



Comhairle Cathrach  
& Contae Luimnigh

Limerick City  
& County Council

Forbairt Gheilleagrach,  
Ceanncheathrú Chorpáraídeach,  
Cé na gCeannaithe,  
Luimneach

Economic Development,  
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10<sup>th</sup> August 2018.

To Each Member of the Metropolitan District of Limerick.

Re: Proposed Castletroy Local Area Plan 2019 – 2025

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A Chomhairleoir, a chara,

I enclose herewith a copy of the Chief Executive's Report on the Proposed Castletroy Local Area Plan for your consideration.

The Proposed Local Area Plan was placed on public Display from Saturday 19<sup>th</sup> May 2018 to Monday 2<sup>nd</sup> July 2018 inclusive. During the statutory display period for the Proposed Local Area Plan a public information meeting was held on 30<sup>th</sup> May 2018. A total of 55 submissions were received within the statutory timeframe. A report consisting of a summary of the submissions received together with the Chief Executives recommendations are attached as required by Section 20 of the Planning and Development Act (Amended). The submissions can be inspected in the Forward Planning Section of Limerick City & County Council during normal office hours and copies of the original submissions will be available for inspection at the September meeting of the Metropolitan District of Limerick.

The Members of the Metropolitan District of Limerick at their September meeting shall consider the Chief Executives Report and decide whether to make or amend the Proposed Castletroy Local Area Plan. If the Council decide to amend the Local Area Plan, any material alterations 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,

Dr. Pat Daly,  
Director of Services,  
Economic Development and Planning.

# Proposed Castletroy Local Area Plan 2019 – 2025

Section 20(3) (c) Chief Executive's Report  
To Members



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

10<sup>th</sup> August 2018



## 1.0 Introduction

This report presents the submissions made following publication of the Draft Castletroy Local Area Plan (LAP) 2019-2025. It sets out the Chief Executive's responses to the issues raised and any amendments to the proposed LAP. The report is part of the statutory procedure for preparing a new Local Area Plan (LAP) as set out in Section 20 of the Planning and Development Act, 2000 (Amended).

The Draft Local Area Plan was placed on public display from Saturday 19<sup>th</sup> of May 2018 to Monday 2<sup>nd</sup> July 2018 inclusive. A total of 55 no. written submissions were received within the statutory timeframe.

### 1.1 Structure of this report

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

Part B outlines the proposed amendments recommended to the text of the proposed LAP in response to the Chief Executive's recommendations on the submissions received. Any paragraph, policy or objective to be amended in the proposed LAP is reproduced in full with deleted text shown ~~struck through~~ and additional text shown underlined.

Part C is the Strategic Environmental Assessment Environmental Report and full Appropriate Assessment of the amendments recommended to be included in the proposed Local Area Plan.

### 1.2 Progress to date and next steps

The steps in the process of preparation of the Plan for Castletroy are shown in the following table.

Date	Stage
1 <sup>st</sup> September 2017	Formal notification of intention to prepare LAP and commence preparation of proposed LAP
30 <sup>th</sup> September – 6 <sup>th</sup> November 2017	First issues stage: Pre-draft submissions were invited
4 <sup>th</sup> of October 2017	Public Information Evening
19 <sup>th</sup> May 2018 – 2 <sup>nd</sup> July 2018	Draft Plan on public display: Public submissions invited during statutory period
30 <sup>th</sup> May 2018	Public information evening on Draft LAP
<b>The remaining stages of the Plan are as follows:</b>	
17 <sup>th</sup> September 2018	Metropolitan District of Limerick Meeting, Members of the area shall consider this report and to make, revoke or amend the Plan.

October 2018	Material Alterations on display for a further 4 weeks. Public submissions can only be made on the proposed alterations
October 2018	Chief Executive's Report on alterations to be prepared
February 2019	Final adoption of Plan
March 2019	Plan comes into force 4 weeks from the time of adoption

Following receipt of the Chief Executive's Report, the Members of the Metropolitan District of Limerick have up to 6 weeks in which to consider the contents of this report and the proposed LAP. Members may then accept the proposed LAP and adopt it. Should amendments be proposed which, would constitute material alterations to the proposed LAP, 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 received on the proposed amendments.

Members may then decide to make the LAP with or without the proposed amendments or with modifications to the proposed amendments, subject to the provisions of the Planning and Development Act, 2000 (Amended). The formal making of the LAP is by resolution of the Metropolitan District. During the LAP 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

Submission no	Submission received from
1	Department of Housing, Planning and Local Government
2	Environmental Protection Agency
3	Transport Infrastructure Ireland
4	Irish Water
5	Colin Fitzpatrick
6	Brid-Ann O'Callaghan
7	Brian O' Doherty
8	Katriona Murphy
9	Michal Wadowski
10	Patrick McMahan
11	Tom & Breda Doheny
12	Jack Cunningham
13	David Fitzgerald
14	Aoife O' Dwyer
15	Dave Kelly
16	Senator Maria Byrne
17	Eamon Baker
18	Bruce Harper
19	Fiona Golden O' Mahony
20	Jennifer Brett
21	Saurabh Shrihar
22	Yvonne Kiely - Curragh Birin Residents Association
23	Julie Golden
24	Miriam Rainsford
25	Ciara Jo Hanlon
26	Conor Walsh
27	Diarmuid Murphy

28	Shane O' Connor – HRA Planning on behalf of A & G Thomond Limited
29	Name Not Given
30	Walter Corley
31	Elena Secas MCC and Deputy Jan O'Sullivan
32	Dr. Joe Lynch and Dr. Geraldine Mooney Simmie
33	Robert Keran - Virtus on behalf of UGP Castletroy SC Ltd.
34	Anthony P.M Stack – Bru na Grudan Residents Association
35	Simon Clear & Associates on behalf of Bloomfield Homes Ltd.
36	Richard Feeney on behalf of Castletroy College and Scoil Chaladh Treoigh
37	Brian McNamara
38	Siún McCarthy - Fehily Timoney & Company on behalf of Zinc Properties
39	David E. Fitzgerald
40	Eva Coombes
41	Richard Feeney
42	Gary Rowan – HRA Planning on behalf of OCM EMRM DEBTCO DAC
43	Simon Bradshaw GVA on behalf of Tesco Ireland
44	Maurice Walsh – Limerick Youth Services
45	Siún McCarthy - Fehily Timoney & Company on behalf of Zinc Properties
46	Helen Madden
47	Siún McCarthy - Fehily Timoney & Company on behalf of Shannon Commercial Properties
48	William O' Connor
49	Luke Curley
50	Sheila Deegan, Culture and Arts Officer, Limerick City and County Council
51	Gary Rowan - HRA Planning on behalf of Tom O' Connor
52	Eamon Hutton - Fehily Timoney & Company on behalf of IDA Ireland
53	John Redington
54	Diane Mc Donagh - Town and Country Resource Ltd on behalf of Kirkland Investments Ltd

55	Niall O'Shea
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**Part A**

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

1	<b>Name/Group:</b>	Department of Housing, Planning and Local Government
	<b>Submission:</b>	<b>Response</b>
	<p>The Department accepts the strategic importance of the Castletroy area in providing residential lands for population growth within the Limerick area. A number of comments are made in relation to the quantum of land zoned for residential development within the draft plan and the impact that may have on the objective of consolidating the urban core of Limerick City.</p> <p><u>Alignment with LAP and higher level plans and strategies</u></p> <p>(a) The Plan has made assumptions in relation to the percentage split of the NPF target figures without the Regional Spatial and Economic Strategy(RSES) and the Metropolitan Area Strategic Plan (MASP) being completed for the Limerick area and the assumptions would appear premature in light of the preparation of the MASP. National policy calls for the preparation of a Housing Need Demand Assessment in order to align future housing requirements. Taking account of the above, the Department is unclear on the basis of the figures provided in Table 4 and clarification is sought of same in the metropolitan and regional context.</p>	<p>(a) The Planning Authority acknowledges the comments of the Department of Housing, Planning and Local Government. It was necessary to make assumptions in terms of population projections in the absence of a draft RSES, the MASP and Circular FPS04/2018 dated 3<sup>rd</sup> of July. The Castletroy Local Area Plan was extended until June 2019 and in accordance with the Planning and Development Act 2000 (Amended) the statutory process for review of the plan had to commence. It is intended that the Castletroy plan will form part of the new Limerick City and Environs Area, which will form part of the Limerick Development Plan, which will commence as part of the Development Plan preparation process early next year. Therefore, within two years, it is expected that this LAP will be revoked. Table 4 of the draft LAP and the population projections will be revised to take account of the detail outlined in the Departments submission.</p> <p>The Housing Need Demand Assessment will be carried out as part of the Development Plan process</p>

<p><u>Headroom &amp; Vacancy</u></p> <p>(b) Based on the assumptions of 22% of the target population for Limerick City &amp; Environs as set out in the NPF being accommodated in Castletroy the submission sets out that this equates to 74% of the total target population over the next 24 years. The headroom factor of 150% is noted and the vacancy rate of 359 dwellings as per the 2016 census. The omission of the number of vacant units from the targets is noted and it is considered that the 150% headroom factor is excessive and as per the guidelines for Development plans which states that headroom provision of 50% should be applied.</p> <p><u>Phasing of Lands</u></p> <p>(c) It is outlined that there is no phasing of land identified in the draft plan and no differentiation between currently serviced lands to that which requires servicing. The submission notes that significant new road construction works proposed, junction improvements, bus lanes and cycle lanes but notes the Council have not provided any cost estimates or timelines for the development of the proposed infrastructure services.</p> <p>The proposal by the NTA to prepare a Transport Strategy for Limerick City &amp; Environs is welcomed however; the</p>	<p>through the Core Strategy in line with the requirements of the National Planning Framework.</p> <p>(b) The 150% headroom factor was taken from the existing Mid - West Regional Planning Guidelines. Circular FPS04/2018 dated the 3<sup>rd</sup> of July in relation to the NPF implementation and in particular the projections relating to populations are now available and have now been considered. Accordingly, the submission from the Department states 50% headroom should be applied and the revised figures take account of the most recent Geo directory figures for vacancy, which is 59 units and have been included.</p> <p>(c) As part of the preparation of the draft plan, an assessment of all residentially zoned land, in terms of services and serviceability was carried out to identify the development potential of lands in line with the requirements of the NPF. A summary matrix has been prepared; it is recommended that this matrix be included in the Plan. It is recommended that Objective H2: Residential density, design and mix is amended to include phasing of land to take into account the NPF requirements, Circular FPS04/2018 and the serviced land assessment. There is an excess of 23 hectares of residential lands zoned in the plan. It is considered that the lands are needed to meet the housing demand</p>
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<p>submission contends that the extent of residential zoning proposed within Castletroy will not assist in the prioritisation and sequencing of development and infrastructure provision in line with the principles of compact growth.</p> <p><u>Serviced Land</u></p> <p>(d) The submission references the NPO 72a, 72b and 72c of the NPF and calls for planning authorities to apply a standardised, tiered approach in identifying zoned land that is serviced and serviceable, considering and making reasonable estimates of the costs of delivery of required infrastructure. In addition lands that cannot be serviced within the lifetime of the LAP or a reasonable time thereafter should not be zoned for development purposes.</p> <p><u>Compact Growth Model and Delivering Development on Brownfield/Infill Lands</u></p> <p>(e) Submission contends that the over-zoning of residential lands within the suburbs may detract from the development of brownfield/infill sites within the City and erode the possibility of compact growth. The submission suggests that a</p>	<p>in the area, having particular regard to the following unique circumstances that exist in Castletroy, including:</p> <ul style="list-style-type: none"> <li>• Very high percentage of the population are under 40 years (71% according to Census 2016)</li> <li>• Historical growth patterns in the area as identified in Chapter 2 of the Plan.</li> <li>• The necessity for the development of some of this residentially zoned land to facilitate the key infrastructural projects including road, cycle ways and walkways and community facilities.</li> </ul> <p>(d) A full assessment of the residentially zoned lands was carried out, as identified above, in preparation of the draft plan, which examined the nature of the services available at all of the residential development area lands. A summary matrix has been prepared and is presented with an associated map, which shall be included in the Appendix 4 of the Plan.</p> <p>(e) The above referenced matrix identifies lands, which are serviced and lands that are serviceable within the lifetime of the plan. Furthermore, it identifies a phasing programme and highlights lands that currently at various stages of the planning</p>
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	<p>prioritization of lands that, are currently serviced and will realistically deliver housing over the 6-year plan period.</p> <p>The submission requires that the plan:</p> <ul style="list-style-type: none"> <li>- Include phasing of residentially zoned lands on serviceability;</li> <li>- Identify lands that are serviced and lands that are serviceable during the 6 years lifetime of the Draft Plan;</li> <li>- Include estimate cost and timeline for proposed infrastructure;</li> <li>- Provide clarity of the analysis offered in Table 4 of the Draft Plan;</li> <li>- Incorporate the reuse of vacant dwellings into the residential and requirements.</li> </ul> <p><u>Miscellaneous</u></p> <p>(f) The submission concludes with a recommendation to include reference to the Metropolitan Area Strategic Plan (MASP) within the hierarchy and include a section on the forthcoming MASP as well as referencing the Ireland 2040 funding stream. Section 1.5.1. Removal of reference to “gateway” is also recommended in Section 2.1.1, 3.2 and 4.1</p>	<p>process.</p> <ul style="list-style-type: none"> <li>• Phasing of land has now been included in the Plan</li> <li>• Serviced lands assessment has been complied for all residentially zoned lands in the plan area. Summary matrix sets out the rational for the phasing.</li> <li>• Estimated costs and timeline have been provided for proposed infrastructure in the assessment of serviced lands – Matrix attached</li> <li>• Table 4 has been amended and clarified</li> <li>• Vacancy rates in line with the latest data from the Geo directory have been included in the revised figures</li> </ul> <p>(f) Reference will be made in the LAP hierarchy to the Metropolitan Area Strategic Plan along with a section on MASP and the funding stream will be referenced. Section 2.1.1 refers to the adopted County Development Plan, which is a statutory document, which cannot be amended through the Local Area Plan preparation process. All references to the “Gateway” will be removed.</p>
	<p><b>Chief Executive’s Recommendations:</b></p>	
	<ul style="list-style-type: none"> <li>- Amend Table 2 in Chapter 2 Section 2.4.1 and associated text as follows:</li> </ul> <p>The total population residing in the Castletroy plan area in 2006 was <del>10,601</del> <b>12,440</b>, which made up 8.06% of the total population of County Limerick. It is clear that there has been a significant population increase in Castletroy <del>(39%)</del> <b>42%</b> <del>since the population of 10,601 recorded in the 2006 census</del> <b>between 2002 and 2016.</b></p>	

**Table 2: Population of the area covered by the Castletroy Local Area Plan**

Year	Castletroy Population	Population Increase	% Increase
1981	3,727*	-	-
1996	7,000*	3,273	87.8
2002	<del>8,979</del> <u>10,321</u>	<del>1,979</del> <u>3,321</u>	<del>28.3</del> <u>47.4</u>
2006	<del>10,601</del> <u>12,440</u>	<del>1,622</del> <u>2,119</u>	<del>18.1</del> <u>20.5</u>
2011	13,841	<del>3,240</del> <u>1,401</u>	<del>30.6</del> <u>11.3</u>
2016	14,733	892	6.4

Source: CSO Census

\*Did not include the town of Annacotty which is part of the plan boundary

- Amend Table 4 in Chapter 3 Section 3.7.1 and associated text as follows:  
106 hectares are zoned for residential use in the existing Castletroy Local Area Plan, the draft plan proposes ~~80.03~~ 69 hectares for residential use.

