



Comhairle Cathrach  
& Contae **Luimnigh**

**Limerick City**  
& County Council

Forbairt Gheilleagrach,  
Ceanncheathrú Chorpáraideach,  
Cé na gCeannaithe,  
Luimneach

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**1<sup>st</sup> March 2018**

**To: The Mayor and Each Member of Limerick City and County Council**

**Re: Proposed Variation No. 6 to the extended Limerick County Development Plan 2010-2016 to incorporate changes to Chapter 8 – Transport & Infrastructure Section.**

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**A Chomhairleoir, a chara,**

I enclose herewith a copy of the Chief Executive's Report on the Proposed Variation No. 6 to the extended Limerick County Development Plan 2010-2016 for your consideration. The proposed Variation comprises of changes to Chapter 8 – Transport & Infrastructure Section.

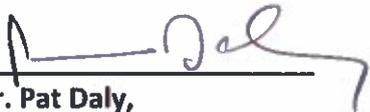
The proposed variation was placed on public display for a period of not less than 4 weeks from Saturday 6<sup>th</sup> January 2018 to Monday 5<sup>th</sup> February inclusive. A total of 9 written submissions were received within the statutory time frame. A report consisting of a summary of the submissions received, together with the Chief Executive's recommendations are attached as required by Section 13 of the Planning and Development Act, 2000 (Amended). The submissions can be inspected in the Forward Planning Section during normal office hours and copies of the original submissions will be available for inspection at the Full Council meeting in March.

You are invited to attend a briefing meeting on the 12<sup>th</sup> of March at 2.30pm in the Small Exhibition Area, Merchants Quay, Limerick.

The Members of Limerick City and County Council, at their March meeting shall consider the Chief Executive's Report and decide whether to accept or amend Proposed Variation No. 6 to the extended Limerick County Development Plan 2010 - 2016. Any proposed amendments will be put on public display for a further 4 weeks.

If you have any queries on the report please contact Karen Burke, A/Senior Executive Planner, on 061-557480.

Mise le meas,

A handwritten signature in black ink, appearing to read 'Pat Daly', is written over a solid black horizontal line.

**Dr. Pat Daly,**  
**Director of Economic Development**

**Section 13 (4) (a)**  
**Chief Executive's Report to Members**

**On submissions to the Proposed Variation No. 6 to Limerick County Development Plan 2010 – 2016 (As Extended), to incorporate changes to Chapter 8 - Transport and Infrastructure Section**

**1<sup>st</sup> March 2018**



**Comhairle Cathrach  
& Contae Luimnigh**

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**Limerick City  
& County Council**

Forward/Strategic Planning  
Limerick City and County Council,  
Economic Development Directorate,  
Merchants Quay,  
Limerick

## 1.1 Introduction

This report presents the submissions and observations made following publication of the proposed Variation No. 6 to the Limerick County Development Plan, 2010 - 2016 (as Extended), and sets out the Chief Executive's responses to the issues raised. The report forms part of the statutory procedure for preparing a variation to a Development Plan that is set out in Section 13 of the Planning and Development Act, 2000 (Amended).

Under the Planning and Development Act 2000, (Amended), the Chief Executive is required to prepare a report on the submissions and observations received in respect of the proposed variation, including submissions made by the Minister and the Regional Authority, to respond to the issues raised and to make recommendations in relation to the proposed variation, taking into account the proper planning and sustainable development of the area, the statutory obligations of the Local Authority and relevant policies or objectives of the Government or any Minister of Government.

The variation consists of the following text changes to the Development Plan:

The following Table sets out the proposed improvement works ~~for the 2010-2016 period~~, having regard to the objectives in the National Development Plan.

**Table 8.3 Proposed National Road Improvements ~~for the Period 2010-2016~~**

N18 Galway Road	Southern Ring Road – Phase 2: Complete land acquisition and continue construction of the Limerick Southern Ring Road, Phase 2 scheme in County Limerick
M7 Dublin Road	N7 Route Improvements Nenagh to Limerick: Complete land acquisition and continue construction of the M7 Nenagh to Limerick scheme in County Limerick
M8 Mitchelstown - Cahir	Complete land acquisition and continue construction of the M8 Route Improvements from Mitchelstown to Cahir in County Limerick.
N20 Cork Road	Design, reserve land and commence construction of the N20 upgrade to Motorway standard, which forms part of the strategic Atlantic Corridor and is included in "Transport 21" from Patrickswell to Charleville in County Limerick.

