

# Strategic Environmental Assessment (SEA) Screening Report

for:

## Proposed Variation No.6a to Limerick City Development Plan 2010 – 2016

to incorporate the objectives of the Limerick Regeneration  
Framework Implementation Plan

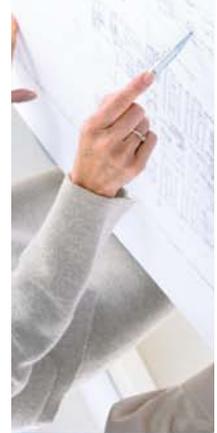
February 2017



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## Strategic Environmental Assessment (SEA) Screening Report

for:

**Proposed Variation No.6a to Limerick City Development Plan 2010 – 2016**  
to incorporate the objectives of the Limerick Regeneration Framework  
Implementation Plan

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Status: Final

Issue no: 03  
Incorporating comments from  
Environmental Authorities

Date: February 2017

16011 SEA Variation to Limerick City Development Plan

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## 1.0 INTRODUCTION

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### 1.1 INTRODUCTION

This document comprises the Screening Statement in relation to the Proposed Variation No.6 to the Limerick City Development Plan 2010 – 2016. The Proposed Variation to the development plan is consequent to the objectives contained in the Limerick Regeneration Framework Implementation Plan (LRFIP).

The LRFIP was subject to a full Strategic Environmental Assessment on the basis of that the LRFIP was a plan which was subject to preparation and adoption by the Office of Regeneration, Limerick City Council and which set the framework for the future development of projects within the identified Regeneration Areas of Limerick. Although the LRFIP set the framework for future development, it did not provide the framework for consent of projects listed. It was always intended that the LRFIP, once adopted would be given legal effect through a review of the Limerick City Development Plan 2010 – 2016 as part of the development plan review process. The development plan review process has been delayed pending publication of the Regional Spatial and Economic Strategy by the Southern & Eastern Regional Assembly. Accordingly, it is now proposed to vary the existing Limerick City Development Plan 2010 -2016 to give the LRFIP legal effect and whose objectives and policies already have been subject to SEA.

The SEA process completed for the LRFIP resulted in a number of modifications to the LRFIP but showed that there were no likely significant effects of delivering the objectives of the LRFIP in the Regeneration Areas. Accordingly, the objectives contained in this Proposed Variation have therefore been subject to environmental assessment already as they are consequent to the LRFIP. The Environmental Authorities and the public were already given the opportunity of reviewing the Environmental Report and the Draft LRFIP when they were placed on public display for a period of five weeks from November 1<sup>st</sup> until December 5<sup>th</sup> 2013. Two hundred and seventy-four submissions were received during the submission period and changes made to the proposed LRFIP were evaluated for their environmental consequences. The Environmental Report was updated with an Environmental Report Addendum which was presented to the Council along with changes to the LRFIP and approved by Limerick City Council on the 24th February 2014. An SEA Statement was prepared providing a summary of how environmental considerations were factored into the LRFIP, how submissions and consultations were taken into account and the reasons for choosing the Plan as adopted in light of other reasonable alternatives considered. The SEA Statement also outlined extensive monitoring measures to be carried out during the plan period.

### 1.2 LEGAL FRAMEWORK

All land-use plans in Ireland are subject to SEA procedures and environmental considerations must be assessed at an early stage in the decision-making process. Article 13K of the 2011 Regulations states that where a Planning Authority proposes to make a variation of a Development Plan under section 13 of the Act, (which is required in this case), *‘it shall, before giving notice under section 13(2) of the Act it shall consider whether or not the proposed variation would be likely to have significant effects on the environment, taking account of relevant criteria set out in Schedule 2A’*. The criteria set out in Schedule 2A are listed under

(i) characteristics of the plan and (ii) characteristics of the effects and of the area likely to be affected. The proposed variation is considered under the criteria set out in Schedule 2A as outlined in section 3.0 of this report. The assessment is also informed by a screening exercise of the proposed variation against the Environmental Protection Objectives contained in the Environmental Report prepared as part of the Limerick City Development Plan 2010-2016 as detailed in section 4.0 of this report.

As the proposal constitutes a framework for development within the Regeneration Areas of Limerick City and this will be adopted as a variation of the current Limerick City Development Plan 2010 - 2016, as set out under Section 13 of the Planning and Development Act 2000, as amended; it is necessary to screen the proposed variation to determine whether an SEA will be required. This 'SEA Screening Report' has been prepared in order to assist the Environmental Authorities and the public, in the preparation of submissions / observations, on whether or not the proposed variation would be likely to have significant effects on the environment.

The proposed Plan is also subject to Habitats Directive Assessment (HDA) Screening. The SEA and HDA screening processes are parallel but separate processes that will overlap, however whilst the HDA process focuses on the protection of Natura 2000 sites, the SEA process is concerned with impact on the general environment. Both the SEA and HDA screening processes have been carried out within the same timeframe for this proposed variation to the Plan. A similar consultation process will be used and both documents should be referred to in considering any potential impact on the environment.

## **1.3 THE PROCESS**

### **1.3.1 Iterative Process**

The process of SEA is an iterative one and has been used to inform the proposed variation including changes to existing zoning and wider policy wording. One of the more significant changes to emerge from the SEA process is the change in zoning required on 2.6 hectares of land in Moyross, located at the Bays site. The land is currently zoned mixed use in the Limerick City Development Plan 2010 – 2016 and it is a clear objective to promote redevelopment of the Bays in the LRFIP. However, the Strategic Flood Risk Assessment undertaken as part of the SEA, identified that part of the undeveloped land surrounding the Bays is located within an identified Flood Zone. In order to address the issue and ensure sustainable development, a change in zoning from mixed use to open space was recommended.

Additional policy wording was also recommended to the proposed variation, to ensure that all future development in St. Mary's Park and Moyross is subject to site specific flood risk assessment including consideration of surface water provisions at development management stage, in accordance with the 'Planning System and Flood Risk Management – Guidelines for Planning Authorities'.

### **1.3.2 Consultation with the Environmental Authorities**

The SEA Screening Report was issued to the environmental authorities for comment in January 2017. Two responses were received including one from the Development Applications Unit of the Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs (DAU) on the 14<sup>th</sup> February 2017 and one from the Environmental Protection Agency (EPA) on the 16<sup>th</sup> February 2017.

### **1.3.2.1 Development Applications Unit of the Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs**

The DAU notes that the SEA Screening Report does not address the potential for previously unrecorded cultural heritage nor is the cultural heritage potential of the watercourses adjacent to the areas addressed. The DAU recommends that the cultural heritage section of the report be updated to address the potential for Limerick City's watercourses to retain underwater cultural heritage and that such potential will be taken into account in any future appropriate assessments.

Section 3.2.4.3 of this report (pp.25-26) has been updated to include reference to underwater archaeology and unrecorded cultural heritage and policies BHA.10 (Underwater Archaeology) and BHA.10 A (Preservation of the Underwater Archaeological Heritage) have been identified and included in this report.

It should be noted that the issue of underwater archaeology is already extensively dealt with in the Limerick City Development Plan (pp.10. 7 and pp.10.8). The range of other archaeological policies, coupled with those relating to the built environment is extensive and in policy terms confers protection on both built and archaeological heritage, which in an urban context are often closely related.

### **1.3.2.2 Environmental Protection Agency**

The EPA's submission highlights that the variation should take into account, the EPA's previous comments on the LRFIP. It also highlights that the recommendations, key issues and challenges described within the report 'State of the Environment Report' - *Ireland's Environment 2016 – An Assessment (EPA, 2016)* should be taken into account, as relevant and appropriate to the Plan area. The EPA urge consideration of a number of new plans currently under preparation and which should be taken into account. However, these plans are not even at draft stage yet and accordingly their proposals / recommendations are not yet known and cannot be assessed at this stage. In any case it must be clarified that this variation will not influence these higher order strategic plans and this has been clarified in this report.

As highlighted throughout this report, this Screening Report has been undertaken within the context of the LRFIP and the rigorous SEA procedure undertaken in support of that document. Accordingly, the EPA's previous comments on the LRFIP were previously addressed under a separate process and have informed this SEA Screening Report insofar as possible.

### **1.3.3 Public Consultation**

The Proposed Variation to the Limerick City Development Plan 2010 – 2016 has been prepared under Section 13 of the Planning & Development Act 2000, as amended to incorporate the provisions of the adopted LRFIP. The proposed variation will be placed on public display to facilitate written submissions / observations from the public. The SEA Screening report and the HDA Screening Report will also be on display during this period to facilitate comment from the public.

Under the terms of the provisions of Article 13K of the Regulations and following the appropriate consultation period, the planning authority shall determine whether or not implementation of the Development Plan Variation would be likely to have significant effects on the environment, taking account of relevant criteria set out in Schedule 2A of the Regulations and any submission or observation received from the Environmental Authority.

## 2.0 THE PROPOSED VARIATION

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### 2.1 INTRODUCTION

The proposed variation to the Limerick City Development Plan 2010 – 2016 comprises the incorporation of the physical, economic and social objectives of the Limerick Regeneration Framework Implementation Plan (LRFIP).

The proposed variation will ensure that the objectives of the LRFIP forms part of the statutory plan for the city, which is fundamental to the entire regeneration process and will build on the considerable work carried out to date. The variation will set the scene for the physical, social and economic regeneration of the area, focus the objectives and interventions, and will drive the regeneration project forward over the coming years.

### 2.2 BACKGROUND TO THE LRFIP

The LRFIP originates from the separate Northside and Southside Regeneration Masterplans which were prepared for Moyross & St. Mary's Park on the Northside and Southill & Ballincurra Weston on the Southside in 2008, by two separate design teams. The two masterplans proposed the demolition of all housing, community and retail facilities and their replacement with new, better quality neighbourhoods.

In 2010 a review was undertaken having regard to current economic constraints, to specifically focus on a strategy of retention, renovation and remodelling in contrast to the extensive demolition originally proposed. This review resulted in the preparation of draft Framework and Implementation Plans for each of the four regeneration areas.

Following the transfer of responsibility for the regeneration programme from the Limerick Regeneration Agencies to Limerick City Council in June 2012, a review of the regeneration approach took place. During the consultation process of this review the principle of large scale demolition works was re-assessed and the revised approach is now contained in the LRFIP with the central aim of achieving balanced sustainable neighbourhoods.

The purpose of the LRFIP is to present a single holistic and integrated spatial Framework Plan with detailed social, physical, economic and environmental objectives for all four regeneration areas within Limerick City. Its overall objective is to plan for the future development of the area, provide guidance for the phased implementation and the associated costs, and to present a framework plan for regeneration.

### 2.3 LRFIP CONTEXT

The LRFIP is a strategic document outlining how Limerick City & County Council intends to facilitate and promote significant social, economic and physical development within the defined regeneration areas in the short, medium and long term. The exact location and extent of the regeneration areas are identified in Figure 2.1.

The vision of the LRFIP is to create:

*“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-serviced and*

*attractive neighbourhoods will be physically connected and fully integrated with the social, economic and cultural life of Limerick.”*

Geared towards delivering smart, sustainable and inclusive growth and with key deliverables set out under each area, the aim of the LRFIP is two-fold:

- To improve the quality of life and wellbeing of the communities in the regeneration areas by responding comprehensively to the problems (physical, social, community safety and economic) that exist, addressing the identified needs of people and adopting a sustainable development approach;
- To promote the social and economic inclusion of the regeneration areas into the mainstream life of the city, reducing the gaps between the regeneration areas and the average for the city as a whole. This will be achieved by opening access to training, education and work opportunities, harnessing and promoting existing resources and making early interventions – recognising that it is often as early as pre-school or at primary school that life courses are set. The plan also aims to attract co-ordinated public and private investment.

The 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. The LRFIP also establishes the parameters and criteria for the processes by which subsequent decisions affecting regeneration will be made. Whilst not a land use plan per se, the LRFIP does contain very specific and detailed physical proposals and improvements to the area. These proposals will of course be subject to the planning application process and thus will be individually assessed in accordance with standard planning requirements.

The LRFIP incorporates advice and comments received from the Environmental Protection Agency (EPA) and the Department of Environment, Community and Local Government. It is accompanied by an Environmental Report and SEA Statement, which was prepared following a scoping exercise, in line with emerging best practice for the carrying out of SEAs. As such, the recommended mitigation measures, in many instances, have already been incorporated into the LRFIP in an iterative process, some of which have brought about significant changes in the scope and extent of work and intervention required.

## **2.4 GEOGRAPHIC AREA OF THE LRFIP**

The regeneration study area within the LRFIP presents a diverse mix of physical, environmental, cultural and environmental variables. The regeneration area relates to four geographically separate and primarily residential areas within Limerick City as defined in Figure 2.1 namely the neighbourhoods of St. Mary’s Park, Moyross, Ballinacurra Weston and Southill. Each of these areas is described in turn.



 Regeneration Boundaries



**Figure 2.1** Four Defined Regeneration Areas

#### **2.4.1 St. Mary's Park**

St. Mary's Park located on the northern half of King's Island is situated north east of Limerick City Centre. Kings Island is framed by the River Shannon to the north and west and the Abbey River to the east and south and extends over an area of 68.7 hectares (see Figure 2.2). Whilst the area maintains important ecological, archeological and tourism significance, it still functions as an established residential area.

While the southern part of the island is a lively area with a mix of land uses, the area to the north is predominantly residential. Poor transport connections has resulted in the isolation of St. Mary's Park and disconnection from the rest of the City. King's Island features a delicate ecological environment along its eastern edge, which has been designated as a Special Area of Conservation. In addition, the island has a significant architectural and archaeological heritage, containing the remains of the Limerick City Walls and a number of surviving buildings from the 12th and 13th century.

#### **2.4.2 Moyross**

Moyross lying to the north of Limerick City covers an area of approximately 200 hectares. The Knockalisheen Road provides the main access to Moyross at two points to the north and south east of the development. Developed between 1973–1987 Moyross is the largest public housing estate in the city. Perhaps the biggest single issue for Moyross is the lack of connectivity between it and surrounding neighbourhoods. Even within the defined regeneration area, movement is obstructed with illegible block layouts with each sub-estate consisting of large cul-de-sacs. Given this lack of permeability into and across the study area, access to employment and services is poor contributing to its social-economic problems.

#### **2.4.3 Ballinacurra Weston**

Ballinacurra Weston forms part of an inner urban suburb of Limerick City southwest of the city centre comprising of over 14 hectares of land. The area is bounded by Childers Road and Hyde Road to the east and south and Byrne Avenue and Prospect Hill to the north and west (see figure 2.4). Despite its strategic location on the southern fringe of Limerick City Centre, it remains disconnected from its urban surroundings due to a number of factors including inter-alia; a complex socio-economic profile, its constrained physical layout and lack of internal permeability.

#### **2.4.4 Southill**

Southill is located adjacent to the Limerick Southern Ring Road (M7) approximately 1.5km south of the city centre. Comprising over 231 hectares the defined regeneration area incorporates a mix of landuses including residential, commercial, industrial and retail. However with four distinct residential neighbourhoods (Carew Park, Kincora Park, Keyes Park and O'Malley Park) the dominant land use is residential. Issues within the area are complex and numerous including significant urban obsolescence, degeneration, vacancy and under-utilisation resulting in deterioration to the physical and social fabric of the area.

## 2.5 SCHEDULE OF PROPOSED VARIATION

The Proposed Variation comprises two distinct parts including:

- Update of text within existing chapters - Chapter 1: Introduction; Chapter 2: Strategic Context; Chapter 3: Economic Development Strategy; Chapter 4: Retail; Chapter 6: Housing; Chapter 8: Social & Community; Chapter 11: Landscape, Biodiversity & Recreation; and Chapter 15: Landuse Zoning Objectives; and
- Replace Chapter 7: Regeneration, in its entirety with objectives contained within the LRFIP which was adopted by Council on the 24<sup>th</sup> February 2014 and was subject to full SEA and Appropriate Assessment (AA).

The updated text within eight existing chapters references the LRFIP instead of the Regeneration Masterplans which were previously prepared for the Regeneration Areas. The text also clarifies the housing land availability and phasing of development in Chapter 2. It clarifies that the target of 4,400 units as set out in the core strategy can still be achieved within the Regeneration Areas, notwithstanding an overall reduction of 8.5 hectares in the amount of residential zoned land. The important factor in this instance is that the reduction in the quantum of zoned residential land does not impact on the core strategy figures as set out in the Limerick City Development Plan 2010 – 2016. The text changes made to these chapters are mostly minor changes to the narrative and do not refer directly to land uses in the regeneration areas. Because the changes do not comprise new policy or objectives but rather provide the context and setting, the changes are not likely to have any significant environmental effects.

It is proposed to replace Chapter 7: Regeneration, in its entirety with objectives contained within the LRFIP which was adopted by Council on the 24<sup>th</sup> February 2014 and was subject to full SEA and Appropriate Assessment (AA). The Limerick City Development Plan already acknowledged that Framework Implementation Plans would set out the key priorities to guide the development of the four Regeneration Areas in the immediate future. Accordingly, the overarching objective for the Regeneration Areas has not changed. What has changed, however is the level of detail now incorporated into Chapter 7 on foot of the specific priorities for each Regeneration Area. However, these priorities/objectives have already been subject to full SEA and AA and accordingly it has been accepted that there are no likely significant effects of delivering the priorities / objectives of the LRFIP in the Regeneration Areas. Whereas previously Chapter 7 adopted a flexible approach to zoning and development in the Regeneration Areas, integration of key priorities and objectives from the LRFIP into the Development Plan now ensures a more co-ordinated and statutory plan led approach to development.

This SEA Screening Report seeks to focus on the changes proposed in Chapter 7.0. It is important to note that this document assesses only the proposed new key objectives as existing ones are already part of the CDP and so do not fall within the scope of this assessment. To provide a clearer understanding of the Proposed Variation, a review of the chapter structure is provided with the specific policies.

### 2.5.1 Vision

The Proposed Variation acknowledges the vision of the LRFIP to create: *“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-serviced and attractive*

*neighbourhoods will be physically connected and fully integrated with the social, economic and cultural life of Limerick”.*

### **2.5.2 Proposed Policies**

These overarching policies emanate from the LRFIP and ensure that the vision and provisions of the LRFIP, which has been subject to SEA and AA are fully encapsulated within the Limerick City Development Plan 2010 – 2016.

Policy RG1: It is the policy of Limerick City and County Council to support the implementation of the Limerick Regeneration Framework Implementation Plan in a coordinated and sustainable manner and to co-operate with other agencies in the Region to deliver the goals and objectives set out in Plan.

Policy RG2: It is the policy of Limerick City and County Council to improve the tenure diversity within the regeneration areas.

Policy RG3: It is the policy of Limerick City and County Council to secure the objectives as set out in the Social Framework Strategy of the adopted Limerick Regeneration Framework Implementation Plan.

Policy RG4: It is the policy of Limerick City and County Council to secure the objectives as set out in the Economic Framework Strategy of the adopted Limerick Regeneration Framework Implementation Plan.

Policy RG.5: It is the objective of Limerick City and County Council to actively support the implementation of the objectives contained within the Physical Framework Strategy for each of the regeneration areas.

Policy RG.6: It is the policy of Limerick City and County Council to undertake an annual Monitoring Report of the adopted Limerick Regeneration Framework Implementation plan to establish key trends emerging and measure progress.

### **2.5.3 Local Objectives**

In addition to policies the Proposed Variation deals with each of the four Regeneration Areas separately under the following headings

- Existing Context;
- Key Challenges;
- Tenure Diversity; and
- Local Objectives.

The local objectives for each of the Regeneration Areas are transcribed directly from the LRFIP. Appendix 1.0 details the additional local objectives to be included in the development plan by means of the proposed variation and their location (source) in the relevant section of the LRFIP.