**Table 4: Allocation to 2040 for Limerick City & Environs Breakdown**

	2016 Population	NPF Population Growth (56,000)	% split for additional population
Former City Council boundary	58,259	28,000	50%
Clare (undeveloped zoned lands 5 hectares)	4,521	560	1%
Southern Environs	19,065	15,120	27%
Castletroy	<del>12,347*</del> <u>14,733</u>	12,320	22%
<b>Total</b>	<del>94,192</del>	<del>56,000</del>	<del>100</del>

~~\*Castletroy population does not include the town of Annacotty however Annacotty is part of the plan area.~~

~~While Mungret and Annacotty were excluded from the 2016 population areas it is considered reasonable that going forward the additional 56,000 population includes both of these.~~

Based on the above it is assumed that 22% of the NPF population growth will be allocated to Castletroy. This equates to the following:

- ~~-12,320 population over the next 24 years resulting in:~~
- ~~-513 additional people in Castletroy per annum~~
- ~~-205 houses per annum (on the basis of a household size of 2.5)~~

~~1/3 of these households will be provided on lands where a density of 50 hectares applies within a 500m public transport corridor and 2/3 of these households will be provided on lands where a density of 35 units per hectare applies (see zoning map). Based on the above the residential zoned land requirements are calculated as follows:~~

- ~~68 houses per annum will be provided on lands where a density of 50 unit per hectare applies~~
- ~~1.4 hectares will be required annually (density of 50 units per hectare)~~
- ~~8.4 hectares residential lands required over the lifetime of the plan.~~
- ~~Add 150% headroom as set out in chapter 5 of the Regional Planning Guidelines in 2010 = 21 hectares residential lands required where a density of 50 units will apply~~
- ~~137 houses per annum will be provide on lands where a density of 35 units per hectare applies~~
- ~~4 hectares will be required annually (density of 35 units per hectare)~~
- ~~24 hectares residential lands required over the lifetime of the plan~~
- ~~Add 150% headroom as set out in chapter 5 of the Regional Planning Guidelines in 2010 = 60 hectares residential lands required where a density of 35 units will apply~~

**Total amount of land required for residential development 60+21=81 hectares of land.**

12,320 population over the next 24 years resulting in:

- 513 additional people in Castletroy per annum
- 3,080 additional people in Castletroy over the plan period (6 years)
- 1,232 houses required (on the basis of a household size of 2.5)
- 30.8 hectares residential lands required over the lifetime of the plan (based on 40 units per hectare)
- Add headroom of 50% as set out in the National Planning Framework Implementation Road Map 2018 = 46 hectares

**Total amount of land required for residential development 46 hectares of land.**

- Delete existing Table 5 and associated text in Section 3.7.2 and replace with proposed amended Table 5 in Chapter 3 and associated text in Section 3.7.2 as follows:

**Table 5: ~~Lands zoned for residential development (includes lands zoned Mixed Use and Enterprise & Employment as per Site Development Briefs), number of units and population equivalent 2019-2025~~**

	Area	Number of units	Population equivalent
<del>Total land zoned for residential use where a density of 35 units per</del>	27.75	1,388	3,470

<del>hectare applies.</del>			
<del>Residential portion of Site Development Briefs site 1 zoned for Enterprise &amp; Employment Purposes (35 units per hectare)</del>	<del>52.32</del>	<del>1,831</del>	<del>4,578</del>
<del>Residential portion of Site Development Briefs site 1 zoned for Enterprise &amp; Employment Purposes (50 units per hectare)</del>	<del>.75</del>	<del>37</del>	<del>93</del>
<del>Residential portion of Site Development Brief Site 2 zoned for Mixed Use purposes (35 units per hectare)</del>	<del>10</del>	<del>350</del>	<del>875</del>
<del>Total Residential lands and Site Specific Design Briefs</del>	<del>90.82</del>	<del>3,606</del>	<del>9,196</del>

**3.7.2 Land currently available for Housing Development**

There is a total requirement for 81 hectares of lands needed for residential use over the plan period. The plan proposes to designate 80 hectares of residentially zoned lands and a further 10.75 hectares of land for residential use from a Mixed use site and an Enterprise and Employment zoned site. This could accommodate a population of up to circa 9,200 additional people where a density of 50 units per hectares is applied within the 500m public transport corridor and where a density of 35 units per hectares applied on the remaining lands.

**Table 5: Lands zoned for residential development (includes lands zoned Mixed Use and Enterprise & Employment as per Site Development Briefs), number of units and population equivalent 2019-2025**

	<u>Area</u>	<u>Number of units</u>	<u>Population equivalent</u>
<u>Total land zoned for Phase 1 (Density of 35 units per hectare applies.</u>	<u>58.8</u>	<u>2,058</u>	<u>5,145</u>
<u>Total land zoned for Phase 2 (Density of 35 units per hectare applies.</u>	<u>23.3</u>	<u>816</u>	<u>2,038</u>
<u>Residential portion of Site Development Briefs site 3 zoned for Enterprise &amp; Employment Purposes</u>	<u>.75</u>	<u>26</u>	<u>65</u>

<u>(35 units per hectare)</u>			
<u>Residential portion of Site Development Brief Site 2 zoned for Mixed Use purposes (35 units per hectare)</u>	<u>10</u>	<u>350</u>	<u>875</u>
<u>Vacant units in Castletroy as per the Geo Directory</u>		<u>59</u>	<u>147</u>
<u>Total Residential lands and Site Specific Design Briefs</u>	<u>92.85</u>	<u>3,309</u>	<u>8,270</u>

Phasing of sites in line with the requirements of the National Planning Framework in terms of serviceability of sites.

**3.7.2 Land currently available for Housing Development**

There is a total requirement for 46 hectares of lands needed for residential use over the plan period. The plan proposes to introduce a phasing programme, which will be supported by an Objective in Chapter 4 Housing, whereby 50% of the lands in Phase 1 must be developed before development can proceed on lands identified in Phase 2. It is proposed to designate 58.8 hectares of lands for Phase 1 residential use. This is 12.8 hectares in excess of the 46 hectares required in line with the population projections set out in the NPF for the Limerick City and Environs area.

A detailed serviced lands assessment matrix was compiled as part of the plan preparation process in line with the requirements of the NPF to establish the suitability of the land for development within the plan boundary. As a result of this and having regard to the very young age profile of the area, whereby 71% of the population are under the age of 40 years, the historical growth patterns in the area over successive plans, the demand for housing in the area and the support of housing in certain locations will provide for the delivery of essential road infrastructure projects and community facilities. A further 10.75 hectares of lands are available for residential use from a Mixed Use site and an Enterprise and Employment zoned site. The development of residential lands zoned Phase 1 could potential accommodate 6,085 additional people, using a residential density of 35 units per hectares. The number of vacant units in the areas as identified in the latest Geo directory data is 59 units. This has been included in the population projection figures, which is an additional 147 people.

Update Figure 2 in Chapter 1 Section 1.5 to include Metropolitan Area Strategic Plan

**Figure 2: Development Plan – links with other plans**



Insert the following text into Section 1.5.1.1

The Government announced the establishment of a new Urban Regeneration and Development Fund (URDF), as a result of the NPF and Project Ireland 2040. Its function primarily is to support the compact growth and sustainable development of Ireland's five cities and other large urban centres. The DHPLG has responsibility for implementing the URDF, which has an allocation of €2 billion in the National Development Plan (NDP) to 2027. The fund will operate on a competitive bid – based Exchequer grant basis, it is hoped that the funding may deliver key infrastructural projects for Limerick City and Environs.

Insert the following text into Section 1.5.2.1

In addition to the RSES's providing a regional spatial and economic strategy for the region, the NPF also set out the requirement for Metropolitan Area Strategic Plans (MASP'S) to be prepared for the Dublin, Cork, Limerick, Galway and Waterford Metropolitan areas. It is anticipated that each Metropolitan Area Strategic Plan will set out a clear and concise strategy to:

- Identify the key change parameters for the city in question, i.e. population, employment, housing, retail, travel patterns and key renewal, development and amenity areas;
- Work out a sequence of infrastructure prioritisation, delivery and co-ordination;
- And deliver compact regeneration and growth.

- Amend Table 3 and text in Chapter 3 in Section 3.2 as follows:

The population targets as they apply to the Gateway area of County Limerick are outlined in Table 3 below.

**Table 3: Population Targets ~~for the Gateway~~**

Settlement Hierarchy				
Hierarchy position	Town	Pop 2006	2016 target	2022 target
Tier 1: <del>The Gateway</del> The City and City Environs	Southern Environs	16,000	31,851	35,601

Note \* did not include the settlement of Annacotty

- Amend Chapter 4, Section 4.1 Introduction as follows:

#### 4.1 Introduction

Based on the population and household projections in Chapter 3, ~~69~~ hectares of lands are zoned Phase 1 for residential use and can accommodate an additional population of circa ~~8,300~~ 6,085 people over the plan period to 2025. Chapter 3, Policy SSP1 Development of Gateways of the County Development Plan 2010-2016 (as extended) sets out that it is policy of the Council to recognise the role of the Limerick/Shannon ~~Gateway region~~ as a key driver of social and economic growth in the County and in the wider region and to promote the ~~Gateway City region~~ as the main growth centre.

Further, it is a policy of the County Development Plan to ensure that sufficient land is zoned within the city environs so that, as part of the Limerick ~~Gateway City Region~~, they will act as the primary focus for investment in infrastructure, housing, transport, employment, education, shopping, health facilities and community.

- Rename Objective H2 in Chapter 4, Section 4.2 and add additional point (h) to the Objective

**Objective H2: Residential density, design, mix and Phasing:**

**Add point (h) as follows**

(h) Ensure development of sites in Phase 2 can only proceed when at least 50% of all development in New Residential zoned Areas Phase 1 is completed

- Add in point (d) to Objective H3 in Chapter 4, Section 4.3

(d) In line with the requirements of the National Planning Framework, ensure that at least 40% of all new housing development are delivered within the existing built up areas of cities, towns and villages on infill and or brownfield sites.

- Amend Section 4.7, in Chapter 4 as follows:

~~According to the 2016 census there was 359 vacant dwelling units in the areas, which accounts for 6.35% of the total housing stock.~~ According to the most recent Geodirectory figures, there are currently 59 vacant dwellings in the area.

- Amend Objective BM02 in Chapter 10 point (b) as follows

A maximum of 65% of the mixed use zoned lands shall be developed for residential purposes, as per Table 5, no more than 10 hectares shall develop for residential purposes and this shall include any use such as nursing home, residential care facility etc. (Total Site Area 16.5 hectares)

- Include Serviced Lands Assessment Matrix and associated Map in Appendix 5

- Update Figure 22 in Chapter 11 Section 11.1 as follows:

**Figure 22: Total Zoned Lands**

Zoning	Area designated in 2018 LAP (ha)	Area designated in 2009 LAP (ha)	% change
Agriculture	<del>93.94</del> <u>56.29</u>	53.92	<del>+88.6</del> <u>-4.4</u>
Education and Community Facilities	<del>36.24</del> <u>40.37</u>	121.95	<del>-70</del> <u>-66.9</u>
Existing Residential	<del>261.17</del> <u>260.08</u>	320.86	<del>-22.8</del> <u>18.9</u>
Groody Valley	<del>96.55</del> <u>95.71</u>	84.76	<del>+13.9</del> <u>-12.9</u>
Enterprise & Employment	<del>142.43</del> <u>183.05</u>	194.12	<del>-26.6</del> <u>-5.7</u>
Industrial	55.76	70.16	-20.5
Open Space	<del>42.37</del> <u>42.68</u>	67.09	<del>-36.8</del> <u>-36.4</u>
Sports Grounds	61.92	New use category	
Residential Development Area Phase 1	<del>80.03</del> <u>58.8</u>	106.63	<del>-25</del> <u>-44.8</u>
<u>Residential Development Area Phase 2</u>	<u>23.3</u>	New use category	
Retail	24.38	45.02	-45.8
Special Control Area	<del>98</del> <u>0.65</u>	.84	<del>+16</del> <u>+17</u>
Utility	6.56	6.23	-5.3
University	86.10	New use category – previously Education and Community	

			Facilities	
	<b>Mixed Use</b>	<del>15.21</del> <u>12.98</u>	New use category	
	<b>SEA/AA Response</b>			
	<p>- Strategic Environmental Assessment Environmental Report will be fully revised to take account of the above changes and a Natura Impact Statement will be prepared in light of the submissions received and resulting changes to the plan, which will be contained in Section C of this report.</p>			

<b>2</b>	<b>Name/Group:</b>	Environmental Protection Agency		
	<b>Submission:</b>	<b>Response</b>		
	<p>The submission makes comment in relation to the Draft LAP and the Strategic Environmental Assessment Environmental Report (SEA ER). The report includes updated SEA guidance for the preparation and finalisation of the Draft Plan and the SEA ER.</p> <p>In relation to the Environmental Report it recommends an assessment of the environmental effects of implementing the plan and the potential for cumulative effects in combination with other relevant plans/programmes and projects which should be described.</p> <p>An assessment of alternatives is also required and how the selection of these lead to the preferred alternative. This should be assessed against the Strategic Environmental Objectives identified in the SEA ER.</p> <p>In relation to mitigation measures the submission requires that the plan clearly includes a commitment to implement the necessary proposed mitigation measures where potential for likely significant effects have been identified.</p> <p>The submission recommends that the Monitoring Programme is flexible to take account of the specific environmental</p>	<p>An assessment of all the environmental effects of the plan will be included in the Environmental Report.</p> <p>Further examination of the alternatives selected will also be included particularly now as responses have been received from statutory authorities which will inform the plan content.</p> <p>Mitigation measures will be further examined in the Environmental Report as these will change as the zoning of the plan changes.</p> <p>The Monitoring Programme is to be based on the mid-term plan review process but will use sources from other sections in the council,</p>		

<p>issues as they arise and should consider and deal with the possibility of cumulative effects. When the plan is adopted it is recommended that the monitoring programmes sets out the sources of data, including the departments responsible for collecting, collating and analysing the data.</p> <p>Future amendments to the Draft plan should be screened for their likely significant effects in accordance with the criteria sets out in Schedule 2A of the SEA Regulations.</p> <p>Following the adoption of the plan an SEA statement should be prepared and should summarise how Environmental considerations have been integrated into the plan;</p> <ul style="list-style-type: none"> <li>- How the environmental report, submissions, observations and consultations have been taken into account during the preparation of the plan;</li> <li>- The reason for choosing the plan adopted in light of other reasonable alternatives dealt with;</li> <li>- The measures decided upon to monitor the significant environmental effects of implementation of the plan.</li> </ul> <p>Submission concludes that a copy of the SEA statement with the above information should be sent to any environmental authority consulted during the SEA process.</p>	<p>such as Transportation and Environment to give a more complete picture of environmental effects.</p> <p>All amendments and changes will be screened. In this report an initial response is also included under the SEA/AA response which summarises environmental responses to each of the submissions.</p> <p>The Statement will be prepared and will be published in line with the requirements of the Planning and Development Act (Amended).</p> <p>The SEA statement will be forwarded to the Statutory authorities on adoption of the plan.</p>
<p><b>Chief Executive’s Recommendations:</b></p>	
	<ul style="list-style-type: none"> <li>- Updated the Environmental Report and prepare a Natura Impact Statement, in light of the submissions received.</li> </ul>
<p><b>SEA/AA Response</b></p>	
	<ul style="list-style-type: none"> <li>- Environmental Report will be updated and a Natura Impact Statement will be prepared in light of the submissions received and resulting changes to the plan,</li> </ul>

	which will be contained in Section C of this report.	
<b>3</b>	<b>Name/Group:</b>	Transport Infrastructure Ireland
	<b>Submission:</b>	<b>Response</b>
	<p>(a) Submission makes reference to the Trans-European Transport Networks TEN – T and identifies the N7 National Primary Route adjoining the LAP as part of the network. It further sets out the routes strategic national role and identifies that it is an important inter-urban transport corridor linking strategic centres including markets, airports, ports as well as other strategic national roads. The importance of maintaining its strategic function is supported in Project Ireland 2040 National Planning Framework, the National Development Plan, the Strategic Investment Framework for Land Transport, Smarter Travel and in the Spatial Planning and National Roads Guidelines for Planning Authorities. With regard to this the TII welcomes the inclusion of objective T8 to safeguard the capacity of the M7 and the requirement that all future development proposals in proximity to the M7 have regard to the Spatial Planning and National Roads Guidelines. Submission suggests that reference should be made to the TEN – T Regulations in Chapter 6 to emphasise the importance of the national road network.</p> <p>(b) TII acknowledged that the proposed land use zoning strategy is broadly consistent with the previously adopted plan in that no additional lands are zoned. Reference is made to the DoECLG Spatial Planning and National Roads Guidelines</p>	<p>(a) Noted and reference will be made to the Trans-European Transport Networks TENT_T in Chapter 6 of the LAP</p> <p>(b) Limerick City &amp; County Council will request any significant development within proximity to Junction 29 to carry out a full Traffic Impact Assessment including an assessment of any potential impact the development may have on Junction 29</p>

