

Limerick Local Economic & Community Plan Socio-economic Statement & High Level Goals

Draft Report on Submissions & Observations
received

August 2015



1. Introduction

1.1 Purpose of Report

This report presents the submissions made following publication of the Limerick Local Economic & Community Plan (LECP) Draft Socio-economic Statement. It sets out the responses to the issues raised in submissions and any amendments to the proposed LECP Socio-economic Statement. The report is prepared following guidance issued by the Department of Environment, Community and Local Government in relation to the preparation of Local Economic and Community Plans.

1.2 Consultation

The LECP Draft Socio-economic Statement was placed on public display inviting members of the public and interested parties to make submissions or observations from 04th June 2015 until 02nd July 2015 inclusive. A further period of consultation was held with stakeholders and elected members. A total of 18 written submissions were received within the statutory timeframe.

1.3 Structure of this report

Part A addresses each of the written submissions received within the public display period. It includes the names and addresses of persons or bodies that made submissions, a summary of the issues raised and the response and recommendations on each submission.

Part B includes the revised Socio-economic Statement document. Any paragraph, policy or objective to be amended in the proposed LAP is outlined with deleted text shown ~~struck through~~ and additional proposed text shown underlined.

Part C is the Strategic Environmental Assessment Screening and Appropriate Assessment Screening of the amendments recommended to the LECP Socio-economic Statement.

1.4 Progress to date and next steps

The steps in the process of preparation of the LECP are shown in the following table. Please note this timetable is indicative only and may change.

Date	Stage
Early 2015	Preparation of Socio-economic Baseline Study
March 2015 – May 2015	Preparation of Socio-economic Statement & High Level Goals
June 2015 – July 2015	Consultation on Socio-economic Statement & High Level Goals
The remaining stages of the LECP are as follows:	
August 2015 – September 2015	Advisory Steering Group prepares revised Socio-economic Statement & High Level Goals
August 2015 – September 2015	LCDC & ED&P SPC adopt revised Socio-economic Statement & High Level Goals
September 2015 – October 2015	Municipal Districts & Regional Assembly consider revised Socio-economic Statement & High Level Goals
October 2015	Advisory Steering Group Prepare LECP Objectives & Actions
November – December 2015	LECP Objectives & Actions agreed by ED&P SPC & LCDC
December 2015 – January 2016	Draft LECP considered by Municipal Districts & Regional Assembly,
February 2016	Final adoption of Plan by LCDC, ED&P SPC & full Council

The community elements of the LECP are being prepared under the auspices of Limerick Community Development Committee (LCDC) and the economic elements under the auspices of the Strategic Policy Committee (SPC) for Economic Development & Planning.

The preparation of the LECP Draft Socio-Economic Statement and High Level Goals was informed by the Socio Economic Analysis document. This document provides a detailed baseline analysis of socio-economic conditions in Limerick City and County. The draft document was also prepared in consultation with the LECP Advisory Steering Group, the LCDC and the SPC for Economic Development and Planning.

The LCDC is a partnership-based structure of local stakeholders, set up as an independent statutory committee of Limerick City and County Council under the Local Government Reform Act (2014). The setting up of the LCDC and the preparation of the LECP are part of the recent reforms of local government.

Consultation of the draft Socio-economic Statement & High Level Goals included the invitation of submissions from members of the public, elected members and stakeholders. This report is prepared following the closing date for submissions from members of the public. Ongoing consultation with stakeholders is taking place throughout the plan making period and where stakeholders have made submissions prior to preparation of this report these are referred to below.

2.0 Persons / Bodies who made submissions To Date

Submission No.	Submission received from	Overview of Topics Discussed
1	Connect Ireland	Promotion of economic development through networking with diaspora
2	Geraldine Trent	Opposed to gasification plant at Gortadroma
3	Dan Hegarty	General discussion regarding local economic and community development
4	Step Forward Disability Group	Importance of rural transport to disability groups
5	Limerick Green Party	Community diversity, economic development, ecological sustainability, and green public transport proposals
6	Clann Credo – The Social Investment Fund	Social enterprise & investment
7	Hospital Family Resource Centre	Education and Training, community participation, health & well-being
8	Dublin Airport Authority	No comments
9	Environmental Protection Agency	Protection of environment
10.	Irish Water	Alignment of investment programmes arising from LECP with spatial

		planning strategies.
11.	NRA	Guidelines relating to spatial planning and national roads and priorities in relation to national roads in Limerick.
12.	Southern & Eastern Regional Assembly	Compliance with spatial planning hierarchy, evidence based approach to formulating LECP based on socio-economic baseline analysis & consideration of monitoring and review.
13.	Geological Survey of Ireland	Protection of Geological Sites
14.	National Transport Authority	Transportation policy
15.	Community Workers Co-operative	Need to ensure ownership by all stakeholders
16.	Cllr Eddie Ryan	Conservation, protection and recreation of Loobagh River
17.	Cllr Lisa Marie Sheehy	Conservation, protection and recreation of Loobagh River
18.	Limerick Clare Energy Agency	Targets in relation to energy & energy related CO2 emissions & renewable energy

Part A

Submissions, Responses and Recommendations

Limerick Local Economic & Community Plan: Report on Submissions Received July 2015

1	Name/Group:	Connect Ireland
	Submission:	Response
	Request that consideration be given to inclusion of actions that would underpin the Councils commitment to the ConnectIreland job creation model as one to the economic development actions in the plan. Includes recommended text for inclusion in the plan in this regard.	Comments noted. A high level goal has been included in relation to the creation of jobs and enterprises and specific objectives included under the Economic Pillar in relation to networking and partnership. The recommended action could be considered for inclusion in the LECP itself as an action rather than in the Socio-economic Statement.
	Recommendations:	
	No change	

2	Name/Group:	Geraldine Trent, Kiltteery
	Submission:	Response
	Objects to proposed gasification plant at Gortadroma.	The LECP Socio-economic Statement does not include any proposal relating to a gasification plant at Gortadroma and it is not intended to include site specific proposals such as that proposed within the draft LECP. Any such proposal will be subject to the relevant planning process.
	Recommendations:	
	No change	

3	Name/Group:	Dan Hegarty
	Submission:	Response
	The submission outlines a lengthy discussion regarding economic and community issues in Limerick without providing specific recommendations for	Comments noted

	<p>changes to the document and expresses concern that it will not be implemented. Points noted include the following:</p> <ul style="list-style-type: none"> - Refers to the need to employ local people and use local traders. - Need to facilitate not only high level jobs but also lower level positions and refers to the flow of jobs coming to other cities and not to Limerick. - Refers to the need for a critical evaluation of the regeneration projects. - Outlines the unfulfilled potential of the River Shannon as a tourist attraction. 	
	Recommendations:	
	No change	