### **2.5.4 Landuse Changes**

A number of land use changes are contained within the proposed variation affecting 39.91 hectares of land. These land use changes are contained within the LRFIP and have already been subject to SEA. A summary of the zoning changes is provided below:

| From                              | To                                | Total Area   |
|-----------------------------------|-----------------------------------|--------------|
| Public Open Space                 | Residential                       | 7.3795       |
| Residential                       | Education, Community and Cultural | 3.648        |
| Education, Community and Cultural | Residential                       | 2.902        |
| Public Open Space                 | Education, Community and Cultural | 0.718        |
| Light Industrial                  | Residential                       | 0.88         |
| Light Industrial                  | Mixed Use                         | 0.15         |
| Residential                       | Mixed Use                         | 0.39         |
| Residential                       | Public Open Space                 | 15.858       |
| Agriculture                       | Public Open Space                 | 3.58         |
| Sports Grounds                    | Public Open Space                 | 1.56         |
| Sports Grounds                    | Residential                       | 0.25         |
| Mixed Use                         | Public Open Space                 | 2.6          |
| <b>Total</b>                      |                                   | <b>39.91</b> |

Changes are proposed to 2 no. sites comprising 2.43 hectares of land in **Ballinacurra Weston**, including:

| Existing          | Proposed                          | Area   | Justification                                                                                                                                                                                                                                                                                                                                                                 |                                                                                       |
|-------------------|-----------------------------------|--------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|
| Public Open Space | Residential                       | 0.74ha | <p>Provided for in the LRFIP.</p> <p>Site identified to deliver private residential units. The delivery of private residential units on this site can only commence once the local connections from Clarina Park to Byrne Avenue and Lenihan Ave. are made, in accordance with the adopted Framework Plan. This is a key infill site in an existing urbanized environment</p> |   |
| Residential       | Education, Community and Cultural | 1.69ha | <p>Provided for in the LRFIP</p> <p>Reflects existing community uses on the ground associated with Our Lady of Lourdes Community Centre and Church.</p>                                                                                                                                                                                                                       |  |

Changes are proposed to 11 no. sites comprising 9.6 hectares of land in **Southill**, including:

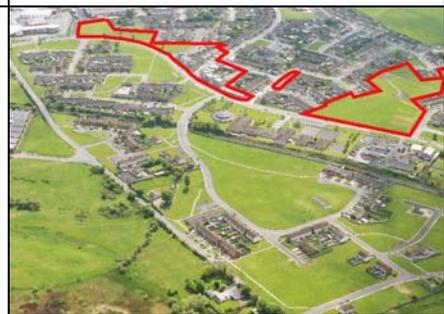
| Existing          | Proposed                          | Area   | Justification                                                                                                                                                                                                                                                              |                                                                                       |
|-------------------|-----------------------------------|--------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|
| Public Open Space | Residential                       | 0.60   | <p>Provided for in the LRFIP</p> <p>The land use zoning reflects the change in use which has occurred following a grant of planning permission for a residential scheme on the site.</p>                                                                                   |    |
| Public Open Space | Residential                       | 0.14ha | <p>Provided for in the LRFIP</p> <p>The redevelopment of this site will improve existing deficiencies by protecting exposed rear gardens. It will enhance natural surveillance and provide a function to previously underutilised lands within the current urban form.</p> |    |
| Light Industrial  | Mixed Use                         | 0.15ha | <p>Provided for in the LRFIP</p> <p>Identified as a key gateway site into Southill.</p>                                                                                                                                                                                    |   |
| Residential       | Mixed Use                         | 0.39ha | <p>Provided for in the LRFIP</p> <p>Identified as a key gateway site into Southill.</p>                                                                                                                                                                                    |  |
| Residential       | Education, Community and Cultural | 1.9ha  | <p>Provided for in the LRFIP</p> <p>Reflects existing community uses on the ground associated with Southill Area Centre, the Health Centre, Southill Junior School and the Church.</p>                                                                                     |  |

|                                   |                                   |        |                                                                                                                                                                                                    |                                                                                       |
|-----------------------------------|-----------------------------------|--------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|
| Light Industrial                  | Residential                       | 0.88ha | <p>Provided for in the LRFIP</p> <p>Provides a continuous street and provides a function to previously underutilised lands. New active frontages will provide overlooking to the public realm.</p> |    |
| Public Open Space                 | Education, Community and Cultural | 0.26ha | <p>Provided for in the LRFIP</p> <p>Promotes the enhancement of a key gateway site at the junction of Childers Road and Roxboro Road.</p>                                                          |    |
| Public Open Space                 | Residential                       | 2.19ha | <p>Provided for in the LRFIP</p> <p>Provides development opportunities for private housing and will ensure better urban design.</p>                                                                |   |
| Public Open Space                 | Residential                       | .794ha | <p>Provided for in the LRFIP</p> <p>Identified for private housing. Delineation of boundary acknowledges 50m setback (archaeological buffer) to ring fort.</p>                                     |  |
| Education, Community and Cultural | Residential                       | 2.90ha | <p>Provided for in the LRFIP</p> <p>Provides development opportunities for private housing in accordance with the core strategy.</p>                                                               |  |

Changes are proposed to 3 no. sites comprising 2.21 hectares of land at **St. Mary's Park**,

| Existing          | Proposed                          | Area   | Justification                                                                                                                                                                                                      |                                                                                      |
|-------------------|-----------------------------------|--------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|
| Residential       | Public Open Space                 | 1.69ha | <p>Provided for in the LRFIP</p> <p>Improves overall natural surveillance and the visual access and amenity to the SAC and wetlands it is proposed to demolish existing units and return the area to parkland.</p> |   |
| Public Open Space | Education, Community and Cultural | 0.45ha | <p>Provided for in the LRFIP</p> <p>Reflects existing community uses on the ground associated with St. Mary's Park Community Centre.</p>                                                                           |   |
| Residential       | Education, Community and Cultural | 0.05ha | <p>Provided for in the LRFIP</p> <p>Reflects existing community uses on the ground associated with St. Mary's Park Community Centre.</p>                                                                           |  |

Changes are proposed to 8 no. sites comprising 25.6 hectares of land in **Moyross**, including:

| Existing          | Proposed          | Area   | Justification                                                                                                                                                                                                                                                             |                                                                                       |
|-------------------|-------------------|--------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|
| Public Open Space | Residential       | 3.24ha | <p>Provided for in the LRFIP</p> <p>The land use zoning reflects the change in use which has occurred following a grant of planning permission for a residential scheme at Cliona Park Phase I identified to deliver replacement housing schemes in the short – term.</p> |  |
| Residential       | Public Open Space | 9.28ha | <p>Provided for in the LRFIP</p> <p>Delivers a strategic linear park from the River Shannon, through the heart of Moyross to Caherdavin.</p>                                                                                                                              |  |

|                   |                   |        |                                                                                                                                                                          |                                                                                       |
|-------------------|-------------------|--------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|
| Sports Ground     | Public Open space | 1.56ha | <p>Provided for in the LRFIP</p> <p>Delivers a strategic linear park from the River Shannon, through the heart of Moyross to Caherdavin.</p>                             |    |
| Sports Ground     | Residential       | 0.25ha | <p>Provided for in the LRFIP</p> <p>Provides housing to seal the exposed existing side gables and provide optimum passive surveillance to the strategic linear park.</p> |    |
| Public Open space | Residential       | 0.26ha | <p>Provided for in the LRFIP</p> <p>Provides housing to seal the exposed existing side gables and provide optimum passive surveillance to the strategic linear park</p>  |   |
| Residential       | Public Open Space | 4.88ha | <p>Provided for in the LRFIP</p> <p>Delivers a strategic linear park from the River Shannon, through the heart of Moyross to Caherdavin.</p>                             |  |
| Agricultural      | Public Open Space | 3.58ha | <p>Provided for in the LRFIP</p> <p>Delivers a strategic linear park from the River Shannon, through the heart of Moyross to Caherdavin.</p>                             |  |

|           |                   |       |                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                     |
|-----------|-------------------|-------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|
| Mixed Use | Public Open Space | 2.6ha | The continued zoning of some undeveloped lands for a use that is vulnerable to flooding cannot be justified and would not satisfy the criteria in the Justification Test set out in The Planning System and Flood Risk Management Guidelines for Planning Authorities (DEHLG, OPW, 2009). It was decided to replace part of the Mixed Use zoning related to the Bays site with lower vulnerability land uses. |  |
|-----------|-------------------|-------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|

## 2.7 APPROPRIATE ASSESSMENT

The Appropriate Assessment (AA) process commenced in advance of preparation and publication of the draft proposed variation. The first step in the process is this Stage 1 Screening to determine if Stage 2 Appropriate Assessment will be required for the proposed variation.

Stage 1 Screening has found that there are seven SACs and one SPA within 15km of the Plan boundary. The majority of these are physically remote from the Regeneration Areas. It was found that pathways for impacts to occur only exist for the Lower River Shannon SAC and the River Fergus Estuary SPA. All other SACs can be screened out at this stage.

The proposed variations were assessed as per Article 6 of the Habitats Directive. A number of aspects were analysed for their potential effects to the Lower River Shannon SAC (and other Natura 2000 areas within the zone of influence). These include: the reconfiguration of land to the north of St. Mary’s Park, disturbance to birds as a result of potential amenity use of lands close to the SAC, impacts to habitats and species resulting from the upgrading of a connecting bridge, impacts to water quality, and the spread of alien invasive species.

In each case it is considered that the impacts will not be significant due to the requirement for careful planning and design of the final projects as well as site treatment in the case of alien invasive species. It is therefore considered that the proposed variations to the Limerick City Development Plan can be implemented without resulting in significant effects to the Natura 2000 network, either alone or in combination with other plans or projects.

## 3.0 ASSESSMENT OF LIKELY SIGNIFICANT EFFECTS

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### 3.1 INTRODUCTION

The following assessment has been conducted in accordance with the Planning and Development (Strategic Environmental Assessment) Regulations 2004, as amended. The Screening of the proposed Draft Variation No.6 of the Limerick City Development Plan 2010 - 2016 is undertaken using specified criteria for determining the likely significant environmental impacts of a Plan as set out in Schedule 2a of the SEA Regulations (S.I. 436 of 2004).

### 3.2 CHARACTERISTICS OF THE PLAN

#### 3.2.1 The degree to which the Plan sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.

The Limerick City Development Plan 2010 - 2016 has been prepared to guide the sustainable development of the city area over the period of 2010 to 2016. The overall objectives of the Plan are to:

- Promote and provide for the sustainable development of Limerick City enabling it to fulfil its role as a National Gateway City.
- Promote social inclusion and to facilitate equality of access to employment, education, transport, suitable housing, social and cultural activities, whether by direct provision (e.g social housing) or by facilitating others to provide the service (e.g education).
- Provide for a high quality natural and built environment and improved quality of life for those living and working in Limerick City and also for those visiting the City.

The main elements of the city development strategy which are further explored and developed within the plan include:

- The need to extend the administrative boundaries of the City to provide more coherent and focussed policies to support the Gateway.
- The regeneration of the Moyross, Southill/Ballinacurra Weston and Kings Island areas of the City in a sustainable manner.
- The development of a strong and vibrant City Centre in accordance with the policies set out in the City Centre Strategy, 2008.
- The completion of the inner orbital route and fourth river crossing together with the introduction of green routes throughout the City to improve access to the City Centre and other critical nodes within the City.
- Support for the Atlantic Corridor project to link the gateways along the Atlantic seaboard.

Thus the Plan sets a framework for the location, type and nature of development within the area of the specified Plan period.

The Plan has a number of general objectives in the development management section relating to sustainability and environmental management. One such objective relating to Environmental Impact Assessment states that *“To facilitate the proper assessment of development proposals in circumstances where it is considered that a proposed development*

would be likely to have a significant effect on the environment, due to the nature, scale or location of the proposal, Limerick City Council will require the submission of an Environmental Impact Statement in accordance with the provisions of the Planning & Development Regulations, 2001 (or as may be amended during the lifetime of the plan". A further objective states that "the precautionary principle will be applied to all proposals in environmentally sensitive areas and those which may be in use by protected species. This means that an Ecological Risk Assessment is required in order to ensure that development does not undermine the conservation objectives of these sites". Therefore, any specific development proposal or area identified for development will be advanced / developed in compliance with the relevant environmental assessment processes.

### **3.2.2 The degree to which the plan influences other plans, including those in a hierarchy.**

The Limerick City Development Plan 2010 – 2016 was formulated within a hierarchy of Plans and strategies at County, Regional and National level. Through the Planning and Development Act 2000, the following hierarchy of policy in relation to planning is established:

- National Development Plan (NDP);
- National Spatial Strategy (NSS);
- Regional Planning Guidelines;
- County, Borough and City Development Plans; and
- Local Area Plans.

It is acknowledged that the National Planning Framework is currently being prepared by Government. However, to date only an Issues Paper has been published and accordingly the content and strategic direction of this plan is not known at this time. Similarly, the Regional Spatial and Economic Strategy by the Southern Regional Assembly has not yet been prepared. As a result, these documents are not in a position to influence the variation process at this time.

The Limerick City Development Plan is positioned at the lower end of the hierarchy. Limerick City does not have any local area plans at present and consequently the proposed variation will not influence any other statutory plans.

Whilst a 'Limerick Economic Strategy and Spatial Implementation Plan' was prepared for the city, this was a non-statutory plan and has subsequently been adopted by means of a variation into the Limerick City Development Plan 2010 – 2016. The Limerick Economic Strategy and Spatial Implementation Plan focuses on revitalising the heart of the city and prioritises a targeted set of strategic economic activities. Outside of the city centre it identifies key locations which would be suitable for IDA supported office-based employment centres. Whilst not directly impacting on the regeneration areas, the strategy does seek to enhance linkages and permeability throughout the city, linking it with the outer urban areas. With a specific focus on the city this non-statutory plan will not be influenced by the proposed variation which specifically relates to development within the regeneration areas.

### **3.2.3 The relevance of the plan for the integration of environmental considerations, in particular with a view to promoting sustainable development.**

The proposed amendment is being prepared in the context of the Limerick City Development Plan, the guiding document for development within the area and which has been prepared on the basis of promoting proper planning and sustainable development. The Development Plan

is subject to higher level international, national and regional environmental protection policies, and therefore must be consistent with these policies and implement them at a local level.

The development plan underwent a detailed and thorough Strategic Environmental Assessment (SEA) in accordance with the SEA Directive (2001/42/EEC) and Appropriate Assessment in accordance with Article 6 of the EU Directive (92/43/EEC). This process allowed for consideration at length of the environmental implications of the Plan's implementation. The SEA detailed all environmental issues of concern within the catchment area. Significantly, the Environmental Report highlighted a number of issues or concerns in relation to the local environment and in response a variety of objectives were incorporated within the Plan, including flooding, water quality and landscape sensitivity. The Assessment process concluded that full implementation of the Plan, particularly its environmental protection policies coupled with the mitigation measures included in the Environmental Report would result in a neutral impact overall on the various environmental receptors.

It should also be noted that the proposed amendment is being promoted in the context of the Limerick Regeneration Framework Implementation Plan (LRFIP). This plan has also been subject to Strategic Environmental Assessment (SEA) in accordance with the SEA Directive (2001/42/EEC) and Appropriate Assessment in accordance with Article 6 of the EU Directive (92/43/EEC).

### **3.2.4 Environmental problems relevant to the plan**

The overall development and associated environmental strategies for the city as detailed in the 2010 City Development Plan) have already been considered under the SEA process and the proposed amendment does not materially alter this strategy.

As stated above the Environmental Report, conducted as part of the SEA process, discussed various issues of concern with the Plan area. Specifically issues of concern were raised at the outset during the Scoping phase of the of the SEA process and included;

- Biodiversity;
- Water quality;
- Flooding;
- Cultural Heritage;
- Landscape and Amenity;
- Transport; and
- Population & Health

As the proposed variation solely affects the regeneration area, it is proposed to examine these environmental issues insofar as they affect the four identified regeneration areas.

#### **3.2.4.1 Biodiversity and Flora & Fauna**

Though the regeneration areas are located in primarily urban and developed habitats, some aspects of the study areas support and are located adjacent to a diversity of natural and semi natural habitats which support a diversity of habitat types and species some of which attract the benefit of legislative protection or which provide important local biodiversity features supporting common features and species.

To date, several desktop and baseline ecological surveys and habitats directive assessments have been collated and undertaken for previous regeneration objectives in each of the four areas in 2010 and 2011. A comprehensive Appropriate Assessment Report was also undertaken for the LRFIP in 2013. These studies have recognised the proximity of the

Moyross and St. Mary's study areas to the internationally and nationally designated areas of ecological conservation value including;

- Natura 2000 site 'Lower River Shannon candidate Special Area of Conservation' (SAC site code No. 2165) and;
- the national designation – 'Knockalisheen Marsh proposed Natural Heritage Area' (site code No. 2001).

The Lower River Shannon, Special Area of Conservation (SAC) (code 002165) is designated under the EU Habitats Directive and covers the River Shannon and an adjacent strip of riparian woodland and reed-swamp along its fringe. St. Mary's Park located on the Shannon/Abbey River within a tidal estuary has a strip of riparian woodland that fringes almost the entire island and falls within the SAC designation. On the island's western shore this fringe is narrow and in some places there is open grassland. However, on the eastern shore it is much more developed and uninterrupted. Comprising approximately 10 hectares of woodland, this is an example of the Annex I priority type Alluvial forests and is one of the rarest native woodland types in Ireland. It is of high biodiversity value and home to a range of woodland species as well as being vital for the preservation of water quality and the prevention of bank erosion.

The SAC designation also encroaches into the Moyross regeneration area including a small triangle of wetland habitat immediately north of Watch House Cross on the eastern boundary and an extensive area of wetland to the north. These areas in Moyross also fall within the Knockalisheen Marsh (code 002001) designated as a proposed Natural Heritage Area (pNHA). The site consists of grassland that slopes gradually to a wetland area consisting of wet grassland and fen communities which are considered species rich which then drains into the River Shannon. The nature designations are detailed in Figure 3.1.

In addition to these designated habitats there are also a number of other semi-natural habitats of local biodiversity value within each of the four regeneration areas. The Limerick City Bio-Diversity Plan, by raising knowledge about habitats, within the city area and with recommendations for everyday actions to conserve bio diversity, is a useful reference point in retaining natural environments within the city area. Given the lack of existing natural landscape within the regeneration area it would be desirable to protect and enhance any existing natural features including tree stands, hedgerows and water features.

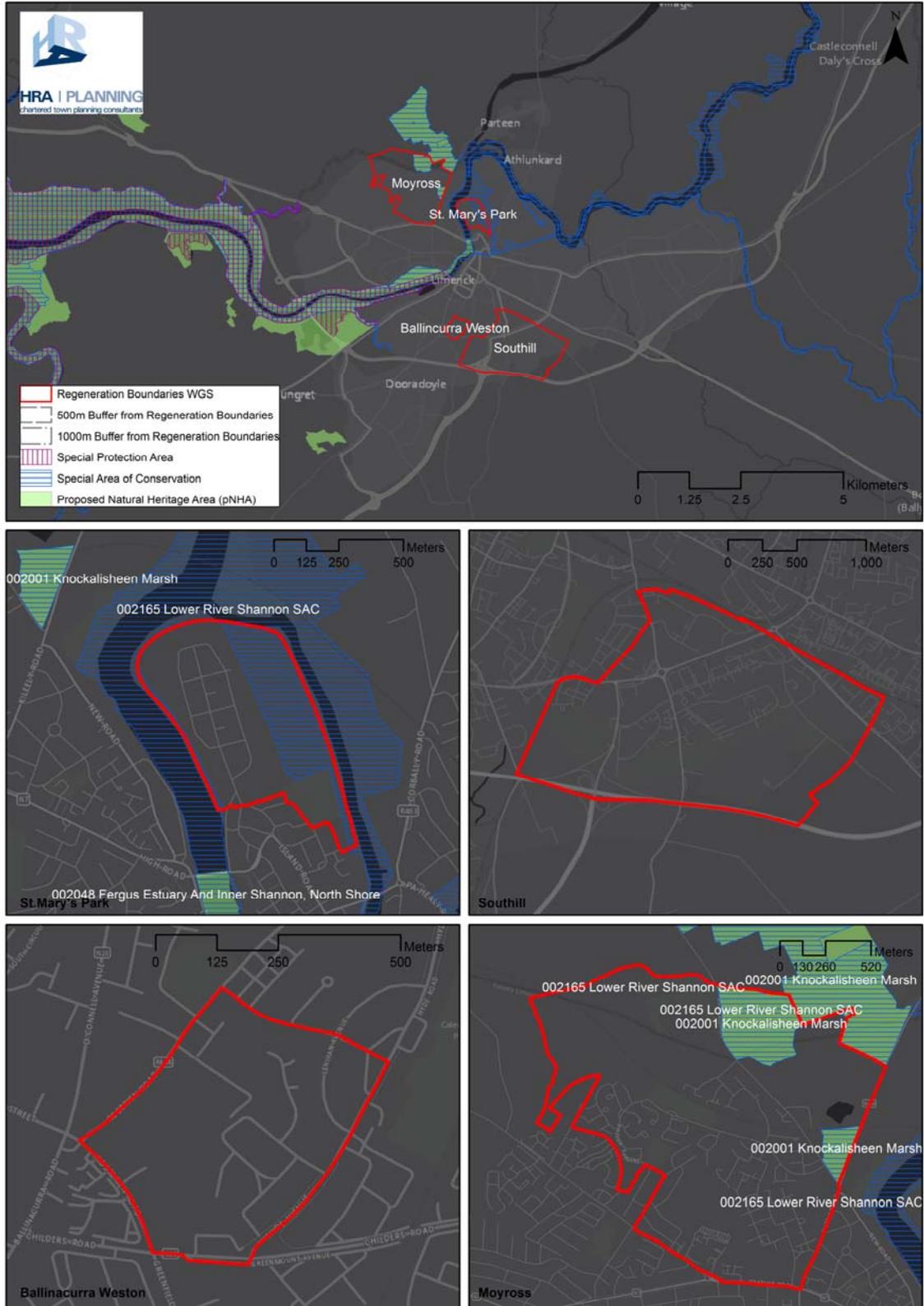


Figure 3.1 Environmental Designations

While the Limerick City Development Plan 2010 - 2016 includes policies for the protection and enhancement of biodiversity, these are more strategic in nature and at a higher level. Existing policies and objectives in the development plan includes:

LBR.8 It is the policy of Limerick City Council to apply the precautionary principle in relation to proposed development in environmentally sensitive areas to ensure all potential adverse impacts on any designated natural heritage area and any NATURA 2000 sites arising from any proposed development or land use activity are avoided, remedied or mitigated.