<p>N21 Tralee Road (and Killarney Road)</p>	<p><u>Design, reserve land for and commence construction of a bypass of Adare and N21 Route Improvements from Adare to the County boundary, as resources become available, having regard to the requirements of the Habitats, Water Framework, Floods, and EIA Directives and in accordance with the mitigation measures identified in the Appropriate Assessment, Strategic Flood Risk Assessment and Strategic Environmental Assessment of Variation No. 6 at project level.</u></p> <p><del>Design, reserve land for and commence construction of a bypass of Adare on a route to the south of Adare to connect with the proposed M20 Cork to Limerick project at a location to the south of Adare as resources become available.</del></p>
<p><u>N21 to N69</u></p>	<p><u>Design, reserve land for and commence construction of a new road between the N21 at Rathkeale and the N69 at Foynes as resources become available, having regard to the requirements of the Habitats, Water Framework, Floods and EIA Directives and in accordance with the mitigation measures identified in the Appropriate Assessment, Strategic Flood Risk Assessment and Strategic Environmental Assessment of Variation No. 6 at project level.</u></p>
<p>N24 Tipperary Road</p>	<p>Ballysimon to County Boundary: Design, reserve land and commence construction of N24 Route Improvements from Ballysimon to County Boundary, as resources become available.</p> <p>Western Corridor Improvements (Pallasgreen – Bansha): Design, reserve land for and commence construction of so much of N24 Western Corridor Improvements, as will lie in County Limerick as resources become available.</p>
<p>N69 Tarbert (Foynes) Road</p>	<p>Design, reserve land for and commence construction of N69 Route Improvements from Limerick to Glin as resources become available.</p>

**Section 8.2.7 Harbours and Airports**

**Objective IN24 Enhancing Connectivity with the Estuary**

It is an objective of the Council, as resources become available and in consultation with ~~the NRA-TII,~~ to design, reserve land for and commence construction of a new road ~~to-examine sustainable-route-options~~ from the N69 and the strategically important port of Foynes to the national primary road network and Limerick Gateway to provide for improved vehicular connectivity, having regard to the requirements of the Habitats, Water Framework, Floods, and EIA Directives and in accordance with the mitigation measures identified in the Appropriate Assessment, Strategic Flood Risk Assessment and Strategic Environmental Assessment of Variation No. 6 at project level.

## **1.2 Public Display period**

The proposed Variation was placed on public display for a period of not less than 4 weeks from Saturday 6<sup>th</sup> January 2018 to Monday 5<sup>th</sup> February 2018 inclusive. A total of 9 written submissions were received within the statutory time frame in response to the public display period.

## **1.3 Structure of the Report**

Section A of the report addresses each of the 9 written submissions and observations received. It includes the names and addresses of persons or agencies who made the submissions and observations, a summary of the issues raised, the response and recommendation of the Chief Executive on each submission and SEA/AA comments.

## **1.4 Next Step**

Following receipt of the Chief Executive's Report, the Members of the Council have up to 6 weeks in which to consider the contents of the report and the proposed Variation. Members may then accept the proposed variation with or without amendments. Should amendments be proposed which would constitute material alterations to the Variation, there is a further public display period (4 weeks) giving Members of the public an opportunity to comment on the proposed amendments only. This is followed by the preparation of a second Chief Executive's Report to the Members on any submissions or observations received on the proposed amendments.

Members may then decide to make the variation with or without the proposed amendments or with modifications to the proposed amendments, as they consider appropriate and subject to the provisions of the Planning and Development Act, 2000 (Amended). The formal making the variation is by resolution of the Council.

During the Variation process the Council must consider the proper planning and sustainable development of the area, statutory obligations and any relevant plans and policies of the Government or any Minister of the Government.

## **2.0 Persons / Bodies who made Submissions within the Statutory Timeframe**

A total of 9 submissions were received within the statutory timeframe (See Table 2 below).