4	Name/Group:	Step Forward Disability Group, Hospital, Co. Limerick	
	Submission:	Response	
	<p>SFDG is a disability support group providing training & support for people with disabilities & their families & carers and which aims to create a greater awareness in general of the existence & needs of those with a disability. Submission includes results of a community health needs assessment for Hospital and surrounding areas. Submission includes a position paper on the importance of rural transport outlining the contribution the service makes and advising that SFDG will not be viable in the future without the rural transport scheme.</p>		

<p>(a) Submission requests the inclusion of the following text in specific objective 2.5.3 Transport: “(i) Facilitate investment in public transport to ensure that all busses are accessible to ensure that older people, families and people with disabilities have access to public transport system which meets their own individual needs (example: wheelchair accessible, low steps, adaptable for buggies etc.)</p> <p>(ii) Local rural transport routes (example Rural Bus) must be maintain and expanded to meet the needs of older people and those with disabilities in the community¹.</p> <p>(iii) There should be a community wide consultation to give a voice to individuals, communities and business regarding their transport needs both now and in the future, with an ageing population and people with disabilities living independently in the community transport infrastructure needs to be updated and invested in to meet ongoing changing needs into the future.”</p> <p>(b) Recommends inclusion of the following text in specific objective 2.3.2 Health & Well-being: “Family Resource Centre’s both county and</p>	<p>(a)(i) It is suggested that the following text is all encompassing and should be included in the Socio-economic Statement: “Facilitate investment in public transport that is universally accessible”.</p> <p>(ii) Specific objective 2.5.3 (iv) contained in the S-ES addresses this requirement regarding rural transport.</p> <p>(iii) The recommendation is noted. The recommendation should be considered for inclusion in the LECP itself as an action rather than in the S-ES.</p> <p>(b) Action Areas 2.3.1(ii), (v) 2.3.2(ii), (iii) 2.3.3 (iii), 2.3.5 specifically provide for working with statutory agencies and voluntary and community organisations to</p>
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<p>city should be maintained and expanded to ensure they can continue to deliver vital community and family supports services giving local people access to training & education opportunities, mental health services, peer support, disability services, family support, older people services etc. “</p> <p>(c)(i) Recommends inclusion of the following text in Specific Objective 2.3.3 Ageing Well/Age Friendly County “This action area should also include disability as many people with disabilities are ageing and many people who are ageing are acquiring disabilities and still wish to remain independent in their own communities with support from their local authority.</p> <p>(ii)Local of information on local services, isolation, mental health and poor transport links have the biggest impact on the health needs of a community as identified by research carried out by KIlmallock and Bruff Primary Health Care Team²; health & well-being of individuals, families and communities will only improve when it is covered across all actions of the social pillar from transport, health and well-being and age friendly/disabilities etc.”</p> <p>(d) Recommends inclusion of the following text in Specific Objective 2.5.2 Urban and</p>	<p>improve access to services.</p> <p>(c) (i) Recommendation noted. An Age Friendly city and county should benefit all citizens irrespective of age, ability, geography.</p> <p>(ii) Recommendation noted.</p>
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<p>village renewal:</p> <p>(i) Requirement for a county and city wide disability access audit to review parking, accessibility of footpaths, businesses, public buildings, information services etc. to ensure that they are accessible for all in the community.</p> <p>(ii) To invest in communities to ensure that poorly built infrastructure and lack of vital services are not a barrier to participation for people with disabilities and older people in the community.</p> <p>(iii) Post Offices, Banks, Shops, garda stations etc. must remain open as they provide a vital economic, safety and social services to older people and those with disabilities who do not always have access to accessible transport service.</p> <p>(iv) People need to feel safe in their communities, this can only be achieved by investing in community policing, community alert, Text Alerts, CCTV and personal and home alarm systems.</p>	<p>(d) (i) Action Area 2.5.2 (v) provides for the improvement of the public realm of towns and villages to include inter alia greater accessibility to streetscapes, buildings and services.</p> <p>(ii) Action Area 2.5.2 (v) provides for the improvement of the public realm of towns and villages to include inter alia greater accessibility to streetscapes, buildings and services</p> <p>(iii) The recommendation should be considered for inclusion in the LECP itself as an action rather than in the S-ES.</p> <p>(iv) Recommendation noted. Action area 2.7.2 provides for a number of objectives for the promotion of community safety.</p>
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	Recommendations:	
	<p>Recommendation (a)(i): Recommended that additional Objective be included under Action Area 2.5.3 Transport to read "<u>Facilitate investment in public transport that is universally accessible</u>".</p> <p>Recommendation (a)(ii): No change.</p> <p>Recommendation (a)(iii): The recommendation is noted. The recommendation should be considered for inclusion in the LECP itself as an action rather than in the S-ES.</p> <p>Recommendation (b): No change.</p> <p>Recommendation (c)(i): Recommendation noted. No change.</p> <p>Recommendation (c)(ii): Recommendation noted. No change.</p> <p>Recommendation (d)(i): Recommendation noted. No change.</p> <p>Recommendation (d)(ii): Recommendation noted. No change.</p> <p>Recommendation (d)(iii): Recommendation noted. The recommendation should be considered for inclusion in the LECP itself as an action rather than in the S-ES.</p> <p>Recommendation (d)(iv): Recommendation noted. No change.</p>	

5	Name/Group:	Limerick Green Party
	Submission:	Response
	<p>The submission recommends additions to a number of the Action Areas contained in the document, as follows:</p> <p>(a) Action area 2.3.4: add the following objective: To improve the integration of immigrant communities and traveller communities and the celebration of diverse communities</p>	<p>(a) Objective 2.6.2(i) provides for increasing and strengthening the capacity of communities, particularly focussing on groups at risk of social exclusion and new communities, in civic life.</p>

<p>within Limerick.</p> <p>(b) Action area 2.4.6: add the following objective: To build on the existing partnership with UL and LIT to bring the opportunities into the city and county.</p> <p>(c) Action area 2.4.6: add the following objective: To promote local businesses who set up in town centres in order to revitalize the economic hearts of these communities.</p> <p>(d) Action area 2.4.5: add the following objective: To put specific emphasis on encouraging ecologically sustainable businesses and SMEs.</p> <p>(e) The inclusion of a specific Action Area on Green Public Transport to reduce emissions and noise pollution and to bring the county into line with the EU 2020 targets on emissions reductions with a focus on the following: low emissions public transport fleet; promotion of green vehicles; to link public transportation with park and ride facilities to increase the proportion of public transport journeys; expansion of the bike locker scheme to the city suburbs.</p> <p>(f) Action area 2.5.2: add the following objective: To work to maintain the historical and cultural sites in the city</p>	<p>(b) Objective 2.9.2(ii) seeks to build on the networks and co-operation developed by the Limerick Charter including those relationships between the local authority, third level sector and the private sector.</p> <p>(c) The recommendation is noted. Objectives 2.4.1(i), 2.4.3(iv) and Action area 2.4.5 seek to promote a broad range of supports for the business and retail sectors including the promotion of location of business in town centre locations.</p> <p>(d) The recommendation is noted. Objectives 2.4.1(iii), 2.4.3(v), 2.5.1(iii), 2.5.4 (i) and (ii); 2.5.5 (i) and (ii); and 2.8.4(i) seek to develop and promote environmental awareness and sustainable practice amongst business and communities.</p> <p>(e) The recommendation is noted. The recommended actions should be considered for inclusion in the LECP itself as an action rather than in the S-ES. It is proposed to include an additional high-level goal in relation to climate change which will guide the inclusion of specific actions within the draft LECP.</p> <p>(f) The recommendation is noted. The recommended action should be considered for</p>
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	and county with special emphasis on revitalising sites that have fallen into disrepair.	inclusion in the LECP itself as an action rather than in the S-ES.
	Recommendations:	
	Recommendations (a) to (d) inclusive are already provided for in the draft SES and HLGs. Recommendation: no change. Recommendations (e) to (f) inclusive are action related and should be considered, where relevant, for inclusion in the draft LECP itself as an action rather than in the S-ES.	