LBR.9 It is the policy of Limerick City Council to ensure that proposals along the River Shannon and other waterways associated with the River Shannon catchment within Limerick City will achieve an appropriate balance of uses commensurate with the sensitivity of the natural environment and avoiding adverse impacts on European conservation sites and sensitive natural receptors associated with the River Shannon.

LBR10 It is the policy of Limerick City Council:

- To protect and maintain existing important individual and groups of trees from development risk, provide additional tree planting of native deciduous trees and other appropriate plantings through planning permissions in order to benefit local biodiversity;
- To strengthen the protection of trees in the City and protect tree lined settings;
- To preserve, maintain and increase the general tree cover in the City by extending planting at identified locations.

LBR16 It is the policy of Limerick City Council to develop a network of high quality amenity walkway routes, particularly along waterways, linking existing parks and public open spaces and providing for strategic creation of new public open spaces.

In contrast, the proposed variation which seeks to implement the LRFIP sets out the detailed framework to guide regeneration with the integration and creation of parks and amenity spaces a key priority. The proposed variation includes a number of area specific measures and local objectives which will enhance biodiversity value, including the protection and enhancement of the special landscape character and setting of Delmege Estate in Moyross, the protection of existing biodiversity in the area and to return the eastern side of St. Munchin's Street to parkland once demolition of the area has taken place. In the absence of this variation and its proactive policies and objectives, it is likely that further loss and degradation of habitats within the regeneration areas would occur. Furthermore, the survival of individual species of flora and fauna would also be threatened.

### **3.2.4.2 Water Quality**

The Shannon International River Basin District is one of the eight river basin districts established in Ireland arising out of the legal requirements of the Water Framework Directive<sup>1</sup>. The Lower River Shannon flows alongside St. Mary's Park and runs adjacent to Moyross. As detailed in the SRBD, the pressures on the water quality of the River Shannon have been identified as high nutrients, oxygen demand.

The water quality of the River Shannon surveyed by the EPA, using a biological assessment method, is regarded as a representative indicator of the national status of such waters and reflects any overall trends in conditions. The data is collected on a three year cycle with the latest such period ending in 2012<sup>2</sup>. Meelick Bridge is the closest testing point to the west of Moyross and classifies the waters at this point as good (Q3).

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<sup>1</sup> For the 2nd Cycle 2015 - 2021, the Eastern, South Eastern, South Western, Western and Shannon River Basin Districts will be merged to form one national River Basin District

<sup>2</sup> EPA Integrated Water Quality Report 2012

Groundwater quality is protected under the requirements of the Water Framework Directive (2000/60/EEC). Groundwater vulnerability within and surrounding the regeneration areas is shown on Figure 3.2 ranging from “High to Low” with some “Extreme” small pockets. In St Mary’s Park a band of extreme vulnerability exists on the north eastern boundary adjoining the River Shannon whilst in Moyross such a pocket exists to the north and northeast of the study area where rock is near the surface. An “Extreme” pocket in Ballinacurra Weston exists to the north-east of the study area, near the Adapt House complex, whilst in Southill some extreme pockets exist to the north and northeast of the study area.

The Development Plan already contains a number of policies and objectives which seek to enhance water quality in the area including:

- EM.2 It is the policy of Limerick City Council to assist in the preparation and joint implementation of the Shannon River Basin Management Strategy in order to promote and achieve an improvement of both surface and ground water quality.
- WS.7 It is the policy of Limerick City Council to ensure that all new developments incorporate sustainable urban drainage systems at the application stage.

The proposed variation does not seek to alter these policies and instead prioritises the enhancement of water quality in any development proposal including measures to 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. Significant protection of groundwater and surface water resources is provided for at National, Regional and County level. In the absence of the proposed variation existing legislation and relevant statutory plans including the Shannon River Basin Management Plans, the forthcoming National River Basin Management Plan and the Limerick City Development Plan 2010-2016 will provide for significant protection and enhancement of water quality. However, measures proposed in the regeneration area and supported in the proposed variation including refurbishment of old housing and building stock and the upgrade of associated infrastructure will ensure the provision of efficient and effective water services and the maintenance of water quality to these sites.

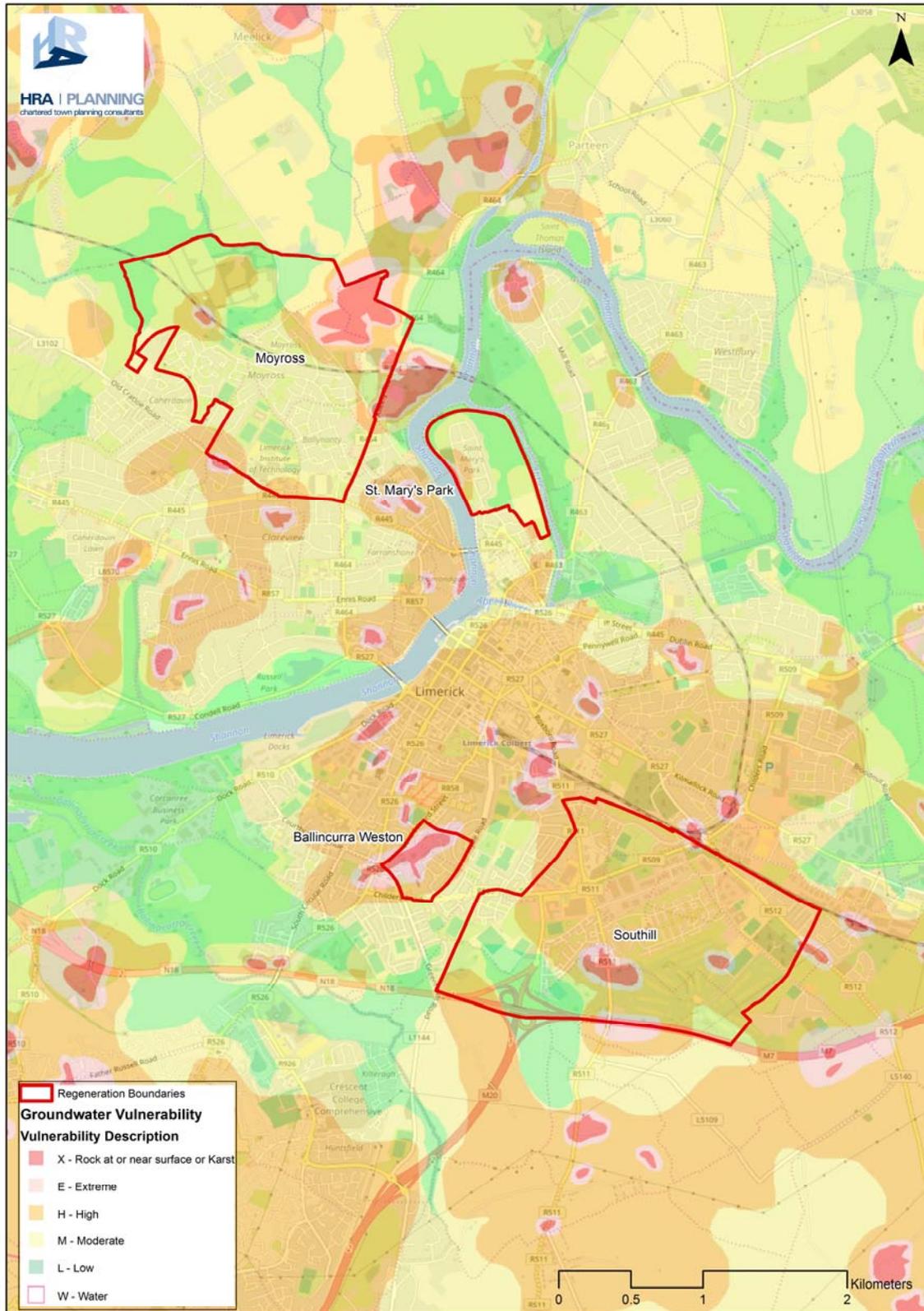


Figure 3.2 Groundwater Vulnerability Source: GSI

### 3.2.4.3 Flood Risk

Flooding is a natural process that can happen at any time, in a wide variety of locations. The two main types of flooding potentially affecting the regeneration area are from (i) coastal flooding which arises from the sea or estuaries; and (ii) fluvial flooding which arises from rivers or streams. A Strategic Flood Risk Assessment (SFRA) has been undertaken in respect of the proposed variation in accordance with the requirements of the Planning Guidelines, The Planning System and Flood Risk Management. Limerick City was subject to a detailed flood risk mapping and management study under the CFRAM programme and maps released during 2016 were incorporated within the SFRA.

The predominant flood threat to the regeneration areas lies in the area of St. Mary's Park and arises from coastal flooding associated with the River Shannon and Abbey River. While fluvial flooding has occurred in and around Limerick City in the past, higher flood levels have been noted in the Limerick area from storm surges. It is considered that a tidal storm surge is the dominant critical flooding mechanism for the Limerick City area including the regeneration areas and in particular St. Mary's Park.

To provide a structural response to flood risk management the King's Island Scheme is underway and is being designed to provide the required standard of protection for St Mary's Park and the entirety of King's Island (see Section 4.4.2 of SFRA for further details). As of September 2016, work has begun on Phase I of the defences with Phase II under detailed design. The proposed works will offer protection up to the 0.5% AEP tidal event. Circular PL 2/2014<sup>3</sup> supports the regeneration of identified strategically located urban centres and particularly city and town centre areas whose continued consolidation, growth and development or regeneration is being encouraged. In accordance with the Guidelines the relocation of the residential use was considered but as detailed in the Justification Test contained in Appendix B, this was not feasible. Accordingly, the proposed flood relief scheme details the flood risk management measures required for the area. It is noted that the Circular does permit minor development such as small scale infill or the rebuilding of houses that are unlikely to raise significant flooding issues. Any undeveloped areas within St. Mary's Park within Flood Zone A/B are appropriately zoned as amenity and open space. The section of residential property along the eastern side of St Munchin's Street is proposed to be rezoned from residential to public open space. In the lands proposed for Community and Educational (previously public open space), it is proposed to provide an extended multi-use community centre. It is necessary to provide a 25m wayleave from the riverbank to accommodate potential embankments/flood risk management measures. Residual risk may be high and will require to be assessed during a site specific FRA.

A significant extent of the regeneration area within Moyross falls within Flood Zone A. A precautionary approach has been adopted in accordance with the Guidelines and future development works within Moyross avoids areas at risk of flooding. Thus, it is not proposed to provide for any replacement / new build dwellings within the flood zone with all undeveloped areas within the flood zone remaining as either open space or a greenfield site. Part of the 'Bays' site, zoned as mixed use, did lie within Flood Zone A. However, following consideration of the SEA process it is now proposed to zone that area located within Flood Zone A as open space.

The Ballinacurra Weston regeneration area is located outside of the defined area at risk of flooding and is neither located within Flood Zone A or Flood Zone B. Most of the regeneration

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<sup>3</sup> As per Circular PL2/2014 Within Flood Zone A / B, "where the planning authority considers that the existing use zoning is still appropriate, the planning authority must specify the nature and design of structural or non-structural flood risk management measures required prior to future development in such areas, in order to ensure that flood hazard and risk to the area and to other adjoining locations will not be increased, or if practicable, will be reduced".

area within Southill is located outside the defined area of flood risk with the exception of an area of land located on the northern side of a tributary of the Ballinacurra Creek. The area of flood risk is located on the western side of the Rosbrien interchange away from the proposed development works within the regeneration area which are located to the north east of the interchange.

The development plan already contains a number of specific flood risk management policies including:

- WS.8 It is the policy of Limerick City Council to continue to work towards reducing flooding within the City and ensure that all new development proposals comply fully with the requirements of 'The Planning System & Flood Risk Management Guidelines for Planning Authorities', 2009, and any additional guidance introduced during the lifetime of the Development Plan.
- WS.9 It is the policy of Limerick City Council to ensure that development should not itself be subject to an inappropriate risk of flooding nor should it cause or exacerbate such a risk at other locations.

The proposed variation seeks to provide updated flood information and an updated SFRA in the consideration of development plan policies and objectives including zoning objectives. Via its programme of relocation, demolition and replacement, the net impact of regeneration within St. Mary's Park and the immediate surrounding area will be an overall reduction in the number of people living in St. Mary's Park within Flood Zone A. This initiative is in full compliance with the Flood Risk Management Guidelines and the Circular PL 2/2014. A detailed Justification Test has been prepared in support of the proposed demolition and replacement housing programme in St. Mary's Park and this is attached as an Appendix to the SFRA.

### **3.2.4.3 Cultural Heritage**

Archaeological heritage is protected under the National Monuments Acts (1930–2004), Natural Cultural Institutions Act 1997, and the Planning Acts. A primary source of information for known archaeological features is the Record of Monuments and Places (RMP). The Limerick City Development Plan 2010 - 2016 contains an extensive list of protected structures (RPS) within the city along with a number of Architectural Conservation Areas (ACA's). The RMP is not an exhaustive list of all archaeology in existence, and so regard must also be had to published policy in relation to the archaeological assessment of large-scale developments on sites where there are no previously recorded monuments (*Framework and Principles for the Protection of the Archaeological Heritage* – Published by Dúchas The Heritage Service).

Partially located within a Zone of Archaeological Potential St. Mary's Park is the oldest part of the city and today is commonly referred to as its 'medieval core'. A number of significant buildings survive from 12th and 13th century Limerick (as well as some remaining extant stretches of the City Wall, which was dismantled in the 1760s). Although traces of the medieval streetscape remain, the majority of the area's medieval buildings have disappeared. 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. 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.

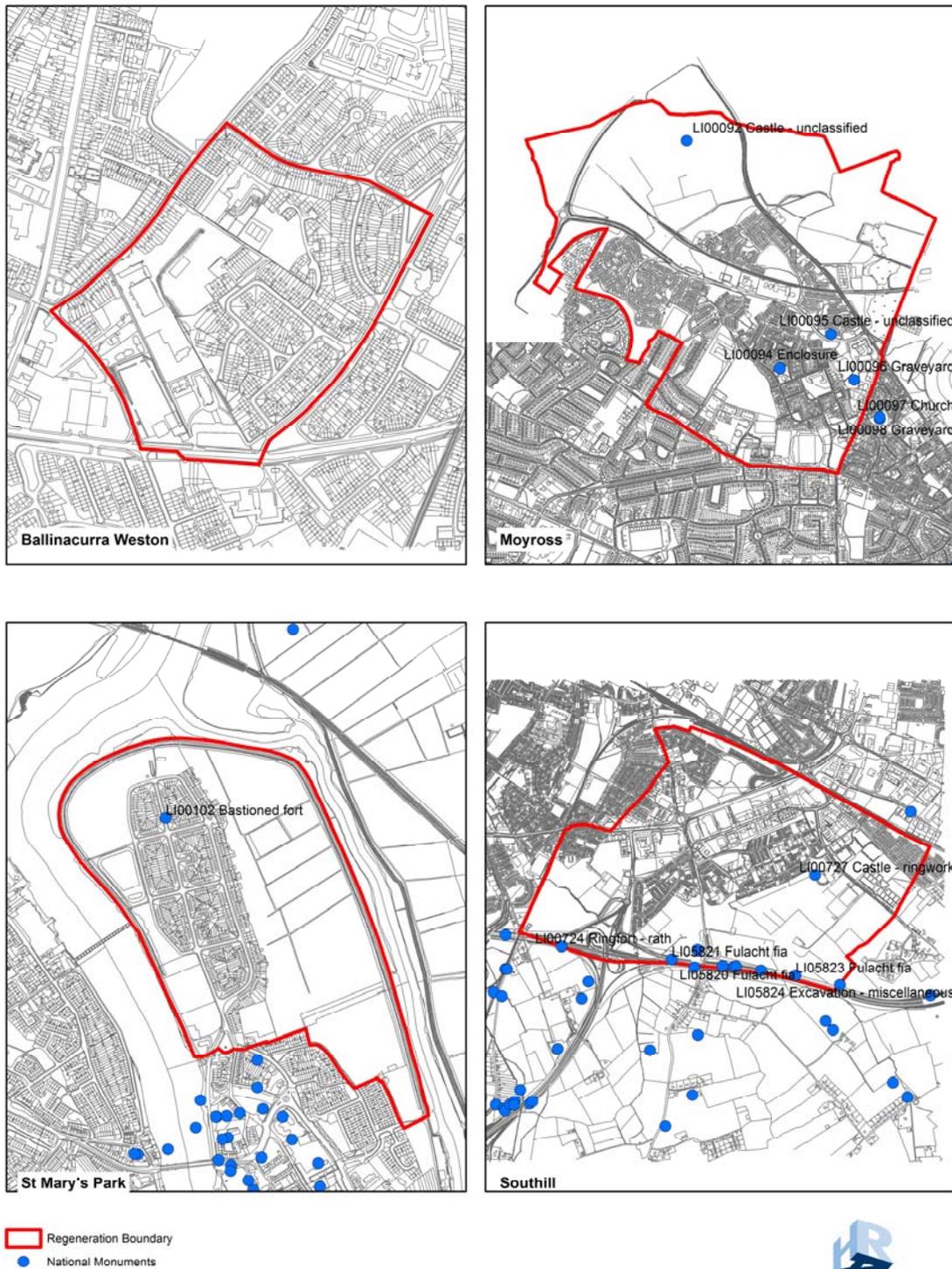


Figure 3.4 Record of Monuments and Places

Of significance within the wider St. Mary's Park environment is the presence of the river and the possibility the cultural heritage potential of the watercourses adjacent to the area. The watercourses would have been the conduit into the early settlement of Limerick, particularly in Viking times, and thus retain enormous potential for underwater cultural heritage, in the form of wrecks, wreck material, sites such as fish traps, quays, etc. or artefacts from all periods. This was borne out when the Limerick Main Drainage scheme was carried out, which focused on the Abbey River, and with thousands of archaeological discoveries, many of which are now on display in the Hunt Museum in Limerick. The City Development Plan recognises the significance of maritime heritage in the city with policy ACT.22 ensuring that Limerick City Council promotes the maritime heritage of the City

A recent Archaeological Assessment for Moyross undertaken for the purposes of facilitating regeneration works shows a small number of known archaeological sites distributed across the area. The study identified three Recorded Monuments and one delisted site within the regeneration area, consisting mainly of mid to late medieval habitation or castle sites. The locations of the records identified in Figure 3.4 may represent an estimation and as such there is potential for encountering these features anywhere in the general vicinity. There are no structures within the regeneration area of Moyross on the Limerick City Record of Protected Structures (RPS). Similarly, none of the structures within the study area feature on the National Inventory of Architectural Heritage (NIAH) compiled for Limerick City.

The National Monuments map indicates that there are no statutory protected archaeological sites, monuments or places within the regeneration area of Ballinacurra Weston. The area also falls outside of the Zone of Archaeological Potential identified for Limerick City in the LCDP 2010-2016. There are no structures within the regeneration area of Ballinacurra Weston on the Limerick City Record of Protected Structures (RPS). Similarly, none of the structures within the study area feature on the National Inventory of Architectural Heritage (NIAH) compiled for Limerick City.