**Table 2: Submissions Received within the Statutory Timeframe**

<b>Submission No.</b>	<b>Name and Address</b>
1	Department of Housing, Planning and Local Government, Custom House, Dublin 1
2	Environmental Protection Agency, Inniscarra, Co. Cork
3	Transport Infrastructure Ireland, Parkgate Street, Dublin 8
4	Irish Water, Talbot Street, Dublin 1
5	Southern Regional Assembly, O'Connell Street, Waterford
6	Shannon Foynes Port Company, Foynes, Co. Limerick
7	Aeneas O'Connor, Croagh, Co. Limerick
8	Paul & Eileen Madden, Rathkeale, Co. Limerick
9	Joan Kennedy, Croagh, Co. Limerick

**Section A**

**Submissions, Responses and Chief Executive's Recommendations**

	<b>Name/Group:</b>	Department of Housing, Planning and Local Government
<b>Ref.</b>	<b>Submission summary</b>	<b>Chief Executive's Response</b>
1	No comments to make on Variation No.6 to the extended Limerick County Development Plan 2010 – 2016	Noted
	<b>Chief Executive's Recommendation:</b>	No Change
	<b>Implications for SEA/AA</b>	N/A

	<b>Name/Group:</b>	Environmental Protection Agency
<b>Ref.</b>	<b>Submission summary</b>	<b>Chief Executive's Response</b>
2	<p>The submission is intended to promote full and transparent integration of the plan making and the Strategic Environmental Assessment processes, the preparation of the Variation provided a timely opportunity to address the challenges outlined in the Environmental Report and make real progress towards achieving a sustainable transport system for the wider Limerick City area. However, the following challenges are highlighted:</p> <ul style="list-style-type: none"> <li>- Road Transport – transport system is highly dependent on fossil fuels with significant emissions of greenhouse gases and air pollutants, with 19.5 % of the greenhouse gases from the transport sector, which will significantly increase by 2020. A key challenge is to protect and maintain good air quality by measures like electric cars etc.</li> <li>- Air pollution and Transport – the transport sector accounted for 12% of all pollutant emissions in 2015 and is one of the largest producers of particulate matter pollution in cities,</li> </ul>	<p>The EPA's State of the Environment Report was consulted and has informed the environmental baseline, problems, issues and threats contained as part of the Strategic Environmental Assessment Environmental Report (SEA ER) which has informed the preparation of the Variation.</p> <p>Limerick City &amp; County Council are committed to promotion of sustainable travel as set out in the County Development Plan 2010 – 2016 (As Extended) in Objective IN 01: Promotion of Sustainable Travel and Policy IN P4: Promotion of Sustainable pattern of Transport Use. Limerick City &amp; County Council are proactively promoting Smarter Travel policies and facilitating alternative means of transport where possible.</p> <p>The Variation has considered issues in relation to air quality and the transport sector. The results the Route Selection Report (RSR, May 2016) indicate that the route corridor will have neutral</p>

