation of the Limerick 2030 Economic and Spatial Plan

Appropriate Assessment Screening.

November 2014

Appropriate Assessment Screening –Limerick Economic Strategy and Spatial Plan.

This Appropriate Assessment Screening Document is for the Limerick Economic Strategy and Spatial Plan. The contents of the Plan are based on the existing zoning template of the 2010 City Development Plan. The effects of the implementation of the plan will be similar to those identified in the Appropriate Assessment Report of the 2010 City Plan.

The screening is in accordance with the requirements of Article 6(3) of the EU Habitats Directive (92/43/EEC). The principal consideration for an Appropriate Assessment would be if the proposed works were likely to have significant effects on a Natura 2000 site – Special Areas of Conservation and Special Protection Areas (SACs and SPAs) are Natura sites.

The conclusion of the screening document is that a full Appropriate Assessment is not required as the plan operates within the existing zoning template of the Limerick City 2010 Development Plan. This had been subject to appropriate assessment.

The reasons for the conclusion of no significant effects and hence no need for full Article 6 Assessment are as follows:

1 The Limerick Economic Strategy and Spatial plan operates within a previously assessed zoning template which had been assessed as part of the preparation of the Limerick City Development plan 2010. Many of these areas are brown field sites.

2 As a result of this there is no encroachment on Natura 2000 sites.

3 The additional population which might result from the implementation of the Economic and Spatial Plan is within the capacity of the waste water treatment plan infrastructure which means that there will not be a risk of pollution to the Natura 2000 sites.

The key difference between the effects of this plan and the 2010 City Development Plan will be that actions based on the Limerick Economic and Spatial Plan will be more focused and area specific. One key factor is that now, the plan preparation will be the remit of one local authority within a revised metropolitan area.



Figure 1: Metropolitan area boundary for the 2030 Economic and Spatial Plan.

This means that the tendency towards divergent policy approaches to the City and the environs that existed previously will be replaced by a more coherent strategy aimed at the former Limerick City centre area in the context of the metropolitan area and the county as a whole. It is likely that any new actions will be based on opportunity sites and areas with more detailed master-plans prepared to take into account the individual circumstances of each area. The identification of the seven key areas in the current draft is the first step towards this.

The areas described in the report are within the zoned areas of the current City plan and adjacent to those zoned in the Local Area Plans for the Southern Environs and Castletroy. As with any built up areas there are areas of green space and areas of more intense development activity. The zoning maps of the relevant plans show the land use zonings of the differing areas outlined in the report. The report outlines seven key areas in the City, improvements to which are key to the success of the plan. They are shown in Table 1.

Table 1: Key areas and their zoning patterns.

Zone	Land use zoning and description.
The Water front	City Centre /mixed use. Site stretches from the Docks to the south along the central Quays to Merchants Quay, to the Castle and include Georges Quay.
Kings island	Residential/ mixed use. Historically important and the oldest part of the city surrounded by water.
Clare Bank.	Residential Open Space/ City centre. Offers potential for recreation with much open space zoning.
City Centre Core	City Centre/ Commercial.
Main Georgian Area	City Centre/ Commercial
Docklands	City Centre/ Commercial/ Mixed use.
Eastern Fringes	City Centre.

These areas are categorised as “brown field sites” in that they have had a long history of development. In terms of material assets of which the previously existing building stock is part, the SEA guidelines (DEHLG 2004 p.31) stress the need to “maximise use of the existing built environment”. This is an important part of the new spatial plan. Seven projects referred to as transformational projects have been selected to enhance the City area. These are as follows:

1. A ‘World Class’ waterfront – a renaissance of Limerick’s entire waterfront;
2. The ‘Limerick Cultural Centre’ – an iconic destination building on the waterfront;
3. ‘Great streets’ – a transformation of the city’s three main streets – O’Connell Street, Catherine Street and Henry Street;
4. A new city square/plaza – to define the focal point or ‘heart’ of the city centre;

5. A city centre higher education campus - the creation of a multi-versity combining facilities from LIT, University of Limerick and Mary Immaculate in the heart of the city centre;
6. Renewal of the Georgian Quarter – a concentrated programme to restore the Georgian part of the city to its former glory; and lastly
7. Colbert Station renewal – a new public transport interchange and enhanced station environment.

As stated in Table 1, these proposals are based on and are consistent with the zoning pattern set out in the Limerick 2010 City Development Plan. As most of these areas, particularly the City centre areas are brown field sites the effects of development are expected to be limited, involving as they would re-development of an existing heavily modified environment.

The key Natura 2000 sites within the boundaries of the metropolitan area are the Lower River Shannon SAC site (002165) and the River Shannon and Fergus Estuaries Special Protection Area (004077). However, where possible the zoning adjoining these sites is open space as in the case of the Clare Banks, while in the City centre the development areas are brown field sites, which mean that any development would not encroach onto Natura 2000 sites. **For individual planning applications appropriate assessment screening and inclusion of relevant mitigation measures will take place. This will provide an additional safeguard.**

Other important areas that are of bio-diversity interest include Knockalisheen Marsh, itself a proposed Natural Heritage Area, adjacent to Kings island, while to the east of the City and forming the boundary between the current City area and Castletroy is the Groody river with its associated open space corridor. The Groody which drains into the Lower River Shannon SAC site in the Castletroy area, is protected by appropriate green space zoning, while Knockalisheen Marsh lies outside the development boundary of the Limerick Metropolitan Area.