6	Name/Group:	Clann Credo
	Submission:	Response
	Clann Credo provide social finance for community growth for organisations that have both a social return and repayment capacity. Submission outlines the contribution made by the social enterprise sector to the economy and recommends the inclusion of "Social Enterprise" in to the Economic Pillar in Section 2.4.	The reference to social enterprise is welcomed and this requirement is already addressed in Specific Objective 2.4.4 (ii) seeks to promote peer lending initiatives and financing for community and social enterprise.
	Recommendations:	
	No change	

7	Name/Group:	Hospital Family Resource Centre
	Submission:	Response
	<p>HFRC submission recommends the following amendments to the document:</p> <p>(a) Section 2.2 Ensure that there is adequate organisation of and inclusion of community groups and consultation on the development of the objectives and actions.</p> <p>(b) HLG (i) Ensure that where outreaching and development of activities within people’s local areas such as information and support hubs in the community.</p> <p>(c) HLG (iv) Community supports would be targeted at disadvantaged and rural communities.</p> <p>(d) HLG (vii) The LECP should support the involvement of community and voluntary groups, FRCs and community development organisations in relevant areas such as LCDC, Children’s Services Committees etc.</p> <p>(e) Objective 2.3.1 – add objective on the support of Education and Training Networks.</p> <p>(f) Objective 2.3.1 – add objective on the co-ordination between educational service providers and the dissemination of information on adult education opportunities.</p> <p>(g) Objective 2.3.2 – include reference to</p>	<p>(a) A comprehensive community consultation phase will be undertaken in developing the objectives and actions of the LECP.</p> <p>(b) Recommendation noted.</p> <p>(c) Noted.</p> <p>(d) Noted. This is being done via the Public Participation Network in the context of the LCDC.</p> <p>(e) Noted. The recommendation should be considered for inclusion in the LECP itself as an action rather than in the S-ES.</p> <p>(f) Noted</p>

	<p>mental health initiatives.</p> <p>(h) Objective 2.3.5 – support for a variety of family support and children programmes.</p> <p>(i) Objective 2.6 - The submission draws a distinction between community development and local development. The difference should be taken into account when developing the LECP strategies.</p> <p>(j) Objective 2.7.1 – Suggestion to include reference to Limerick Area network on Violence against Women as named network under this objective.</p>	<p>(g) Reference to mental health already included.</p> <p>(h) Noted. Already included in Objective 2.3.5(ii) although programmes not specifically mentioned.</p> <p>(i) Noted. Will be considered in context of drafting LECP.</p> <p>(j) Reference made to other structures and specific projects under Objective 2.7.1(i).</p>
	Recommendations:	
	<p>Recommendations (a) and (i) will be considered in the context of the development of the draft LECP. No change proposed.</p> <p>Recommendations (b) to (h) and recommendation (j) already contained in S-ES and HLGs. No change.</p> <p>Recommendation (e) to be considered as an action in the LECP. No change.</p>	

8	Name/Group:	DAA, Dublin Airport
	Submission:	Response
	Welcomes the preparation of the LECP. Has no issues to add at this time.	(a) Comments noted
	Recommendations:	
	No change	

9	Name/Group:	Environmental Protection Agency	
	Submission:	Response	
	<p>(a) Recommends inclusion of a specific high level goal relating to the protection of the receiving environment.</p> <p>(b) Recommends inclusion of a commitment to ensure policies and objectives of the CDP's, responsible for the protection and conservation of environmentally sensitive areas, will be complied with in implementing the LECP.</p> <p>(c) Consider encouraging community level activities such as energy conservation, water conservation, river clean-ups, riparian zone protection measures which would be beneficial for both local communities as well as the environment. Supporting measures which promote and encourage local eco-tourism ventures, fishing/angling, bird watching, agri-tourism, supporting and encouraging citizen science activities such as local heritage mapping, supporting habitat restoration would also be beneficial in forming a closer link between social participation and involvement in and</p>	<p>(a) Insert a high level goal as recommended in relation to the protection of the environment.</p> <p>(b) Recommendation noted. It is considered appropriate to include actions in this regard in the draft LECP rather than in the S-ES document.</p> <p>(c) Recommendation noted. It is considered appropriate to include actions in this regard in the draft LECP rather than in the S-ES document.</p>	

	<p>environmental protection at a local level.</p> <p>(d) Consider taking into account the relevant environmental topics contained in the SEA Environmental Monitoring Programme aspects of the CDPs, as appropriate, so that over the lifetime of the LECP the potential cumulative/in-combination effects can be reviewed.</p> <p>(e) recommend that a commitment is included relating to the requirement for AA Screening to be carried out for projects arising out of the LECP with potential to impact on Natura 2000 sites. We recommend that a similar commitment be included highlighting that, under the EIA and Planning and Development Regulations, certain projects arising during the implementation of the LECP may require an Environmental Impact Assessment, including for sub-threshold developments.</p> <p>(f) Adequate and appropriate infrastructure should be in place, or required to be put in place, to service any development proposed and authorised during the lifetime of the particular LECP.</p>	<p>(d) The draft LECP is required to give consideration to monitoring arrangements. This recommendation should therefore be given consideration when preparing the draft LECP.</p> <p>(e) Recommendation noted. It is considered appropriate to include actions in this regard in the draft LECP rather than in the S-ES document.</p> <p>(f) Recommendation noted. It is considered appropriate to include actions in this regard in the draft LECP rather than in the S-ES document.</p>
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Recommendations:	
	(a) Insert the following high level goal on page 13: <u>To ensure the protection of the receiving environment in implementing the LECP.</u>

10	Name/Group:	Irish Water
	Submission:	Response
	(a) Advises that Irish Water is finalising its strategic plan for water services in Ireland for the next 25 years. (b) Refers to section 2.5 of the LECP draft SES regarding public capital / infrastructure programmes & advises that investment programmes arising from the LECP should be prepared taking cognisance of spatial planning hierarchies, particularly core strategies. (c) Refers to Irish Waters partnership in the green-schools programme to support education in relation to water issues and the tidy towns competition to raise awareness regarding sustainable water management.	Comments noted The LECP will be prepared in accordance with the core strategy of the Development Plans for the City and County and the Regional Planning Guidelines and if necessary will be reviewed when the forthcoming Regional Spatial and Economic Strategy is prepared.
	Recommendations:	
	No change	

11	Name/Group:	National Roads Authority
	Submission:	Response
	(a) Requests that the Council have regard to the DoECLG Spatial Planning & National	Comments noted. Any actions contained within the draft LECP should reflect NRA road priorities where relevant.