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 and is a protected structure under the Limerick County Development Plan 2010 - 2016. There are no other protected structures in the area,

There are a number of important policies and objectives in the Limerick City Development Plan seeking to protect and enhance the cultural heritage of the wider city and the regeneration areas including its riverine environment. These include:

- ACT13 It is the policy of Limerick City Council to protect heritage buildings through the proper planning and sustainable development of City of Limerick.
- BHA2 It is the policy of Limerick City Council to protect and enhance the archaeological value of the sites (and their settings) located within the 'Zone of Archaeology Potential' and all other features listed in the Sites and Monuments Record (SMR).
- BHA3 It is the policy of Limerick City Council to require Archaeological Impact Assessment be carried out on all development proposals that are likely to impact upon in-situ archaeological structures or deposits within the Zone of Archaeology Potential.
- BHA12 It is the policy of Limerick City Council to protect all structures indicated on the Record of Protected Structure which shall include structures or parts of structures which are

of special social architectural, historical, archaeological, artistic, cultural, scientific social or technical interest and continually review the Record where necessary.

BHA10 It is the policy of Limerick City Council that all development proposals which will impact on riverine, inter-tidal and sub-tidal environments should be accompanied by an Archaeological Assessment.

BHA10A It is the policy of the Council to seek the preservation (in situ, or at a minimum, preservation by record) of all known and all previously unrecorded sites and features of historical and archaeological record in riverine, lacustrine, estuarine and or marine environments.

The proposed variation does not seek to impact on these policies and objectives but instead seeks to support and complement them through local initiatives including improving connectivity at Island Road from St. Mary's Park to the Medieval Quarter by transforming 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 prioritise.

#### **3.2.4.4 Landscape and Amenity**

There is currently no published landscape mapping for Limerick city or for the country. There are no regional or local designations affecting the urban sites. However, the green areas, the natural heritage and recreational amenities within the city have the potential to play a key role in creating and sustaining place. Aerial views of the regeneration areas depict a landscape in transition between completed and occupied development, demolished and vacant sites and semi- completed works. Quality recreation and leisure facilities have a fundamental impact on the quality of life in a city and to its social integration and cohesiveness. Amenities within the regeneration areas include natural and recreational amenities as well as social and community infrastructure.

St. Mary's Park is characterised by an island of housing surrounded by a large expanse of natural open green space bound on all sides by water. The River Shannon and its rich riparian and wetland habitats as a key strength of the St. Mary's Park area.

Moyross forms part of a suburban residential setting but also comprises a vast expanse of undeveloped greenfield land including the Knockalisheen Marsh area.

Ballinacurra Weston comprises a suburban residential setting with limited open space provision. Significant tree groups occur at different intervals to the north of the area, particularly to the rear of Adapt House and to the rear of Beechgrove Estate. Given the lack of existing natural landscape within Ballinacurra Weston it would be desirable to protect and enhance any existing features.

Southill primarily comprises a suburban residential setting with defined commercial and community areas particularly along Roxboro Road. The Rathbane Municipal Golf Course and Southill House Demesne located along the Roxboro Road contains significant mature tree groups with smaller clusters or bands of trees noted at other locations.

The City Development Plan seeks to protect and enhance the existing landscape through:

Policy LBR9 It is the policy of Limerick City Council to ensure that proposals along the River Shannon and other waterways associated with the River Shannon catchment within Limerick City will achieve an appropriate balance of uses commensurate with the sensitivity of the natural environment and avoiding adverse impacts on

European conservation sites and sensitive natural receptors associated with the River Shannon.

Policy LBR11 It is the policy of Limerick City Council to protect and maintain surviving remnants of Historic Gardens, Designed Landscapes and surrounding Parklands including form and patterns of hard and soft landscaping and all mature trees and vegetation as highlighted in the DEHLG 'Survey Of Historic Gardens & Designed Landscapes' Inventory.

Policy LBR17 It is the policy of Limerick City Council to facilitate the creation of the proposed walkways and natural wildlife and recreational amenities as set out in the 2009 Coonagh Recreational Framework Plan in line with Article 6 of the Habitats Directive.

The proposed variation is specific in its intent and purpose as it seeks to enhance the existing public realm and natural environment through the protection of natural landscapes and the enhancement of existing desire lines. Improving connectivity including pedestrian linkages between existing open space and developed areas all seeks to enhance landscape and amenity features within the city and the regeneration areas. Specific objectives seek to protect and enhance the special landscape character and setting of Southill House and provide opportunities to maximise the educational value of the passive open space surrounding St. Mary's Park.

#### **3.2.4.5 Material Assets - Transportation**

A significant challenge facing the regeneration areas and certain parts of Limerick city is the existing road network and the lack of connections into and within the regeneration areas. The existing road network and lack of connections isolates the regeneration areas from the rest of Limerick city and exacerbates existing social problems. With car ownership relatively low in the regeneration areas there is still a desire to encourage other modes of transport. It is therefore a challenge for the Development Plan to meet the growing demand for travel by sustainable forms of transport other than private car including public transport, walking and cycling. There are no delineated cycle lanes currently within the regeneration areas with weak pedestrian connections and linkages.

St. Mary's Park is located in close proximity to the city centre, some 800m from the city core. However, access to St. Mary's Park is limited to one main entrance from Island Road Roundabout and three other older access routes culminating in essentially one access point at St. Ita's Street to a large cul-de sac. This has resulted in isolating the northern half of the Island from the rest of the city and has made walking and cycling difficult as cars dominate the only route in and out of the area.

Perhaps the biggest single movement issue for Moyross is the lack of connectivity between it and the surrounding neighbourhoods. Even within Moyross itself it is difficult to navigate given the illegible block layout with each sub estate consisting of large cul-de-sacs.

Ballinacurra Weston is located within the context of a number of major transport axes which carry large volumes of traffic on a daily basis. Located in a built-up urban environment Ballinacurra Weston has good connections into the centre of Limerick City but poor internal connections between housing and community / recreational facilities.

Restricted access to Southill currently exacerbates the existing socio economic problems in the area. There is a single access point from John Carew Road into Carew Park and Kincora Park estates. However this is only accessible to traffic travelling out of the city and can not be

accessed from the national road network the M7. This restriction is significantly stifling economic development in the area and hindering commercial development.

The City Development Plan already contains a number of strategic transport objectives for the city including objectives which will impact on the regeneration areas:

- Policy TR1 It is the policy of Limerick City Council to implement the objectives and strategies of the National Development Plan, Transport 21, Smarter Travel and any other transport plans that may arise during the lifetime of this development plan including the proposals contained in Mid West Area Strategic Plan and Public Transport Feasibility study.
- Policy TR5 Work with the Department of Transport, the National Roads Authority, Clare County Council and Limerick County Council to provide a northern distributor road for Limerick City with facilities for car based, freight, public transport, cycling and pedestrian traffic.
- Policy TR9 It is the policy of Limerick City Council to facilitate the extension, improvement, and development of the riverside walkways and footpaths along the Shannon River and its tributaries while ensuring the conservation value of the designated River areas are maintained.
- Policy TR19 It is the policy of Limerick Council to liaise with the National Roads Authority (NRA) and Limerick County Council to promote the provision of an additional road link for N20/N21 traffic accessing the City from the Southern Ring Road. In this regard there is a need to provide this access as a result of the layout of the Rosbrien Interchange.

The proposed variation seeks to ensure that site specific transport policies are provided for each regeneration area specific to their needs and with an overall desire to enhance connectivity both within the regeneration area and between the regeneration area and the city. Specific objectives for Moyross include seeking the completion of the northern distributor road and to support the construction of the Coonagh - Knockalisheen bypass, providing a new western entrance to Moyross. Providing a direct access from the M7 through Southill is promoted in the LRFIP and proposed variation as a significant and strategic gateway access into the city. Other measures relevant to St. Mary's Park include the provision of crossings for pedestrians and cyclists which will provide direct and convenient access between local amenities including at Star Rovers Football Club; the Primary Health Care facility at Island Road; and at St. Mary's Community Centre, Verdant Place.

#### **3.2.4.6 Population & Health**

Limerick City, the fourth largest city in the State, has a population of 57,106 persons. The defined regeneration areas occupy almost 3 per cent of the land area of Limerick City and yet accommodate 11 per cent of the total population of the city. Limerick City is the second most disadvantaged local authority area in the country and has been in this position consistently since 1991. Collectively the four regeneration areas include approximately 3,557<sup>4</sup> houses with a population of over 16,283 people. Across the areas there are a number of common traits in terms of structural economic deficiencies, extensive social problems, and physical planning.

The proposed variation seeks to implement area specific measures to deliver the necessary physical, social and environmental infrastructure to improve quality of life for residents of the regeneration area. The proposed variation seeks to promote ease of movement both within the regeneration areas but also externally with the wider city. The open space and public realm strategy further seeks to improve quality of life through the reconfiguration of unused

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<sup>4</sup> CSO Statistics 2011

area of open space, the creation of wildlife corridors and linkages and high quality public open space. Economic objectives within the LRFIP seek to build employment nodes around key locations that already offer employment opportunities. The Housing Strategy firstly focuses on a programme of refurbishment and proposes to refurbish 1,504 no. existing units. It also proposes a programme of demolition and replacement housing with 605 no. units proposed for demolition (over half of these units are located in Moyross). A housing replacement strategy provides for 593 no. units thereby accommodating those who have been displaced on foot of demolition. Whilst the provision of refurbished houses and new housing is of direct beneficial impact in terms of quality of life, the impacts from a social perspective in terms of temporary and permanent relocation and displacement of people out of their community and the breakdown of community structures have not been fully assessed. However, on balance the impacts must be considered to be beneficial as the overall quality of life of the environment is improved for the population of the area.

#### **3.2.4.8 Concluding Remarks on Environmental Issues**

A full and detailed analysis through the Strategic Environmental Assessment process was conducted on the Plan's implementation. The issues of concern, highlighted at the outset of the Plan's preparation, were, as is shown above, comprehensively addressed within both the Plan and the Environmental Report.

#### **3.2.5 The relevance of the plan for the implementation of European Union legislation on the environment (e.g. plans linked to waste management or water protection).**

The City Development Plan sits within a hierarchy of County, Regional and National Plans and has been framed with due consideration to the policy direction provided in these Plans. Furthermore, the Plan gives effect to the implementation of various European Union legislation such as the EU Habitats Directive (92/43/EEC), the Water Framework Directive and Urban Wastewater Directive (91/271/EEC) amongst others and as well as national environmental quality/control legislation.

These issues were already discussed in detail within the SEA's Environmental Report for the Limerick City Development Plan and for the Limerick Regeneration Framework Implementation Plan.

### **3.3 CHARACTERISTICS OF THE EFFECTS AND OF THE AREA LIKELY TO BE AFFECTED**

Over the lifetime of the Limerick City Development Plan 2010 – 2016 and on foot of the local objectives and zoning amendments proposed in the variation, it is considered that the characteristics of the effects will ensure the regeneration area develops in a sustainable manner. The City Development Plan already supports extensive regeneration within the identified regeneration areas and subject to a number of local objectives, required for framework plans to be prepared to ensure the coordinated and sustainable regeneration of these areas. The proposed variation does not change the overall strategic objectives for the regeneration area as set out in the Development Plan but rather provides an area specific local response to key challenges already existing. Having regard to the wording of the local objectives and the measures contained therein, the probability that these effects will be environmentally significant in negative terms is negligible.

#### **3.3.1 The probability, duration, frequency and reversibility of the effects.**

It is considered that the proposed variation will not result in an impact on the environment that would be significant having consideration to its probability, duration, frequency and

reversibility of the effects. This assessment is based on the nature of the proposed Plan, which is to produce a coordinated and updated planning framework for the regeneration areas in the context of the existing planning framework for the city. It is not proposed to introduce significant and material changes in the planning context. Where limited material changes are proposed, it is considered that they will have a positive and or neutral impact on the environment.

Section 4.0 of this report examines each of the local objectives and the proposed zoning objectives against the Environmental Protection Objectives (EPOs) formulated for and used in the Strategic Environmental Assessment undertaken for the City Development Plan and demonstrates the neutral and mostly beneficial impacts of the proposed variation on the city of Limerick

### **3.3.2 The cumulative nature of the effects**

Environmental parameters and plans and programmes cannot be looked at in isolation. There can be cumulative, secondary and synergistic effects between many of them.

Regeneration measures and specific proposals will potentially, both indirectly and cumulatively conflict with the protection of various environmental components including ecology, the landscape, cultural heritage, water resources and land resources. These potential conflicts will be mitigated by measures which have already been integrated into the City Development Plan through the SEA (see Section 3.2) and they will be addressed by lower tier environmental assessment, as appropriate.

It is noted that although significant cumulative effects are likely to occur in combination with other policy documents such as, the Economic and Spatial Plan for Limerick and the Mid West Regional Planning Guidelines, it is not possible to identify the spatial location of these precise effects in this assessment due to the strategic nature of the other policy documents. In any case the proposed variation has been prepared in the context of these policy documents and so embraces a lot of their high level objectives and policies from the outset. General situations in which cumulative effects could occur in instances including those where:

- There is a requirement to provide for new infrastructure under another strategic action;
- New or upgraded transport corridors are provided in line with new regeneration works;
- New road infrastructure and new build occur together within or in close proximity to environmental sensitivities;
- An increase in population in the regeneration areas creates a greater demand on external services and facilities resulting in additional development.

Cumulative effects are those that arise when the effects of the implementation of one plan occur in combination with those of other plans or developments. Table 3.1 identifies the principle plans, policies and programmes that are likely to give rise to developments causing effects that could combine or interact with those of the LRFIP and the proposed variation. This analysis shows that at national level there has been very limited assessment of the likely effects of the types of developments that could occur in combination with the implementation of the proposed variation. It is the sequence of policy assessment that facilitates the assessment of cumulative effects. The absence of these other relevant plans that create context (and their associated assessments) renders it premature – and therefore impractical – to make any meaningful assessment of cumulative effects between national plans or policies and the proposed variation.

**Table 3.1** Knowledge of likely effects of other plans with potential to interact with IP effects

| Policy, Plan, Programme or Projects                                                | Spatially Specific? | SEA | Environmental Effects Known | Relevance of Policy, Plan, Programme or Project to Proposed Variation                                                                                                                                                                                                                    | Interactions resulting in Cumulative Impacts                                                                                                      |
|------------------------------------------------------------------------------------|---------------------|-----|-----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>National</b>                                                                    |                     |     |                             |                                                                                                                                                                                                                                                                                          |                                                                                                                                                   |
| National Spatial Strategy 2002 – 2020                                              | Yes                 | No  | No                          | Limerick as a 'Gateway ' is focused for population and economic growth.                                                                                                                                                                                                                  | Exact interactions unknown but could result in cumulative impacts.                                                                                |
| National Development Plan 2007 – 2013                                              | No                  | No  | No                          | The Social Housing Provision and Renewal Sub Programme could have potential impacts.                                                                                                                                                                                                     | Exact interactions unknown but could result in cumulative impacts.                                                                                |
| Towards a New National Climate Policy: Interim Report of the NESC Secretariat 2012 | No                  | No  | No                          | Promotes sustainable neighbourhoods including higher densities and consolidated urban centres.                                                                                                                                                                                           | Exact interactions unknown but could result in cumulative impacts.                                                                                |
| Transport 21                                                                       | Yes                 | No  | No                          | Promotes development of transport infrastructure.                                                                                                                                                                                                                                        | Unlikely                                                                                                                                          |
| National Climate Change Strategy 2007-2012                                         | No                  | No  | No                          | Promotes achievement of targets agreed under Kyoto Protocol.                                                                                                                                                                                                                             | None                                                                                                                                              |
| Delivering Homes Sustaining Communities 2007                                       | No                  | No  | No                          | Effective use of land in the construction of new housing schemes by integrating housing provision with necessary transport, physical and social infrastructure and amenities.                                                                                                            | Exact interactions unknown but could result in cumulative impacts.                                                                                |
| Social Housing Strategy 2020                                                       | No                  | No  | No                          | The strategy which sets out a road map until 2020 provides concrete actions, timelines and importantly, financial resources of €3.8bn for the delivery of 35,000 new social housing units. Support will also be provided to 75,000 households through an enhanced private rented sector. | Exact interactions unknown but could result in cumulative impacts and positive impacts if private supply is enhanced with the regeneration areas. |
| Rebuilding Ireland Action Plan for Housing & Homelessness                          | No                  | No  | No                          | Objective is to increase the supply and improve the quality of existing social housing stock through regeneration and improvement works including the return of vacant stock to effective use. It also seeks to enhance the supply of private housing stock.                             | Exact interactions unknown but could result in cumulative impacts and positive impacts if private supply is enhanced with the regeneration areas. |

| <b>Regional</b>                                           |               |     |               |                                                                                                                                                                                                               |                                                                                                                       |
|-----------------------------------------------------------|---------------|-----|---------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------|
| Shannon River Basin Management Plan                       | Yes           | Yes | Yes           | Seeks to maintain good water quality status of the River Shannon and associated water networks.                                                                                                               | Impacts arising from interactions are avoided by integration of mitigation measures into the County Development Plan. |
| Mid West Regional Planning Guidelines                     | Yes (partial) | Yes | Yes           | Promotes Limerick City as Zone 1 where significant population growth should be accommodated and this has implications for the regeneration areas.                                                             | Impacts arising from interactions are avoided by integration of mitigation measures into the County Development Plan. |
| Southern Region Waste Management Plan 2015 - 2021         | Yes (partial) | Yes | Yes           | Provision of waste infrastructure including bring banks and collection centres are promoted within the city and could affect the regeneration areas.                                                          | Impacts arising from interactions are avoided by integration of mitigation measures into the County Development Plan. |
| Mid West Area Strategic Plan                              | Yes           | Yes | Yes           | A landuse and transportation strategy which does provide for road construction and road improvement measures within the regeneration areas                                                                    | Impacts arising from interactions are avoided by integration of mitigation measures into the County Development Plan. |
| Limerick & Clare Joint Housing Strategy 2011 - 2017       | Yes (partial) | Yes | Yes           | The strategy focuses on the regeneration programme and resultant population growth which it states is critical to redirecting population growth into Limerick City and to the success of the Gateway overall. | Impacts arising from interactions are avoided by integration of mitigation measures into the County Development Plan. |
| Retail Strategy for the Mid West Region 2010 - 2016       | Yes           | Yes | Yes           | Promotes further development at Roxboro Shopping Centre and Watch House Cross and identifies these as a District Centre.                                                                                      | Impacts arising from interactions are avoided by integration of mitigation measures into the LRFIP.                   |
| Limerick and Clare Sports and Recreational Strategy 2012  | Yes (partial) | Yes | Yes           | The strategy is sub regional and high level in its approach, and does not, therefore, focus on community based or community level facilities though it does recognise their importance.                       | None                                                                                                                  |
| <b>Local</b>                                              |               |     |               |                                                                                                                                                                                                               |                                                                                                                       |
| Limerick 2030 – An Economic and Spatial Plan for Limerick | Yes           | Yes | Yes (partial) | Supports a range of economic initiatives for the regeneration area. Could lead to population growth in the city and greater demand for housing which could impact on regeneration area.                       | Impacts arising from interactions are avoided by integration of spatial plan into the City Development Plan.          |

### **3.3.3 The transboundary nature of the effects**

It is considered that the proposed Plan will not result in any impact that would impact materially on other member states. Relevant national guidance and the RPGs have informed the plan making process and the preparation of the proposed variation. Accordingly the overall thrust and spirit of the variation is in line with the greater vision for the region and adjoining counties.

The Moyross Regeneration area is located on the periphery of the Development Plan area adjoining Co. Clare. The Knockalisheen Marsh transcends the county boundary and accordingly any development within or in proximity to the marsh could impact through the impairment of views and prospects from outside the Development Plan Area. However, the Knockalisheen Marsh has not been identified for a development purpose and accordingly no impacts should occur.

Transport infrastructure has a transboundary character. The proposed variation does seek completion of the northern distributor road and completion of the Coonagh – Knockalisheen Road which will have an impact on Co. Clare. However, any potential impacts will already have been assessed as part of their planning consent. Another objective in the proposed variation seeks to investigate the provision of a more direct access from the M7 and N20 into Southill. However, the objective makes it clear that this is subject to a feasibility study and the examination of alternatives.

Where material changes are proposed in the variation, it is considered that they will have a positive and or neutral impact on the environment.

### **3.3.4 Risks to human health or the environment (e.g due to accidents)**

The implementation of the development plan variation will not result in any risks to human health. Any future development in the area will conform to the Plan, of which the fundamental essence is to create a healthy environment in which people can live, work and spend leisure time.

The proposed amendment will improve human health as the proposed variation seeks to create better living environments through better considered urban design solutions and the creation of attractive streetscapes, open space and community facilities, integrated into the wider cityscape.

There are no designated SEVESO sites or significant industrial operations within the regeneration areas. The proposed variation contains social, physical, environmental and economic frameworks for the area along with strategies for retail development, employment opportunities, regenerated housing and transport improvements. Therefore, it is not considered that there will be any significant risk to human health or the environment in implementing the proposed variation.