	<p>addressing development at national road junctions in this instance Junction 29. The guidelines require that planning authorities exercise care in the assessment of development/local area plan proposals relating to development objectives and or zonings which could generate significant additional traffic and that proposals can be catered for by the design assumptions underpinning such junctions and interchanges thereby avoiding potentially compromising the capacity and efficiency of the national road/associated junctions. The TII request that the Council has regard to the provision of official policy in determining a land use zoning and transport strategy for the Local Area Plan and in developing objective for Local Area Plan implementation to ensure that on-going safe and efficient operation of the national road network and its associated junctions.</p> <p>(c) The TII recommends that consideration should be given to preparing an appropriate evidence based Transport Assessment for the Draft Local Area Plan to demonstrate that proposal can be accommodated on the existing local/regional road networks and that additional trip demand can be accommodated without impacting on the national road and associated junction. It recommends that any amendments arising to the land use and/or zoning strategy should be incorporated into the LAP prior to adoption. Reference is made to Section 1.4 of guidance document</p>	<p>(Ballysimon Interchange).</p> <p>(c) Limerick City and County Council in partnership with The National Transport Authority is commencing the process of developing a new Limerick Transport Strategy (LTS). The purpose of this is to deliver an integrated Transport Strategy for the Limerick City and Environs and to promote and encourage sustainable transport. The LTS will set out a series of actions and measures, covering infrastructural, operational and policy elements to be implemented in Limerick over the next 20 years and will outline a framework to deliver the projects in a phased manner. This strategy will take account of current</p>
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	<p>Traffic and Transport Assessment Guidelines (2014) and ABTA guidance at TII publications PE-PDV-02046.</p> <p>(d) Submission refers to the Site Development Brief (SDB) 2 and requests that the brief sets out a requirement for a Traffic and Transport Assessment for the masterplan lands. Such a TTA should consider the cumulative impact of the development in the area, existing and planned on the strategic national road network. Attention is drawn in the submission to the provision of the DoECLG Local Area Plan Guidelines and the DoECLG Sustainable Residential Development in Urban Areas Guidelines, which supplement but do not replace statutory plans. The Sustainable Residential Development in Urban Areas Guidelines advise that if it is intended to use non – statutory document for development management, planning authorities should incorporate them in the development plan by way of a variation with public consultation. This is not evident in the Masterplan proposed in the Draft LAP with the potential to impact on the strategic national road network. Submission</p>	<p>and predicted population, the National Planning Framework – Ireland 2040, national transport policies, existing plans and strategies in the region, existing transport assets and opportunities. It will consider all transportation modes including walking, cycling, buses, coaches, Bus Rapid Transit Systems (BRTS), light rail, heavy rail, car sharing and private cars in developing a comprehensive transport strategy for the Limerick City and Environs.</p> <p>(d) Objective BM01 will be amended to include the requirement for a Traffic and Transport Assessment at planning application stage.</p>
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	<p>recommends that this is reviewed and welcomes consultation with the Local Authority on any subsequent masterplans prepared.</p> <p>(e) With respect to the Limerick Northern Distributor Road (LNDR), the Local Authority is advised to evaluate the consequence of the special requirement of the tolling scheme and the financial implications for the Exchequer of the Limerick Northern Distributor Road. Details of these impacts have been circulated to the Council and have been attached to the submissions. With regard to the above the submission advised that the Council need to consider any implications for the R445 Plassey Road to the M7 Junction 28 Road Improvement Scheme Options Evaluation Report which is supported and part funded by the TII.</p> <p>(f) The Submission recommends that consideration is given to including the requirements of Chapter 3 of the DoECLG Spatial Planning and National Roads Guidelines into the local area plan concerning specific objectives relation to Traffic and Transport Assessment and Road Safety Audit. The inclusion of Objective T5 in relation to signage adjacent to the M7 and N24 and Section 6.4 in relation to</p>	<p>(e) An assessment of the potential impacts of LNDR on both the local and wider transport network is currently being undertaken on behalf of Clare County Council and Limerick City and County Council for submission to the Department of Transport, Tourism and Sport (DTTaS). As part of the appraisal process, which is in line with the requirement of the DTTaS Common Appraisal Framework, consideration is being given to the potential impact on tolling operations on the Limerick Tunnel PPP Scheme. Engagement has taken place with DTTaS and TII in relation to traffic modelling and any potential financial impacts of providing the LNDR scheme. It is envisaged that further engagement will take place with DTTaS and TII when the Project Appraisal is completed.</p> <p>Consideration has been given to the R445 Plassey to M7 Junction 28 Road Improvement Scheme Options Evaluation Report in the preparation of the Project Appraisal.</p> <p>(f) Noted and reference will be made to Chapter 3 of the DoECLG Spatial Planning and National Roads Guidelines in Chapter 6: Transport of the Plan</p>
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	<p>Environmental Noise are noted. The submission requests that TII Traffic &amp; Transport Assessment Guidelines are referenced in the Draft LAP relating to development proposals with implications for the national road network. It is noted that thresholds advised in the TII Traffic &amp; Transport Assessment Guidelines (2014), including sub-threshold TTA requirements, relate specifically to development proposals affecting national roads.</p>	
	<b>Chief Executive's Recommendations:</b>	
	<p>(a) Insert new policy into Chapter 6 – Strategic Policy for Transport as follows:  <u>Policy T2: It is a policy of the Council to support the Trans - European Transport Networks (TENT-T) programme to ensure cohesion, interconnection and interoperability of the European wide transport network.</u></p> <p>(b) No change</p> <p>(c) No change</p> <p>(d) Amend Objective BM01 in Chapter 10 to include additional point (f)  <u>(f) All developments are subject to a Traffic and Transport Assessment and Road Safety Audit in accordance with Chapter 3 of the DoECLG Spatial Planning and National Roads Guidelines at planning application stage.</u></p> <p>(e) No change</p> <p>(f) Amend the text in Section 6.1 to include the following:  <u>Any development in this area shall consider the requirements of Chapter 3 of the DoECLG for Spatial Planning and National Roads Guidelines.</u></p>	
	<b>SEA/AA Response</b>	N/A

<b>4</b>	<b>Name/Group:</b>	Irish Water
	<b>Submission:</b>	<b>Response</b>
	<p>Irish Water welcome the opportunity to review the Castletroy LAP and the submission comments as follows:</p> <p><b>Wastewater</b></p> <p>(a) The submission envisages that there is adequate treatment capacity to accommodate the proposed population allocation of 3,078 people over the Draft LAP period. The current capacity</p>	(a) Noted

	<p>of the Castletroy WWTP is 45,000-population equivalent and the load to the plant in 2017 was identified as 36,486-population equivalent. Currently an upgrade to the plant is being progressed and this will increase capacity to 80,000-population equivalent. This project is at design stage and has an anticipated completion date of 2024. IW are not aware of any bottlenecks in the wastewater network and it remains the case for the zonings proposed under the LAP. Connection applications will identify any need for local network reinforcement.</p> <p>IW are aware of excessive infiltration of the network especially when the River Shannon is high. The Limerick and Castletroy DAP is to commence in 2018 and this will increase the understanding of the network.</p> <p><b>Water Supply</b></p> <p>(b) The Castletroy area is serviced by the Clareville Water Treatment Plant and the submission envisages that there is adequate treatment capacity and water capacity to accommodate the proposed population allocation of 3,078 people over the Draft LAP period. In terms of strategic water network, there are no known bottlenecks that would prevent further growth. Connection applications will identify any need for local network reinforcement.</p>	<p>(b) Noted. The text of the Plan will be amended under Section 7.3 Foul Sewerage and section 3.0 and 3.4.1 of the Strategic Environmental Report; In addition, the Environmental Report will also be updated to reflect this submission.</p>
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	<p>The submission recommends that the text of the Draft Plan is edited as follows:</p> <p>Section 7.3 Foul Sewerage  The provision of adequate water supply and wastewater treatment utilities is crucial to the continued expansion of Castletroy. The Castletroy Wastewater Treatment Plant has treatment facilities to cater for a population equivalent of 45,000. This is adequate to cater for the existing load and <del>committed</del> <u>current</u> industrial discharges from industry and is not discharging at the maximum load permitted by existing licenses at present.</p> <p style="padding-left: 40px;">Section 3.0 and 3.4.1 Wastewater Treatment SEA  Future development potential of the area will have implications for the capacity of wastewater treatment systems. An initial response from Irish Water indicates that there is sufficient capacity. This will continue to be reviewed throughout the plan preparation process as the zoning template of the plan alters. There is sufficient capacity to allow for significant development, both residential and commercial. It will avoid downstream pollution effects, as there is sufficient capacity to deal with the development of land zoned for the lifetime of this plan. This <del>removes</del> <u>reduces</u> the possibility of inadequate treatment of discharges from the plant.</p> <p>Submission concludes that IW have a suite of policies and objectives that it would suggest for inclusion in the County Development Plan in relation to protecting Irish Water assets and the environment for the benefit of current and future population served by public water services networks.</p>	
	<p><b>Chief Executive’s Recommendations:</b></p>	

	<p>(a) No Change</p> <p>(b) Amend text under Section 7.3 Foul Sewerage as follows:</p> <p>The Castletroy Wastewater Treatment Plant has treatment facilities to cater for a population equivalent of 45,000. This is adequate to cater for the existing load and <del>committed</del><u>current</u> industrial discharges from industry and is not discharging at the maximum load permitted by existing licenses at present.</p> <ul style="list-style-type: none"> <li>- Amend section 3.0 and 3.4.1 Wastewater Treatment of the Strategic Environmental Assessment as follows:</li> </ul> <p>It will avoid downstream pollution effects, as there is sufficient capacity to deal with the development of land zoned for the lifetime of this plan. This <del>removes</del><u>reduces</u> the possibility of inadequate treatment of discharges from the plant.</p>
	<b>SEA/AA Response</b>
	- Environmental Report to be updated to reflect submission from Irish Water.

<b>5</b>	<b>Name/Group:</b>	Colin Fitzpatrick
	<b>Submission:</b>	<b>Response</b>
	<p>(a) Transport and Amenity Map identifies a cycle lane along the University Road, which is not in place;</p> <p>(b) Lack of cycleway running into the Kilmurry Junction is a danger for cyclists, as traffic converge on this junction;</p> <p>(c) Pedestrian route is unsuitable as cars frequently block it;</p> <p>(d) Cycle lane along Walkers Road not on the Map, should this be considered a pedestrian route as well.</p>	<p>(a) Map will be amended</p> <p>(b) Noted, and will be reviewed as part of the Limerick Metropolitan Transport Strategy commencing in September 2018</p> <p>(c) Noted</p> <p>(d) Map will be amended to include cycle-lane, pedestrian facilities are currently available on Walkers Road.</p>
	<b>Chief Executive's Recommendations:</b>	
	<p>(a) Amend Transport and Amenity Map to remove the "existing cycle lanes" along the University Road</p> <p>(b) No Change</p> <p>(c) No Change</p> <p>(d) Amend Transport and Amenity Map to include the cycle lane along Walkers Road</p>	
	<b>SEA/AA Response</b>	N/A

<b>6</b>	<b>Name/Group:</b>	Brid-Ann O' Callaghan
	<b>Submission:</b>	<b>Response</b>

	Concerns raised with regard to traffic congestion and safety for motorist, pedestrians and cyclists at the end of the Golf Links Road in the vicinity of O' Shea's pub	The Council has appointed a Design Team to examine this section of road, on completion of the assessment, the recommendations will be considered, subject to funding. In addition to the above, Chapter 6: Transport of the draft plan, outlines policy support for a proposed Junction improvement at the Old Golf Links Road/Old Ballysimon Road Junction. The plan also identifies a new road from PJ Matthews on the Old Ballysimon Road to Southhill. It is considered that these measures will assist in alleviating congestion in the vicinity of this junction.
	<b>Chief Executive's Recommendations:</b>	
	- Amend Land Use Zoning Map and Transport and Amenity Map to include the Indicative Link Road proposed from PJ Matthews on the Old Ballysimon Road to Southhill.	
	<b>SEA/AA Response</b>	N/A

<b>7</b>	<b>Name/Group:</b>	Brian O' Doherty
	<b>Submission:</b>	<b>Response</b>
	(a) Submission welcomes the Park and Ride in the Groody area and the park with a play area  (b) Submission suggests that the derelict buildings in the Goody Valley should be used as apartments, student apartments, restaurant/café/convenience store, Marks and Spencer.	(a) Noted  (b) Noted and any proposal on site should be in line with the Site Development Brief for the Groody Valley (SDB 3). This includes a maximum of 15% of the site area for residential use. Retail provision is not permitted on the site, as it is considered that, the retail needs of the area are being sufficiently met by the adjoining retail offering.
	<b>Chief Executive's Recommendations:</b>	No Change
	<b>SEA/AA Response</b>	N/A

<b>8</b>	<b>Name/Group:</b>	Katriona Murphy
	<b>Submission:</b>	<b>Response</b>
	(a) Submission sets out the need for additional footpath access to the Gaelscoil and welcomes the	(a) Noted, this is in line with the proposals set out under Site Development Brief (SDB 4) for the provision of pedestrian

	proposal in the Draft Plan for this.  (b) Need for drainage of the common green areas in the Woodhaven housing estate, as they are very swampy, even in the summer months.	and cycle access. The development of these facilities are subject to funding.  (b) Estate management is outside the scope of the Local Area Plan preparation process.
	<b>Chief Executive's Recommendations:</b>	No Change
	<b>SEA/AA Response</b>	N/A

<b>9</b>	<b>Name/Group:</b>	Michal Wadowski
	<b>Submission:</b>	<b>Response</b>
	Submission stresses the importance of the proposed road between the Old Schoolhouse Road and the Groody Road and stresses the importance of including cycle lanes to facilitate access for schoolchildren to the schools in the area. Submission suggests that the proposal would alleviate traffic jams along Ballysimon Road/Golf Links Road in the mornings and afternoons.	Policy support has been included in the plan, to support the development of this infrastructure. The Local Authority are endeavoring to secure resources to deliver this key piece of infrastructure, linking the Groody Valley Road to the Golf Links Road.
	<b>Chief Executive's Recommendations:</b>	No Change
	<b>SEA/AA Response</b>	N/A

<b>10</b>	<b>Name/Group:</b>	Patrick McMahon
	<b>Submission:</b>	<b>Response</b>
	(a) Reverse the current traffic system on Walkers Road, which allows for right turns at the top of the road and bring it back to what it was previously. The current system is inadequate to deal with the construction traffic from the development site.  (b) Submission sets out that in order to alleviate traffic from the University it would make sense to begin construction on the access to the National Technology Park from the	(a) The Local Authority have invested significant resources into upgrading Walkers Road, to enhance traffic flow in the area.  (b) Noted and policy support has been provided for the provision of the Northern Distributor Road and the link road from the National Technology Park to the Northern Distributor Road

	Northern Distributor Road and construct a flyover over the Mulcair to relieve traffic at the University rather than building the Shannon Bridge first.	in Chapter 6: Transport of the Local Area Plan. It is anticipated, that an application for the Limerick Northern Distributor Scheme will be submitted to An Bord Pleanála Q4 2018.
	<b>Chief Executive's Recommendations:</b>	No Change
	<b>SEA/AA Response</b>	N/A

<b>11</b>	<b>Name/Group:</b>	Tom & Breda Doheny
	<b>Submission:</b>	<b>Response</b>
	Submission outlines that the Flood extent identified by the CFRAM mapping at his property on Mountshannon Road is not reflective of flood events in the area and sets out that the maximum flood level recorded on the site was 10m and this lasted for a maximum of 4 hours. Request that the flood mapping is corrected.	The flood mapping referred to, has been prepared on behalf of the Office of Public Works (OPW) under the Catchment Flood Risk Assessment Management as part of a national programme. Extensive consultation took place as part of the process and the mapping has been formally adopted. There is no provision for the Local Authority to amend the Flooding Maps issued by the OPW.
	<b>Chief Executive's Recommendations:</b>	No Change
	<b>SEA/AA Response</b>	N/A

<b>12</b>	<b>Name/Group:</b>	Jack Cunningham
	<b>Submission:</b>	<b>Response</b>
	Submission raises concerns with regard to the proposed expansion of Castletroy having regard to the traffic issues in the area. Concerns expressed to the changing demographic in the area and the effect this has had on crime rates and anti-social behaviour. The introduction of more traveller accommodation and social housing causes great disturbance in the area. Submission concludes by strongly objecting to the Castletroy Expansion Plan.	The purpose of the Local Area Plan is to provide adequate zoned land for development and to provide policy support for the proper planning and sustainable development of the area. The Planning and Development Act outlines the requirements for the provision of Social Housing in all planning applications for housing developments. Furthermore, it is a statutory obligation for the Local Authority to adopt a Traveller Accommodation Programme identifying the housing needs of travellers in the City and County and are obliged to implement the programme as required.
	<b>Chief Executive's Recommendations:</b>	No Change
	<b>SEA/AA Response</b>	N/A

<b>13</b>	<b>Name/Group:</b>	David Fitzgerald on behalf of Tradewinds Energy
	<b>Submission:</b>	<b>Response</b>