	<p>Roads Guidelines for Planning Authorities. (b) Outlines the NRA priorities in relation to national roads in Limerick City & County which include maintenance of the existing road network, including junctions and the Limerick Tunnel and development of key national road schemes including: Foynes to Limerick road improvement scheme, N21 Adare bypass, M7/N24 Ballysimon Junction; capacity enhancing works; M20 Cork to Limerick (Northern Section); N21 Adare – Abbeyfeale (includes bypass of Rathkeale, Newcastlewest & Abbeyfeale).</p>	
	<p>Recommendations:</p>	
	<p>No change</p>	

12	Name/Group:	Southern Regional Assembly	
	Submission:	Response	
	<p>(a) Section 1.3.4 should state that clear targeted actions will be identified, with responsibility for leading/co-ordination assigned such that measureable impacts on the key issues & challenges can be measured (b) Include in S. 1.3.4 a principle to ensure that the LECP is consistent with the Limerick City and County Development Plans, their Core Strategies, NSS, MWRPG, & sub-regional plans including the Strategic Integrated Framework Plan for the Shannon Estuary.</p>	<p>(a) Insert text as shown under “recommendations” below (b) Insert text as shown under “recommendations” below (c) Insert text as shown under “recommendations” below (d) Insert text as shown under “recommendations” below (e) Insert text as shown under “recommendations” below (f) Insert text as shown under “recommendations” below (g) Insert text as shown under “recommendations” below (h) An extensive socio-economic evidence base was carried out (contained in a separate document) which included evidence in relation to population; households & families; affluence and deprivation; employment & labour market structure; economic growth and competitiveness; labour market; education and skills; children and young people; social</p>	

<p>(c) Include a section discussing public consultation & the centrality of the bottom-up approach to setting relevant high level goals, objectives & actions.</p> <p>(d) Include in S. 1.4 illustrations setting out the Irish Planning Policy Hierarchy.</p> <p>(e) Consider discussion of the high-level goals of the plans/strategies listed & practical implications for the LECP & inclusion of graphics in relation to spatial planning context.</p> <p>(f) Consider inclusion of an overview of relevant aspects of local strategies & plans with a focus on relevant lessons learned.</p> <p>(g) Include the Europe 2020 targets in Figure 2.</p> <p>(h) Provide additional interpretation & discussion of trends shown in data contained in socio-economic evidence base.</p> <p>(i) Consider inclusion of additional information in relation to monitoring and review of the plan.</p> <p>(j) Include statistics or specific examples & specific metrics in SWOT analysis.</p>	<p>exclusion, health and well-being; disability and carers; housing; social capital; transport; crime; and personal computers, ICT and broadband. This detailed analysis provided the background to the Socio-economic Statement and High Level Goals document. That evidence base was used to inform the development of the high level goals and action areas and given the extensive nature of this analysis it is considered that further analysis is not necessary. Therefore no change is recommended.</p> <p>(i) It is considered appropriate to include additional information in relation to monitoring and review of the plan within the draft LECP. No change required at this stage.</p> <p>(j) The SWOT analysis includes some specific metrics where appropriate. The detailed socio-economic baseline report includes more detailed figures and statistics. It is considered appropriate to include additional strengths and opportunities in the SWOT analysis as identified in the submission.</p>
<p>Recommendations:</p>	
<p>Include the following text in Section 1.3.4, guiding principles: <u>“Clear targeted actions will be identified, with responsibility for leading/co-ordination assigned such that impacts on the key issues and challenges can be measured”</u>.</p> <p>(a) Include the following text in Section 1.3.4 <u>“Consistency with the Limerick City and County Development Plans, their Core Strategies, National Spatial Strategy, Regional Planning Guidelines for the Mid-West Region and Sub-regional Plans – including the Strategic Integrated Framework Plan for the Shannon Estuary”</u>.</p>	

(b) Include the following text after section 1.3.4: “1.3.5 Public Participation As outlined above, one of the guiding principles underpinning the preparation of the LECP is a developmental “bottom-up” approach to setting relevant high level goals, objectives and actions. To facilitate this consultation will be carried out with members of the public, public authorities and publicly funded bodies that make a contribution to economic development and community development within the local authority functional area and prescribed bodies. Consultation is also on-going throughout the process with elected members of Limerick City and County Council. Public participation will be facilitated in part through the Public Participation Network (PPN) as well as through publication of a notice inviting submissions from interested parties”.

(c) Include illustration to show overview of Irish Planning Policy Hierarchy followed by text stating “The diagram above sets out Irelands emerging planning Policy hierarchy with which the LECP must be consistent”.

(d) In Section 1.4 include the following text in relation to the high-level goals of plans/strategies & include graphics in relation to Limericks spatial planning context:

“EXISTING POLICY AND GUIDANCE FRAMEWORK

The following sets out a non-exhaustive list of key strategies and the high-level goals contained therein which have been used to guide the preparation of the LECP high-level goals.

Action Plan for Jobs, 2015 & Draft Action Plan for Jobs for the Mid West Region

Action Programme for Effective Local Government: Putting People First

Age Friendly Limerick 2015-2020

Agri-Food Strategy 2025

Better Outcomes Brighter Futures: The National Policy Framework for Children & Young People 2014-2020

Commission for the Economic Development of Rural Areas (CEDRA)

Construction 2020: A Strategy for a renewed construction sector

Delivering Equality of Opportunity in Schools (DEIS), National Action Plan, 2005.

Delivering Green Potential: Government Policy Statement on Growth and Employment in the Green Economy

Delivering Homes Sustaining Communities 2007

Driving Enterprise Delivering Jobs

Europe 2020: A European strategy for smart, sustainable and inclusive growth

EU Structural and Investment Funds (2014-2020).