	<p>which has significant health implications. The need to reduce transport related pollution needs to be recognised and addressed in the Variation.</p> <ul style="list-style-type: none"> <li>- Climate Change Mitigation – A national climate policy goal of the Draft National Planning Framework is to reduce overall emissions of Carbon Dioxide levels by at least 80% of 1990 levels by 2050. Ireland also has an obligation to deliver 10% of transport energy from renewable sources by 2020. The Variation should consider how best to support and implement the relevant aspects of the NRPF and better ways to promote urban and spatial planning.</li> <li>- Alternative Fuels, Biofuels, Obligation Scheme/Smarter Travel – the use of alternative fuels, including electricity forms part of a significant part of Government Policy on reducing transport emissions, the Draft Bio Energy Plan commitment to the continuation of the Bio Fuels Obligation Scheme is relevant to the Variation and remains key to meeting the target of 10% renewable transport target.</li> </ul>	<p>impact on ambient air quality detailed as part of the SEA ER. Further assessments will be undertaken as part of the project level assessment Environmental Impact Assessment process.</p> <p>The Foynes to Limerick Road Improvement Scheme is supported by the newly published National Planning Framework and National Development Plan 2018 - 2027 which includes support measures to enhance road connectivity to Shannon Foynes and provide for a Bypass of Adare. The Variation will promote the improvement in the urban and spatial planning by removing HGVs and congestion from existing towns and villages and facilitating settlements capacity to expand and grow.</p> <p>The Variation supports both the national Smarter Travel and Limerick Smarter Travel policy. The SEA ER found that there are no significant cumulative or in combination effects perceived at this Plan level stage.</p> <p>For the transport sector, the National Mitigation Plan scenario implies a requirement for significant reductions in petrol and diesel consumption due to vehicle efficiency gains, electrification of the private transport fleet and an increased share of biofuels by 2030. These issues and the implications relating to Biofuels is more appropriately assessed and implemented at project level stage.</p>
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	<ul style="list-style-type: none"> <li>- Climate Change Adaptation – Urgent need for the transport sector to adapt to the effect of climate change, the Variation should consider the impacts on local and regional exposure and vulnerability to weather and climate events and projected changes to these due to climate change.</li>   <li>- Noise pollution – noise pollution is a significant health concern affecting the quality of life and wellbeing, and road transport is one of the main sources of environmental noise in Europe. Available noise action plans should be considered and reviewed to reflect the plan period and associated development proposals. In addition engineering and technology based solutions needed for mitigating noise, options should focus on preventative and management aspects. Options looking at utilisation of more environmentally friendly alternatives, such as public and private electric transport, and more attractive means of transport modes in the Variation area could be considered.</li> </ul>	<p>Consideration of the Draft National Adaptation Framework as part of the proposed Variation was undertaken as part of the SEA ER in Appendix A. The Variation is also supported by a separate Strategic Flood Risk Assessment which included likely implications relating to flood risk and climate change. It found that the proposed road development can be adequately managed and mitigated for and that the construction and operation of the road can be engineered not to cause unacceptable adverse flooding. Forthcoming regional, local and sectoral (including transport sector) adaption plans that will emerge from the NAF will be considered at project level. The EIA process and further including site specific flood risk assessment will inform project level assessment.</p> <p>Joint Noise Action Plan 2013 has been carried out as part of the SEA (detailed in Appendix A of the SEA ER) which has been used to inform the Variation process. Noise maps are included for the N21 and N69 in the SEA ER. Furthermore, noise pollution has been considered as part of the route selection and the Variation process. Site specific mitigation measures will be required if the new infrastructure is likely to have an impact on residents along the route corridor, however no specific mitigation can be provided due to the strategic nature of the Variation process. Furthermore, Road design guidelines set standards for noise abatement and pollution control which will be considered in the Environmental Impact Assessment Report and adhered to.</p>
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<p>Specific Comments on the Variation to be considered:</p> <p>The EPA acknowledge the proposed textual changes to Chapter 8 of the County Development Plan, as shown in <i>Table 8.3 – Summary of Likely Significant Adverse Effects and Mitigation Measures</i>. There is merit however, in including a specific reference for the need for developments/projects to 'comply with the relevant environmental policies and objectives in the County Development Plan'. This would place a stronger emphasis on the need to implement the mitigation and monitoring measures necessary to protect and manage environmental sensitivities and vulnerabilities.</p> <p>In addition to the above comments, specific comments have been included on the Strategic Environmental Assessment Environmental Report as follows:</p> <p>(a) Non-Technical Summary</p> <ul style="list-style-type: none"> <li>- Integration between Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk Assessment, could include a broad summary of the key findings of the Appropriate Assessment and Strategic Flood Risk Assessments carried out and how they have been integrated into the SEA and Variation.</li> </ul> <p>(b) Environmental Baseline</p> <ul style="list-style-type: none"> <li>- Population and Human Health - in relation to population and human health, the relevant aspects of the Draft National Planning Framework, regarding the further population and economic growth projections of</li> </ul>	<p>Noted, all projects at planning application stage are required to comply with the policies and objectives in the County Development Plan.</p> <p>Noted. Both the Non-Technical Summary (NTS) and the Strategic Environmental Assessment Environmental Report (SEA ER) include the results of the Appropriate Assessment (AA) and Strategic Flood Risk Assessment (SFRA) processes as part of the assessment of the Variation in Section 8 of both documents. Furthermore, the integrated approach has ensured the incorporation of additional text recommended as part of the Variation process.</p> <p>The Variation supports the growth of Limerick City and region outlined in the National Planning Framework.</p>
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	<p>Limerick City may also be useful to refer to.</p> <ul style="list-style-type: none"> <li>- Habitat Mapping – it is noted that habitat mapping has been completed for the area in 2016. This will be important in minimising (or avoiding) disturbance to key environmental sensitivities, including protected species and designated habitats.</li>   <li>- Water Resources – it is noted the potential for significant effects on rivers within the Variation area due to the proposed construction of additional bridge structures which will be required to be considered in more detail as part of the project level EIA. Construction and environmental management plans (CEMPs) should be required, where appropriate, and the necessary measures to protect environmental sensitivities including water quality should be established, implemented and monitored.</li> </ul>	<p>Noted. This has been referred to in the Environmental Report. The evolving nature of the surveys will ensure that the design at project level will be informed by the most up to date information which will assist in avoiding or minimising disturbance to the ecological sensitive areas including protected species and designated habitats along the route. Cross reference with the Natura Impact Report (Environmental Report - Table 8.3 Pg. 123) outlines measures to be taken at project level (Natura Impact Report Pg. 71-74). These also include measures to avoid introduction of invasive species. Further habitat surveys and mapping will be undertaken as part of the project level assessments required as part of the EIA process.</p> <p>A Construction and Environmental Management Plan (CEMP) will be required to be produced as part of the planning application. The CEMP will set out the necessary measures to protect environmental sensitivities including measures to protect water quality and any monitoring of same.</p> <p>The Variation has included the Draft River Basin Management Plan for</p>