	<p>Submission requests a change of zoning from Industrial to Residential for the following reasons:</p> <ul style="list-style-type: none"> <li>• National Housing Policy should be adhered to;</li> <li>• Oversupply of enterprise and industrial lands in the area;</li> <li>• Site area suitable for high density housing;</li> <li>• Site services within 10m of the site</li> <li>• Site adjoins built retail and designated retail areas and area is suitable for mix of development;</li> <li>• Site elevation would be amenable and conducive to proper development and housing mix should be permitted;</li> <li>• Adjoins traveller accommodation, which is settled and agreeable;</li> <li>• Historically a small number of dwellings were previously built on site;</li> <li>• A road widening system should be permitted and no ransom strip permitted;</li> <li>• Several Councillors are in agreement and support the proposed change;</li> <li>• Site is 603m from the existing windmill and is suitable for housing</li> </ul>	<p>Map has been submitted with this document. For clarity, the submission has incorrectly identified the site as Industrial zoned land – the site is zoned for Enterprise &amp; Employment zoning in the Draft Local Area Plan.</p> <p>The site sits adjacent to the Dublin Road (R445) and forms part of the National Technology Park (NTP). The NTP is a strategically important employment centre for the region and it is considered prudent to protect and retain the Enterprise &amp; Employment zoning on this site.</p> <p>In addition to the above, there is currently sufficient residentially zoned land identified for the 6-year period of the plan, in accordance with the requirements of the Department of Housing, Planning and Local Government.</p>
	<b>Chief Executive’s Recommendations:</b>	No Change
	<b>SEA/AA Response</b>	N/A

<b>14</b>	<b>Name/Group:</b>	Aoife O’ Dwyer
	<b>Submission:</b>	<b>Response</b>
	(a) Concerns expressed regarding Site Development Brief 4 and the provision of walkways/cycle ways	(a) The Local Authority requires that the development of new walkways be adequately overlooked to act as a

	<p>and seating areas, which will lead to, increased antisocial behaviour and potential for loitering for drinking.</p> <p>(b) Submission also queries why a community centre has not been provided in the plan.</p>	<p>deterrent to antisocial behavior. The provision of seating will be considered in the overall design of the scheme.</p> <p>(b) Should an opportunity arise to deliver a community centre to serve the area, proposals will be considered on appropriately zoned lands subject to normal planning considerations.</p>
	<b>Chief Executive's Recommendations:</b>	No Change
	<b>SEA/AA Response</b>	N/A

<b>15</b>	<b>Name/Group:</b>	Dave Kelly
	<b>Submission:</b>	<b>Response</b>
	Request for a footpath to be extended along the full extent of the Golf Links Road on the side of Golf Course to ensure pedestrian and cyclist safety	The development of footpaths are an issue for consideration of the Operation and Maintenance Department of Limerick City and County Council and the issue will be forwarded to this section for consideration, subject to funding.
	<b>Chief Executive's Recommendations:</b>	No Change
	<b>SEA/AA Response</b>	N/A

<b>16</b>	<b>Name/Group:</b>	Senator Maria Byrne
	<b>Submission:</b>	<b>Response</b>
	Submission requests that An Garda Siochana are contacted to examine the potential of providing a Garda Station in the area. The submission sets out that the anticipated increase in population in the area warrants the provision of a new station. This issue has been raised in the Seanad with Minister for Justice & Equality Charlie Flanagan TD and at local level with Chief Superintendent Gerard Roche. He has set out that "At this time, I believe a new Garda Station is not justified". Senator Byrnes concludes that a call should be made to the Garda Commissioner for consideration of an up to date station.	An Garda Siochana were consulted during the pre-draft stage of the Plan preparation and again during the statutory consultation period of the plan and no response was received in relation to the delivery of a Garda Station to serve the Castletroy area. Should the need arise, for a proposed Garda Station in the future, there are sufficient zoned lands to accommodate its development.
	<b>Chief Executive's Recommendations:</b>	No Change
	<b>SEA/AA Response</b>	N/A

<b>17</b>	<b>Name/Group:</b>	Eamon Baker
	<b>Submission:</b>	<b>Response</b>
	Castletroy should have a local train station, the station could be provided on the existing route through Rhebogue, which is ideally located in proximity to Castletroy and the University of Limerick and adjacent to the river path, linking the City Centre and the University. The combination of bike and travel could also be utilised given the existing facilities.	The Limerick Metropolitan Transport Strategy will examine the potential for local rail connections, in conjunction with all other means of transport.
	<b>Chief Executive's Recommendations:</b>	No Change
	<b>SEA/AA Response</b>	N/A

<b>18</b>	<b>Name/Group:</b>	Bruce Harper
	<b>Submission:</b>	<b>Response</b>
	Observation sets out that the Transport and Amenity Map has incorrectly identified cycle lanes.	Submission noted and the Transport and Amenity Map will be amended to reflect the situation on the ground.
	<b>Chief Executive's Recommendations:</b>	
	<ul style="list-style-type: none"> <li>- Amend Transport and Amenity Map to remove the "existing cycle lanes" along the University Road</li> <li>- Amend Transport and Amenity Map to include the cycle lane along Walkers Road</li> </ul>	
	<b>SEA/AA Response</b>	N/A

<b>19</b>	<b>Name/Group:</b>	Fiona Golden O' Mahony
	<b>Submission:</b>	<b>Response</b>
	Submission sets out that provision needs to be made for a Garda Station, a Day Care Centre for the Elderly and a Youth Centre.	In relation to the provision of a Garda Station in the Castletroy Area, see response to Submission No. 16 above.  Should an opportunity arise to deliver a Day Care Centre or a Youth Centre to serve the area, proposals will be considered on appropriately zoned lands subject to normal planning considerations
	<b>Chief Executive's Recommendations:</b>	No Change
	<b>SEA/AA Response</b>	N/A

<b>20</b>	<b>Name/Group:</b>	Jennifer Brett
	<b>Submission:</b>	<b>Response</b>
	Submission sets out that the lands at the rear of her dwelling have been split into two different land uses in the Draft Plan while in actual fact the whole area is part of an existing residential site	Site zoning will be amended from Agricultural zoning to Existing Residential zoning to reflect the actual use on site.
	<b>Chief Executive's Recommendations:</b>	
	- Amend Land Use Zoning Map and Flood Map from to change zoning from Agricultural use to Existing Residential Area	
	<b>SEA/AA Response</b>	N/A

<b>21</b>	<b>Name/Group:</b>	Saurabh Shrihar
	<b>Submission:</b>	<b>Response</b>
	<p>Submission requests that the following facilities are made available in the vicinity of the Northern Trust complex:</p> <ul style="list-style-type: none"> <li>(a) Primary School</li> <li>(b) Creche</li> <li>(c) Road connection to Kylemore to access Monaleen National School</li> <li>(d) Buses to City Centre every 30 mins</li> <li>(e) Kids Play area</li> </ul>	<ul style="list-style-type: none"> <li>- Zoning provision has been made in the Draft Plan for Education and Community Facilities near the Northern Trust complex.</li> <li>- An indicative link road has been identified between the Groody Road and the Golf Links Road, which will improve connectivity in the area.</li> <li>- The scheduling of buses in the Castletroy area is the responsibility of the National Transport Authority and will be considered in the Limerick Metropolitan Transportation Study.</li> <li>- Objective C3: Open space hierarchy and playground provision and Table 9 Open Space Hierarchy within Residential Estates of the Draft Plan sets out the criteria for the provision of play areas within any new housing development in the plan area. Provision has also been made in the Groody Green Wedge to reserve an area for recreational use.</li> </ul>

	<b>Chief Executive's Recommendations:</b>	No Change
	<b>SEA/AA Response</b>	N/A

<b>22</b>	<b>Name/Group:</b>	Yvonne Kiely – Curragh Birin Residents Association
	<b>Submission:</b>	<b>Response</b>
	<p>(a) Submission sets out concerns with respect to the proposed walkway at the rear of Caislean Na hAbhainn ending at the back of the Curragh Birin estate. There are no direct access points to the Dublin Road from the walkway and presently people exit through the Curragh Birin estate. The proposed walkway would allow people to walk along the back of a row of houses and there is a concern with respect to privacy. Submission contends that it would make more sense if the walkway was along the other side of the Groody Link Road which is zoned for open space. This area would provide a safer solution as there would be greater visibility to the walkway.</p> <p>(b) Submission suggests that the proposed residential development along the Groody Road should include a mix of affordable housing as well as student accommodation.</p> <p>(c) Submission questions if lands to the back of the Bru na Ghrudan estate which was designated as a green area for a park to be developed by the builder of the estate will remain as a green space designated for this use in the current plan.</p>	<p>(a) The proposed links are to allow for connectivity between residential developments and to allow for safe off road walkways. The development of pedestrian facilities shall have regard to amenity of existing dwellings and to the safety of future users.</p> <p>This proposed links are in addition to the proposal for walkway and cycle ways through the Groody Valley Green Wedge.</p> <p>(b) Noted. Currently there is no provision for an Affordable Housing Scheme nationally.</p> <p>(c) The area at the back of Bru na Grudan is zoned for Open Space and any planning application for the provision of compatible uses in this area will be looked at favorably subject to normal planning considerations.</p>
	<b>Chief Executive's Recommendations:</b>	No Change
	<b>SEA/AA Response</b>	N/A

<b>23</b>	<b>Name/Group:</b>	Julie Golden
	<b>Submission:</b>	<b>Response</b>
	Submission sets out that provision needs to be made in the plan for a library.	Objective C7: Provision of a Library provides policy support for a library within the Plan boundary. Should the opportunity arise to deliver a library, within the lifetime of the plan, proposals will be considered through the Development Management process on appropriately zoned lands subject to normal planning considerations.
	<b>Chief Executive's Recommendations:</b>	No Change
	<b>SEA/AA Response</b>	N/A

<b>24</b>	<b>Name/Group:</b>	Miriam Rainsford
	<b>Submission:</b>	<b>Response</b>
	<p>(a) Submission sets out that provision needs to be made in the plan for a library and suggests it should be located between Supervalu and the Woodhaven estate.</p> <p>(b) Submission notes that lands around Woodhaven are zoned as Residential Development Area. The submission questions the ownership of the sites.</p> <p>(c) Concern voiced with regard to the potential crime the park and ride would attract and instead suggests that the bus routes in the area should be extended.</p> <p>(d) Concern voiced regarding any development on the Groody Valley given that it floods.</p>	<p>(a) See response to Submission No. 23 above.</p> <p>(b) The Residential Development Area around the Woodhaven estate is in private ownership.</p> <p>(c) The extension of existing Bus Routes and the provision of new Bus Routes will be reviewed as part of the Limerick Metropolitan Transport Strategy commencing in September 2018. Measures to deter anti-social behavior will be incorporated in the provision of a park and ride facility including adequate overlooking and appropriate lighting.</p> <p>(d) The Site Development Brief proposed for the Groody Valley Green Wedge allows for flood compatible uses, which will only develop if deemed appropriate in</p>

	(e) Submission concludes that it is a fear that the Castletroy area could end up a large urban sprawl of housing estates with little amenities.	<p>terms of siting and layout.</p> <p>(e) Provision has been made in the plan for facilities to support sustainable development. These include but are not limited to:</p> <ul style="list-style-type: none"> <li>- Both public and private open space requirements in private housing developments and maintenance with limited development of appropriate uses on the Groody Valley Green Wedge;</li> <li>- Policy support for the provision of a Library;</li> <li>- Walkways, Cycleways and playing pitches as outlined in SDB4 and through the wider plan area.</li> </ul>
	<b>Chief Executive's Recommendations:</b>	No Change
	<b>SEA/AA Response</b>	N/A

<b>25</b>	<b>Name/Group:</b>	Ciara Jo. Hanlon President University of Limerick Student Life
	<b>Submission:</b>	<b>Response</b>
	Submission sets out that the University has 15,000 students with plans to expand by a further 20%. Request for a Garda Station in the area, which would serve normal day-to-day requirements as well as clearance for the opening of bank accounts by the 2,000 international students on campus.	See response to Submission No. 16 above.
	<b>Chief Executive's Recommendations:</b>	No Change
	<b>SEA/AA Response</b>	N/A

<b>26</b>	<b>Name/Group:</b>	Conor Walsh
	<b>Submission:</b>	<b>Response</b>
	Submission suggests that the L1121 road should be realigned to bring it in line with the Schoolhouse Road and this would eliminate the need for the Junction between the L1121 and the Monaleen Road. It would improve local traffic flow and improve bus times on the 304A route. The submission sets out that the current situation makes it difficult for buses to manoeuvre between the Schoolhouse Road	The Limerick Metropolitan Transport Strategy will consider realignment of roads where considered necessary, as well as scheduling and rerouting on buses serving the Castletroy area.

	and the L1121. Submission also seeks increased frequency in the 304A bus from every 30 minutes to every 20 minutes.	
	<b>Chief Executive's Recommendations:</b>	No Change
	<b>SEA/AA Response</b>	N/A

<b>27</b>	<b>Name/Group:</b>	Diarmuid Murphy
	<b>Submission:</b>	<b>Response</b>
	Submission requests lands on the Bloodmill Road be rezoned to mixed-use zoning in line with the lands in the vicinity.	It is considered that the lands be retained as Enterprise and Employment and Agricultural zoning as per the Draft Plan. The lands dezoned to Agricultural zoning in the Draft are identified as been at risk of flooding in the CFRAM Maps, while the lands may benefit from the upgrade works outlined in Submission No. 47, no site specific flood risk assessment details have been submitted in support of the proposed change of zoning and mixed use zoning permits vulnerable uses, such as residential development, in areas deemed to be at risk of flooding. Vulnerable uses not considered acceptable in accordance with the Planning System and Flood Risk Management Guidelines issued to Planning Authorities in 2009. Accordingly, it is proposed to remain the zoning as set out in the Draft Plan.
	<b>Chief Executive's Recommendations:</b>	No Change
	<b>SEA/AA Response</b>	N/A

<b>28</b>	<b>Name/Group:</b>	Shane O' Connor – Hughes, Rowan and Associates on behalf of A&G Thomond Limited
	<b>Submission:</b>	<b>Response</b>
	(a) Submission requests a change of zoning of 1.7 hectares of land from Groody Valley Green Wedge to Residential Development Area for the provision of circa 65 residential units. It also requests that the indicative road link running along the northern site boundary in an east/west direction is relocated to the centre of the site which is	(a) Submission noted, there is sufficient zoned lands identified in the plan area to cater for the population projection for the plan period, refer to Submission No. 1 in response to this issue. The location of the proposed link road is indicative, however, the location of the roadway will be amended to sit immediately adjacent to the residentially zoned lands.

	<p>reflective of the location of the entrance to and main arterial route serving the site.</p> <p>(b) Submission sets out that an ecological assessment and a site-specific flood risk assessment has been undertaken in respect of the lands. It confirms that the ecological value of the 1.7 hectares of land where the zoning change is sought is negligible and the site specific flood risk assessment confirms the site is within Flood Zone C. A total of 10.4 hectares of lands are in the applicant's ownership and the remaining 8.7 hectares will be planted in accordance with the ecological assessment and have an emphasis on native species planting.</p> <p>(c) The submission sets out that the proposal will secure the delivery of part of the road link identified in the Draft LAP; Will facilitate effective utilisation of serviced lands; Respect the ecological sensitivities of the land; Avoid areas of potential flood risk; Facilitate infill development between land that is currently zoned for residential use and the Groody Valley Green Wedge.</p> <p>(d) Submission contends that a substantial portion of the zoned lands are impacted on by high-tension ESB wires under which development is not permitted. Submission sets out that of the residential lands zoned near the site some 1.19 hectares have been sterilised from development. It is argued that the quantum of</p>	<p>(b) In terms of ecology, the site is part of the wider River Groody Green Wedge and its alteration could fragment the wider habitat. Given that there is more than adequate residential zoning in the plan area, it is not considered appropriate to change the zoning in the area and it shall remain unaltered.</p> <p>(c) The Local Authority welcome the potential delivery of this proposed road infrastructure, however consider sufficient lands are currently zoned.</p> <p>(d) The Local Authority endeavours to underground overhead power lines were possible, particularly in residential areas. There is currently sufficient zoned lands identified in the Plan area to cater for the projected population growth.</p>
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	additional lands requested for zoning is 1.7 hectares and as 1.19 hectares are not developable, the additional lands for residential use would amount to 0.5 hectares which would be negligible and would be in line with the core strategy.	
	<b>Chief Executive's Recommendations:</b>	
	<ul style="list-style-type: none"> <li>- Amend Land Use Zoning Map, Flood Map Transport, and Amenity Map to relocate the Indicative Road Link to run along the boundary of the existing residentially zoned lands.</li> <li>- (a) – (d) – No Change</li> </ul>	
	<b>SEA/AA Response</b>	N/A

<b>29</b>	<b>Name/Group:</b>	Name Not Given
	<b>Submission:</b>	<b>Response</b>
	<p>(a) Roundabout required in Foxhollow to facilitate traffic movements</p> <p>(b) Bridge needs to be widened along the Golf Links Road next to O' Shea's pub to facilitate traffic movements.</p>	<p>(a) The Plan identifies a link road from the Groody Road to the Schoolhouse Road Junction. It is likely that this will include a roundabout and will facilitate ease of traffic movements in the area.</p> <p>(b) The Council has appointed a Design Team to examine this section of road, on completion of the assessment, the recommendation will be considered, subject to funding.</p>
	<b>Chief Executive's Recommendations:</b>	No Change
	<b>SEA/AA Response</b>	N/A

<b>30</b>	<b>Name/Group:</b>	Walter Corley
	<b>Submission:</b>	<b>Response</b>
	(a) Additional cycle lanes required in the area, with continuous loop if possible	(a) Additional cycle facilities will be considered as part of the Limerick Metropolitan Transport Strategy and will be implemented subject to funding.