Lower River Shannon Special Area of Conservation Site (002165): This site, designated for a variety of riparian habitats and species, runs through the city. As indicated in the SEA screening document the LESASP is grounded within the zoning frame work of the existing plan and does not involve encroachment on the SAC site.

River Shannon and Fergus Estuaries (004077): this is designated for wintering and resident wild fowl. It is 1km distant from the areas mentioned in the LESASP. This site is not likely to be affected as there will be no encroachment on the SPA and the areas within the LESAP are already heavily modified and have been

previously zoned for these uses in the 2010 City Development Plan and earlier City Development Plans.

Screening Matrix

Brief description of the plan:

The main objective of the document is to is to “create a city centre that can attract new business investment and encourage the formation of local businesses by providing the type of high quality flexible space to meet the demands of business and ensuring the necessary business and support structures are in place” (Interim Report p. 4).

Brief description of the Natura 2000 sites:

The **Lower River Shannon SAC**, The site is a SAC selected for lagoons and alluvial wet woodlands, both habitats listed on Annex I of the E.U. Habitats Directive. The site is also selected for floating river vegetation, *Molinia* meadows, estuaries, tidal mudflats, Atlantic salt meadows, Mediterranean salt meadows, *Salicornia* mudflats, sand banks, perennial vegetation of stony banks, sea cliffs, reefs and large shallow inlets and bays all habitats listed on Annex I of the E.U. Habitats Directive. The site is also selected for the following species listed on Annex II of the same directive – Bottle-nosed Dolphin, Sea Lamprey, River Lamprey, Brook Lamprey, Freshwater Pearl Mussel, Atlantic Salmon and Otter. The overall ecological quality of the site is heavily dependant on good water quality.

River Shannon and Fergus Estuaries (004077): this is designated for wintering and resident wild fowl. Important feeding areas such as mudflats are part of the site, and in winter the bird population increases dramatically as wintering migrants use the site for feeding and roosting. It also plays host to lesser numbers of breeding wild fowl. Bunlickey lake important as an inland roosting site for cormorants is within 1km of the plan area.

Describe the individual elements of the project (either alone or in combination with other plans or projects) likely to give rise to impacts on the Natura 2000 site:

The main way in which ex-situ impacts could be created is on the SAC site is through the introduction of pollutants or sediments or by blocking the river channel which would interfere with fish or lamprey passage and possible upstream spawning. This is unlikely as mitigation measures can be incorporated into individual planning applications and in many cases open space zonings provide a buffer between development and the site. In other areas such as the city centre it is a heavily modified brown field site and the effects of re-development, particularly with suitable design and mitigation measures incorporated is not expected to be significant.

Describe any likely direct, indirect or secondary impacts of the project (either alone or in combination with other plans or projects) on the Natura 2000 site by virtue of:

- **Size and scale;**

None- the plan is confined to previously zoned areas and any effects will be the same as those identified in the 2010 Appropriate Assessment which was carried out for the City Development plan. There will be no encroachment on the Natura 2000 site network within the plan area. It is considered that in one location- that of the water front that improvements will take place following the proposed demolition of Sarsfield house which will result in the creation of a green space area, part of additional green infrastructure for the City. The creation of open grassland, even if only of amenity grassland, is important in that such open areas in urban settings provide a buffer from physical development for the river and often provide resting areas for wild fowl during stormy weather conditions when they might be displaced from their more natural haunts,

- **Land-take;**

There are no land take implications within the Natura 2000 sites as the plan will concentrate on previously zoned areas, most of which are brown field sites.

- **Distance from Natura 2000 site or key features of the site;**

The Lower River Shannon SAC site runs through the plan area while the River Shannon and Fergus Estuary lies 1km downstream. Because the proposals are very area specific it is not considered that they will affect other Natura 2000 sites.

- **Resource requirements (water abstraction etc);**

There are no resource implications as it is not anticipated that any extraction of material –rock etc or soil or additional abstraction of water would not take place from the designated sites. Such materials will be sourced from licensed quarries which will have planning permission or be the subject of quarry registration.

- **Emission (disposal to land, water or air);**

See below under reduction of species density heading in relation to capacity of Waste Water Infrastructure.

- **Excavation requirements;**

Any excavation that would take place will be outside the SAC and SPA sites

Transportation requirements;

While the Plan proposes modifications to existing traffic flows this is within the development footprint of previously existing streets within the City and is not expected to have any effects on the designated sites.

- **Duration of construction, operation, decommissioning, etc;**

The Plan is long term plan with policies proposed until 2030.

- **Other**

None.

Describe any likely changes to the site arising as a result of :

- **reduction of habitat area:**

None- works are outside Special Protection Areas and Special Areas of Conservation.