Food Harvest 2020: A Vision for Irish agri food and fisheries

Further Education & Training Strategy 2014-2018

Harnessing our Ocean Wealth: An Integrated Marine Plan for Ireland 2012

Healthy Ireland: A Framework for Improved Health & Well Being 2013-2025

Housing Policy Statement 2011

Infrastructure and Capital Investment 2012-2016: Medium Term Exchequer Framework

Leipzig Charter on sustainable European cities

Literacy and Numeracy and Learning for Life: The National Strategy to Improve Literacy and Numeracy Amongst Children and Young People 2011-2020

Limerick City & County Development Plans 2010 – 2016

Limerick City Centre Strategy 2008

Limerick City and County Council Corporate Plan 2015-19

Limerick 2030 – An Economic and Spatial Plan for Limerick’ (June 2013)

Limerick Regeneration Framework Implementation Plan

Making it Happen - Growing Enterprise in Ireland

Medium Term Economic Strategy (MTES) 2014- 2020

Mid-West Climate Change Strategy 2012

Mid-West Area Strategic Plan

National Action Plan for Social Inclusion 2007- 2016

National Development Plan 2007-2013

National Disability Strategy Implementation Plan 2013-2015

National Digital Strategy, June 2013, Department of Communications and Natural Resources

National Plan for Social Inclusion 2007-2016

National Reform Programme for Ireland

National Social Target for Poverty Reduction

National Partnership Agreement 2014-2020

National Reform Programme for Ireland

National Spatial Strategy

National Strategy for Traveller/ Roma Integration

National Women's Strategy 2007-2016

OECD report on Local Development: Ireland (important in context of alignment of local government and local development)

Our Cities: Drivers of National Competitiveness

People, Place & Policy: Growing Tourism to 2025

Programme for Employability, Inclusion and Learning (PEIL) 2014-2020

Regional Planning Guidelines for the Mid-West Region 2010-2022

Retail Strategy for the Mid-West Region

Rural Development Programme (LEADER) 2014-2020

S&E Regional Operational Programme 2014- 2020

Smarter Travel: A Sustainable Transport Future. A New Transport Policy for Ireland 2009 – 2020

Social Inclusion Community Activation Programme (SICAP)

Towards 2016

Towards Intercultural Limerick - Limerick City and County Integration Plan 2013-2016

Youth Guarantee Implementation Plan (Pathways to Work)

The LECP is being positioned in the wider context of relevant EU, national, regional, and local level policy frameworks. This fit is critically important for successful implementation and in order to position the LECP to secure mainstream funding for implementation.

The following section presents an overview of the high-level goals of plans/strategies in key areas relevant to the LECP. It connects policy frameworks at EU level, to national policies and local level implementation arrangements.

It is important that the overall approach and content of the LECP are in keeping with best practice in the wider European context and that an integrated approach is adopted to economic and community development.

A number of important developments at European level are relevant here, including the Leipzig Charter on sustainable European cities, the role of cities as “engines of economic growth in Europe”, as reflected in the Europe 2020 strategy, and the stronger priority given to sustainable urban development in the EU Structural and Investment Funds (2014-2020)

The Limerick City and County Development Plans are part of a systematic hierarchy of land use and spatial plans, including the National Spatial Strategy and Regional Planning Guidelines. They are informed by the plans and strategies of the Government and other public agencies in general. It is important that the LECP framework sits comfortably within the hierarchy of existing policy.

The following high-level goals of existing policy are relevant:

- Delivering growth that is “smart”, through more effective investments in education, research and innovation, “inclusive”, by tackling job creation and poverty reduction, and “sustainable”, through a move towards a low carbon economy.
- The role of cities as “engines of economic growth in Europe”, as reflected in the Europe 2020 strategy, and the stronger priority given to sustainable urban development in the EU Structural and Investment Funds (2014-2020)

- Role of the Atlantic Gateways of Cork, Limerick, Galway and Waterford which have much initial potential through strengthened individual cities, enhanced connectivity and a collaborative approach to planning and promotion, to develop a second major metropolitan corridor on the island of Ireland.
- Promotion of a better balance of population, jobs and development between the regions and the designation of Limerick as a Gateway city and as such its designation as the focus for population and economic growth for the region.
- Creation of dynamic and sustainable rural economies with an energised relationship between rural and urban areas for the benefit of society as a whole.
- Creation of sustainable communities as places where people want to live and work, that are environmentally sustainable and contribute to a high quality of life for residents. This includes improving social inclusion and reducing poverty.
- Development of a stronger central core that will drive growth in the wider region (development of the Gateway and Hub to achieve the critical mass and value-added investment which the wider region requires).
- Need to integrate land-use with transportation planning, promote balanced growth within the region and to achieve the maximum social, economic, health and cultural benefits for all the region's citizens.
- Creating an improved environment for enterprise growth and job creation with a focus on support for regional enterprise development with a focus on particular areas of opportunity for the region in sectors such as manufacturing, tourism, MedTech, aviation and aerospace, food & beverage, sports & design sectors.
- Delivery of a new vision for Limerick as a leading centre for commercial investment in the Mid-West region. to capture a greater share of knowledge-based investment, supporting innovation, enterprise and new start-ups.
- Reaching specific poverty reduction targets for each stage of the lifecycle
- The provision of focused education and training courses and focus specific resources and provide additional supports to those furthest from the labour market
- Improving outcomes for children and young people in most disadvantaged communities & ensuring children have a voice in

matters that affect them, their lives will be better understood and they will receive quality supports and services to promote all aspects of their development.

- Promotion of health and wellbeing including healthy ageing
- Identification of renewable energy, transport, built environment and industrial/commercial development as key sectors where action needs to be taken to address the challenge of reducing energy related emissions and to outline the actions to be taken to meet the requirements under the Kyoto Protocol.
- Employability and work are clearly identified at all policy level (EU, national, local) as the key route out of poverty and exclusion. Current policy especially targets the long-term unemployed and households with low work intensity.
- There is an increasing emphasis on finding new solutions to problems, on social innovation and on drawing on the assets / resources that are available in local communities in more effective ways. This is reflected in new approaches in housing policy, in enterprise and employment policy (job creation) and local development.
- Social policies continue to place a strong focus on promoting social inclusion and poverty reduction. New targets are set for poverty reduction by 2020. This includes a sub-target to reduce child poverty. The more difficult conditions for achieving poverty reduction with the economic recession are also acknowledged.
- Taking advantage of opportunities provided by digital technologies / industries is a further policy priority. Getting more small businesses involved in trading on-line, greater absorption of digital by all age groups in the population (more off-liners on-line) through education programmes at all levels and roll-out of ICT infrastructure to support this, e-health, e-government and e-inclusion are all promoted.
- There is strong focus on addressing needs of people affected by social disadvantage (a needs-based approach) including the development and use of common assessment tools (e.g., in relation to children), flexibility to address different needs (e.g., of adult

learners). Developing plans to address problems but also drawing on individual / family / community strengths and monitoring progress by adopting the “pathways” approach (e.g., in activation policy, in further education and training, in management of chronic illnesses in health) are key elements of policy processes. These types of processes apply across a wide range of social policies (health, children, further education and training) and employment / activation policy.