	<p>(b) Speed bumps required to slow traffic flow from Whitehorn and Briarfield</p> <p>(c) School, Lidl and Walkers Road should be left turn only</p> <p>(d) Road to O’ Shea’s pub should be one way only</p> <p>(e) New link road from Groody Road to Golf Links road will increase traffic along the road to O’ Shea’s pub</p>	<p>(b) Speed Ramps will be provided where warranted as specified in the Limerick City &amp; County Council Traffic Calming Policy and subject to funding.</p> <p>(c) These junctions are currently left turn only.</p> <p>(d) Refer to response to Submission No. 29(b) above.</p> <p>(e) The proposed link road, in conjunction with the upgrade of the section of road to O’Shea’s Pub, should alleviate traffic congestion in the area.</p>
	<b>Chief Executive’s Recommendations:</b>	No Change
	<b>SEA/AA response</b>	N/A

31	<b>Name/Group:</b>	Elena Secas MCC and Deputy Jan O’ Sullivan
	<b>Submission:</b>	<b>Response</b>
	<p>(a) The submission supports the following:</p> <ol style="list-style-type: none"> <li>1. The rezoning of the Parkway Valley Site from Retail/Commercial to Enterprise and Employment,</li> <li>2. The provision of cycle routes and bus lanes for the entire Dublin Road and other areas,</li> <li>3. The distributor road linking Groody Road to the Golf Links Road,</li> <li>4. The pedestrian walkway for safe access to Gáelscoil Chalagh an Treoigh,</li> <li>5. The additional lands zoned Education and Community, and</li> <li>6. The preservation of the Groody Valley green wedge</li> </ol> <p>(b) It is also necessary to consider the scale of the housing crisis and projected population growth the plan should increase the area zoned for residential development in Castletroy.</p>	<p>(a) Items 1 – 6 noted</p> <p>(b) See response to Submission No.1 in relation to the population projections and the required zoned lands for residential development in Castletroy.</p>
	<b>Chief Executive’s Recommendations:</b>	No Change

	<b>SEA/AA Response</b>	N/A
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<b>32</b>	<b>Name/Group:</b>	Dr. Joe Lynch and Dr. Geraldine Mooney-Simmie
	<b>Submission:</b>	<b>Response</b>
	<p>The submission supports the Park and Ride proposal on the Groody Road and forwards suggestions that would not impinge on the Park and Ride facility, but would improve quality of life and align with government policy on obesity. These suggestions include;</p> <ol style="list-style-type: none"> <li>1. A tree-lined Groody River walk/cycleway, and</li> <li>2. A 'Peoples Park'.</li> </ol> <p>The submission suggests there is a general positive response to these suggestions by residents on Cois Ghruada.</p>	<p>Noted</p> <p>The Plan has made provision for planting, walkways and cycle ways and a public amenity area, as set out in Site Development Brief 1, contained in the plan.</p>
	<b>Chief Executive's Recommendations:</b>	No Change
	<b>SEA/AA Response</b>	N/A

<b>33</b>	<b>Name/Group:</b>	Robert Keran – Virtus on behalf of UGP Castletroy SC Ltd
	<b>Submission:</b>	<b>Response</b>
	<p>(a) The submission seeks an appropriate planning framework to allow the Castletroy Town Centre to fulfil its roles as a designated District Centre in the retail hierarchy. The submission requests that the following objective is included in the plan.</p> <p><i>“Having regard to the proposed population growth in the catchment area as set in the LAP, the previous planning permission for the expansion of the District Centre(Reg. Ref: 041908), and the future expansion plans of the UL campus, it is an objective of the LAP to promote the sustainable expansion of Castletroy District Centre, to encourage additional retail development of a type and scale</i></p>	<p>a) The Retail Planning Guidelines 2012 sets out that “Retail development must follow the settlement hierarchy of the State and retail development should be appropriate to the scale and function of the settlement or part of the settlement in which it is located as designated by the National Spatial Strategy, relevant regional planning guidelines and development plan core strategies. The Guidelines require that key policy objectives must guide planning authorities in addressing retail development issues in their development planning and development management functions, namely: <i>“Ensuring that retail development is plan-led; Promoting city/town centre vitality through a sequential approach to –development; and Securing competitiveness in the</i></p>

	<p><i>appropriate to the District Centre designation, and other supporting facilities, such as retail services, café/restaurant and other community/social uses”.</i></p> <p>The submission references the potential population growth in the area and the catchment of the District Centre into the electoral divisions of Ballysimon and Ballyvarra and to the resident student population and the staff working in the University of Limerick as justification for the expansion of the District Centre.</p> <p>(b) Submission sets out a point of clarification in relation to the thresholds set in the Retail Planning Guidelines for District Centres. The 2005 Guidelines were used in the making of the County Development Plan in 2006 and these guidelines placed a cap of 10,000sqm net floorspace on District Centres. The submission argues that the current iteration of the Retail Planning Guidelines does not contain this cap. The Castletroy Shopping Centre is identified as a District Centre. The Castletroy Local Area Plan makes reference to Policy ED 13 of the County Development Plan which sets out this cap and the submission suggests that this reference is inconsistent with the National Planning Framework and should be removed from the Draft LAP.</p> <p>(c) The submission argues that the Castletroy Town Centre is currently</p>	<p><i>retail sector by actively enabling good quality --development proposals to come forward in suitable locations;”</i></p> <p>Furthermore, the Guidelines state, Retailing within the environs of major cities and towns can also perform important functions, for example as part of the district centres identified in the relevant development plan and serving social, cultural and retailing needs of their local catchments. However, retailing in district centres should not be promoted to a scale of development such that they begin to act as retailing destinations in their own right or where this would undermine the vitality of the central area of the city or town in the environs of which the district centre is located.</p> <p>b) The Local Authority acknowledge that the cap set out in the County Development Plan is taken from the 2005 Retail Planning Guidelines and that the 2012 Retail Planning Guidelines supersede these Guidelines. The Retail Planning Guidelines 2012 set out that retailing in district centres should not be promoted to a scale of development such that they begin to act as retailing destinations in their own right or where this would undermine the vitality of the central area of the city or town in the environs of which the district centre is located. Until the Retail Strategy is reviewed, expansion of the District Centre should be limited.</p> <p>c) The revival of the Castletroy Town Centre over the recent past, coupled</p>
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	<p>not fulfilling its role as a district centre in line with the definition set out in the Retail Planning Guidelines (2012).</p> <p>(d) The submission indicates that there has been no significant expansion to the Castletroy Town Centre in the recent past, despite significant population and employment increase in the area. The submission further contends that there is significant potential to upgrade the Town Centre with additional floorspace of appropriate quantum in accordance with its role as a District Centre.</p>	<p>with the development of Lidl and the expansion of Centra have enhanced the retail offering in Castletroy.</p> <p>d) The Retail Strategy will be reviewed in line with the review of the City and County Development Plans and will set out the strategy in line with the National Planning Framework. Until this Strategy has been reviewed, to consider the impact of this District Centre and other district centres on the City Centre's vitality and viability, expansion of the District Centre shall be limited.</p>
	<b>Chief Executive's Recommendations:</b>	No Change
	<b>SEA/AA Response</b>	N/A

34	<b>Name/Group:</b>	Anthony P.M. Stack representing Bru na Grudan Residents Association	
	<b>Submission:</b>	<b>Response</b>	
	<p>The submission supports the Park and Ride proposal on the Groody Road and includes suggestions to improve community amenities. These suggestions are;</p> <p>a) A 'Peoples Park' within Site Development Brief 1,</p> <p>b) A lawn bowls green within Site Development Brief 1, and</p> <p>c) Construction of walkway/cycleway along the Groody River from Singland and Caislean na hAbhann roundabout.</p>	<p>Noted. See response to Submission No. 32 above. Other uses compatible with the zoning objectives for this site will be considered in line with the proper planning and sustainable development of the area. The Groody River Management Map will be amended to include the lands adjoining Singland and fronting the Dublin Road (R445) in line with the boundaries of SDB1.</p>	
	<p><b>Chief Executive's Recommendations:</b></p> <ul style="list-style-type: none"> <li>- Change to text in legend in the Groody River Valley Management to refer to walkway/cycleway.</li> <li>- Change the boundary in the Groody River Valley Management Map to include the site at the junction of Singland with the Dublin Road (R445) and the Groody Road.</li> </ul>		
	<b>SEA/AA Response</b>	N/A	

<b>35</b>	<b>Name/Group:</b>	Simon Clear & Associates on behalf of Bloomfield Homes Ltd
	<b>Submission:</b>	<b>Response</b>
	This submission seeks to change the zoning in the Draft LAP from Open Space to Residential Development Area within the Bloomfield Housing Estate. The submission argues that the proposed rezoning of the subject lands to open space is contrary to the aims of the National Planning Framework, which promotes more compact and sustainable urban development. It also argues that there is an extant permission for development within the area proposed for rezoning for a crèche. The submission seeks clarification on the rationale used to rezone the site as this area was never proposed as an area of Open Space in any planning application and it considers the rezoning to be site/ownership specific with an intension to negatively thwart development, sterilise lands and the proposed zoning objective may be contrary to the purposes of planning legislation. The submission concludes seeking to change the zoning in the Draft LAP to facilitate residential development.	Limerick City and County Council have prepared a draft Noise Action Plan 2018, which takes account of the recently produced Strategic Noise Maps prepared by Transport Infrastructure Ireland. The mapping identifies high levels of noise levels in the vicinity of this site, in addition to this planning permission was recently refused by Limerick City and County for a residential development on these lands. Having regard to the above identified noise issue on site and the potential impact for future residents, it is considered necessary to dezone these lands in accordance with the proper planning and sustainable development of the area.
	<b>Chief Executive's Recommendations:</b>	No Change
	<b>SEA/AA Response</b>	N/A

<b>36</b>	<b>Name/Group:</b>	Richard Feeney on behalf of Castletroy College and Gaelscoil Chaladh and Treoigh – Joint Submission
	<b>Submission:</b>	<b>Response</b>
	The submission sets out that Castletroy College and Gaelscoil Chaladh an Treoigh have similar and aligned problems with regard to parking and traffic management at peak times and both lack adequate sporting facilities. This submission is an effort to address these problems in partnership. Gaelscoil Chaladh an Treoigh have 410 pupils and 50 children attending the Naíonra, while Castletroy College has 1,218 pupils.	a) Limerick City and County Council is committed to working with schools, in addressing the traffic and parking issues that exists at both schools. The Smarter Travel Section of the Local Authority, in particular, have invested significant time in working with the Gaelscoil Chaladh an Treoigh to promote alternative means of getting to and from school. The Limerick Metropolitan Transport Strategy, commencing in September 2018, will

<p>a) Concerns are voiced in relation to parking at the site of the Gaelsoil at peak times often with a backlog of parking on to the Dublin Road. As the school contains a Naionra the children need to be dropped to the door of the school and there are not adequate parking facilities on site. The submission proposes that further parking be provided adjacent to the current carpark on site which could be used by parents for drop offs and in the evening by the locality for access to sports facilities. A second proposal is that the school is accessed by a one-way system whereby there is an entrance from the Dublin Road and an exit to the Shopping Centre where Drop and Go spaces could be provided.</p> <p>The proposal for walkways and cycle ways to link the Shopping Centre with Newtown are welcomed however, the submission seeks that these are kept a reasonable distance from the school perimeter so as to retain the children’s privacy and avoid exposure to any anti-social behaviour. The provision of the all-weather facility next to the perimeter is welcomed and is considered would be a benefit to allow ease of access to the facility. A large set down area to the west of the college should be provided, to facilitate parking for staff parents and local residents. Proposal to develop a large set down and parking area to the west of the college. The lands at this location would need to be zoned for community use to facilitate this.</p> <p>A second solution is offered in the form of realigning the existing cycleway and paths along Castletroy</p>	<p>examine the issues highlighted in the submission, particularly in terms of sustainable means of travel.</p> <p>The development of the walkway and cycle ways outlined in Site Development Brief 4 outlined in the draft Plan is key to allowing greater accessibility between the two schools and the larger residential areas. In this regard, the Local Authority are actively seeking funding from the National Transport Authority to deliver this connection. The promotion of sustainable means of travel to and from school needs to be developed by the schools, in conjunction with the development of set down areas. There are some hedgerows that that may have to be removed to facilitate this development, however, where possible, all mature trees shall be retained.</p> <p>In addition to the above, the Local Authority have considered it necessary to include an additional junction on the Dublin Road (R445), to assist in alleviating some of the congestion issues that exists, near the Gaelscoil. The Local Authority are committed to working with adjoining landowners to deliver this key piece of infrastructure.</p>
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	<p>College road from Cherryfield past the College and on to Woodhaven.</p> <p>The school proposes to provide parking to the rear of the school buildings and the proposed walkways and cycle ways set out in the Draft LAP would compromise the ability to do this. The avenue to the side of the school is also used for vehicular access to the sporting facilities and is used by heavy machinery, plant and emergency vehicles. Submission considers that the vehicular access should be separated from public use.</p> <p>b) The submission proposes a community project be established to provide sporting facilities in the area, which would be used by both schools and would be made available in the evening, weekends and over school holidays by local clubs including Aisling Annacotty, Monaleen GAA, UL Bohemians RFC and Emerald AC, whom have submitted letters. The proposal includes the following:</p> <ul style="list-style-type: none"> <li>- A full GAA size multiuse astro pitch to facilitate GAA, soccer and rugby matches, alongside Castletroy College</li> <li>- Smaller multi use astro pitch to facilitate juvenile GAA, rugby and soccer, alongside the Gaelscoil;</li> <li>- Two lane all - weather track to link in with the proposed walkway;</li> <li>- A hockey field on lands in private ownership;</li> <li>- An extension of the second rugby pitch into the community lands;</li> </ul>	<p>b) Site Development Brief 4 outlined in the Plan includes a playing pitch on the Local Authority owned lands, and the walkway and cycle way connecting the two schools. The submission includes a much larger scheme in terms of playing pitches, running track and hockey pitch. The lands are zoned Education and Community Facilities in the proposed Local Area Plan and the proposed uses are open for consideration on this zoning.</p>
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	<ul style="list-style-type: none"> <li>- Possible locations for storage and changing facilities;</li> <li>- Fencing and landscaping.</li> </ul> <p>c) In relation to control, management and maintenance of the facility, the submission sets out that the schools will take the lead but more detail is required from the Council on the intentions for the park before they can make further comments. In this respect, they seek detail on parkland maintenance, opening and closing times etc.</p> <p>d) The submission sees a conflict between the proposal set out in the Draft LAP and the provision of playing pitches in terms of the line of walkways/cycle ways particularly next to the Gaelscoil, which, compromises the size of the proposed pitches.</p> <p>e) Submission suggest linking parking areas in the Newtown Centre, Castletroy Town Centre, Castletroy Park, Castletroy College and Gaelscoil Chaladh and Treoigh could make the facilities easily accessible and draw people to the area whilst allowing evening and night time use(through the incorporation of flood lights) of facilities and passive surveillance in the area. The facilities proposed would also be accessible to all levels of ability and disability particularly as they incorporate astro surfaces.</p> <p>f) It is proposed to fund the project with sports capital funding and/or Leader funding and the loan facility through Clann Credo, the social development bank if required.</p>	<p>c) The control, management and maintenance of the proposed pitch on the Local Authority lands is an issue, which, would have to be explored in consultation with the local community groups.</p> <p>d) The development of the walkway and cycle way are a key piece of infrastructure, which the Local Authority are keen to progress. The Local Authority will examine this issue in the progression of the proposal for the walkway and cycle way.</p> <p>e) The Local Authority welcome the proposal to link parking, however, the majority of these lands are in private ownership.</p> <p>f) Noted</p>
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	<p>Successful fund raising has been undertaken to raise money to improve the existing pitches and this will continue to facilitate the proposed works. A number of local developers have also expressed an interest in supporting the initiative and the submission welcomes any support from the Council.</p> <p>g) Submission concludes that the aims in SDB4 are excellent and it is recognised that this is a singular opportunity to deliver something meaningful for the community, which will complement the proposed development in the area. The submission welcomes the masterplan proposed and the designation of land for community use and request that this zoning designation is maintained and encourages an increase to this area for further community uses.</p>	<p>g) The Local Authority is committed to the delivery of the proposals set out in Site Development Brief 4, on lands in their ownership, subject to funding.</p>
	<b>Chief Executive's Recommendations:</b>	
	<ul style="list-style-type: none"> <li>- Amend Land Use Zoning Map, Flood Map and Transport and Amenity Map to include for a junction on the Dublin Road (R445) in proximity to Gaelscoil Chaladh an Treoigh</li> <li>- (b) – (g) – No Change</li> </ul>	
	<b>SEA/AA Response</b>	N/A