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<p>It should also be ensured that the Draft National River Basin Management Plan for Ireland (DHPLG) and associated programme of measures, is fully integrated as appropriate to protect and improve water quality status within the Variation area and providing the appropriate protection for groundwater dependant terrestrial ecosystems within the Variation area, such as the Askeaton Fen Complex (Special Area of Conservation).</p> <p>- Flooding - 'Areas of Further Assessment' have been identified by the OPW in the Shannon CFRAMS study within the Variation area. The recommendations of the flood risk management plans for the relevant Units of Management should be integrated as appropriate. A commitment to ensure that any additional zoning or development arising out of the implementation of the Variation, fully complies with the Flood Risk Management Guidelines (2009), should also be considered.</p>	<p>Ireland and the Shannon River Basin Management Plan and programme of measures as part of the SEA ER in Appendix A – both of which are similar in terms of implementation measures required at project stage. Once the Draft National Plan is finalised and measures finalised this will be included as part of the project level assessments. The NIR has determined that no significant effects are anticipated to the Askeaton Fen Complex due to the proposed corridor location and current design of adjacent section of proposed road which avoids cutting and will allow for unimpeded hydrological connectivity across the proposed route in areas where there is potential for groundwater impacts. Further assessments will be required at project stage including any potential effects on the Askeaton Fen Complex.</p> <p>All policies in the County Development Plan 2010 - 2016 (As Extended) comply with the Flood Risk Management Guidelines (2009). <i>Objective IN O39 Flood Risk Management and Development</i> of the County Development Plan is relevant and applied to all development. The proposed Variation complies with the Flood Risk Management Guidelines. An Strategic Flood Risk Assessment has been prepared to support the Variation. The SFRA concludes that the Foynes to Limerick scheme, passes the justification test (in accordance with the 'The Planning System and Flood Risk Management Guidelines for Planning Authorities'. Having regard to the strategic nature of the proposed route, the sequential approach involved in the route corridor selection process and the</p>
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	<p>- Inter-relationships between Environmental Topics - Consider including an additional 'interaction tick' between Biodiversity and Population – Human Health, given that an increase in population can lead to a need for further zoning / development of lands, related critical service infrastructure and roads etc. These can lead to impacts on greenfield lands ecological linkages, fragmentation of habitats/corridors, disturbance to species etc.</p> <p>- Assessment of Variation Provisions Table 8.3 – Summary of Likely Significant Adverse Effects and Mitigation Measures indicates the existing mitigation measures contained within the Limerick County Development Plan relevant to each Strategic Environmental Objective. There is merit in including this Table in the Variation document as a separate appendix, to highlight the context in which the variation will be implemented, from an environmental protection perspective. It would also highlight the level of integration between the assessment and Variation-making processes.</p> <p>There is also merit in reviewing the relevant mitigation measures associated with the Shannon Integrated Framework Plan (SIFP) in the context of minimising potential</p>	<p>findings of the flood risk assessment, any potential impact, can be managed and mitigated, without any unacceptable adverse flood impact elsewhere.</p> <p>Noted, consideration has been given to these issues in the preparation of the reports which were placed on consultation and public display. The inter-relationship table will be updated as suggested as part of the Environmental Impact Assessment Report as part of the planning process.</p> <p>The Variation is to the Plan, the mitigation measures outlined in Table 8.3 of the SEA ER are a cross reference between the existing policies and objectives already contained in the Plan and the Strategic Environmental Objectives which are relevant to all development occurring in the County. The SEA statement supports the Variation therefore an additional appendix is not deemed to be required in this instance.</p> <p>Consideration of the Shannon Integrated Framework Plan was undertaken as part of the Variation preparation process.</p>
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	<p>for adverse environmental effects between the SIFP and the Variation.</p> <ul style="list-style-type: none"> <li>- Relationship with other plans and programmes - In Chapter 4 of the Strategic Environmental Assessment Environmental Report, a possible additional plan to consider in a regional / local context might include the Wild Atlantic Way (Fáilte Ireland).</li> </ul> <p>It is worth noting that the Draft National Planning Framework includes an intention for regional transport strategies / metropolitan area spatial plans to be prepared. Where relevant to the Limerick City area, and when prepared, these should be integrated into the County Development Plan.</p> <ul style="list-style-type: none"> <li>- Mitigation Measures – in Section 8.4 – Strategic Environmental Assessment Recommended Mitigation, achievement of the proposed mitigation measures is contingent on compliance with the existing policies and objectives of the County Development Plan, as well as implementation of the recommendations from the Strategic Environmental Assessment Environmental Report, Appropriate Assessment and Flood Risk Assessment. The monitoring programme for the Strategic Environmental Assessment Environmental Report should be robust enough to assist in determining whether implementation of the required mitigation measures (and compliance with the County Development Plan environmental objectives and policies) is being</li> </ul>	<p>The Wild Atlantic Way runs west from Foynes towards Glin. It is expected that improvements in the road network will have positive effects on tourism assets including the Wild Atlantic Way.</p> <p>Limerick City Region will be the subject of a Metropolitan Plan, the area subject to this is yet to be determined, however, Limerick City &amp; County Council are currently working with the Regional Assembly to determine the extent of the Metropolitan Area.</p> <p>The monitoring programme is outlined in Table 9.1 and includes indicators as well as the method of implementation through 'source' much of the implementation will be contingent on the project level assessments required as part of the EIA, AA and Site specific flood risk assessment and monitoring of same at project level.</p>
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	<p>achieved over the lifetime of the Variation.</p> <ul style="list-style-type: none"> <li>- Monitoring – it is noted in Table 9.1 Proposed Monitoring Framework describes the indicators and sources of monitoring data for each environmental topic described. Consideration should be given to the following:                     <ul style="list-style-type: none"> <li>- The inclusion of monitoring frequencies.</li> <li>- Monitoring of both positive and negative effects, where they occur.</li> <li>- Inclusion of the on-going review of environmental targets and indicators in the monitoring programme. Responsibility for this role should be clearly defined.</li> </ul> </li> </ul> <p>The Monitoring Programme should be flexible to take account of specific environmental issues as they arise. The programme must be able to deal with the possibility of cumulative effects.</p> <p>While the monitoring programme, upon adoption of the Variation, should set out the actual departments responsible for collecting, collating and analysing the data, the Monitoring Programme should include information on how the monitoring proposed will allow unforeseen adverse effects to be identified and responded to as appropriate.</p>	<p>The monitoring programme is linked with review process of the Development Plan, both mid and final term and it is through this process that the implementation of policies and associated mitigation measures is reviewed. Following this process policies and monitoring and mitigation measures are updated. Further monitoring will be determined as part of the project level assessments and will include details of monitoring frequencies, cumulative effects and addressing unforeseen adverse effects and departments responsible as appropriate.</p>
	<b>Chief Executive’s Recommendation:</b>	No Change
	<b>Implications for SEA/AA</b>	N/A