### **3.3.5 The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)**

Limerick City, the fourth largest city in the State, has a population of 57,106 persons. The defined regeneration areas occupy almost 3 per cent of the land area of Limerick City and yet accommodate 11 per cent of the total population of the city. Limerick City is the second most disadvantaged local authority area in the country and has been in this position consistently since

1991. Collectively the four regeneration areas include approximately 3,557<sup>5</sup> houses with a population of over 16,283 people. Across the areas there are a number of common traits in terms of structural economic deficiencies, extensive social problems, and physical planning.

It is not considered that the development of the zoned lands including the local objectives for each of the regeneration areas and the achievement of the population targets will result in significant environmental impacts. The proposed variation will result in the net loss of 8.4 hectares of residential zoned land. However, importantly the proposed variation will not upset the existing core strategy or population projections for the county. There is sufficient land within the plan area to meet the housing need for the lifetime of the plan and with 60% of the population target (for the plan period) capable of being met by the regeneration programme, the development plan is in accordance with national policy and its adopted core strategy.

### **3.3.6 The value and vulnerability of the area likely to be affected due to natural characteristics or cultural heritage**

St. Mary's Park is deemed to be the most sensitive of the four regeneration areas from a nature conservation perspective having regard to the SAC designation which surrounds the island. Whilst Moyross is touched by both a SAC designation and pNHA designation it is not as extensive as the designation in St. Mary's Park as it lies on the north eastern fringe of the regeneration area. The proposed variation has taken a precautionary approach to such designations such that no development is proposed within designated sites and all development in proximity to a designated site will be subject to project level NIA. A comprehensive Appropriate Assessment Report was also undertaken for the LRFIP in 2013 and the findings of this assessment informed the overall approach of the LRFIP. Furthermore, the proposed variation was assessed as per Article 6 of the Habitats Directive and a Screening Report was undertaken. The AA Screening Report considered that future projects advanced on foot of policies and zoning promoted in the variation can avoid any potential impacts through careful planning and design at detailed design stage. Through the adoption of a best practice approach and implementation of standard environmental measures, the elements of the proposed variation can be achieved without resulting in significant effects to the Natura 2000 network.

There are 28 no. protected structures within the regeneration areas with 27 no. of these located in the wider Kings Island area including St. Mary's Park. Southill House is the only other protected structure within the regeneration area. The proposed variation seeks to reuse and adapt many older buildings including protected structures and provided such works are undertaken in a sensitive manner the impacts should be positive. There is a limited amount of archaeological heritage features within the regeneration areas with the exception of St. Mary's Park where the southernmost part of the regeneration area is located within a Zone of Archaeological Potential. There are also a number of recorded monuments and protected structures present. However that part of the island where most works are proposed (to existing houses) is located outside of the zone. Further investigation shall be required through Archaeological Impact Assessment to assess the full potential impacts on cultural heritage in these areas.

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<sup>5</sup> CSO Statistics 2011

### **3.3.7 The value and vulnerability of the area likely to be affected due to exceeded environmental quality standards or limit values.**

It is not expected that environmental quality standards will be exceeded or that the value of vulnerable areas will be limited as a result of the proposed variation. Environmental policies and objectives contained within the proposed variation and the existing city development plan ensure that the impact of any proposed developments on existing habitats, species and the value of the existing landscape are kept to a minimum. Development proposed within the regeneration areas will be subject to assessment as part of a planning application and will also be required to demonstrate compliance with the relevant legislation and environmental quality standards and limits.

### **3.3.8 The value and vulnerability of the area likely to be affected due to intensive land-use.**

The identified regeneration areas are located in an urbanised environment. The proposed variation will facilitate redevelopment and regeneration of existing urban and brownfield sites including existing areas of open space which have no beneficial contribution to the setting or the surrounding community. The proposed variation is likely to intensify the land-use, however not to a degree that would adversely impact upon the existing natural and built environment. Furthermore, there are adequate environmental provisions within the development plan and the proposed variation to ensure that adverse environmental impacts do not occur.

### **3.3.9 The effects on areas of landscape which have a recognized national, European Union or international protection status**

The overall approach of the proposed variation is to concentrate new development on infill or underutilised sites within an existing built-up, urban area whilst avoiding more environmentally sensitive and vulnerable sites. The landscape affected by the proposed variation within the regeneration areas and the wider cityscape does not have a recognized national, EU or international protection status. There are however nationally designated sites for nature conservation as detailed in S.3.3.6 of this report.

The proposed variation encourages opportunities to protect existing, and create new, habitats through the creation of a multi-functional green network throughout the regeneration area which includes areas of high biodiversity value. Emphasis is also placed on the protection of designated, as well as undesignated sites, of high biodiversity value.

## 4.0 Matrix to assess the characteristics of the proposed Variation having regard to the Environmental Protection Objectives (EPO) of the Limerick City Development Plan 2010 - Strategic Environmental Assessment (SEA).

### 4.1 INTRODUCTION

Environmental Protection Objectives (EPOs) are methodological measures against which the environmental effects of the LRFIP can be tested. If complied with in full, EPOs would result in an environmentally neutral impact from realisation of the LRFIP.

The SEA carried out on the Limerick City Development Plan 2010 – 2016 identified a number of Environmental Protection Objectives (EPO's) for the city. Whilst it is important that EPOs identified for the city are consistent it is also important that the specifics and detail of the LRFIP, which differs from the City Development Plan, are adequately assessed. Therefore, the EPOs identified for the LRFIP whilst generally consistent with the City Development Plan, have been broadened to include additional objectives.

**Table 1.0** Environmental Protection Objectives

|                                           |                                                                                                                                                                                                             |
|-------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Biodiversity<br/>Flora &amp; Fauna</b> | <b>B1</b> Protect, conserve and enhance habitats, species and areas of national and local importance, including aquatic habitats and species and promote the sustainable management of ecological networks. |
|                                           | <b>B2</b> To avoid significant impacts on relevant habitats, species, environmental features or other sustaining resources in Wildlife Sites.                                                               |
| <b>Cultural Heritage</b>                  | <b>C1</b> Protect and conserve features of archaeological heritage and their settings.                                                                                                                      |
|                                           | <b>C2</b> Protect and conserve and promote the sustainable reuse of architectural heritage.                                                                                                                 |
| <b>Water</b>                              | <b>W1</b> Achieve and maintain required water quality standards and reduce discharges of pollutants or contaminants to waters.                                                                              |
| <b>Population &amp; Health</b>            | <b>P1</b> Facilitate a good standard of quality of life for the City's population through ensuring high quality residential, recreational and working environments                                          |
| <b>Soils &amp; Geology</b>                | <b>S1</b> Protect the quality of soils in the interests of avoiding environmental degradation in water quality and biodiversity                                                                             |
| <b>Air &amp; Climatic Factors</b>         | <b>AC1</b> to increase energy efficiency and the proportion of energy efficiency generated from renewable sources                                                                                           |
| <b>Landscape &amp; Amenity</b>            | <b>L1</b> Protect and conserve the quality, character and distinctiveness of the townscape of Limerick and minimise negative visual impacts                                                                 |
| <b>Material Assets</b>                    | <b>MA1</b> Maintain the quality of and access to assets such as open spaces, water resources and all other physical and social infrastructure.                                                              |

**Will the implementation of the policy serve to have:**

|                                                                        |          |
|------------------------------------------------------------------------|----------|
| A Significant Beneficial Impact on Environmental Receptor?             | <b>+</b> |
| A Significant Adverse Impact on Environmental Receptor?                | <b>-</b> |
| An Uncertain Impact on Environmental Receptor?                         | <b>?</b> |
| An Insignificant Impact or No relationship with Environmental Receptor | <b>0</b> |

| Proposed Variation               |                                                                                                                                                                                                                                                                                                                                                                                                           | B1 | B2 | W1 | P1 | C1 | C2 | S1 | AC1 | L1 | MA1 | Potential Impacts                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                              |
|----------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|----|----|----|----|----|----|-----|----|-----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>St. Mary's Park</b>           |                                                                                                                                                                                                                                                                                                                                                                                                           |    |    |    |    |    |    |    |     |    |     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                              |
| Movement & Connectivity Strategy | To environmentally improve the existing street network of St. Mary's Park to provide a safe, attractive, accessible and well-designed network of streets in tandem with the upgrade to the existing water network and refurbishment works to existing houses.                                                                                                                                             | 0  | 0  | +  | +  | ?  | +  | 0  | +   | +  | +   | Largely positive and insignificant effects. The environmental improvements proposed largely occur on brownfield or existing urbanised streets, thereby requiring little new build or disturbance. Upgrading the existing water network however may potentially impact on unknown archaeology in the area and works may occur in proximity to the SAC. Most of St. Mary's Park is located within Flood Zone A and is subject to flooding. The southernmost part of the regeneration area is located within a Zone of Archaeological Potential so further investigation would be required to address the uncertain impact on cultural heritage.                                                                                                                                                                                                   | Adherence to the Guidelines for Planning Authorities 'The Planning System and Flood Risk Management' and Best Practice Urban Design principles. Project level NIS may be required. Archaeological Impact Assessment required.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                              |
|                                  | To provide crossings for pedestrians and cyclists which will provide direct and convenient access between local amenities at the following locations:<br>a) At Star Rovers Football Club;<br>b) At the Primary Health Care facility at Island Road;<br>c) At St. Mary's Community Centre, Verdant Place.                                                                                                  | 0  | 0  | 0  | +  | 0  | 0  | 0  | 0   | 0  | 0   | +                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Largely insignificant to positive impacts. Proposed crossings will occur in existing urbanised environments and on streets. Limited works proposed.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                              |
|                                  | To examine options to improve connectivity at Island Road from St. Mary's Park to the Medieval Quarter by transforming 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; whilst ensuring protection of the integrity of the environmentally designated sites.      | 0  | 0  | 0  | +  | 0  | 0  | 0  | 0   | 0  | 0   | +                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Largely insignificant and positive effects. The traffic calming measures proposed largely occur on an existing urbanised streets, thereby requiring little new build or disturbance. The extent of works is currently unknown and therefore there could be potential impacts on unknown archaeology in the area. Works may occur in proximity to the SAC. Most of St. Mary's Park is located within Flood Zone A and is subject to flooding.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Adherence to the Guidelines for Planning Authorities 'The Planning System and Flood Risk Management' and Best Practice Urban Design principles. Project level NIS may be required. Archaeological Impact Assessment required.                                                                                                |
|                                  | To improve local connections converging on the existing St. Mary's Park Community Centre at the following locations:<br>a) A one-way link road from the Toll House to Verdant Place. This proposal recognises the restricted dimension between the Toll House and the Bridge and the lack of pedestrian footpaths in the area;<br>b) A new street, at Island Gate, from Verdant Place to Dominick Street. | 0  | 0  | 0  | +  | ?  | 0  | +  | 0   | 0  | +   | +                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Insignificant and positive impacts. Most of St. Mary's Park is located within Flood Zone A and is subject to flooding and any new potential linkages will be subject to site specific FRA. Thus the exact design and location of these routes will be important in the consideration of flood risk management. Whilst internal linkages are proposed on land outside the SAC the potential impact on other environmental features would need to be investigated fully. Whilst such connections would directly benefit the population providing greater connectivity they could also lead to increased mobility and if not properly managed an increase in the use of the car. The southernmost part of the regeneration area is located within a Zone of Archaeological Potential so further investigation would be required to address the uncertain impact on cultural heritage and in particular sub terrain archaeology. | Adherence to the Guidelines for Planning Authorities 'The Planning System and Flood Risk Management' and Best Practice Urban Design principles. Provision of works within St. Mary's Park must be subject to a detailed Flood Risk Assessment. Project level NIS may be required. Archaeological Impact Assessment required. |
|                                  | To explore the potential to upgrade Eel's Weir to provide a connection to the New Road and beyond and ensure that any development proposed does not have a negative impact on habitats.                                                                                                                                                                                                                   | ?  | ?  | ?  | +  | 0  | 0  | 0  | 0   | 0  | 0   | +                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | There are many uncertain impacts on EPOs as the extent of upgrade works is not known at this stage. However as the proposed works involve refurbishment it is likely that any potential impacts could be mitigated. Although new works are not proposed within the SAC such development would result in greater pedestrian traffic through the SAC.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Consideration would need to be given to the protection of water quality during construction and any works. Guiding barriers would need to be constructed to control the movement and direction of flow of pedestrian traffic. Project level NIS shall be required.                                                           |
| Landuse Strategy                 | To 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.                                                                                                                                                    | ?  | ?  | ?  | +  | ?  | ?  | 0  | 0   | ?  | +   | There are many uncertain impacts on EPOs as the extent of development works is not known at this stage. However it is noted that the works proposed are subject to detailed environmental considerations and requirements. The objective is largely strategic in nature and accordingly must be carefully considered when / if it advances.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Subject to detailed environmental considerations and requirements as specified in the objective.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                              |
|                                  | To promote the development of key strategic sites within Nicholas Street and Bridge Street for potential enterprise development attracting further inward investment.                                                                                                                                                                                                                                     | ?  | +  | 0  | +  | ?  | ?  | ?  | 0   | +  | +   | There are many positive impacts arising from this initiative but there are also some uncertain impacts which can only be determined at detailed project stage. The key strategic sites within Nicholas Street, including the development of a National Social Innovation Hub at Bridge Street are within Flood Zone A/B although will be protected by the King's Island flood relief scheme. It is likely however that any potential impacts could be mitigated particularly relating to noise and potential traffic generation. Promotion of brownfield sites and underutilised sites is very positive. The southernmost part of the regeneration area is located within a Zone of Archaeological Potential so further investigation would be required to address the uncertain impact on cultural heritage including sub terrain archaeology. | Adherence to the Guidelines for Planning Authorities 'The Planning System and Flood Risk Management'. Provision of works within St. Mary's Park must be subject to a detailed Flood Risk Assessment. Archaeological Impact Assessment required.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                              |
|                                  | To promote employment growth in King's Island and St. Mary's Park through the re-use of underutilised sites, derelict buildings and the                                                                                                                                                                                                                                                                   | ?  | +  | 0  | +  | ?  | ?  | ?  | 0   | +  | +   | +                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | There are many positive impacts arising from this initiative but there are also some uncertain impacts which can only be determined at detailed project stage, particularly relating to the reuse of underutilised sites.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | As per circular PL 2/2014 applications for minor development such as small scale infill, small extensions to houses or change if use of                                                                                                                                                                                      |

|                                    |                                                                                                                                                                                                                                                                                                                                                                                            |   |   |   |     |   |   |   |   |   |   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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|                                    | upgrading of sites already in employment uses.                                                                                                                                                                                                                                                                                                                                             |   |   |   |     |   | ? |   |   |   |   | Much of Kings Island lies within Flood Zone A/B although it will be protected by the King's Island flood relief scheme. Promotion of brownfield sites and underutilised sites is very positive. The southernmost part of the regeneration area is located within a Zone of Archaeological Potential so further investigation would be required to address the uncertain impact on cultural heritage and in particular any impacts on archaeology and existing architectural heritage.                                                                                                                                                                                                                                                                              | existing buildings could be considered. All future applications for re-development within this area will require an FRA, including consideration of residual risk and surface water/pluvial risk. Residual risk must be estimated and managed by site design measures. Archaeological Impact Assessment is likely to be required.                                                                                                        |
|                                    | To promote the development of a National Social Innovation Hub within Nicholas Street to attract a mix of social innovation and social enterprise.                                                                                                                                                                                                                                         | ? | + | 0 | +   | ? | ? | ? | 0 | ? | + | The precise site of development is unknown and so direct potential impacts are also unknown. Much of Kings Island lies within Flood Zone A/B although it will be protected by the King's Island flood relief scheme. Promotion of brownfield sites and underutilised sites is very positive. The southernmost part of the regeneration area is located within a Zone of Archaeological Potential so further investigation would be required to address the uncertain impact on cultural heritage and in particular any impacts on archaeology and existing architectural heritage.                                                                                                                                                                                 | Provision of works within St. Mary's Park must be subject to a detailed Flood Risk Assessment.                                                                                                                                                                                                                                                                                                                                           |
|                                    | To 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. | 0 | ? | 0 | +   | ? | 0 | ? | 0 | ? | + | Extending the existing community centre would bring many positive impacts but its location within an identified flood zone A could result in increased flood risk unless appropriately mitigated. As per circular PL 2/2014, no further redevelopment should be undertaken in areas within Flood Zone A/B until such time as the flood relief scheme is complete. Although not located within a Zone of Archaeological Potential given the historical nature of the area there could be potential for sub terrain archaeology and this would need to be investigated further. As per circular PL 2/2014, no further redevelopment should be undertaken in areas within Flood Zone A/B until such time as the flood relief scheme is complete.                      | It is necessary to provide a 25m wayleave from the riverbank to accommodate potential embankments/flood risk management measures. Residual risk may be high and will require to be assessed during a site specific FRA. Adherence and conformity to development management standards as set out in the Limerick City Development Plan 2010 – 2016 particularly relating to archaeological policies. Project level NIS shall be required. |
|                                    | To support the redevelopment of the Opera Centre site, adjacent to King's Island / St. Mary's Park, which is seen as an economic catalyst for the area, city and region.                                                                                                                                                                                                                   | 0 | 0 | 0 | +   | ? | ? | 0 | 0 | ? | 0 | There are many positive impacts arising from this initiative but there are also some uncertain impacts which can only be determined at detailed project stage. The reuse of underutilised sites is positive but there are a number of protected structures on site which need to be carefully considered.                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Adherence and conformity to development management standards as set out in the Limerick City Development Plan 2010 – 2016 particularly relating to archaeological and cultural heritage policies.                                                                                                                                                                                                                                        |
| Zoning Strategy                    | 1.69 ha from residential use to open space                                                                                                                                                                                                                                                                                                                                                 | + | + | ? | +/- | 0 | 0 | + | 0 | + | + | Mainly positive to neutral long term impacts associated with proposed rezoning although demolition of units is necessary to facilitate rezoning. There could 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. The current landscape of the urban area is run down and neglected. The provision of open space will have a visually positive impact on the existing urban landscape. There is an uncertain impact on adjoining wetlands due to the potential for hydrological changes to occur within areas that are currently wetland. It is important that water is not drained from the wetland as a result of this phase. |                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|                                    | 0.45 ha from open space to education and community use                                                                                                                                                                                                                                                                                                                                     | 0 | 0 | 0 | 0   | 0 | 0 | 0 | 0 | 0 | 0 | This zoning change simply reflects an existing use on the ground and accordingly there are no potential impacts as any impact that could occur has occurred.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Reflects existing use on the ground and the presence of St. Mary's Park Community Centre                                                                                                                                                                                                                                                                                                                                                 |
|                                    | 0.05 ha from residential to educational and community use                                                                                                                                                                                                                                                                                                                                  | 0 | 0 | 0 | 0   | 0 | 0 | 0 | 0 | 0 | 0 | This zoning change simply reflects an existing use on the ground and accordingly there are no potential impacts as any impact that could occur has occurred.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Reflects existing use on the ground and the presence of St. Mary's Park Community Centre                                                                                                                                                                                                                                                                                                                                                 |
| Open Space & Public Realm Strategy | To return the eastern side of St. Munchin's Street to parkland once demolition of the area has taken place.                                                                                                                                                                                                                                                                                | ? | ? | 0 | +   | 0 | 0 | 0 | + | + | - | Largely positive to neutral impacts with some uncertain impacts. Returning the land to parkland involves demolition of houses and this could give rise to indirect impacts on the SAC if the water regime in the wetland was to be affected. The demolition of houses in this instance is seen as a positive as all displaced families are to be rehoused through replacement infill housing.                                                                                                                                                                                                                                                                                                                                                                      | This section of parkland must be available to incorporate a flood defence embankment under the proposed flood defence scheme, as detailed in Figure 4.1 of the SFRA                                                                                                                                                                                                                                                                      |
|                                    | To provide for active play space facilities for a range of ages up to 15 years with good natural surveillance to maximise the safety of these areas.                                                                                                                                                                                                                                       | ? | ? | 0 | +   | 0 | 0 | 0 | 0 | 0 | + | Largely positive to neutral impacts with some uncertainty given the location of the proposed sites are unknown. A large area of St. Mary's Park is located in a SAC and accordingly the identification of potential sites outside of the SAC is important. Overall a positive contribution to the area.                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|                                    | To provide opportunities to maximise the educational value of the passive open space surrounding St. Mary's Park.                                                                                                                                                                                                                                                                          | ? | ? | 0 | +/- | 0 | 0 | ? | 0 | ? | ? | There are many uncertain impacts on EPOs as the extent of works proposed are unknown. It is unknown whether works are proposed in the SAC but if proposed such works would result in greater pedestrian traffic through the SAC.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Guiding barriers would need to be constructed to control the movement and direction of flow of pedestrian traffic. A NIS is likely to be required if proposed in or near a SAC                                                                                                                                                                                                                                                           |