<b>37</b>	<b>Name/Group:</b>	Brian McNamara
	<b>Submission:</b>	<b>Response</b>
	<p>The submission refers to the indicative pedestrian route in the 2009 LAP from the Groody to the Golf Link Road through Curragh Birin and an existing cul de sac at Beechwood. The submission states that a previous submission was made which stated that there was insufficient space for a walkway/cycleway through the cul de sac. There is occasional anti-social behaviour in the area and to provide the pedestrian</p>	<p>The lands are currently zoned Open Space in the draft Local Area Plan.</p>

	access would exasperate the issue.  This submission notes the indicative pedestrian/cycleway is not indicated through the cul de sac at Beechwood in the proposed Plan. The submission seeks clarification that the lands zoned will remain zoned for 'Open Space'.	
	<b>Chief Executive's Recommendations:</b>	No Change
	<b>SEA/AA Response</b>	N/A

<b>38</b>	<b>Name/Group:</b>	Siún McCarthy – Fehily, Timoney Consulting Engineers on behalf of Zinc Properties Limited (Northern Site)
	<b>Submission:</b>	<b>Response</b>
	(a) Submission seeks an extension of the boundary of the Castletroy Local Area Plan to include lands beyond the M7 Motorway at Killonan with an area of 9.8 hectares. The submission proposes that this site is zoned for Low Density Residential development. The submission sets out that the area is characterised by ribbon/linear development to both the east and west, which gives the area a distinct clustered formation. The submission considers that the development would create excellent linkages within the settlement. The submission contends that this development would create medium to large residents on large site within and adjacent to the services of towns and villages. It is anticipated that the site could provide 62-82 dwelling units on site and an indicative layout has been attached to the submission. It is submitted that this type of development would provide an alternative to one-off dwellings in the	(a) Comments noted. There are sufficient residentially zoned lands within the boundary of the Castletroy Plan to serve the needs of the area for the next 6 years. There is currently no need to zone additional land beyond the boundary of the plan.

	<p>countryside. Zinc Properties will provide integral sanitary and water services to the site with the potential for neighbouring properties to connect into these services.</p> <p>(b) Submission request that clarity is provided on the calculations provided for the requirement of 81 hectares of lands zoned for residential use and an identified zoning of 80.03 hectares of residential lands in the Draft LAP. The submission requests that if there is a deficiency for land zoned for residential use in the plan that consideration is given to extending the boundary and zoning the proposed site for Low Density Residential development.</p>	<p>(b) Table 2, Table 4 and Table 5 of the Plan will be amended in line with the requirements of the response to Submission No. 1, in relation to population projections and land requirements in the Plan. It identifies a land requirement of 46 hectares of residential lands over the plan period. This includes a headroom factor of 50%.</p>
	<b>Chief Executive's Recommendations:</b>	No Change
	<b>SEA/AA Response</b>	N/A

<b>39</b>	<b>Name/Group:</b>	David E. Fitzgerald
	<b>Submission:</b>	<b>Response</b>
	Request for a zoning change from Agricultural use to Residential use	It is considered that there are sufficient residentially zoned lands identified within the Plan boundary to cater for the proposed growth in accordance with the NPF for the lifetime of the plan. See response to Submission No.1 in this regard.
	<b>Chief Executive's Recommendations:</b>	No Change
	<b>SEA/AA response</b>	N/A

<b>40</b>	<b>Name/Group:</b>	Eva Coombes
	<b>Submission:</b>	<b>Response</b>
	The submission suggests that building on the Groody flood plain is 'inviting disaster' and an alternative solution is sought.	The Local Authority is guided by the principles set out in The Planning System and Flood Risk Management (2009), Guidelines for Planning Authorities and the OPW national CFRAM study. A Stage 1 Flood Risk Assessment has been undertaken as part of the proposed plan

		preparation (Refer to Volume 2 Environmental Report).
	<b>Chief Executive's Recommendations:</b>	No Change
	<b>SEA/AA Response</b>	NA

41	<b>Name/Group:</b>	Richard Feeney
	<b>Submission:</b>	<b>Response</b>
	<p>(a) The submission suggests that there is a need to provide an additional cycleway/walkway link from Groody to Castletroy which would improve movement and bypass the Dublin Road;</p> <p>(b) The need for playground facilities in the area, citing the example that there is only one playground to service a large community. The submission identifies a number of locations that may be considered suitable location for a playground.</p>	<p>(a) Objective T6: Network for pedestrian and cycle facilities of the Plan seek to support the improving of the pedestrian and cycle network in the area. The Transport and Amenity Map identifies both existing and proposed new linkage in the proposed LAP. In addition, the Limerick Metropolitan Transport Strategy will examine provision of additional cycling facilities.</p> <p>(b) Policy support has been included in the proposed Local Area Plan for the provision of an area for recreational use in the Groody Valley Green Wedge, under Objective GV05: Open Space.</p>
	<p><b>Chief Executive's Recommendations:</b></p> <ul style="list-style-type: none"> <li>- Amend to text in legend in the Groody River Valley Management to refer to walkway/cycleway.</li> <li>- Amend the boundary in the Groody River Valley Management Map to include the site at the junction of the Dublin Road (R445) and the Groody Road.</li> <li>- Amend text in legend (Riverside walkway to riverside walkway/cycleway) in the Groody River Valley Management Map, and Transport and Amenity Map (Proposed Pedestrian Routes to pedestrian/cycleway routes, and Indicative riverside walkway and links to indicative riverside walkway/cycleway).</li> </ul>	
	<b>SEA/AA Response</b>	N/A

42	<b>Name/Group:</b>	Gary Rowan, HRA on behalf of OCM EMRU DEBT CO DAC
	<b>Submission:</b>	<b>Response</b>
	<p>The submission welcomes the zoning objectives for the subject site and concentrates on two points – density standards and correction of land-use zoning applicable to the subject lands.</p> <p>(a) The submission welcomes the Residential Development Area zoning set out for this site however raises concerns with respect to the achievement of densities of 50 units per hectare at this location. The concerns relate to the practicality and implement ability of these densities in a Limerick context. Market research from Sherry Fitzgerald Auctioneers is put forward setting out a house preference survey in the area, which establishes a demand for semi-detached dwelling units with 8% of the market seeking apartment accommodation. The submission considers that to achieve densities of 50 units per hectare will require the provision of apartments, which it further argues are out of context at this location. A further study has been submitted from Cuddy QS Quantity Surveyors and Construction Consultants, which confirms that apartment construction is currently commercially unfeasible. It is argued that this would reduce the incentive for developers to commence construction and/or bring forward residential development for this site. Two design concepts are illustrated in the submission the first on the basis of 50 units per hectare and the other on the basis of 45 units per hectare. The submission</p>	<p>(a) Limerick City &amp; County Council has carried out independent valuations and accept that densities of 50 units per hectares in the City Environs is currently unviable. Furthermore in the absence of the study by the National Transport Authority for a Transport Strategy for Limerick Metropolitan Area and the fact there is currently no quality transport corridor along the Dublin Road (R445), it is recommended that the 50 units per hectare is replaced with a minimum of 35 units per hectare until such time as adequate public transport infrastructure is in place.</p>

	<p>recommends that the 50 units per hectare objective should be included at appropriate locations within the 500m public transport corridor and in line with the recommendation of the Sustainable Residential Development in Urban Areas: Guidelines for Planning Authorities it should be subject to appropriate design and amenity standards.</p> <p>(b) The submission identifies that a small protrusion of the proposed SBD4 occurs on lands within the ownership of OCM EMRU DEBTO DAC and a map of the legal interest of the landowner has been submitted. The submission contends that the inclusion of this portion of the site will not lead to the achievement of objectives of SDB4 given its limited size and because it is at the outer extremity of the zoning. The submission concludes by seeking to have this portion rezoned to Residential use thereby making it consistent with the remaining landholding.</p>	<p>(b) The Local Authority acknowledge the ownership details, submitted with this submission and the land use zoning map will be altered to rezone this portion of land from Education and Community Facilities to Residential Development Area.</p>
	<b>Chief Executive's Recommendations:</b>	
	<p>(a)</p> <ul style="list-style-type: none"> <li>- Amend point (c) of Objective H2 in Chapter 4 as follows:</li> <li>- Require minimum net density of 35 units to the hectare on residentially zoned sites <del>within the plan area and 50 units per hectare within 500 m of a bus stop. Map 1 outlines the 500 meters radius where a minimum density of 50 dwelling per hectare will be required on residential development.</del></li> <li>- Amend Land Use Zoning Map and Flood Map to remove the 500 meters public transport corridor</li> </ul> <p>(b) Amend land Use Zoning Map and Flood Map to rezone portion of land from Education and Community Facilities to Residential Development Area</p>	
	<b>SEA/AA Response</b>	N/A

<b>43</b>	<b>Name/Group:</b>	Simon Bradshaw, GVA on behalf of Tesco Ireland
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	<b>Submission:</b>	<b>Response</b>
	<p>Submission requests that the LAP include policies that would promote the development of retail stores at suitable location in accordance with the Retail Planning Guidelines 2012. The submission argues that given the anticipated population growth within the plan area that further provision needs to be made for additional convenience floorspace. This could be achieved by removing the retail restriction in the area and allow development of retail on retail and Mixed use zoned lands.</p> <p>The submission sets out that there is a contradiction in the objectives relating to retail provision and requests that part of Section 5.4.1 be removed to allow for the realisation of zoning objectives and provide for retail convenience uses where they are required.</p> <p>“The retail floor space has reached its capacity in terms of the threshold set for Local Authorities by the Retail Planning Guidelines for Planning Authorities in Castletroy. It is considered that the retail provision in the plan meets the demands of the resident population and allows for a self-sustaining community while reducing the need to travel for everyday services”.</p> <p>The submission recommends that the Planning Authority include a policy for the submission of Retail Impact Statements as well as other reports as part of any retail planning application in the area.</p>	<p>The Retail Planning Guidelines 2012 sets out that “Retail development must follow the settlement hierarchy of the State and retail development should be appropriate to the scale and function of the settlement or part of the settlement in which it is located as designated by the NSS, relevant regional planning guidelines and development plan core strategies. The Guidelines require that key policy objectives must guide planning authorities in addressing retail development issues in their development planning and development management functions, namely: <i>“Ensuring that retail development is plan-led; Promoting city/town centre vitality through a sequential approach to –development; and Securing competitiveness in the retail sector by actively enabling good quality -- development proposals to come forward in suitable locations;”</i></p> <p>Furthermore, the Guidelines state, Retailing within the environs of major cities and towns can also perform important functions, for example as part of the district centres identified in the relevant development plan and serving social, cultural and retailing needs of their local catchments. However, retailing in district centres should not be promoted to a scale of development such that they begin to act as retailing destinations in their own right or where this would undermine the vitality of the central area of the city or town in the environs of which the district centre is located.</p> <p>Until such time as, Limerick City and County review the Retail Strategy, further expansion of the Castletroy Shopping Centre shall be limited.</p>
	<b>Chief Executive’s Recommendations:</b>	No Change
	<b>SEA/AA Response</b>	N/A

<b>44</b>	<b>Name/Group:</b>	Maurice Walsh representing Limerick Youth Service
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<b>Submission:</b>	<b>Response</b>
<p>The submission notes the large increase in the youth population and the lack of community facilities. Given the increasingly diverse community in the area, there is a need for multi-purpose community facilities that are safe and accessible to all young people. All facilities should be guided by national policy documents concerning youth affairs such as National Youth Strategy 2015-2020, Teenspace - National Recreation Policy for Young People 2007, Better Outcomes Brighter Futures – the National Policy Framework for children and Young People 2014 – 2020. The submission includes a report on research by Limerick Youth Service with 23 focus groups of young people in Limerick in 2017 to inform the Youth Service Strategic Plan. Young people from the Castletroy Youth Club contributed to the study.</p>	<p>Submission noted. Given the envisaged population growth and the young profile the proposed LAP includes revised zoning to support expansion of existing schools and the construction of new schools. In addition, there is a significant amount of Education &amp; Community zoned lands. In terms of recreational opportunities, the proposed LAP makes provision for playlots in tandem with new residential development. Objective C2 seeks to improve open space provision and Objective C3 requires residential development proposals to adhere to the requirements of the open space hierarchy in residential estates.</p> <p>Reference will be made to the attached recreation policy in Chapter 9.</p>
<p><b>Chief Executive’s Recommendations:</b> Amend Section 9.1 in Chapter 9 to include:</p> <ul style="list-style-type: none"> <li>- <a href="#">National Youth strategy 2015 -2020</a></li> <li>- <a href="#">Teenspace – National Recreation Policy for Young People 2007</a></li> <li>- <a href="#">Better Outcomes Brighter Futures – the National Policy Framework for Children and Young people 2014 - 2020</a></li> </ul>	
<b>SEA/AA Response</b>	N/A

<b>45</b>	<b>Name/Group:</b>	Siún McCarthy – Fehily, Timoney Consulting Engineers on behalf of Zinc Properties Limited (Southern Site)
<b>Submission:</b>		<b>Response</b>
<p>(a) Submission seeks an extension of the boundary of the Castletroy Plan to include lands beyond on the M7 Motorway at Killonan with an area of 9.8 hectares. The submission proposes that this site is zoned for Low Density Residential development. The submission sets out that the area is characterised by</p>		<p>(a) Refer to response to Submission No. 38.</p>

	<p>ribbon/linear development to both the east and west, which gives the area a distinct clustered formation. The submission considers that the development would create excellent linkages within the settlement. The submission contends that this development would create medium to large residents on large site within and adjacent to the services of towns and villages. It is anticipated that the site could provide 62-82 dwelling units on site and an indicative layout has been attached to the submission. It is submitted that this type of development would provide an alternative to one-off dwellings in the countryside. Zinc Properties will provide integral sanitary and water services to the site with the potential for neighbouring properties to connect into these services.</p> <p>(b) Submission request that clarity is provided on the calculations provided for the requirement of 81 hectares of lands zoned for residential use and an identified zoning of 80.03 hectares of residential lands in the Draft LAP. The submission requests that if there is a deficit in the amount of land zoned for residential use in the plan that consideration is given to extending the boundary and zoning the proposed site for Low Density Residential development.</p>	<p>(b) Refer to response to Submission No. 38</p>
	<b>Chief Executive's Recommendations:</b>	No Change
	<b>SEA/AA Response</b>	N/A

<b>46</b>	<b>Name/Group:</b>	Helen Madden
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<b>Submission:</b>	<b>Response</b>
<p>The submission sets out the following;</p> <p>a) The need for community centres for young people in the area;</p> <p>b) the need for a Garda station;</p> <p>c) Questions what provisions have been made for national and secondary school expansion;</p> <p>d) Open Space should not be reduced by 36.8%;</p> <p>e) Too much land is zoned residential development;</p>	<p>The purpose of the Proposed LAP is to ensure that there is adequate zoned land for various land uses for the needs of the envisaged population growth within the lifespan of the plan.</p> <p>a) Should an opportunity arise to deliver a community centre to serve the area, proposals will be considered on appropriately zoned lands subject to normal planning considerations.</p> <p>b) See response to Submission No. 16 above</p> <p>c) The Department of Education and Skills are consulted on the proposed LAP preparation and requested to advise of their requirements in terms of envisaged student numbers. Similarly, local schools are also contacted regarding their requirements. The proposed plan is also informed by national guidance 'The Provision of Schools and the Planning System – A Code of Practice for Planning Authorities', 2008.</p> <p>d) The 2009 – 2015 Castletroy LAP did not differentiate between open space accessible to the public and open space associated with sports clubs, which are not open to the public. It is considered more appropriate to differentiate between these types of open spaces to accurately reflect public accessibility. The current iteration of the Plan includes this differentiation. Refer to Chapter 11, 11.1 for full detail in relation to the amount of land zoned per zoning type.</p> <p>e) Refer to response to Submission No. 1 in relation to the amount of land zoned for residential purposes.</p>