- In relation to specific groups / individuals, greater user involvement is promoted, for instance, in health, policies in favour of older people, children, education and adult learning. Stronger engagement of citizens and communities in decision-making is a feature of new approaches to local and community development. These apply in the roll out of community-based planning models linked to the reform of local government and in specific areas including estate management.
- Social policy demonstrates a strong focus on preventive action and early intervention to prevent more serious problems arising over time: for instance, in relation to children and families, children / young people at risk of offending, older people at risk, etc. This orientation in policy is linked to the development of high quality universal services.
- Targeting resources for remedial actions to deal with problems for those groups with the most acute needs (e.g., in family support, youth justice, young people who are at risk of drop out from school, housing, etc.) are further features across social policy and in housing policy.
- There is a strong focus on the need for improved coordination and integration across policy fields. This applies at all stages of the policy process: in planning, implementation, monitoring and evaluation. Further impetus is given to this priority at national level in some areas of policy (e.g., new inter-departmental structure in local development, new national policy framework in local development, the setting up of the Child and Family Support Agency) and also at local level (e.g., the creation of LCDCs in local government reform, strengthening the role of Children Services Committees in coordination and planning of interventions in favour of children and families). There is also a stronger focus on evidence-based policy making.”

Include figures showing Limericks position as outlined in the NSS and RPGs and the following text “The following figures outline Limericks position within the spatial structure set out in the NSS which designates Limerick and Shannon as a joint gateway. The

figures also illustrate the complementary role of other towns and villages and the role of linkages in terms of good transport, communications and energy networks”.

(e) Include an overview of relevant aspects of local strategies & plans with a focus on relevant lessons learned in section 1.4:

“Overview of Existing Strategies & Plans – Lessons Learnt

A key finding from a review of existing local level plans and strategies is that policies are in a state of reform. This is strongly linked to the impact of the economic and fiscal crisis but also to other factors (beyond the crisis) including the challenge to work towards a new growth model. The policy context covers a wide range of sectoral policy fields and the overall picture is one of complexity. Key conclusions emerging from the review of plans and strategies and lessons learnt are as follows:

- EU-level strategy and policy provides the macro level framework. Increasingly, policies at this level have a direct impact on national policies in terms of goals (and corresponding targets) and the approaches adopted in policy.
- There has been a lack of a co-ordinated, evidence based approach to implementation of plans in the past leading to fragmented spatial development and inconsistencies in terms of services provided at local level. A lack of formal monitoring structures has added to these issues.
- There has been a strong urban – rural divide, for example Limerick had been administered by two separate local authorities – one with an urban focused and one with a rural focus.
- Independent evaluation of policies at local level has been weak. This however is something which the LCDC aims to address.
- Communities must be enabled to identify and address social and economic issues in their own areas and be actively involved in promoting and advancing sustainable solutions.
- Limerick city as a whole must be revitalised to become an attractive place to live, work and visit so that it can function as the urban centre of the focus of the region. There are many strategies in place at a regional and local level to deliver this revitalisation. **Limerick 2030** is the most recent articulation of the vision for Limerick City, aiming to reposition the city as a leading centre for commercial investment, retail and education in the Mid-West region. As well as bringing shoppers, businesses and jobs and educational opportunities back into the city, the plan aims to develop the city as a destination for visitors linked to transformation of the city centre and capitalisation on its cultural heritage, cultural industries and sport.

- There has been a lack of integration of land use and transport planning in the metropolitan area in the past. However, there is now significant potential for Limerick to benefit through the implementation of MWASP and from a number of Smarter Travel Initiatives in the city.
- The role of cities as “engines of economic growth” and sustainable urban development have not been given the required level of support to achieve the critical mass required in the city. In fact Limerick City experienced a decline in population in recent census periods. Core strategies of development plans Prior to current legislation regarding core strategies of development plans there was no strong legislative requirement to implement spatial planning hierarchies.
- In the past there has been a lack of a balanced and holistic approach to addressing social, economic and environmental challenges, which require a multi-stakeholder approach and robust local governance structures.
- In general, there is a need for a focus on improved governance, stronger accountability and transparency in the use of public money, better management practices and showing evidence of results achieved under publicly-funded interventions.
- In the past there has been limited attempt to incorporate the multi-agency approach required to implement plans and strategies to facilitate implementation and clearly identify responsibilities for the various stakeholders.
- Plans need a clear implementation strategy identifying clear responsibilities and outputs.”

(f) Include the following Europe 2020 targets in Figure 2.

High Level Targets: Definition	<u>Targets for Europe</u>
Employment: increase in the employment rate (%) for men and women aged 20-64 years	<u>75%</u>
R&D / innovation: combined public and private investment levels in this sector as % of GDP	<u>3%</u>

<p>Climate change / energy:</p> <p>(i) Reduction in greenhouse gas emissions % lower than 1990</p> <p>(ii) Increase in % of energy from renewables</p> <p>(iii) % increase in energy efficiency</p>	<p>(i) <u>20% - 30%</u></p> <p>(ii) <u>20%</u></p> <p>(iii) <u>20%</u></p>	<p>(j) Include the following text in SWOT analysis: <u>Strength: Limerick is strategically important from a national and regional perspective as a gateway city and its function as a leader in strategic development is evident in documents such as the Shannon Integrated Framework Plan and the Mid-West Area Strategic Plan. Opportunity: Potential to address disparities between city and county in a co-ordinated and sustainable manner through the unified local authority and the Limerick 2030 Strategy.</u></p>
<p>Education</p> <p>(i) Reduction in the school drop-out rates (%)</p> <p>(ii) Increase in rates (%) of 30-34-year-olds completing third level education</p>	<p>(i) <u>Rates to reduce to below 10%</u></p> <p>(ii) <u>Third level education 30-34 year olds: 40%</u></p>	
<p>Poverty / social exclusion: reduction in the number of people in or at risk of poverty and social exclusion</p>	<p><u>At least 20 million fewer people in or at risk of poverty and social exclusion</u></p>	

13	Name/Group:	Geological Survey of Ireland
	Submission:	Response
	Advises that geological sites throughout the County should be protected and geological heritage and groundwater should be included in the Environmental Report for any proposed development.	Comments noted. The relevant development plan includes policies in this regard and the LECP will be prepared in compliance with the policies and objectives of the city and county development plans.