| Moyross                            |                                                                                                                                                                                                                                 |   |   |   |   |   |   |   |   |   |   |                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                              |
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| Movement & Connectivity Strategy   | To complete the northern distributor road and to support the construction of the Coonagh - Knockalisheen bypass, providing a new western entrance to Moyross.                                                                   | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | + | This road was the subject of an EIS and application to An Bord Pleanala which was granted permission. Any potential associated impacts have been appropriately mitigated.                                                                                                                                                                                                                                                                | This infrastructure is a critical element for the Regeneration of Moyross and Limerick City allowing for enhanced circulation patterns. This proposed new road is in accordance with National and local policy. This proposed route while aiding vehicular circulation will also facilitate public bus services, cycling and walking routes.                                                                 |
|                                    | To upgrade the existing Moyross Avenue 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. | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | + | Largely insignificant and positive effects. The traffic calming measures proposed largely occur on an existing urbanised streets, thereby requiring little new build or disturbance. The extent of works is currently unknown and therefore there could be potential impacts on sub terrain archaeology in the area.                                                                                                                     | Archaeological Impact Assessment required.                                                                                                                                                                                                                                                                                                                                                                   |
| Landuse Strategy                   | To expand the footprint of the Moyross Community and Enterprise Centre to improve the quality and choice of community focused uses available.                                                                                   | 0 | 0 | 0 | + | ? | 0 | 0 | 0 | 0 | + | Mainly insignificant but positive impacts. Extending the existing community centre would bring many positive impacts.                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                              |
|                                    | To reinforce existing Employment & Enterprise Uses at Moyross Enterprise Centre.                                                                                                                                                | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 | + | Enhancing the existing centre would bring many positive impacts but its location within an identified flood zone A could result in increased flood risk unless appropriately mitigated. The site is also located adjoining a SAC and pNHA                                                                                                                                                                                                | Any development will be subject to project level NIA and FRA                                                                                                                                                                                                                                                                                                                                                 |
|                                    | To promote the redevelopment of the 'Bays' site to add additional local capacity and contribute to the formation of a natural training cluster.                                                                                 | 0 | 0 | ? | + | 0 | 0 | 0 | 0 | 0 | + | This proposal is positive and any land located within the identified flood zone area has been rezoned from mixed use to open space. It has positive benefits for the community. The site is also located adjoining a SAC and pNHA                                                                                                                                                                                                        | Redevelopment of the bays site as a training cluster should be subject to a detailed Flood Risk Assessment and should demonstrate compatibility of uses. Any development will be subject to project level NIA.                                                                                                                                                                                               |
| Zoning Strategy                    | 3.46 ha from open space to residential use                                                                                                                                                                                      | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | + | 0 | Mainly positive to insignificant long term impacts. The potential impacts associated with the largest of the two areas has already been assessed through the planning consent process. The other area represents underutilized open space of no significant amenity value.                                                                                                                                                               | This zoning change relates to 2 no. sites. Some 3.3 hectares has already been granted planning permission for residential development and reflects the current situation. The other site comprising 0.26 hectares comprises a strip of land running along the gable end of existing houses. Provision of housing on this strip of land is necessary to facilitate surveillance of the proposed new parkland. |
|                                    | 14.68 ha from residential to open space use                                                                                                                                                                                     | 0 | 0 | 0 | + | 0 | 0 | ? | 0 | + | + | Mainly positive to insignificant long term impacts. The current landscape of the urban area is run down and neglected. The replacement of existing dwellings will have a visually positive impact on the existing urban landscape. Short-term negative impacts may be felt by the population during the demolition & construction phase but these will be temporary                                                                      | Monitoring of the social impacts associated with the demolition, replacement and new build housing programme should be initiated for future reference. A demolition waste management plan shall be required to facilitate recycling of demolition waste. It is noted the Development Plan proposes a number of environmental management standards during construction.                                       |
|                                    | 1.56 ha from sports use to open space                                                                                                                                                                                           | 0 | 0 | 0 | + | 0 | 0 | ? | 0 | 0 | + | Mainly positive to insignificant impacts. The change in zoning is required to facilitate the construction of the linear park                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                              |
|                                    | 0.25 ha from sports use to residential use                                                                                                                                                                                      | 0 | 0 | 0 | + | 0 | 0 | 0 | 0 | + | + | Mainly positive to insignificant long term impacts. The land comprises a strip running along the gable end of existing houses. Provision of housing on this strip of land is necessary to facilitate surveillance of the proposed new parkland.                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                              |
|                                    | 3.58 ha from agriculture to open space                                                                                                                                                                                          | 0 | 0 | 0 | + | 0 | 0 | ? | 0 | 0 | + | Mainly insignificant impacts as no construction / development works are proposed. Perceptually the land will remain in the same use.                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                              |
| Open Space & Public Realm Strategy | To protect and enhance the special landscape character and setting of Delmege Estate.                                                                                                                                           | + | + | 0 | + | 0 | 0 | + | 0 | + | + | Largely positive to neutral impacts in the long term.                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                              |
|                                    | To protect and enhance existing desire lines within Moyross and integrate as part of public realm improvements within the area.                                                                                                 | ? | ? | 0 | + | ? | 0 | 0 | 0 | + | + | The proposed internal linkages largely occur on brownfield or existing urbanised sites. However some of the connections are proposed on open space land and this has the potential to impact on linkages within the open space network. However a lot of the open space in Moyross is underutilised and so the internal provision of linkages and access routes could effectively enhance the existing open space provision in the area. | Project level NIA may be required.                                                                                                                                                                                                                                                                                                                                                                           |

|                                  |                                                                                                                                                                                                                                                                                                                     |   |   |   |     |   |   |   |   |   |   |   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                      |
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|                                  |                                                                                                                                                                                                                                                                                                                     |   |   |   |     |   |   |   |   |   |   |   | Whilst such connections would directly benefit the population providing greater connectivity they could also lead to increased mobility and if not properly managed an increase in the use of the car.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                      |
|                                  | To retain the existing active playing pitches associated with LIT, St. Nessian's Community College and Thomond Park RFC as sporting facilities.                                                                                                                                                                     | 0 | 0 | 0 | +   | 0 | 0 | + | 0 | + | + | 0 | Largely positive to neutral impact in the long term.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                      |
| <b>Ballinacurra Weson</b>        |                                                                                                                                                                                                                                                                                                                     |   |   |   |     |   |   |   |   |   |   |   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                      |
| Movement & Connectivity Strategy | To improve permeability and connections from Ballinacurra Weston to its wider context at four specific locations in the short-medium term                                                                                                                                                                           | 0 | 0 | 0 | +   | 0 | 0 | ? | 0 | 0 | + | 0 | Generally positive to neutral impacts. The proposed internal linkages largely occur on brownfield or existing urbanised sites. Such connections would directly benefit the population providing greater connectivity thereby encouraging modal split including walking and cycling.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                      |
|                                  | To provide new and improved crossings for pedestrians and cyclists which will provide direct and convenient access between local amenities at five defined locations                                                                                                                                                | 0 | 0 | 0 | +   | 0 | 0 | 0 | 0 | 0 | + | 0 | Largely insignificant to positive impacts. Proposed crossings will occur in existing urbanised environments and on streets. Limited works proposed.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                      |
| Landuse Strategy                 | To promote potential enterprise development in Ballinacurra Weston through the reuse of underutilised sites at the existing local centre,                                                                                                                                                                           | 0 | 0 | 0 | +   | 0 | 0 | 0 | 0 | 0 | + | 0 | Enhancing the existing centre would bring many positive impacts to the local community.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                      |
|                                  | To support the provision of multifunctional spaces at Our Lady of Lourdes Community Centre to provide flexible and accessible spaces adaptable to communities' needs.                                                                                                                                               | 0 | 0 | 0 | +   | 0 | 0 | 0 | 0 | 0 | + | 0 | Enhancing the existing centre would bring many positive impacts to the local community.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                      |
| Zoning Strategy                  | 0.74 ha from open space to residential use                                                                                                                                                                                                                                                                          | 0 | 0 | 0 | +   | 0 | 0 | 0 | 0 | + | 0 | 0 | Key infill site in an urbanized environment identified for the provision of private housing.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | The provision of housing on this land is dependent on links and local connections being provided from Clarina Park to Byrne Venue and Lenihan Avenue |
|                                  | 1.69 ha from residential to education community & cultural uses                                                                                                                                                                                                                                                     | 0 | 0 | 0 | 0   | 0 | 0 | 0 | 0 | 0 | 0 | 0 | Reflects existing uses associated with Our Ladies of Lourdes Community Centre and Church                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                      |
| <b>Southill:</b>                 |                                                                                                                                                                                                                                                                                                                     |   |   |   |     |   |   |   |   |   |   |   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                      |
| Movement & Connectivity Strategy | To investigate the provision of a more direct access from the M7 and N20 into Southill (subject to a feasibility study examining potential options).                                                                                                                                                                | ? | ? | 0 | +/- | ? | 0 | ? | 0 | ? | + | 0 | There are a number of uncertain impacts associated with this proposal which will require further study and clarification with regard to potential impacts on ecology, soils, air & climate, noise and landscape. There will be potential benefits to the population from a social and economic perspective providing greater access to Southill for employment and business opportunities. However such proposals may also lead to a substantial increase in traffic volumes on the Kilmallock Road which may adversely impact on the community living on that road. There may also be potential indirect impacts arising from noise and general disturbance and these need to be assessed further. However it is likely that such potential impacts could be mitigated. | The feasibility study and any associated impacts will need to be carefully considered.                                                               |
|                                  | To transform the Roxborough Road, the main access road dividing O'Malley Park and Keyes Park from 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; | 0 | 0 | 0 | +   | 0 | 0 | 0 | 0 | 0 | + | 0 | Largely insignificant and positive effects. The traffic calming measures proposed largely occur on an existing urbanised streets, thereby requiring little new build or disturbance. The extent of works is currently unknown and therefore there could be potential impacts on sub terrain archaeology in the area.                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Archaeological Impact Assessment required.                                                                                                           |
|                                  | To provide new traffic-calming measures at O'Higgins Drive in Carew Park to improve safety for pedestrians and cyclists and slow traffic                                                                                                                                                                            | 0 | 0 | 0 | +   | 0 | 0 | 0 | 0 | 0 | + | 0 | Largely insignificant to positive impacts. Proposed crossings will occur in existing urbanised environments and on streets. Limited works                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                      |

|                                                                                                                                          |                                                                                                                                                                                                             |   |   |   |     |   |   |   |   |   |   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                |  |
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|                                                                                                                                          | speeds.                                                                                                                                                                                                     |   |   |   |     |   | 0 |   |   |   |   | proposed.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                |  |
|                                                                                                                                          | To provide crossings for pedestrians and cyclists which will provide direct and convenient access between local amenities at four specific locations                                                        | 0 | 0 | 0 | +   | 0 | 0 | 0 | 0 | 0 | + | Largely insignificant to positive impacts. Proposed crossings will occur in existing urbanised environments and on streets. Limited works proposed.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                |  |
|                                                                                                                                          | To create a direct connection from Roxboro roundabout (through the 'Galvone Arms' site) to the heart of Southill – the community hub containing the Church, Health Centre and Southill Area Centre.         | 0 | 0 | 0 | +   | 0 | ? | 0 | 0 | + | + | Generally positive to neutral impacts. The proposed connection largely occurs on brownfield or existing urbanised sites. Such connections would directly benefit the population providing greater connectivity thereby encouraging modal split including walking and cycling. However it would also absorb an area of public open green space.                                                                                                                                                                                                                                                                                                   | Such development would be subject to project consent through the Part 8 process.                                                                                                                                                                                                                                                                                               |  |
|                                                                                                                                          | To promote twelve identified local connections within O'Malley and Keyes Park Southill:                                                                                                                     | 0 | 0 | 0 | +   | 0 | ? | 0 | 0 | + | + | The proposed internal linkages largely occur on brownfield or existing urbanised sites. However some of the connections are proposed on open space land and this has the potential to impact on linkages within the open space network. However a lot of the open space in Southill is underutilised and so the internal provision of linkages and access routes could effectively enhance the existing open space provision in the area. Whilst such connections would directly benefit the population providing greater connectivity they could also lead to increased mobility and if not properly managed an increase in the use of the car. |                                                                                                                                                                                                                                                                                                                                                                                |  |
| Landuse Strategy                                                                                                                         | To enhance the junction of Childers Road and Roxboro Road as a District Centre in order to fulfil its role as the commercial and retail hub serving Southill and the wider area.                            | 0 | 0 | 0 | +   | 0 | 0 | 0 | 0 | 0 | 0 | Positive to neutral impacts. Proposal is in accordance with the Mid West Retail Strategy.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                |  |
|                                                                                                                                          | To expand the footprint of the Southill Area Centre to improve the quality and choice of community focused uses available.                                                                                  | 0 | 0 | 0 | +   | 0 | 0 | 0 | ? | + | + | Positive to neutral impacts. The clustering of activities close to existing community facilities would have a positive contribution towards a reduction in traffic levels.                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                |  |
|                                                                                                                                          | To promote the development of Barry's Field as a large scale community garden/orchard to facilitate horticulture training and community garden enterprise                                                   | 0 | 0 | 0 | +   | 0 | 0 | 0 | 0 | 0 | 0 | Positive to neutral impacts.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                |  |
|                                                                                                                                          | To promote the Galvone Industrial Estate as a hub for green sector focused development                                                                                                                      | 0 | 0 | 0 | 0   | 0 | 0 | 0 | 0 | 0 | 0 | Neutral impacts as the estate is already developed and occupied with employment generating uses.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                |  |
|                                                                                                                                          | To develop a new integrated educational campus to serve the needs of the entire area.                                                                                                                       | ? | 0 | ? | +   | ? | 0 | ? | 0 | ? | + | Positive to neutral impacts                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | The school element of the educational campus has been constructed and is operational. A family and children visitor centre is proposed as part of the next phase of development.                                                                                                                                                                                               |  |
|                                                                                                                                          | To ensure any future development of the Clonlong site and the Topin's Field site be in accordance with the Traveller Accommodation Programme 2014-2018 and any subsequent programme adopted by the Council. | 0 | 0 | 0 | +/- | 0 | 0 | 0 | 0 | 0 | 0 | 0                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | This objective has largely neutral impacts although the potential impact on population could either be positive or negative dependent on the desires and wishes of the travelling community. However the nature of use will be dependent on an external adopted plan.                                                                                                          |  |
|                                                                                                                                          | To consider alternative uses (further education and training) for Southill Junior School.                                                                                                                   | 0 | 0 | 0 | +   | 0 | 0 | 0 | 0 | 0 | + | +                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Largely positive to neutral impacts. Retention of the school for education and training uses is positive.                                                                                                                                                                                                                                                                      |  |
|                                                                                                                                          | To strengthen the opportunities for vocational sports development at 'the Factory' which currently occupies the existing Fulflex building.                                                                  | 0 | 0 | 0 | +   | 0 | 0 | 0 | 0 | 0 | + | +                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Largely positive to neutral impacts.                                                                                                                                                                                                                                                                                                                                           |  |
|                                                                                                                                          | To promote the development of strategic sites within Southill for the construction of landmark/gateway buildings, subject to urban design and built form parameters.                                        | ? | + | 0 | +   | ? | ? | ? | 0 | + | + | +                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | There are many positive impacts arising from this initiative but there are also some uncertain impacts which can only be determined at detailed project stage. It is likely however that any potential impacts could be mitigated particularly relating to noise and potential traffic generation. Promotion of brownfield sites and underutilised sites should be encouraged. |  |
| To promote mixed and employment generating uses along key strategic routes, allowing for a higher efficiency of existing land resources. | ?                                                                                                                                                                                                           | + | 0 | + | ?   | ? | ? | 0 | + | + | + | There are many positive impacts arising from this initiative but there are also some uncertain impacts which can only be determined at detailed project stage. It is likely however that any potential impacts could be                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                |  |

|                                    |                                                                                                                                                                                                                                                                                         |   |   |   |     |   |   |   |   |   |   |   |                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                            |
|------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|---|-----|---|---|---|---|---|---|---|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                    |                                                                                                                                                                                                                                                                                         |   |   |   |     |   |   |   |   |   |   |   | mitigated particularly relating to noise and potential traffic generation. Promotion of brownfield sites and underutilised sites should be encouraged.                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                            |
|                                    | To consider the reuse of St. Enda's complex as a focal point for education and sports related projects.                                                                                                                                                                                 | 0 | 0 | 0 | +   | 0 | 0 | 0 | 0 | 0 | 0 | + | Largely positive to neutral impacts.                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                            |
|                                    | To promote mixed and employment generating uses at Kilmallock Road Enterprise Centre                                                                                                                                                                                                    | 0 | 0 | 0 | 0   | 0 | 0 | 0 | 0 | 0 | 0 | 0 | Neutral impacts as the estate is already developed and occupied with employment generating uses.                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                            |
|                                    | To promote the expansion of a 'service industry training' centre at the LEDP complex which can facilitate programmes to build local capacity for a broad range of roles in re-emerging businesses e.g. call centres / hospitality training                                              | 0 | 0 | 0 | 0   | 0 | 0 | 0 | 0 | 0 | 0 | 0 | Neutral impacts as the estate is already developed and occupied with employment generating uses.                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                            |
| Zoning Strategy                    | 3.72 ha from open space to residential use                                                                                                                                                                                                                                              | 0 | 0 | 0 | +   | 0 | 0 | 0 | 0 | + | 0 | 0 | Mainly positive to neutral long term impacts associated with the landuse change. Positive impacts associated with developing underutilized open space with private housing although loss of open space may concern some. Southill has significant open space which can contribute to social and environmental difficulties. The rationalization of open space provision must be seen as positive | Four separate sites are identified for this change of use including the largest 2.19 hectares of open space identified for private housing dispersed within public housing. The other sites (0.6 hectares) reflect existing permitted residential development and the other two small sites (0.14 hectares & 0.79 hectares) are proposed to enhance the existing urban environment and to facilitate natural surveillance. |
|                                    | 0.15 ha from light industrial use to mixed use and 0.39 ha from residential to mixed use                                                                                                                                                                                                | 0 | 0 | 0 | 0   | 0 | 0 | 0 | 0 | 0 | 0 | 0 | Neutral long term impacts. Both sites carried previous development uses and so any associated impacts on the environment have already been assessed in the SEA for the development plan.                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                            |
|                                    | 1.9 ha from residential to education, community & cultural use                                                                                                                                                                                                                          | 0 | 0 | 0 | 0   | 0 | 0 | 0 | 0 | 0 | 0 | 0 | Neutral long term impacts. The change in zoning simply reflects an existing current use associated with the Southill Area Centre, Health Centre, Junior school and church                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                            |
|                                    | 0.88 hectares from light industrial to residential use                                                                                                                                                                                                                                  | 0 | 0 | 0 | 0   | 0 | 0 | 0 | 0 | 0 | 0 | 0 | Neutral long term impacts. Both sites carried previous development uses and so any associated impacts on the environment have already been assessed in the SEA for the development plan.                                                                                                                                                                                                         | Zoning is necessary to provide a continuous street and new active frontage backing onto light industrial use in an established residential area.                                                                                                                                                                                                                                                                           |
|                                    | 0.26 ha from open space to educational, community & cultural use                                                                                                                                                                                                                        | 0 | 0 | 0 | +   | 0 | 0 | 0 | 0 | + | 0 | 0 | Located within an urbanized environment and adjoining significant road infrastructure. It is not overlooked nor is it linked to any residential development. Its use as functional open space must be questioned.                                                                                                                                                                                | This site is strategically located at a major junction on Childres Road. It is an important gateway location which could accommodate development.                                                                                                                                                                                                                                                                          |
|                                    | 2.9 ha from education community & cultural use to residential use                                                                                                                                                                                                                       | 0 | 0 | 0 | 0   | 0 | 0 | 0 | 0 | 0 | 0 | 0 | Mainly positive to neutral long term impacts. Both sites carried previous development uses and so any associated impacts on the environment have already been assessed in the SEA for the development plan.                                                                                                                                                                                      | As an alternative site has been identified for education & community use, the use of the site is better promoted for private housing                                                                                                                                                                                                                                                                                       |
| Open Space & Public Realm Strategy | To create a new community park at the centre of the community hub to provide recreation and play facilities in a safe, overlooked location and provide a focus for local events and celebrations.                                                                                       | 0 | 0 | 0 | +   | 0 | 0 | 0 | 0 | + | + | + | This proposal would have positive to neutral impacts on the environment.                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                            |
|                                    | To explore the potential to re-establish and environmentally improve the west-east link through the Galvone Industrial Estate from the Roxborough Road to the Kilmallock Road subject to securing an alternative location for the Traveller halting site currently located at Clonlong. | + | + | 0 | +/- | 0 | 0 | 0 | 0 | + | + | + | This proposal would have positive to neutral impacts on the environment. The displacement of the traveller community from this site could have unintended social consequences and could disrupt family structures.                                                                                                                                                                               | Such a proposal should be undertaken in conjunction with the Travelling Community and in particular the residents of Clonlong. Any proposal for relocation should form part of the Traveller Accommodation Programme 2014-2018 and any subsequent programme adopted by the Council.                                                                                                                                        |
|                                    | To protect and enhance the special landscape character and setting of Southill House                                                                                                                                                                                                    | + | + | 0 | +   | + | + | + | 0 | + | + | + | This proposal would have positive to neutral impacts on the environment.                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                            |

## 5.0 Overall Findings

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### 5.1 General Approach

The proposed variation adopts a holistic and inclusive approach integrating social, economic and environmental issues within its physical proposals.