	<p>f) Residential densities are considered too high;</p> <p>g) Residential development should not be open plan, front gardens should be fenced, and 2 parking spaces should be provided per unit;</p> <p>h) A road connection between the Old School Road and Groody Road is considered a priority;</p> <p>i) Cycle paths should not be shared with buses and cars;</p> <p>j) Can the Parkway Valley site can be declared a Derelict Site and action to remedy to unfinished development;</p> <p>k) Questions if the water supply and waste water treatment plant has the capacity to cater for the envisaged population growth;</p> <p>l) Questions if provision can be made for paint/aerosol/battery collection;</p> <p>m) Questions if a graveyard can be provided in Castletroy;</p> <p>n) States a Park and Ride facility should be located at Finnegan’s for the Ballysimon Road.</p>	<p>f) Refer to response to submission number 43 in relation to densities</p> <p>g) Refer to Chapter 10 of the County Development Plan in relation to Development Management Standards for Residential Developments in Urban Areas.</p> <p>h) Comments noted in relation to the provision of Roadway between Old Schoolhouse Road and Groody Road and is supported in the Plan</p> <p>i) Where possible, it is the approach that is taken by the Local Authority</p> <p>j) Parkway Valley site has been entered on the Derelict Site Register.</p> <p>k) Irish Water have indicated that there is currently adequate water and wastewater capacity to cater for the area, with potential to increase capacity currently been examined.</p> <p>l) The civic amenity centre at Mungret accepts this material.</p> <p>m) Should an opportunity arise to deliver a graveyard to serve the area, proposals will be considered on appropriately zoned lands subject to normal planning considerations.</p> <p>n) Park and Ride provision has been indicated within the plan boundary, additional Park and Ride facilities maybe considered at alternative locations, as a result of the Limerick Metropolitan Transport Strategy.</p>
	<b>Chief Executive’s Recommendations:</b>	No Change
	<b>SEA/AA Response</b>	N/A
<b>47</b>	<b>Name/Group:</b>	Siún McCarthy Fehily, Timoney Consulting Engineers on behalf of

		Shannon Commercial Properties
	Submission:	Response
	<p>Submission welcomes the opportunity to have input to the Draft Castletroy LAP.</p> <p>(a) Submission relates to the proposed rezoning of a site at Towlerton in Ballysimon from Enterprise &amp; Employment use to Agricultural use. The justification for the zoning change is in response to the updated flood maps, which identifies this site as falling into flood, and the submission puts forward justification in terms of flooding for the continued Enterprise &amp; Employment zoning on this site.</p> <p>To address this, a hydraulic modelling report has been carried out for the site which identifies that the vast majority of the site falling into the 1% AEP (1 In 100) fluvial flood zone. The model was re-run using mitigation measures, which included regrading, re-profiling and re-configuring the channel upstream extent of the site (R527) culvert to a point 450 metres downstream of the Bloodmill Road. It also looked at an upgrade to the Bloodmill Road culvert with a culvert of sufficient hydraulic capacity to convey flow. This showed that once mitigation measures were in place the flooding of the site would be alleviated.</p> <p>Circular PL2/2014 issued to Local Authorities to provide advice in relation to plan making in areas of existing vulnerable uses which now find themselves in Flood Zone A and B. The guidance required that in zoning lands in areas located in flood zone A &amp; B where the existing</p>	<p>a) In response to the assessment carried out on these lands by Fehily, Timoney Consulting Engineers, the Local Authority commissioned an independent Flood Risk Assessment be carried out, which concurred with the solution proposed by Fehily Timoney Consulting Engineers, which would alleviate flood risk to both the subject lands and the adjoining lands. These works involve the regrading, profiling and upgrading of the watercourse adjacent to the site from the Ballysimon Road upstream of the site to a point 450m downstream of the Bloodmill Road culvert, inclusive of the replacement of the Bloodmill Road culvert. The report concluded that the works would benefit these and the adjacent land with probable minimal impact downstream and that it was in line with the requirement of the Flood Guidelines 2009 to specify the nature and design of structural and on structural flood risk management measures. In line with this report, it is recommended that an objective is attached to the lands, which requires site specific hydraulic model, detailed design and construction of remedial works to the Monacloine Stream, prior to any development, taking place on the lands.</p> <p>The Local Authority have considered the Flood Guidelines and Circular PL2/2014 issued by the Department in considering this rezoning. The lands are proposed to be rezoned as Enterprise and Employment with an</p>

	<p>uses zoning is classified as a vulnerable use the Planning Authority should consider if the existing use zoning of the vulnerable use is still the appropriate zoning. Where the Planning Authority consider that, the existing use zoning is still appropriate the Planning Authority must specific the nature and design of structural or non-structural flood risk management measures required prior to future development in the area. Reference is made to the previous study commissioned by the Limerick City Council and Limerick County Council in 2002 by White Young Green on the Monaclinoe Drainage Area Study and the submission contends that this would alleviate the flood issues at the site and shows there is potential for these works to be undertaken. It notes that the Circular does not reference who should carry out the work or it does not make reference to the issue of landownership. It contends that with the adoption of these mitigation measures the site will be defended against the 1 in 100 and 1 in 1000 year flood event.</p> <p>(b) A Justification Test for the plan making process was also carried out in the submission and concludes that the development meets the stipulations of the Justification test for Plan making. The Justification Test sets out that the National Planning Framework, identifies Limerick City and Environs for significant development, the site is question is located in an employment cluster immediately</p>	<p>Objective included in the plan to carry out the works outlined in the submission.</p> <p>JBA Consulting Engineers (on behalf of the Local Authority) reviewed the solution presented by Fehily Timoney Consulting Engineers and confirmed that the proposed solution is viable, with the effects benefitting these lands and the adjoining lands with probable minimal impact downstream. It is considered that the proposed solution is acceptable for less vulnerable uses in accordance with the Flood Guidelines issued to Planning Authorities in 2009.</p> <p>b) According to “The Planning and Flood Risk Management – Guidelines for Planning Authorities 2009” the introduction of less vulnerable development in Flood Zone A require a justification test.</p> <p>Box 4.1: Justification Test for Development Plans sets out the criteria, which governs the zoning of lands in a Development Plans in an urban settlement where there is a moderate, or high risk of flooding and</p>
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	<p>adjoining the built up area and mitigation can be achieved. The submission recommends that the mitigation measure set out in the submission are taking into account by the Council and it recommends that a site specific policy should be incorporated in the Local Area Plan which requires a Site Specific Flood Risk Assessment for any development proposed on this site at planning application stage. Furthermore the submission highlights, the available services including, drainage, electricity, fibre optics, a gas pipeline and the accessibility of the site by public and private transport means and to pedestrians and cyclists. In relation to the proposed access the submission welcomes the inclusion of the northern spur off the proposed new link street in the Draft Plan and consider that access to the site could be facilitated via this access or at a point along the Bloodmill Road which maybe cul de sac-ed when the new link road is provided.</p>	<p>requires that all of the criteria set out, which must be satisfied. The Planning Authority considers that these lands meet the criteria as follows:</p> <ul style="list-style-type: none"> <li>- Limerick City and Environs have been identified as an urban centre, which is targeted for growth under the National Planning Framework;</li> <li>- The zoning of lands these lands will assist in the consolidation of employment on a strategic arterial route to the City and alongside the existing built up area;</li> <li>- The development of these lands will assist in the consolidation of employment in this area of Castletroy, which has already established a number of significant employers in the immediate vicinity of the site;</li> <li>- There is limited suitable alternative lands available in the vicinity of this site, that would be suitable for this type of development;</li> <li>- A flood risk assessment to an appropriate level has been carried out and identifies a viable solution to eliminate the flood risk, details have been included in terms of the extent and nature of the works to achieve an appropriate level of protection for the lands.</li> </ul> <p>It is considered that the zoning of the these lands for Enterprise &amp; Employment purpose meets the criteria set out in Box 4.1 Justification Test for development plans.</p>
	<p><b>Chief Executive’s Recommendations:</b></p>	
	<ul style="list-style-type: none"> <li>- Amend Land Use Zoning Map and the Flood Map to rezone the lands from Agriculture to Enterprise &amp; Employment;</li> <li>- Include an Objective IN 06 on Land Use Zoning Map and on Flood Map on subject lands and insert a new Objective IN 06</li> </ul> <p><u>Objective IN 06 Monaclineo Stream</u>  <u>It is an objective of the Council to ensure that no development shall commence on these lands until a site-specific hydraulic model has been carried out, a</u></p>	

	<p><u>detailed design complete and construction of remedial works to the Monaclieo Stream have been completed.</u></p> <ul style="list-style-type: none"> <li>- Delete text from Section 7.6</li> </ul> <p><del>This plan rezones land along the Shannon Banks in the National Technology Park and at Towleron from Enterprise &amp; Employment to Agricultural Use.</del></p>
	<b>SEA/AA Response</b>
	<ul style="list-style-type: none"> <li>- Flood Risk Assessment Part of the Environmental Report updated to take into account the above - See Section C of this for assessment.</li> </ul>

<b>48</b>	<b>Name/Group:</b>	William O'Connor
	<b>Submission:</b>	<b>Response</b>
	The submission objects to the proposed LAP, as it is considered that the Council has failed to provide an Appropriate Assessment as required by the Habitats Directive.	The draft Local Area Plan included an Appropriate Assessment Screening, however, having regard to the nature of the submissions received and the proposed amendments, it is considered necessary to carry out a full Natura Impact Statement.
	<b>Chief Executive's Recommendations:</b>	
		- Update Environmental Report and prepare a Natura Impact Assessment
	<b>SEA/AA Response</b>	
		- Updated Environmental Report and prepare a Natura Impact Statement

<b>49</b>	<b>Name/Group:</b>	Luke Curley
	<b>Submission:</b>	<b>Response</b>
	<p>The submission highlights a number of suggestions, in terms of traffic movement in Castletroy area and include a map indicating improvements, which include:</p> <ul style="list-style-type: none"> <li>• Improvement to a number of junctions between the UL and the Kilmurry roundabout;</li> <li>• pedestrian movement at the Kilmurry Roundabout;</li> <li>• upgrading and widening of roads;</li> <li>• improvement to bus stops;</li> <li>• provision of bus shelters;</li> <li>• additional bus stops;</li> <li>• pedestrian bridge from City East Plaza and the City East Retail Park, the widening of Golf Links Roads;</li> <li>• Separation of cycleways from pedestrian as the indication of lanes</li> </ul>	<p>The Limerick Metropolitan Transport Strategy will consider junction improvements, pedestrian movements, provision of bus stops/shelters and cycle facilities. The Strategy will commence in September 2018 and the recommendations implemented subject to funding.</p>

	by paint on paths is not in the interest of safety.	
	<b>Chief Executive's Recommendations:</b>	No Change
	<b>SEA/AA Response</b>	N/A

<b>50</b>	<b>Name/Group:</b>	Sheila Deegan, Culture & Arts Officer, Limerick City and County Council
	<b>Submission:</b>	<b>Response</b>
	<p>(a) Request to list The Limerick Cultural Strategy: A Framework 2016-2030 in the chapter on Community &amp; Recreation and to include 2 of the relevant objectives in this chapter of the plan</p> <p>(b) Request for inclusion of collaboration with cultural groups as well as sports clubs, schools and community organisations in page 78 of the draft document.</p> <p>(c) Request to expand on the reference made to the provision of a library.</p>	<p>(a) Comments noted, the Limerick Cultural Strategy – A Framework 2016 - 2030, will be included, however, individual objectives will be considered in the review of the Limerick City and County Development Plan for inclusion at a strategic level.</p> <p>(b) Comments noted and will be included</p> <p>(c) It is considered that the use of modern libraries extends beyond traditional book loan facility. It is considered that any new library may serve a diverse range of activities. Accordingly it is not considered necessary to expand the reference.</p>
	<b>Chief Executive's Recommendations:</b>	
	<p>(a) Amend Section 9.1 in Chapter 9 to include <a href="#">The Limerick Cultural Strategy: A Framework 2016 - 2030</a></p> <p>(b) Amend Objective C2 to include <a href="#">cultural groups</a></p> <p>(c) No change</p>	
	<b>SEA/AA response</b>	<b>None</b>

<b>51</b>	<b>Name/Group:</b>	Gary Rowan, HRA Planning on behalf of Tom O' Connor
	<b>Submission:</b>	<b>Response</b>
	<p>(a) Submission requests the rezoning of the lands from the agricultural use</p>	<p>(a) See response to Submission No. 1, in terms of sufficient zoned lands within</p>

	<p>proposed in the Draft LAP to Residential Development Area. The submission argues that the use of this land for agricultural purposes is not viable given its location and its size and given that, it is divorced from the rural lands to the south by the M20. The proposal for the site is that a masterplan will be prepared and will provide a residential development with tenure. The plan will provide frontage development along the road network, a buffer to the river, a network of walkways and cycle ways and retention of mature trees and further landscaping to screen the development, as well as maintaining adequate separation from the Southern Ring Road (M7 Motorway) and act as a screen from the road to provide a noise barrier.</p> <p>(b) Submission requests that future population growth allocation which is assumed at 22% of the NPF allocation for Limerick City and Environs, for Castleory should be revisited in the context of the growth which has taken place, the attractiveness of the area as a place to live with many employment opportunities and the submission requests that a reversal of the future growth rates for Castletroy and the Southern Environs takes place whereby Castletroy is allocated 27% of future growth and the Southern Environs 22%.</p> <p>(c) Concern is raised in relation to prescriptive residential densities as it is considered that these are not achievable in all instances. It argues that any reconsideration of densities</p>	<p>the boundary of the Plan. In addition to the above, the site has been identified on the noise maps produced by Transport Infrastructure Ireland, as having considerable noise levels, which would further limit the development potential of the site.</p> <p>(b) The Local Authority are awaiting the publication of the RSES, which will set out the population projections for Limerick City and Environs up to 2040. In the absence of this document it was necessary to make assumptions on the basis of suitability zoned lands and historical growth patterns. Following the adoption of the RSES work will begin on the review of the City &amp; County Development Plan and the core strategy projections set out will inform future plans in the City and Environs.</p> <p>(c) See response to Submission No. 42, in relation to density.</p>
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	<p>would result in the need for a greater amount of zoned land, which could be facilitated at this site, based on a density of 35 units per hectare; the subject lands have capacity to yield 228 units.</p> <p>(d) Reference is made to the NPF in relation to the necessity to allow for choice in housing location, in terms of the tiered approach to land use zoning and the prioritisation of development lands, all of which the submission contends supports the current proposal to zone the site for residential use. The submission identifies the compliance of the site to the Local Area Plan Guidelines for Planning Authorities in terms of the suitability of location, with regard to how it will contribute to the development of a compact walkable neighbourhood, to the provision of conveniently located neighbourhood facilities, to the provision of a mix of residential and commercial uses with adequate local employment, facilitate the provision of active streets designing out anti-social behaviour and allow measures to encourage local people to adopt healthier, smarter ways to travel around their local communities especially through walking and cycling.</p>	<p>(d) See response to Submission No. 1.</p>
	<b>Chief Executive's Recommendations:</b>	No Change
	<b>SEA/AA Response</b>	None

<b>52</b>	<b>Name/Group:</b>	Eamon Hutton - Fehily, Timoney & Company on behalf of IDA Ireland
	<b>Submission:</b>	<b>Response</b>
	a) The submission relates to 31 hectares of land within the National Technology Park (NTP) where a zoning change has been proposed in	(a) In response to the assessment carried out on these lands by Fehily, Timoney Consulting Engineers, the Local Authority commissioned an