	<b>Name/Group:</b> Transport Infrastructure Ireland	
<b>Ref.</b>	<b>Submission summary</b>	<b>Chief Executive’s Response</b>
3	No specific observations to make in relation to proposed Variation No. 6 to the extended	Noted



<p>It is acknowledged that the determination of the Environmental Report concludes that on the basis of the objective information provided in the Strategic Environmental Assessment and separate Natura Impact Report and Strategic Flood Risk Assessment and with the adoption of the mitigation measures, proposed through recommended additional wording to the proposed Variation, that either alone or in – combination will not have likely significant effects on the environment.</p> <p>The determination of the NIR concludes that subject to the full and proper implementation of the policies and objectives contained in the County Development Plan and the mitigation measures details in Section 6 of the NIR, there will be no adverse effects on the integrity of any Natura 2000 site as a result of the adoption of the proposed variation or in combination with other plans or projects and that no reasonable scientific doubt remains in this regard.</p> <p>It is acknowledged that the determination of the Strategic Flood Risk Assessment which concludes that the Foynes to Limerick road improvement scheme, passes the justification test (in accordance with the <i>‘The Planning System and Flood Risk Management Guidelines for Planning Authorities’</i>). Having regard to the strategic nature of the proposed route, the sequential approach involved in the route corridor selection process and the findings of the flood risk assessment, the any potential impact, can be managed and mitigated, without any unacceptable adverse flood impact elsewhere.</p>	<p>Noted</p> <p>Noted</p> <p>Noted, all policies set out in the County Development Plan must comply with the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009). <i>Objective INO39 Flood Risk Management and Development</i>, set out in the County Development Plan 2010 - 2016 (As Extended) applies. In addition to this see Response to Submission No. 2 above on Flooding</p>
<p><b>Chief Executive’s Recommendation:</b></p>	<p>No Change</p>
<p><b>Implications for SEA/AA</b></p>	<p>N/A</p>