The proposed variation has been assessed in terms of its overall sustainability and its potential to impact on the environment. The specific local objectives were assessed against environmental protection objectives established under the City Development Plan 2010 - 2016 SEA process and the results indicate that implementation of the LRFIP will not result in a significant negative or adverse impact on the environmental resources within the regeneration area or the wider catchment of Limerick city. It has been demonstrated through detailed assessment in Section 4.0 that the measures and proposals are consistent with this summary and that in general the proposed variation will have a neutral to positive impact on the environment as a whole.

Where there is the potential for negative impacts or/and uncertain impacts have been identified, mitigation as well as enhancement measures have been included in the local objectives.

At the outset of the screening process, a number of environmental issues were identified, principally biodiversity, flora and fauna; and water issues particularly relating to flooding. While these are and remain the key environmental challenges facing the regeneration areas they also have complex interrelationships with other environmental receptors. Therefore, it is imperative that a holistic, all inclusive response towards the protection of the natural assets within the regeneration areas is adopted. The potential synergies at play if appropriately addressed will lead to an improvement in the quality of life for the residents of the regeneration area.

### 5.2 Preliminary Conclusion following Assessment in terms of Schedule 2a

It is considered that the proposed variation to the Limerick City Development Plan 2010 - 2016 is not likely to have new significant adverse effects on the environment that have not already been detailed and addressed in the original Strategic Environmental Assessment for the adopted Limerick City Development Plan.

Furthermore, the overall strategy, vision and local objectives as set out in the LRFIP were subject to Strategic Environmental Assessment and it is these policies and objectives which currently comprise the proposed variation.

Therefore, it is concluded that Strategic Environmental Assessment is not warranted for the proposed variation. This preliminary conclusion, following assessment in terms of Schedule 2A, will be placed on public display along with the HDA Screening, the SFRA and the proposed variation. This display period will include consultation with the Environmental Authorities.

## **APPENDIX I**

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**Proposed Local Objectives for Regeneration Areas and Location in the Limerick Regeneration Framework Implementation Plan which was subject to SEA and AA**

| Objective No. in Variation                | Local Objective Detail                                                                                                                                                                                                                                                                                   | LRFIP Page Reference |
|-------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|
| <b>Moyross</b>                            |                                                                                                                                                                                                                                                                                                          |                      |
| 2                                         | To provide for active playspace facilities, based on the existing and expected child population projections generated by the existing and future need.                                                                                                                                                   | 284                  |
| 3                                         | To complete the northern distributor road and to support the construction of the Coonagh - Knockalisheen bypass, providing a new western entrance to Moyross.                                                                                                                                            | 283                  |
| 4                                         | To upgrade the existing Moyross Avenue 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.                                                                          | 176                  |
| 5                                         | To protect and enhance the special landscape character and setting of Delmege Estate.                                                                                                                                                                                                                    | 184                  |
| 8                                         | To promote the redevelopment of the 'Bays' site to add additional local capacity and contribute to the formation of a natural training cluster.                                                                                                                                                          | 284                  |
| 10                                        | To protect and enhance existing desire lines within Moyross and integrate as part of public realm improvements within the area.                                                                                                                                                                          |                      |
| 12                                        | To reinforce existing Employment & Enterprise Uses at Moyross Enterprise Centre.                                                                                                                                                                                                                         | 284                  |
| 13<br>14                                  | To expand the footprint of the Moyross Community and Enterprise Centre to improve the quality and choice of community focused uses available.<br>To retain the existing active playing pitches associated with LIT, St. Nessian's Community College and Thomond Park RFC as sporting facilities.         | 284                  |
| <b>St. Mary's Park &amp; Kings Island</b> |                                                                                                                                                                                                                                                                                                          |                      |
| 1                                         | To 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.                                                   | 226                  |
| 2                                         | To environmentally improve the existing street network of St. Mary's Park to provide a safe, attractive, accessible and well-designed network of streets in tandem with the upgrade to the existing water network and refurbishment works to existing houses.                                            | 285                  |
| 3                                         | To provide for active play space facilities for a range of ages up to 15 years with good natural surveillance to maximise the safety of these areas, based on the existing and expected child population projections generated by the existing and future need.                                          | 232                  |
| 5                                         | To provide opportunities to maximise the educational value of the passive open space surrounding St. Mary's Park.                                                                                                                                                                                        | 286                  |
| 8                                         | To return the eastern side of St. Munchin's Street to parkland once demolition of the area has taken place.                                                                                                                                                                                              | 232                  |
| 9                                         | To restrict development on the strip of land east of St. Munchin's Street which was used as a landfill site and filled with domestic refuse.                                                                                                                                                             | 210                  |
| 10                                        | To provide crossings for pedestrians and cyclists which will provide direct and convenient access between local amenities at the following locations:<br>a) At Star Rovers Football Club;<br>b) At the Primary Health Care facility at Island Road;<br>c) At St. Mary's Community Centre, Verdant Place. | 224                  |
| 11                                        | To examine options to improve connectivity at Island Road from St. Mary's Park to the                                                                                                                                                                                                                    | 224                  |

|                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |     |
|---------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|
|                           | Medieval Quarter by transforming 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; whilst ensuring protection of the integrity of the environmentally designated sites.                                                                                                                                                                                                                                                                                           |     |
| 12                        | To promote the development of key strategic sites within Nicholas Street and Bridge Street for potential enterprise development attracting further inward investment.                                                                                                                                                                                                                                                                                                                                                                                                                                    | 226 |
| 13                        | To promote employment growth in King's Island and St. Mary's Park through the re-use of underutilised sites, derelict buildings and the upgrading of sites already in employment uses.                                                                                                                                                                                                                                                                                                                                                                                                                   | 286 |
| 14                        | To promote the development of a National Social Innovation hub within Nicholas Street to attract a mix of social innovation and social enterprise.                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 226 |
| 15                        | To improve local connections converging on the existing St. Mary's Park Community Centre at the following locations:<br>a) A one-way link road from the Toll House to Verdant Place. This proposal recognises the restricted dimension between the Toll House and the Bridge and the lack of pedestrian footpaths in the area;<br>b) A new street, at Island Gate, from Verdant Place to Dominick Street.                                                                                                                                                                                                | 224 |
| 16                        | To 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.                                                                                                                                                                                                               | 286 |
| 17                        | To explore the potential to upgrade Eel's Weir to provide a connection to the New Road and beyond and ensure that any development proposed does not have a negative impact on habitats.                                                                                                                                                                                                                                                                                                                                                                                                                  | 286 |
| 18                        | To support the redevelopment of the Opera Centre site, adjacent to King's Island/St. Mary's Park, which is seen as an economic catalyst for the area, city and region                                                                                                                                                                                                                                                                                                                                                                                                                                    | 226 |
| <b>Ballinacura Weston</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |     |
| 1                         | To improve permeability and connections from Ballinacurra Weston to its wider context at the following locations in the short-medium term:<br>a) Provide a new vehicular connection from Clarina Avenue to Byrne Avenue. The lack of permeability at this location has resulted in high incidences of anti-social behaviour and crime;<br>b) Provide a new vehicular connection from Clarina Park to Lenihan Avenue.<br>c) Upgrade the existing laneway (Alley Lane) to allow greater access to Prospect Hill and Rosbrien Road to the north;<br>d) New street from Beechgrove Avenue to Crecora Avenue. | 288 |
| 2                         | To support the provision of multifunctional spaces at Our Lady of Lourdes Community Centre to provide flexible and accessible spaces adaptable to communities' needs.                                                                                                                                                                                                                                                                                                                                                                                                                                    | 244 |
| 3                         | To provide new and improved crossings for pedestrians and cyclists which will provide direct and convenient access between local amenities at the following locations:<br>a) At Rosbrien Road, to the west of Our Lady of Lourdes Community Centre;<br>b) At Childers Road, north of Our Lady of Lourdes Primary School;<br>c) At Hyde Road from Crecora Avenue;<br>d) At Hyde Road from Lenihan Avenue to Hyde Villas;<br>e) At Byrne Avenue from Clarina Park.                                                                                                                                         | 242 |
| 4                         | To 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.                                                                                                                                                                                                                                                                                                                                                                  | 244 |

| <b>Southill – O'Malley Park &amp; Keyes Park</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |     |
|--------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|
| 1                                                | To investigate the provision of a more direct access from the M7 and N20 into Southill (subject to a feasibility study examining potential options).                                                                                                                                                                                                                                                                                                                                                             | 202 |
| 2<br>3<br>4                                      | To promote the Galvone Industrial Estate as a hub for green sector focused development.<br>To consider alternative uses (further education and training )for Southill Junior School.<br>To expand the footprint of the Southill Area Centre to improve the quality and choice of community focused uses available.                                                                                                                                                                                               | 204 |
| 5                                                | To promote the following local connections within O'Malley and Keyes Park Southill:<br>a) A new street at eastern boundary of Churchfields site to the Church;<br>b) A new street through the centre of the Churchfields site to the Southill Area Centre;                                                                                                                                                                                                                                                       | 280 |
| 5                                                | c) A new east-west connection, south of Rose Court, Keyes Park from the Roxborough Road to the community hub;<br>d) A new north-south connection from Childers Road to O'Malley Park through the Fulflex site;<br>e) A new north-south connection from O'Malley Park to the Childers Road;<br>f) A new east-west connection from Pike Rovers Football Club to Kilmallock Road;<br>g) A new connection from Kennedy Park, adjacent to proposed Integrated Educational Campus at St Kieran's, to the Roxboro Road; | 279 |
| 6                                                | To provide crossings for pedestrians and cyclists which will provide direct and convenient access between local amenities at the following locations:<br>a) At Childers Road: from O'Malley Park to Kennedy Park and the new Integrated Educational Campus at St. Kieran's;<br>b) At Roxboro Cross: From Roxborough Road to the District Centre (Roxborough Shopping Centre).                                                                                                                                    | 202 |
| 7                                                | To create a direct connection from Roxboro roundabout (through the 'Galvone Arms' site) to the heart of Southill – the community hub containing the Church, Health Centre and Southill Area Centre.                                                                                                                                                                                                                                                                                                              | 202 |
| 8                                                | To enhance the junction of Childers Road and Roxboro Road as a District Centre in order to fulfil its role as the commercial and retail hub serving Southill and the wider area.                                                                                                                                                                                                                                                                                                                                 | 281 |
| 9                                                | To develop a new integrated educational campus to serve the needs of the entire area.                                                                                                                                                                                                                                                                                                                                                                                                                            | 281 |
| 10<br>11                                         | To strengthen the opportunities for vocational sports development at 'the Factory' which currently occupies the existing Fulflex building.<br>To promote the development of strategic sites within Southill for the construction of landmark/gateway buildings, subject to urban design and built form parameters.                                                                                                                                                                                               | 204 |
| 12                                               | To promote mixed and employment generating uses along key strategic routes, allowing for a higher efficiency of existing land resources.                                                                                                                                                                                                                                                                                                                                                                         | 204 |
| 13                                               | To explore the potential to re-establish and environmentally improve the west-east link through the Galvone Industrial Estate from the Roxborough Road to the Kilmallock Road subject to securing an alternative location for the Traveller halting site currently located at Clonlong.                                                                                                                                                                                                                          | 202 |
| 14                                               | To create a new community park at the centre of the community hub to provide recreation and play facilities in a safe, overlooked location and provide a focus for local events and celebrations.                                                                                                                                                                                                                                                                                                                | 210 |
| 15                                               | To consider the reuse of St. Enda's complex as a focal point for education and sports related projects.                                                                                                                                                                                                                                                                                                                                                                                                          | 204 |
| 16                                               | To promote mixed and employment generating uses at Kilmallock Road Enterprise Centre                                                                                                                                                                                                                                                                                                                                                                                                                             | 281 |

|                                             |                                                                                                                                                                                                                                                                                                                                                           |     |
|---------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|
| 17                                          | To ensure any future development of the Clonlong site be in accordance with the Traveller Accommodation Programme 2014-2018 and any subsequent programme adopted by the Council.                                                                                                                                                                          | 242 |
| <b>Southill – Kincora &amp; Carew Parks</b> |                                                                                                                                                                                                                                                                                                                                                           |     |
| 1                                           | To transform the Roxborough Road, the main access road dividing O'Malley Park and Keyes Park from 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                                        | 202 |
| 2                                           | To protect and enhance the special landscape character and setting of Southill House;                                                                                                                                                                                                                                                                     | 210 |
| 3                                           | To promote the development of Barry's Field as a large scale community garden/orchard to facilitate horticulture training and community garden enterprise                                                                                                                                                                                                 | 204 |
| 3                                           | a) To create a new east-west connection from John Carew Park to Yeats Avenue;<br>b) To create a new north-south connection through the green at Carew Park to improve accessibility                                                                                                                                                                       | 279 |
| 3                                           | c) Create a new east-west connection from Elm Place, Rathbane to John Carew Park Links Road<br>d) To create a new north-south connection from Childers Road through the LEDP site and the Aldi Discount Store to connect with Kincora and Carew Park;<br>e) To create a pedestrian link from Markievicz Drive across Collins Avenue to the community hub; | 202 |
| 5                                           | To provide crossings for pedestrians and cyclists which will provide direct and convenient access between local amenities at the following locations:<br>a) At Collins Ave from Keyes Park to Southill House;<br>b) At Collins Ave from Lilac Court in Keyes Park to Markievicz Drive in Kincora Park.                                                    | 202 |
| 6                                           | To provide new traffic-calming measures at O'Higgins Drive in Carew Park to improve safety for pedestrians and cyclists and slow traffic speeds.                                                                                                                                                                                                          | 280 |
| 7                                           | To promote the expansion of a 'service industry training' centre at the LEDP complex which can facilitate programmes to build local capacity for a broad range of roles in re-emerging businesses e.g. call centres / hospitality training.                                                                                                               | 204 |
| 8                                           | To ensure any future development of the Toppin's Field site be in accordance with the Traveller Accommodation Programme 2014-2018 and any subsequent programme adopted by the Council.                                                                                                                                                                    |     |

## APPENDIX II

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### Justification Test – St. Mary’s Park

#### 1.0 INTRODUCTION

Development works in St. Mary’s Park Regeneration Area are proposed on lands which are located within a potential flood risk area. A Strategic Flood Risk Assessment (SFRA) has been undertaken in respect of the proposed variation in accordance with the requirements of the Planning Guidelines, The Planning System and Flood Risk Management. Limerick City was subject to a detailed flood risk mapping and management study under the CFRAM programme and maps released during 2016 were incorporated within the SFRA.

The predominant flood threat to the regeneration areas lies in the area of St. Mary’s Park and arises from coastal flooding associated with the River Shannon and Abbey River. While fluvial flooding has occurred in and around Limerick City in the past, higher flood levels have been noted in the Limerick area from storm surges. It is considered that a tidal storm surge is the dominant critical flooding mechanism for the Limerick City area including the regeneration areas and in particular St. Mary’s Park. Special consideration is provided for designated regeneration areas within the Flood Risk Management guidelines and Circular PL 2/2014.

To provide a structural response to flood risk management the King’s Island Scheme is underway and is being designed to provide the required standard of protection for St Mary’s Park and the entirety of King’s Island (see Section 4.4.2 of SFRA for further details). As of September 2016, work has begun on Phase I of the defences with Phase II under detailed design. The proposed works will offer protection up to the 0.5% AEP tidal event. As per circular PL 2/2014, no further redevelopment should be undertaken in areas within Flood Zone A/B until such time as the flood relief scheme is complete.

Notwithstanding such flood relief works, the fact still remains that St. Mary’s Park / Kings Island is in a flood zone and that the regeneration works proposed therein are works which are classified as comprising highly vulnerable uses to flooding. Accordingly, it will be necessary to undertake and pass the Justification Test which is outlined in The Planning System and Flood Risk Management - Guidelines for Planning Authorities. It must be noted that to pass the Justification Test all of the criteria detailed in Box 4.1 of the Guidelines must be satisfied.

#### 2.0 THE PROPOSED VARIATION

Policy RG1 of the proposed variation seeks to “*support the implementation of the Limerick Regeneration Framework Implementation Plan in a coordinated and sustainable manner and to co-operate with other agencies in the Region to deliver the goals and objectives set out in the Plan*”. The LRFIP proposed a total of 21 no. houses are to be built as replacement homes on infill sites vacated through the demolition of older housing units, all located within that area of the existing housing estate located within identified Flood Zone C. In addition, some 27 no. replacement homes are to be provided in Flood Zone A, again on brownfield sites which have arisen as a result of the demolition of older units. An extensive programme of refurbishment is

also proposed to existing housing units within both Flood Zone A, B and C. In this regard it is noted that Circular PL2/2014<sup>6</sup> permits minor development, such as small scale infill, small extensions to houses or the rebuilding of houses in areas of flood risk, as they are unlikely to raise significant flooding issues or introduce a significant additional number of people into flood risk areas.

In addition to these housing and regeneration measures there are also a number of other community, social and economic measures included in the plan and which proposes development with identified flood zone areas. The key strategic sites within Nicholas Street, including the development of a National Social Innovation Hub at Bridge Street are within Flood Zone A/B although will be protected by the King's Island flood relief scheme. Similarly, the proposed extension of the community centre is located within Flood Zone A. As per circular PL 2/2014, no further redevelopment should be undertaken in areas within Flood Zone A/B until such time as the flood relief scheme is complete.

Notwithstanding the future provision of a flood relief scheme in the area, best practice would suggest undertaking a Justification Test in accordance with the requirements set out in The Planning System and Flood Risk Management - Guidelines for Planning Authorities. Most important is the consideration of alternative sites and rationalising the planning approach, in justifying why the regeneration of St. Mary's Park must proceed rather than the alternative scenario of relocation.

### 3.0 THE JUSTIFICATION TEST

The Justification Test requires that three criteria are satisfied and it is proposed to answer each of these criteria individually as detailed below. However in advance of consideration of each of the criteria it must be noted that the area of lands to be developed within the St. Mary's Park are appropriately zoned for residential use in the Limerick City Development Plan 2010 – 2016 and the proposed variation does not seek to change this zoning.

#### 3.1 **The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.**

Not only is the urban settlement of Limerick City targeted for growth at a national, regional and local level but so too are the regeneration areas. There is overwhelming evidence to demonstrate that population growth must occur within the regeneration areas if Limerick City is to achieve critical mass and the population targets allocated to the city.

Limerick city is a designated 'Gateway' in the **National Spatial Strategy** (NSS). As a 'Gateway' Limerick City is the focus for population and economic growth in the Mid-West region and the designation gives effect to the development of the city as a national and regional engine of growth. Some of the key aspects of the NSS which have influenced the LRFIP are the:

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<sup>6</sup> Section 5.28 of Circular PL2/2014 Clarifications of advice contained in the 2009 DECLG Guidelines for planning authorities – "The Planning System and Flood Risk Management"

- spatial structure set out in the strategy in relation to the Mid-West region including the designation of the Limerick/Shannon Gateway;
- role of Gateways and the need for critical mass;
- role of linkages in terms of good transport, communications and energy networks;
- suggested range of policy responses to strengthen communities; and
- the need for effective integration of land use and transportation policy within the spatial structure of urban areas.