- **habitat or species fragmentation;**

Given the location of the proposals mentioned in the plan-outside the SPA and SAC sites and that the area affected has been already modified it will not have any significant effects on the integrity of the SPA or SAC sites. It should also be noted that zoning in the Limerick City Plan and the Southern Environs and Castletroy Plan show buffer zones of green space in undeveloped areas around these sites. Any future revision of the statutory land use plans of the metropolitan area to incorporate the provisions of the Limerick Economic and Land Use Plan will themselves have to be screened for environmental and ecological effects which will provide a further safe guard in terms of environmental sustainability.

reduction in species density;

It is not envisaged that any reductions in species density i.e. density of designated species such as the Lamprey species or salmonids or crayfish would take place as the plan measures involve previously zoned areas and do not encroach on the Natura 2000 sites.

In terms of ex-situ effects on the Special Area of Conservation Site and Special Protection Area sites, the increase in population proposed by the plan identifies an additional 800-1000 houses ($1000 \times 2.73 = 2730$ additional persons). This is unlikely to overload WWTP capacity to a degree which would cause water pollution as the population equivalent of the plant is 130,000. The Environmental Report gives further details of proposed improvements works to the Bunlickey plant which will ensure that its capacity keeps pace with development proposals in the 2030 plan. It is not anticipated that any additional effects on Natura 2000 sites would occur as any development proposals lie within zoned areas of the City plan which had been assessed in 2010. However there will be a number of bio-diversity issues that would rise specifically related to urban areas and the stock of older buildings. In relation to older buildings it will be

necessary to ensure that they are adequately checked for the presence of birds and bats prior to any development taking place. This issue has already been dealt with in the SEA Environmental Report.

- **changes in key indicators of conservation value**

Due to the fact that areas involved are previously zoned and that it lies outside the SPA/SAC sites it is not anticipated that any changes in terms of key indicators such as species numbers in the SPA will result.

- **Climate change:**

These works would have no implications for climate change. The promotion of urban living will help to promote consolidated settlement which should help to reduce commuter traffic with consequent benefits for green house gas emissions.

Describe any likely impacts on the Natura 2000 site as a whole in terms of:

- **interference with the key relationships that define the structure of the site;**

None, the site lies outside the SPA/SAC site and the plan proposals are to take place in a heavily modified area.

- **interference with key relationships that define the function of the site;**

See above.

Provide indicators of significance as a result of the identification of effects set out above in terms of:

- **loss;**

Not applicable.

- **Fragmentation;**

Not applicable.

- **Disruption;**

Not applicable.

- **Disturbance;**

Not applicable.

- **change to key elements of the site (e.g. water quality etc);**

Not applicable. There is sufficient capacity within the WWTPs to deal with any population increases which may come about as a result of the plan.

Describe from the above those elements of the project or plan, or combination of elements, where the above impacts are likely to be significant or where the scale or magnitude of impacts are not known.

It is not likely that any combination of elements will have effects as the plan area is outside the Lower River Shannon SAC site and the Special Protection Areas. The plan proposals are not likely to have any effects on the Natura 2000 sites as they are

confined to the previously zoned areas.

Finding of No Significant Effects Matrix

Name of Project:	Limerick Economic Strategy and Spatial Plan
Name and location of Natura 2000 sites:	River Shannon and Fergus Estuaries SPA (004077) 1 km downstream. Lower River Shannon SAC site (002165) which runs through the plan area.
Description of the Project or Plan	The main objective of the document is to “create a city centre that can attract new business investment and encourage the formation of local businesses by providing the type of high quality flexible space to meet the demands of business and ensuring the necessary business and support structures are in place”.
Is the Project or Plan directly connected with or necessary to the management of the site (provide details) ?	No, it is an update of the content of earlier land use plans and strategies within the Limerick City area.
Are there other projects or plans that together with the project of plan being assessed could affect the site (provide details)?	No. This Plan builds on the component of older plans and strategies such as the City development plan but operates within the zoning and policy content of the 2010 City development plan.
The Assessment of Significance of Effects	
Describe how the project or plan (alone or in combination) is likely to affect the Natura 2000 sites:	The main way in which impacts could be created is through release of pollutants to the river which would end up in the SAC site. Any additional population which might result from the plan is within the capacity of the existing Waste Water Treatment Plants (WWTP).
Explain why these effects are not considered significant:	The effects of the plan are confined to previously zoned areas and will not

	mean any encroachment on SAC/SPA sites. Any identified population increases are within the capacity of the existing WWTP.		
List of Agencies Consulted: Provide contact name and telephone or email address:	The Manager, Development Applications Unit DoEHLG Newtown Road, Wexford. (T: 053 9117382)		
Response to consultation	Awaited.		
Data Collected to Carry out the Assessment			
Who carried out the Assessment?	Sources of Data	Level of assessment Completed	Where can the full results of the assessment be accessed and viewed
Heritage Officer, Forward Planning Section, Limerick County Council.	Existing NPWS Site Synopses Site visits and site surveys.	Desktop study, site visits	The conclusions are included in the screening document and can be viewed with the plan and supporting documents on public display.