	Name/Group:	Shannon Foynes Port Company
Ref.	Submission summary	Chief Executive's Response
6	<p>1. Shannon Foynes Port Company wholeheartedly support the proposed variation. However, contend that the description of the road scheme should be reworded as per the description provided by Transport Infrastructure Ireland, as follows:</p> <p><i>"To provide a high quality road to connect the Port of Foynes (designated as a Core Port on the Trans-European Network) with the M20 at Limerick. The scheme will provide a bypass of Adare in addition to a link to the Shannon-Foynes Port from the new N21".</i></p> <p>The rewording of Objective IN O24 is necessary to reflect the priority that the proposed road, as a whole, should assume. Furthermore, the European TEN-T regulations underpinning Shannon Foynes Port status as an EU TEN-T core network port, includes an explicit requirement that the road network must comprise either motorway or 'express' standard roads. Such connectivity must be in place by 2030 if Shannon Foynes is to retain its TEN-T status. Realisation of the Limerick - Foynes Improvement Scheme is critically important to the existing and future growth of the Shannon Foynes Port Company.</p> <p>2. Delivery of the road scheme must be a priority, the reference to 'resources becoming available' should be removed, as the costs of non-delivery are just too great. Failure to deliver the road would hinder to planned</p>	<p>Limerick's County Development Plan 2010 - 2016 (As Extended) recognises the importance of the developing a high quality road network in County Limerick and supports the development of a number of routes in Policy IN O24. However, it references the construction of a bypass to the south of Adare. The Adare bypass has been the subject of different iterations in the past. It is now indicated as running to the north of the village associated with the Foynes to Limerick route corridor. In light of these changes and the association of the bypass with previous schemes, it is considered prudent to emphasise the separate nature of the bypass as the need for the bypass of Adare has long pre-dated the Foynes to Limerick scheme.</p> <p>Limerick City and County Council are committed to the delivery of the proposed route, however the delivery of the route is subject to resources being available. Furthermore the</p>