	Recommendations:	
	No change	

14	Name/Group:	National Transport Authority
	Submission:	Response
	<p>(a) Refers to measures outlined in NTA strategy in relation to measures to meet the NTA strategy objectives to be included in Development Plans</p> <p>(b) Recommends inclusion of the following text in 2.5.3 Transport:</p> <p>(ii) Progress proposals relating to rail links and Colbert Station redevelopment / renewal, identified in Limerick 2030, in line with the investment programmes of the relevant agencies;</p> <p>(iii) As a means of improving accessibility for all residents, workers and visitors to Limerick, further develop walking, cycling and public transport, particularly in urban areas, through the development of infrastructure in cooperation with other agencies, and through behavioural change programmes such as Smarter Travel Workplaces and Campuses, and Green Schools Travel.</p> <p>(iv) Support the National Transport Authority's Rural Transport Programme in order to improve access for the rural population to key services (health, education), employment and day-to-day</p>	<p>(a) The LECP is required to comply with the Limerick City and County Development Plans.</p> <p>(b) Insert text as shown under "recommendations" below</p>

	activities (shopping), especially targeting those without own transport and vulnerable groups (e.g. elderly persons on low incomes).	
	Recommendations:	
	<p>Include the following text in section 2.5.3:</p> <p><u>(ii)Progress proposals relating to rail links and Colbert Station redevelopment / renewal, identified in Limerick 2030, in line with the investment programmes of the relevant agencies;</u></p> <p><u>(iii)As a means of improving accessibility for all residents, workers and visitors to Limerick, further develop walking, cycling and public transport, particularly in urban areas, through the development of infrastructure in cooperation with other agencies, and through behavioural change programmes such as Smarter Travel Workplaces and Campuses, and Green Schools Travel.</u></p> <p><u>(iv)Support the National Transport Authority’s Rural Transport Programme in order to improve access for the rural population to key services (health, education), employment and day-to-day activities (shopping), especially targeting those without own transport and vulnerable groups (e.g. elderly persons on low incomes).</u></p>	

15	Name/Group:	Community Worker’s Co-operative (CWC)
	Submission:	Response
	<p>CWC is a national organisation that promotes and supports community work as a means of addressing poverty, social exclusion and inequality, and ultimately as a means of achieving social change that will contribute to the creation of a more just, sustainable and equal society.</p> <p>The submission recommends the inclusion of a number of key community development elements into the LECP under the headings of Product and Process:</p> <p>Product</p>	

<p>(a) A strong set of principles should be agreed between all stakeholders including communities to ensure the LECP is based on a shared set of values.</p> <p>(b) A statement on equality and human rights, as suggested in the Promotion of Equality in the Delivery of the Local Economic Plans (LGMA), be developed and included in the LECP.</p> <p>(c) That the LECP explicitly states its commitment to promoting social inclusion by tackling social exclusion as it is defined in the National Plan for Social Inclusion 2007-2016. Further to this it urges the LCDC to ensure that groups experiencing poverty, social exclusion and inequality be specifically consulted as part of the LECP process.</p> <p>(d) The submission draws a distinction between community development and local development. The difference should be taken into account when developing the LECP strategies.</p> <p>(e) That the LECP should not be merely a re-statement of actions that already form part of the plans of other stakeholder organisations – there should be added value. Actions should be collaborative, focussed on intervention, prevention and breaking the cycle. It suggests the need for parity between the economic and community elements of the LECP.</p> <p>Process:</p>	<p>(a) Recommendation noted. Consideration will be given to this as LECP is written.</p> <p>(b) Recommendation noted. Statement on equality and human rights to be developed and included in the draft LECP.</p> <p>(c) Recommendation noted. Consideration will be given to this as LECP is written.</p> <p>(d) Recommendation noted.</p> <p>(e) Recommendation noted.</p>
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	<p>(f) That the process for developing the LECP should be participative, collaborative and consultative. Sufficient time needs to be afforded to communities to allow them to prepare for engagement. Sufficient thought must be put into how to engage with communities/hard to reach groups and which engagement mechanisms are most appropriate. A consultation plan should be developed and widely circulated. Consultation should go beyond the tokenistic.</p>	<p>(f) Recommendation noted.</p>
	<p>Recommendations:</p>	
<p>Consideration will be given to all the recommendations in the submission in the context of the LECP being written. A statement on equality and human rights to be developed and included in the draft LECP. No change.</p>		

16	Name/Group:	Cllr Eddie Ryan
	Submission:	Response
	<p>To Form a Pilot Rivers Trust Project to cover the catchment area of the Loobagh River. The Rivers Trust would work for the Conservation, Protection and Recreational enjoyment of the Loobagh River. The Trust would be an Umbrella Body for local groups such as Angling Groups, Wildlife Groups, School Groups etc. The Trust would work with the Land Owners covering the Catchment Area of the Loobagh River , Community Groups , E P A , Environment Section of LC&CC , Inland Fisheries Ireland , Department of Agriculture Fisheries and</p>	<p>The recommended action should be considered for inclusion in the LECP itself as an action rather than in the S-ES.</p>

	Food, and Farm Organisations. This Pilot Project could be used as a model for all the Rivers in Limerick	
	Recommendations:	
	No change.	

17	Name/Group:	Cllr Lisa Marie Sheehy
	Submission:	Response
	To Form a Pilot Rivers Trust Project to cover the catchment area of the Loobagh River. The Rivers Trust would work for the Conservation, Protection and Recreational enjoyment of the Loobagh River. The Trust would be an Umbrella Body for local groups such as Angling Groups, Wildlife Groups, School Groups etc. The Trust would work with the Land Owners covering the Catchment Area of the Loobagh River , Community Groups , E P A , Environment Section of LC&CC , Inland Fisheries Ireland , Department of Agriculture Fisheries and Food, and Farm Organisations. This Pilot Project could be used as a model for all the Rivers in Limerick	The recommended action should be considered for inclusion in the LECF itself as an action rather than in the S-ES.
	Recommendations:	
	No change.	

18	Name/Group:	Limerick Clare Energy Agency
	Submission:	Response
	<p>(a) Outlines the drivers for action in relation to energy efficiency, CO2 reductions and renewable energy development.</p> <p>(b) Refers to Irelands “Climate Change / energy target” stated as 13.9% - the actual target is 20% for Ireland.</p> <p>(c) Include the following in the SWOT analysis: Strength: The availability of renewable energy resources and technologies within the city and county in its ability to contribute to Irelands legally binding commitments and also to the creation of low carbon communities and centres of learning and commerce. Weakness: The energy infrastructure to harness renewable energy resources is not at optimal levels and that the city and county will be considerably constrained in achieving a low carbon society and economy without investment in suitable renewable energy infrastructure. Opportunities: The transition toward a low carbon society and economy represents considerable opportunities for employment, skills development and increased FDI based on energy security with a low carbon footprint.</p>	<p>(a) No change required</p> <p>(b) Update table as suggested</p> <p>(c) Insert text as shown under “recommendations” below</p>