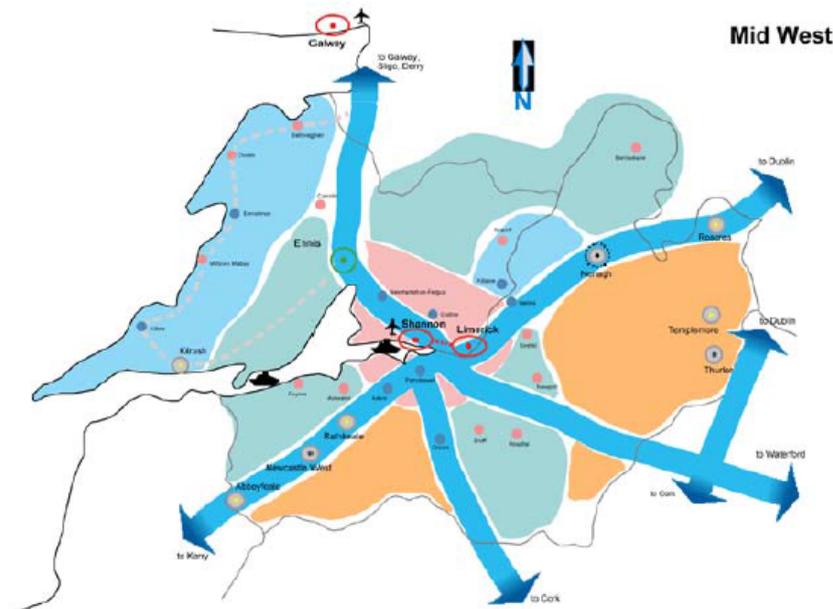


Figure 3.1 NSS Map of the Mid West Region

The **Atlantic Gateways Initiative** is based on the NSS and aims to mobilise the gateways of Waterford, Cork, Limerick and Galway through interaction and collaboration to create a critical mass in the regions to balance that of Dublin. One of the central tenets of this initiative is to maintain population and economic growth to facilitate the required critical mass required. This collaborative approach to population and economic growth including planning and promotion to develop a second major metropolitan corridor on the island of Ireland is also acknowledged in the **National Development Plan 2007-2013**.

Within the policy framework of the NSS and the Atlantic Gateways Initiative, the **Regional Planning Guidelines 2010 to 2022 (RPGs)** sets out a detailed development strategy for the Mid-West region. The RPGs prioritise the development of the Gateway and Hub (Limerick City & Shannon) to achieve the critical mass and value-added investment which the wider region requires. The RPGs identifies a 'Zone' based strategy for the region and proposes that the identified zones be developed in ways that reflect their particular characteristics. Zone 1 which includes Limerick City is the core area of the region and one of the key requirements for this Zone as set out in the RPGs is to consider how residential development will be accommodated on brownfield and redevelopment sites as well as in greenfield locations. The RPGs also acknowledges the City has faced a loss of population in recent years and that the loss of population has had an impact on the nature and scale of the services that the City can support. It

prioritises a stronger central core in terms of the spatial structure for the region including re-population of the city.

**The Limerick City Development Plan 2010 - 2016** (CDP) sets out Limerick City Council's policies for the development of Limerick City to 2016 and beyond including the regeneration areas. The CDP confirms that up to 70% of the increase of the population for the Limerick/Shannon Gateway has been allocated to Limerick City thereby mandating the need to support considerable future public investment in regeneration in the City. The CDP proposes to increase population by 21,450 persons by 2022, thereby necessitating the provision of an additional 9,149 residential units. Existing undeveloped land in the city (excluding Regeneration Areas) has the potential to accommodate 5,678 units and the CDP states that the regeneration areas have an indicated capacity of 4,400 additional units (133 hectares). The CDP states that *"given the compactness of the city it is not possible to prioritise areas other than the regeneration areas"* and have committed the provision of 2,000 additional units prior to 2016 with the balance of 2,400 provided in the period after that. Whilst 2,000 new residential units within the Regeneration Areas have not been delivered to date, adoption of the regeneration programme as set out in the LRFIP by means of variation, seeks to ensure that it continues to facilitate the provision of such units. The Regeneration Programme is therefore particularly critical to redirecting population growth into Limerick City and to the success of the Gateway overall.

The **Limerick and Clare Joint Housing Strategy 2011 to 2017** prioritises the Limerick/Shannon Gateway, followed by Ennis, as the primary locations in the region for residential development. In the Gateway, the growth of the City is prioritised to rebalance recent patterns of development which saw significant population increase in the Limerick Suburbs. The Strategy acknowledges that the NSS and RPG population targets are ambitious, particularly as there has been a sudden slowdown in housing output. The Strategy finds that the Regeneration Programme in particular is critical to redirecting population growth into Limerick City and to the success of the Gateway overall. It finds that insufficient growth in the Regeneration Areas would have serious implications for the implementation of regional and national policy.

On the basis of information presented above, it is considered that these criteria can be satisfied and that the urban settlement of Limerick City, but more specifically the regeneration areas have been targeted for growth at a national regional and local level. In fact it has been comprehensively demonstrated that there is overwhelming evidence to demonstrate that population growth must occur within the regeneration areas if Limerick City is to achieve critical mass and the population targets allocated to the city

### **3.2 The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:**

#### **3.2.1 Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement**

The regeneration area comprising St. Mary's Park was legally defined in 2008 with the establishment of then Northside Regeneration Area (functions since transferred to Limerick City Council) with the specific purpose of facilitating regeneration works. If the works of refurbishment

and infill new build are not permitted within the regeneration area then the regeneration works cannot be facilitated.

Limerick City has an ageing house stock and this is particularly evident in the Regeneration Areas where just under 4% of all housing has been constructed since 1990. St. Mary's Park has the oldest housing stock with 69% of the housing constructed before 1945. The age of the existing housing stock means that a lot of housing in the area is not fit for purpose and at a minimum requires extensive refurbishment.

Due to the age of the housing stock in St. Mary's Park and its poor condition some 114 no<sup>7</sup>. residential units have already been demolished within the regeneration area. This demolition work did not occur in any one location but rather occurred sporadically throughout the regeneration area on a needs basis and has resulted in significant 'gap' infill sites throughout the built footprint of St. Mary's Park. As a result there is no cohesive built form to development in St. Mary's Park and new infill development is required to regenerate the built form.

However, such demolition work has not only impacted on the built physical environment but it has also impacted on the social environment. The total population within the St. Mary's Park regeneration area has fallen by 28% between 2006 and 2011 from 1211 persons to 874 persons. Whilst it is acknowledged that population loss from local authority housing estates is a long-term trend, it is considered that a lot of the population loss in St. Mary's Park is as the result of regeneration work and associated demolitions. However, regeneration was never intended to displace families and/or communities and thus it is important that replacement housing is provided to accommodate those families originally displaced. The provision of replacement / new housing is also necessary to facilitate and encourage appropriate social mix. St. Mary's Park has a high elderly dependency rate of 21 per cent and when examined in conjunction with the youth dependency ratio, the overall dependency ratio in the St. Mary's Park is highest of all the regeneration areas at 60 per cent. Regeneration of St. Mary's Park will not occur until a better social mix and balance is achieved and the high dependency ratio becomes more in line with the city wide average of 26 per cent. This can and will only be facilitated by attracting new families into the area through the provision of new build properties and retaining existing middle aged families in good quality housing.

Whilst achieving better social mix and lowering low dependency ratios is a long term ambition of regeneration for St. Mary's Park there will be a more immediate and pressing need for infill / replacement housing. A detailed study of the area necessitates the demolition of a further 65 no. homes east of St. Munchin's Street, all located within Flood Zone A. These houses, constructed in a monotonous row along the street back onto the Special Area of Conservation (SAC) which is a large expanse of undeveloped natural habitat that will never be developed in the future. The rear of these houses has become a dumping ground for rubbish and essentially resembles a significant landfill within a residential area. The difficulty with rubbish at this location continues to persist and thus in an effort to finally address the situation it is proposed to demolish the remaining 65 no. units fronting onto St. Munchin's Street.

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<sup>7</sup> Figure upto date as of 31<sup>st</sup> December 2015

Of the 65 no. units being demolished 42 no. units are occupied and these 42 no. families do not want to relocate but want to remain living in the area that they have grown up in with their family and neighbours. Extensive consultation has been undertaken with the community of St. Mary's Park and thus to facilitate the regeneration of St. Munchin's Street, at least 42 no. replacement homes must be provided within the existing built fabric of St. Mary's Park. To further complicate the situation there is also a need for additional housing to address overcrowding, estimated to require 32 no. additional units.

Thus, as can be seen for regeneration to function within the St. Mary's Park area a process of refurbishment and new 'infill' build shall be required to achieve the proper planning and sustainable development of the urban settlement. It is considered that such an approach is in line with Circular PL2/2014 and such proposals shall follow best practice in the management of health and safety for uses and residents of the area.

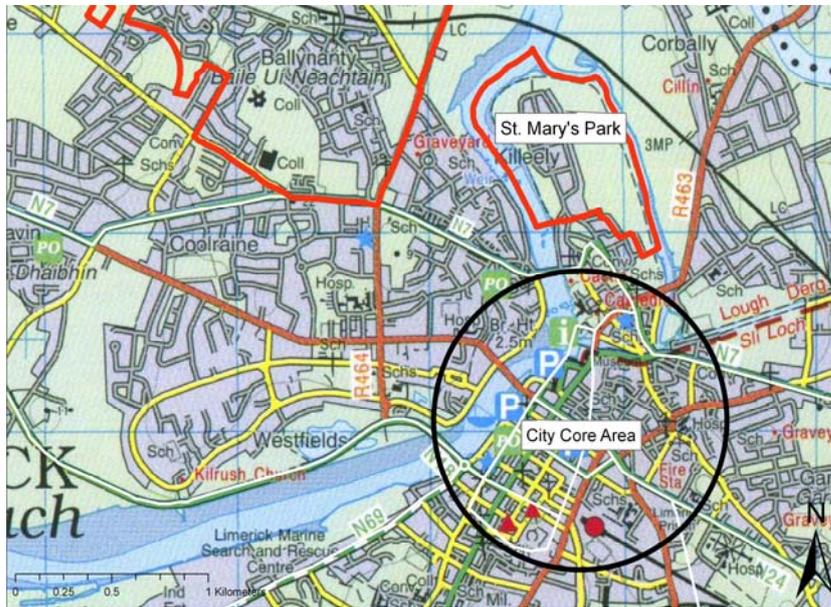
### **3.2.2 Comprises significant previously developed and/or under-utilised land**

Having regard to the location of St. Mary's Park regeneration area within a flood zone a precautionary approach to new build development is being adopted such that no new 'greenfield' sites are being developed.

All proposed works within St. Mary's Park regeneration area is to occur on existing brownfield land primarily generated through the demolition of existing units under the previous regeneration programme. A number of key strategic sites are also proposed for economic development and again these sites are brownfield in nature located within the historic core of King's Island. This land is considered to be prime urban land in proximity to the city centre which needs to be holistically developed to repopulate the city centre and to make most efficient use of the scarce resource. Concentrating development on brownfield sites (previous housing and commercial sites) within St. Mary's Park regeneration area encourages more sustainable lifestyles by providing an opportunity to recycle land and assist environmental, social and economic regeneration. It is anticipated that the cleanup and redevelopment of the sites will impact positively on the local economy by creating a safer and healthier urban space to house residences.

### **3.2.3 Is within or adjoining the core of an established or designated urban settlement**

The St. Mary's Park regeneration area adjoins the commercial core of Limerick City centre as detailed in Figure 3.2. It has already been demonstrated in section 3.1 that Limerick City is designated as a 'Gateway' at national level and therefore can be classified as an established and designated urban settlement.



**Figure 3.2** Relationship of Regeneration Area to City Core

### 3.2.4 Will be essential in achieving compact and sustainable urban growth

Regeneration works within St. Mary's Park is critical and necessary to achieve compact and sustainable urban growth within the regeneration area but also within the city centre of Limerick. The works are not only necessary to improve the quality and sustainability of living in St. Mary's Park but it is also necessary to facilitate the redevelopment of the wider Kings Island area which is a core objective of the CDP. It is noted that Circular PL2/2014 supports consolidation of the built form and accepts in certain instances, that additional development may need to occur in areas located in a flood zone. However it does state that the development plan must specify the nature and design of structural or non-structural flood risk management measures required prior to future development in such areas in order to ensure that flood hazard and risk will not be increased. In this regard it is noted that the Kings Island Flood Scheme is currently underway.

St. Mary's Park and the wider Kings Island area is surrounded by water (River Shannon and Abbey River) and so is disconnected from the city core. Nicholas Street (located outside but connected to the regeneration area) was once a busy thoroughfare and comprised the Main Street of Limerick City. Gradually, the emphasis of the city moved southwards across the Abbey River to the city centre as we know it today. Overtime Nicholas Street has become insignificant in terms of economic activity and its vitality and viability has been substantially and adversely impacted. Such a fall in status and significance has resulted in a feeling of 'isolation' on Kings Island as its one time service centre has now fallen into a state of idleness. The CDP identifies the area surrounding King John's Castle, Nicholas Street and Mary Street (adjoining the regeneration area) as a 'Special Planning Control Area' which seeks to create a new dynamic living area in the heart of the city accommodating additional shopping, living and cultural facilities. However this objective can and will not be achieved in isolation and without the critical regeneration works within St. Mary's Park. This area of the city needs investment and

redevelopment along with social and economic intervention to address existing social problems and anti-social behaviour and without such investment the objectives for a compact and sustainable city centre can not be achieved.

A comprehensive approach to integrated development on this side of the city centre is required and it is for this reason that the legally defined regeneration boundary area cannot be promoted in isolation. The LRFIP and the proposed variation looks beyond the legally defined regeneration boundary in its proposals for regeneration as it acknowledges that the redevelopment of St. Mary's Park cannot occur in isolation from the wider redevelopment of Kings Island and Nicholas Street. For this reason alone the regeneration works proposed within St. Mary's Park regeneration area are essential in achieving compact and sustainable urban growth and in achieving a core objective of the CDP in relation to the defined 'special control area'.

Another reason why the regeneration of St. Mary's Park is so critical to achieving compact and sustainable growth is its relationship with securing implementation of the core strategy within the CDP. The CDP proposes to increase population by 21,450 persons by 2022, thereby necessitating the provision of an additional 9,149 residential units in the city. The CDP states that *"given the compactness of the city it is not possible to prioritise areas other than the regeneration areas"*. Thus the regeneration programme including St. Mary's Park is critical in terms of enhancing the attractiveness of these areas as a place for investment and living, thereby encouraging residential growth within the regeneration areas. If the proposed works were not to be facilitated within St. Mary's Park it could be argued that the decision goes against the core of development plan policy as set out in the CDP as the area would continue to encounter sustained population loss (28% from 2008 – 2011) and not growth contrary to the provisions of the CDP.

### **3.2.5 There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.**

In response to this criterion there is little flexibility with regard to the proposed regeneration works and the overall objectives associated with the regeneration programme. The works proposed within St. Mary's Park are very specific and are aligned to a legally defined regeneration area. Associated with a very specific regeneration programme, with specific funding allocation and tied to a specific legally defined area these works cannot be transferred to another area within or adjoining the core of the urban settlement.

The proposed works within St. Mary's Park partially comprise rejuvenating the built environment by a mixture of demolition, construction and refurbishment of dwellings having regard to urban design guidelines. The demolition of units is necessitated due to the age of existing housing stock (69% constructed prior to 1945) and also having regard to best urban design principles. To date some 114 no. units have been demolished. Having regard to best urban design guidelines and the establishment of high quality and sustainable residential environments it is necessary to infill the existing gap sites with the provision of 49 no. new build units. Failure to infill these sites will result in a poor quality urban environment which would be contrary to the overall principles and objectives of regeneration.

Of course there is also a requirement in regeneration works to focus on a strategic multi faceted approach to address the range of social, educational and economic issues that may be evident.

Thus extensive consultation has been undertaken with the residents of St. Mary's Park and these residents have made it clear that they do not want to leave their community in order to facilitate demolition and physical enhancement works. Accordingly relocation is not an option. It is thus absolutely necessary that these people are 'reoused' within their local community and not redirected to another area of the city. To date a significant element of regeneration funding has been spent on relocating families out of the regeneration areas and now the focus must be on the regeneration area itself. The other reasons, as mentioned previously is to provide additional units to satisfy overcrowding within existing housing units; to potentially re-house families that already left the area following demolition and to facilitate social mix by attracting new families into the area. Undertaking the proposed works in other areas of the city adjoining the city centre is thus not possible as it directly goes against the principles of social regeneration in maintaining thriving community structures.

The whole of St. Mary's Park regeneration area is located within the predicted flood area as detailed in the SFRA with the exception of an island of existing houses in the centre. The area immediately adjoining the defined regeneration area on Kings Island is also mostly within an area defined as being subject to flooding, again with the exception of an island of existing development. This 'island' area located outside of the potential area of flood risk is already heavily developed and whilst it may have the potential to accommodate limited infill, it is not capable of accommodating the volume of replacement housing required having regard to the immediate need for replacement housing, the need arising from existing overcrowding and internally generated need going forward. There are thus no alternative sites available within St. Mary's Park regeneration area or the immediate adjoining area, which are at a lower risk of flooding to facilitate existing and future housing.

There are of course possible alternative lands available for residential development adjoining the city centre in an area not liable to flood risk (Zone C) and which could potentially accommodate residential development. However these sites:

- Are not located within the legally defined regeneration boundary for St. Mary's Park;
- Are unlikely to be in the ownership of the Council and thus are unlikely to be capable of delivering replacement housing in the short term;
- Are removed from the existing community structure of St. Mary's Park and therefore are unsuitable on social grounds; and
- Are isolated from the area undergoing regeneration.

It is thus considered that there are no suitable alternative lands to accommodate replacement housing, in areas at lower risk of flooding within or adjoining the core of the urban settlement.

### **3.3 A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment**

A flood risk assessment has been undertaken by JBA Consulting. All future applications for re-development within this area will require an FRA, including consideration of residual risk and surface water/pluvial risk at the development management stage - in accordance with the requirements stated under Section 5 of the SFRA. Residual risk relates to the potential impacts of defence overtopping or breach following completion of the flood relief scheme. These impacts must be estimated and managed by site design measures specified under the site specific FRA

at development management stage.

### 3.4 Concluding Remarks

The foregoing assessment demonstrates that the refurbishment and infill new build works proposed in St. Mary's Park satisfy all three criteria set out in the Justification Test. The Justification Test assessment is summarised in Table 3.1. As a result it is considered that such works are in compliance with the provisions of The Planning System and Flood Risk Management -Guidelines for Planning Authorities (Department of the Environment, Heritage and Local Government and Office of Public Works, 2009) and Circular PL 2/2014 on the basis that no works should commence until the flood relief scheme is in place.

**Table 3.1** Justification Test Summary

| Criteria                                                                                                                                                                                                                                                         | Determination with Regard to Works in St. Mary's Park                                                                                                                                                                   |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended. | Yes Limerick City is a designated gateway at national and regional level and is identified to accommodate significant growth in the Limerick City Development Plan 2010 – 2016.                                         |
| The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:                                                             | The lands are appropriately zoned for residential use in the CDP. No new development zoning is proposed in the variation.                                                                                               |
| Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement;                                                                                                                                                                  | The proposed works are essential to facilitate regeneration within the legally defined regeneration area of St. Mary's Park and to facilitate expansion of the urban settlement.                                        |
| Comprises significant previously developed and/or under - utilised lands;                                                                                                                                                                                        | All works proposed comprise works on brownfield and / or under-utilised lands.                                                                                                                                          |
| Is within or adjoining the core of an established or designated urban settlement;                                                                                                                                                                                | The St. Mary's Park regeneration area adjoins the commercial core of Limerick City and adjoins the Special Planning Control area within King's Island where it is an objective of the CDP to grow and promote the area. |
| Will be essential in achieving compact and sustainable urban growth; and                                                                                                                                                                                         | The proposed works within St. Mary's Park regeneration area and particularly the proposed replacement housing on infill under-utilised and sites is essential in achieving compact and sustainable urban growth.        |
| There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.                                                                                     | There are no other suitable alternative lands in areas at lower risk of flooding within or adjoining the core of the urban settlement.                                                                                  |
| A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which                                                                      | Yes, Strategic Flood Risk Assessment (SFRA) has been undertaken for the works within St. Mary's Park in accordance with The Planning System and Flood Risk Management -Guidelines                                       |

|                                                                                                                                                                          |                                                                                                                   |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|
| demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere. | for Planning Authorities Department of the Environment, Heritage and Local Government and Office of Public Works. |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|

Of important consideration to the proposed regeneration measures in St. Mary's Park is the fact that the proposed works will still result in an overall net loss of houses in the area when compared prior to regeneration works commencing in 2008. Prior to 2008 there were some 463 no. units within St. Mary's Park. Today the figure stands at 349 no. units and when regeneration works are complete the total no. of residential units will stand at 370. This represents over a 20% reduction in the number of residential units within an area that is subject to flood risk. Accordingly, it could be considered that the proposed regeneration works will significantly improve the existing baseline situation as it results in an overall reduction in population residing in an area of potential flood risk.