	<p>growth of port, the Ten T regulations have an explicit requirement for the road network serving it to be either motorway or 'express' standard road, there is also economic and tourism benefits for the region, if the Foynes to Limerick route is provided. Accordingly the delivery of the scheme must be prioritised in the County Development Plan.</p>	<p>National Planning Framework identifies enhanced road connectivity to Shannon Foynes Port including local by-passes as a key future growth enabler for Limerick.</p>
	<b>Chief Executive's Recommendation:</b>	No Change
	<b>Implications for SEA/AA</b>	N/A

	<b>Name/Group:</b> Aeneas O'Connor, Croagh, Co. Limerick	
<b>Ref.</b>	<b>Submission summary</b>	<b>Chief Executive's Response</b>
7	<p>Wishes to raise a number of concerns with the proposed Variation:</p> <ol style="list-style-type: none"> <li>1) The proposed route will make his farm and livelihood unviable (as farming full-time).</li> <li>2) The route will traverse a site, which had a valid planning permission and has since lapsed, proposed route, will impact on the ability to develop this site and an adjoining family site.</li> <li>3) Family homes currently adjacent to each other, will be separated by the proposed route.</li> <li>4) Concerns raised as to why other submissions have been taken into account, with the result of altering the proposed route, while some have not got a reply to their concerns.</li> </ol>	<p>The selected corridor has been identified as the one which on balance causes the least disruption to properties and agricultural activity as well as having the least environmental impact overall.</p> <p>See Response to No. 7 (1) above</p> <p>See Response to No. 7 (1) above</p> <p>See Response to No. 7 (1) above</p>
	<b>Chief Executive's Recommendation:</b>	No Change
	<b>Implications for SEA/AA</b>	N/A

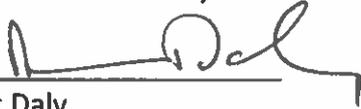
	<b>Name/Group:</b> Paul and Eileen Madden, Rathkeale, Co. Limerick	
<b>Ref.</b>	<b>Submission summary</b>	<b>Chief Executive's Response</b>
8	<ol style="list-style-type: none"> <li>1. The proposed route will impact on farm land, both owned and rented by the above, the loss is estimated at approximately 12 acres and will result in an existing herd of dairy cows being reduced, with serious effects on the viability of the farm.</li> <li>2. Furthermore, it is indicated that the proposed route will impact on some of the best agricultural lands in County Limerick.</li> <li>3. The route was altered to suit other landowners, where the effects would be insignificant</li> <li>4. An alternative route exists through poor marginal lands</li> </ol>	<p>See Response to No. 7 (1) above</p>
	<b>Chief Executive's Recommendation:</b>	No Change
	<b>Implications for SEA/AA</b>	N/A

	<b>Name/Group:</b> Joan Kennedy, Croagh, Co. Limerick	
<b>Ref.</b>	<b>Submission summary</b>	<b>Chief Executive's Response</b>
9	<ol style="list-style-type: none"> <li>1. The route has deviated off the original orange corridor initially laid out to an unacceptable degree.</li> <li>2. The proposed route places an undue burden on the landowner, who has been subject to previous Compulsory Purchase Orders in respect of road widening.</li> <li>3. The proposed route will destroy this landholding and affect the viability of the farm and render it unworkable.</li> </ol>	<p>See Response to No. 7 (1) above</p> <p>See Response to No. 7 (1) above</p> <p>See Response to No. 7 (1) above</p>

	<b>Chief Executive's Recommendation:</b>	No Change
	<b>Implications for SEA/AA</b>	N/A

**Chief Executive's Recommendation (As delegated under Chief Executive Order HR17/39)**

In accordance with Section 13 of the Planning and Development Act 2000 (Amended), it is recommended that proposed Variation No. 6 is made in accordance with the details published on the 06<sup>th</sup> January 2018.



Pat Daly,  
Director of Economic Development



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