<p>Threats: Limerick City and County, in common with Ireland is over 90% dependant on imported fossil fuels to service the needs of society, commerce, transport and the wide range of educational, health care and local government facilities. We are presently being economically sheltered by low oil prices, low interest rates and a weak euro exchange rate. All of these could and will change. The socio – economic impact of high oil prices, high interest rates and a strong euro would be profound. One of the few areas that we can control (if we have the will) is our dependence on imported fuel.</p> <p>(d) Suggests inclusion of the following high level goal “Promote the transition of Limerick City and County towards a low carbon future by 2030. That Limerick City and County will assist the transition to low carbon practices in all communities, commerce, education, health care and local government services”.</p> <p>(e) Include the following as a cross cutting priority: “Energy & Climate Change; are important elements in every sector of society and economy. It is important that the severe weather effects of climate change together with the subtle changes to agriculture are addressed to ensure the needs of future generations are met”.</p> <p>(f) Include the following under the Economic</p>	<p>(d) Insert text as shown under “recommendations” below</p> <p>(e) Insert text as shown under “recommendations” below</p>
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<p>change strategy which has already got targets and goals)</p> <p>(iii) Promote and support local development of indigenous energy resources and technologies, particularly community based initiatives.</p> <p>(iv) Promote the development of energy and water infrastructure to support city, county and community based low carbon projects.</p> <p>(h) Recommends inclusion of the following text: 2.5.5 Responses to climate change – Adaptation:</p> <p>(i) Promote sustainable agricultural practices that encourage efficient resource management and have minimum impact on air and water environmental parameters.</p> <p>(ii) Identify areas of land and costal line in danger of degradation or change as a result of climate change and severe weather events, with a view to determining the socio economic cost of land use change or loss</p> <p>(iii) Identify built areas (residential and commercial) that are in danger of damage due to climate change or severe weather events with a view to determining the infrastructural requirements to protect same.</p> <p>2.5.5 Responses to climate change – Mitigation:</p> <p>(i) Promote and enforce building standards for all new and refurbished buildings to ensure efficient resource use, including</p>	<p>(h) The recommendations outlined are considered outside of the scope of the Socio-economic Statement and High Level Goals document. Many of the suggestions are being addressed by the Shannon Catchment Flood Risk Assessment and Management Study (CFRAMS) the results of which will be incorporated into the Limerick City and County Development Plans with which the LECP must be consistent.</p>
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<p>energy, water, building materials etc.</p> <p>(ii) Identify areas of land and costal line in danger of degradation or change as a result of climate change and severe weather events, with a view to determining the infrastructural requirements to protect same.</p> <p>(iii) Identify built areas (residential and commercial) that are in danger of damage due to climate change or severe weather events with a view to determining the infrastructural requirements to protect same.</p> <p>(iv) To work in partnership with the various statutory, voluntary and community organisations to identify the appropriate infrastructural needs to protect the citizens of Limerick, their homes, workplaces and welfare.</p> <p>(i) Recommends the inclusion of a discussion surrounding the energy required to meet the demands of Limerick City & County should be included in the Socio-economic analysis</p>	<p>(i) It is recommended that a summary of the findings outlined in relation to the energy required to meet the demands of Limerick City & County be included in the Socio-</p>
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	economic Statement under Annex 1 – Key Findings.
Recommendations:	
<p>(b) Amend figure 2 to delete 13.9% and replace with 20%</p> <p>(c) Insert the following text in SWOT analysis <u>Strength: The availability of renewable energy resources and technologies within the city and county in its ability to contribute to Irelands legally binding commitments and also to the creation of low carbon communities and centres of learning and commerce.</u> <u>Weakness: The energy infrastructure to harness renewable energy resources is not at optimal levels and the city and county will be considerably constrained in achieving a low carbon society and economy without investment in suitable renewable energy infrastructure.</u> <u>Opportunities: The transition toward a low carbon society and economy represents considerable opportunities for employment, skills development and increased FDI based on energy security with a low carbon footprint.</u> <u>Threats: Limerick City and County, in common with Ireland is over 90% dependant on imported fossil fuels to service the needs of society, commerce, transport and the wide range of educational, health care and local government facilities. We are presently being economically sheltered by low oil prices, low interest rates and a weak euro exchange rate. All of these could and will change. The socio – economic impact of high oil prices, high interest rates and a strong euro would be profound.</u></p> <p>(d) Include the following as a high level goal in section 2.2: <u>“Promote the transition of Limerick City and County towards a low carbon future by 2030”</u></p> <p>(e) Include the following as a cross cutting priority: <u>“Energy & Climate Change are important elements in every sector of society and economy. It is important that the severe weather effects of climate change together with changes to agriculture are addressed to ensure the needs of future generations are met”</u>.</p> <p>(f) Include the following under the Economic Pillar in S. 2.4 Energy Security & Supply: <u>(i) To Promote the development of indigenous energy sources and technologies, in order to secure Limericks low carbon transition.</u> <u>(ii) To promote energy efficiency in all sectors of the economy</u> <u>(iii) To reduce the carbon footprint associated with socio-economic activity within Limerick City & County, as a clear indicator of energy security and supply.</u></p> <p>(g) Insert the following in S. 2.5.4 Low Carbon, Improved Energy Efficiency: <u>(i) In partnership with statutory, voluntary and community organisations, promote the low carbon agenda through efficient resource management and reduced CO2 emissions.</u> <u>(ii) To implement the actions set out for Limerick City and County in the Climate Change Strategy for the Mid West Region</u></p>	

(iii) Promote and support local development of indigenous energy resources and technologies, particularly community based initiatives.

(iv) Promote the development of energy and water infrastructure to support city, county and community based low carbon projects.

(i) Include the following text in Annex 1 – Key Findings along with relevant tables and charts from submission (refer to Socio-economic Statement to view tables & charts):

Climate Change

The table and chart below sets out the energy related CO2 emissions and their relationship to a notional “Kyoto target” or burden sharing with the EU and National targets on CO2 reductions.

Table A1: Energy Emissions Ireland and LCR – MTCO2 - 2010 & Forecast to 2020

Chart A1: Evolution of Limerick City & County Energy related CO2 emissions

Energy

The following chart and table illustrates the consumption of energy in Limerick City and County. The data clearly illustrates that our socio-economic development is heavily dependent (83%+) upon imported fossil fuels.

The chart and table below illustrates the evolution of energy use in Limerick City & county by economic sector. The chart illustrates:

- The significant increase in energy use from 2000
- The Residential sector accounts for 26% of energy use
- Residential and Transport sectors account for 60% of energy use

The chart below shows the energy use at the peak before the economic crash and forecasts energy use to 2020 using a “business as usual” scenario, where no actions are taken, and the target if the national renewable energy and national energy efficiency action plans are implemented.

Chart A2: Evolution of Energy by Sector – Limerick City & County

Table A2: Energy Consumption Ireland and LCR – GWh - 2010 & Forecast to 2020

Part B

Proposed Amendments to Draft Socio-Economic Statement

(To be read in association with Part A)

Omit wording ~~struck through~~ and insert wording underlined. Where policies or objectives are proposed to be included or amended the policy / objective numbers of those existing may need to be revised.

Part C

Strategic Environmental Assessment Screening and Appropriate Assessment Screening of the Proposed Material Alterations

The changes proposed are not significant and therefore alterations to the Environmental and Appropriate Assessment screening report are not required.