	<p>the Draft Plan from Enterprise and Employment to Agricultural Use. The submission seeks the retention of the Enterprise &amp; Employment use at this site and identifies the strategic importance of the site in terms of economic development in Limerick City and the wider area. It is argued that to dezone the lands would damage the economy of the entire region.</p> <p>The applicants have submitted the following information in support of the submission:</p> <ol style="list-style-type: none"> <li>(1) Flood Risk Assessment for the Proposed Flood Mitigation of IDA land bank at NTP;</li> <li>(2) Preliminary Design Report for the Proposed Flood Mitigation;</li> <li>(3) Appropriate Assessment Screening Report and Natura Impact Statement for the Proposed Flood Mitigation.</li> </ol> <p>The Flood Risk Assessment (FRA) uses the results of a previous river model of the River Shannon along with the latest flood mapping prepared for the OPW in the Shannon CFRAM study and a site-specific assessment to determine the flood risk to the site. The outcomes of the study proposed that the existing berms are partially retained and a new berm is constructed behind them and benched into the existing berm. It is also proposed that dedicated attenuation areas; inside the berm are provided at designated low-lying areas to serve future development at IDA lands. The submission contends that the FRA demonstrates that the flood risk to the site can be adequately managed and development of the lands, will not cause unacceptable</p>	<p>independent Flood Risk Assessment be carried out, which concurred with the solution proposed by Fehily Timoney Consulting Engineers, which would alleviate flood risk to these lands. The proposed flood mitigation measures involves a flood embankment protection to be constructed inside the existing embankment, with construction of a further 170 metres of berm the eastern edge of the lands, with flood attenuation ponds inside the embankments.</p> <p>Hydro Environmental Ltd. reviewed the detailed information submitted on behalf of the Council and concluded, that the proposed solution is viable subject to detailed masterplan in terms of finished floor levels and design details of the individual sites, including a site specific flood risk assessment report been completed.</p> <p>The Local Authority have considered the Flood Guidelines and Circular PL2/2014 issued by the Department in considering this rezoning. The lands are proposed to be rezoned as Enterprise and Employment with an Objective included in the plan to carry out the works outlined in the submission, which are subject to a current planning application and the detailed flood risk assessment and masterplan been completed.</p> <p>According to “The Planning and Flood Risk Management – Guidelines for Planning Authorities 2009” the introduction of less vulnerable development in Flood Zone A require a justification test.</p> <p>Box 4.1: Justification Test for</p>
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	<p>adverse impacts upstream or downstream of the site. Furthermore, the FRA determined that the proposed flood mitigation works would improve the defences against flooding in the NTP. The proposed development will not significantly alter the flood plain or otherwise restrict water flow in the flood plain.</p> <p>As per Section 4 of the Planning System &amp; Flood Risk Management Guidelines a justification test has been carried out and this supports the zoning of the site for Enterprise &amp; Employment use. The justification test submitted highlights the strategic importance of the NTP, as an employment cluster, for the Limerick City Region and key in attracting Foreign Direct Investment.</p> <p>The preliminary design of the mitigation works investigates the design options for the proposed flood mitigation works and sets out a number of Options, which were investigated to come to a preferred choice for the upgrade of the existing flood defence berms including the upgrade of the surface water drainage system and improvements to the storm sewer system. The report concludes that the preferred option is to construct a new berm onto the old berm thereby retaining the vegetation and soil on the existing berm and reducing the need to import fill and to limit the effects of disturbance on the habitats that exists and the designated sites.</p> <p>In addition to the documents submitted summarised, an</p>	<p>Development Plans sets out the criteria, which governs the zoning of lands in a Development Plans in an urban settlement where there is a moderate, or high risk of flooding and requires that all of the criteria must be satisfied. The Planning Authority are satisfied that the proposed lands meets the criteria set out as outlined below:</p> <ul style="list-style-type: none"> <li>- Limerick City and Environs has been identified as an urban centre, which is targeted for growth under the National Planning Framework.</li> <li>- The zoning of lands these lands will assist in the consolidation of employment in the National Technology Park, which is a strategic employment centre not just for Limerick, but also for the Midwest Region.</li> <li>- The development of these lands will assist in the consolidation of employment in this area of Castletroy, which has already established a number of significant employers in the immediate vicinity of the site</li> <li>- There are limited suitable alternative lands available in the vicinity of these lands, the NTP has developed in a planned manner and the location and strategic importance of these lands are critical to the future development of the Park.</li> <li>- A flood risk assessment to an appropriate level has been carried out and identifies a viable solution to eliminate the flood risk; details have been included in terms of the extent and nature of the works to achieve an appropriate level of protection necessary for</li> </ul>
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	<p>Appropriate Assessment Screening Report and Natura Impact Statement for the Proposed Flood Mitigation, which sets out that the potential for significant impacts on Slieve Bernagh Bog SAC(002312), Glenstal Wood SAC (001432), Clare Glen SAC (000930), Glenomra Wood SAC(001013) and Slieve Felim to Silvermines Mountain SPA(004165) has been ruled out. However, the potential exists for significant indirect impacts on the Lower River Shannon SAC and/or River Shannon &amp; River Fergus Estuaries SPA of the proposed flood mitigation works. The report recommends that mitigation measures are used prior to and during construction for the proposed berm upgrade works in relation to water quality, invasive Species and a Water Quality Monitoring Programme and in relation to Cumulative Effects.</p> <p>b) Concern is raised in the submission in relation to the proposal to include walkways and cycle ways along the Rivers Shannon and Mulkear. It is considered unsafe from a Health and Safety perspective, is not adequately overlooked to allow for passive surveillance and would constitute inappropriate and incompatible to an area designated to Enterprise and Employment, where public access should not be encouraged.</p> <p>c) The submission also raises concerns with respect to the land use zoning matrix for Enterprise &amp; Employment zoned lands and specifically the provision to allow schools on these lands. It is argued that this use is not compatible with the uses suitable to</p>	<p>the lands.</p> <p>It is considered that the zoning of the lands for Enterprise &amp; Employment use meets the criteria set out in Box 4.1 Justification Test for development plans. The detailed design and management of the development in terms of construction and management impact on the designated sites will be assessed as part of the planning application.</p> <p>(b) The proposal to development an amenity walkway/cycle way along the River Shannon and Mulkear are part of a larger project that will extend the existing river amenity from the City to the County boundary, through Castleconnell and potentially further should be maintained. The development of this amenity is considered an important tourism product for Limerick.</p> <p>(c) Schools shall generally not be permitted in lands zoned Enterprise and Employment in the zoning matrix, as it potentially conflicts with uses in the National Technology Park and there is sufficient zoned lands elsewhere in the plan area to</p>
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	<p>Enterprise &amp; employment zoned lands most especially in relation to traffic conflicts, differential levels of amenity requirements and inefficient use of high value commercial lands. The submission requests that schools are removed from the matrix.</p> <p>d) Further concerns are raised in relation to the proposal to provide link road from University of Limerick Bohemians Rugby Club to NTP. The submission request that the link road on the Transport Map is removed as the road could hamper the logical expansion of the existing land in the area and would comprise the IDA land bank.</p>	<p>accommodate school development.</p> <p>(d) As part of the Variation process to the County Development Plan for the Limerick Northern Distributor Road to include policy support, it was recommended that access be provided to connect UL Bohemians Rugby Club to the Northern Distributor Road, as the existing access serving the rugby club is restricted. It is considered that the indicative link shall be retained.</p>
	<b>Chief Executive’s Recommendations:</b>	
<p>(a)</p> <ul style="list-style-type: none"> <li>- Amend Land Use Zoning Map and the Flood Map to rezone the lands from Agriculture to Enterprise &amp; Employment;</li> <li>- Include an Objective IN 07 on Land Use Zoning Map and on Flood Map on subject lands and insert a new Objective IN 07</li> </ul> <p><u>Objective IN 07 National Technology Park River Shannon Flood Relief Works</u>  <u>It is an objective of the Council to ensure that no development shall commence on these lands until such time a site-specific flood risk assessment and detailed masterplan in prepared for the lands to the north of the roundabout on the Plassey Road and the upgrade has been complete to the embankments and the attenuation ponds are in place.</u></p> <p>Delete text from Section 7.6  <del>This plan rezones land along the Shannon Banks in the National Technology Park and at Towlerton from Enterprise &amp; Employment to Agricultural Use.</del></p> <p>(b) No Change  (c) Amend Land Use Zoning Matrix to have schools generally not permitted in Enterprise and Employment Lands  (d) No Change</p>		
<b>SEA/AA Response</b>		
<ul style="list-style-type: none"> <li>- Flood Risk Assessment Part of the Environmental Report updated to take into account the above - See Section C of this for assessment.</li> </ul>		

- Natura Impact Assessment will consider the effects of the construction of the proposed berms and associated works in Section C of this report.

<b>53</b>	<b>Name/Group:</b>	John Redington
	<b>Submission:</b>	<b>Response</b>
	Request for site between Troy Studios and the Shannon River to be zoned for Community Use as this area was used as a playing pitch between 2002 and 2013 by Milford GAA. It is set out that the field was used by other sports clubs prior to Milford. The submission notes that the entrance to the field was a pathway leading from the road to Troy Studios and there was a right of way over this however, it sets out that the University of Limerick has placed a fence across this entrance. The submission calls for the right of way to be restored. (Map included with the submission identifying the entrance).	Submission noted, the site is zoned for Enterprise & Employment in the Draft LAP and the provision of Recreational & Leisure facilities are open for consideration on this zoning. Issues in relation to rights of way are a civil issue for the individual landowners.
	<b>Chief Executive's Recommendations:</b>	No Change
	<b>SEA/AA Response</b>	N/A

<b>54</b>	<b>Name/Group:</b>	Diane McDonogh, Town & Country Resources Limited on behalf of Kirkland Investments Limited
	<b>Submission:</b>	<b>Response</b>
	Submission welcomes the opportunity to comment on the Draft LAP and requests a number of amendments to the land use zoning map and the text of the Draft Plan.  These include the following land use zoning mapping changes: <ul style="list-style-type: none"> <li>(a) Extend the eastern boundary of the land use zoning to encompass the lands owned by Kirkland Investments Ltd;</li> <li>(b) Amend the eastern boundary in the central section of SDB2 from Groody Valley Green Wedge to Mixed Use;</li> <li>(c) Amend the zoning from Education and Community Facilities to Mixed</li> </ul>	<ul style="list-style-type: none"> <li>(a) Boundary will be extended to include the lands in Kirkland Investment Ltd's ownership.</li> <li>(b) Part of lands are identified as been at risk of flooding and accordingly shall not be zoned, the remainder will be zoned from Groody Valley Green Wedge to Mixed Use;</li> <li>(c) Zoning will be amended from Education and Community Facilities to</li> </ul>

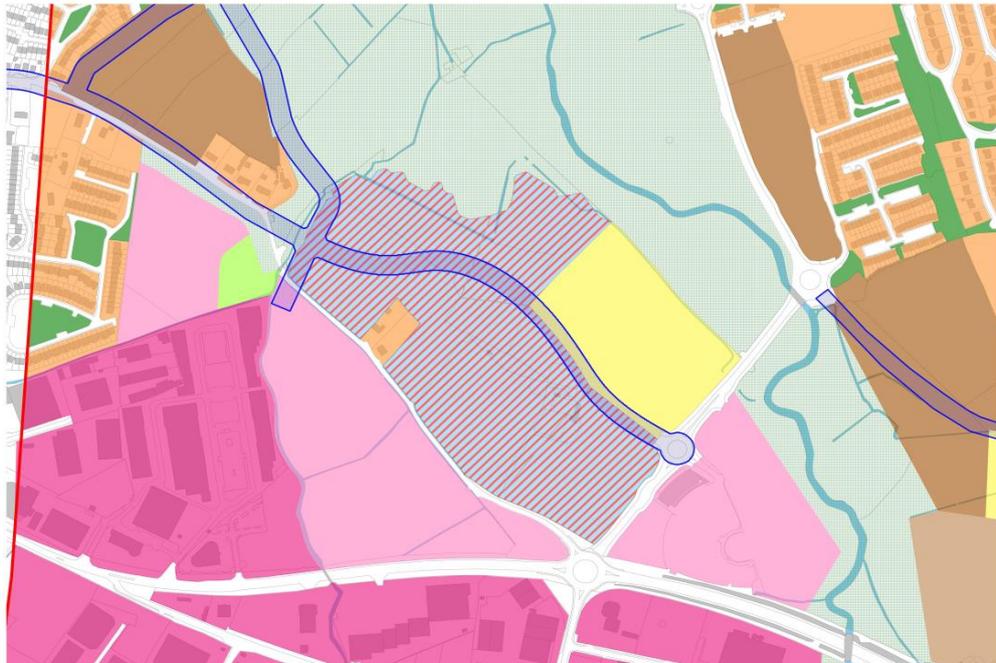
<p>Use at 2 locations within SDB2;</p> <p>(d) Amend the zoning from Groody Valley Green Wedge to Education and Community Facilities at the eastern boundary of SDB2.</p> <p>(e) Revise the alignment of the Towlerton/Garryglass to Bloodmill Road Link Road across the subject lands;</p> <p>(f) Amend the land-use Zoning Map junction connection at the north-eastern boundary of SDB2 to provide a revised connection point to the new link road - Bloodmill Road to Parkway Valley;</p> <p>(g) Amend the Land-use zoning map junction connection at the north-eastern boundary of SDB2 to omit the proposed link to agriculture zoned lands to the west/south-west.</p> <p>Further changes are proposed to the written statement of the text:</p> <p>(h) Clarify the area referenced as Mixed Use from 15.17 hectares to 16.5 hectares. Suggested text “Site Development Brief 2 – Lands at Bloodmill Road Mixed Use lands site area 16.5 hectares”</p> <p>(i) Amend text of Objective BM01: Masterplan to delete phrase – detailed design of individual buildings and spaces including private and collective amenity areas.</p> <p>(j) Amend text of Objective BM01: Masterplan to delete phrase “The area designated as Groody Valley Green Wedge. Along the north o the site shall be incorporated into the overall masterplan and insert “the portion of land zoned Groody Valley Green Wedge within the SDB2 lands</p>	<p>Mixed Use at 2 locations within SDB2;</p> <p>(d) Zoning will be amended from Groody Valley Green Wedge to Education and Community Facilities at the eastern boundary of SDB2.</p> <p>(e) Re-alignment of the Towlerton/Garrylass to Bloodmill Road Link Road will cross the subject lands;</p> <p>(f) Land-use Zoning Map junction connection at the north-eastern boundary of SDB2 will be amended to provide a revised connection point to the new link road - Bloodmill Road to Parkway Valley;</p> <p>(g) The Land-use zoning map junction connection at the north-eastern boundary of SDB2 will be retained in the plan to allow for connection to these lands</p> <p>The following changes will be made to the written text:</p> <p>(h) The site area for Mixed Use will be revised as 16.5 hectares.</p> <p>(i) Text of Objective BM01: Masterplan will be retained – detailed design of individual buildings and spaces including private and collective amenity areas will remain in the text.</p> <p>(j) Text of Objective BM01: Masterplan will be amended to read “The area designated as Groody Valley Green Wedge. Along the north of the site shall be incorporated into the overall masterplan and insert “the portion of land zoned Groody Valley Green Wedge within the SDB2 lands shall be incorporated into the SDB2 Masterplan</p> <p>(k) Text of Objective BM03: Provision of High Quality Design will be amended to insert the word underground as</p>
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	<p>shall be incorporated into the SDB2 Masterplan</p> <p>(k) Amend text of Objective BM03: Provision of High Quality Design to insert the word underground as follows. Any car parking proposed shall be located underground or to the rear of the building. Surface car parking shall be adequately screened and sympathetically integrated within the development site.</p> <p>(l) Amend text Objective C8 Provision of Healthcare Facilities to insert the phrase primary care medical centres. Suggested wording for objective C8 <i>“It is an objective of the Council to support the Health Service Executive and other statutory and voluntary agencies and private healthcare providers in the provision of appropriate healthcare facilities, primary care medical centres an community based care facilities at appropriate locations, subject to proper planning considerations and the principle of sustainable development.”</i></p> <p>(m) Amend the Zoning Matrix to insert “Primary Care Centre” after Health Centre/Clinic.</p>	<p>follows. Any car parking proposed shall be located underground or to the rear of the building. Surface car parking shall be adequately screened and sympathetically integrated within the development site;</p> <p>(l) It is considered that appropriate health care facilities includes primary health care centres;</p> <p>(m) It is considered that Primary Care Centre is covered by Health Centre/Clinic.</p>
	<b>Chief Executive’s Recommendations:</b>	
	<p>(a) Amend boundary to include all lands in Kirkland Investment Ltd.’s ownership within SDB2, Land Use Zoning Map and Flood Map</p> <p>(b) Amend Land Use Zoning Map and Flood Map to include a small portion of the in the central section of SDB2 from Groody Valley Green Wedge to Mixed Use</p> <p>(c) Amend Land Use Zoning Map and Flood Map and SDB2 to reflect changes from Education and Community Facilities to Mixed Use at 2 locations within SDB2</p> <p>(d) Amend Land Use Zoning Map and Flood Map to make changes from Groody Valley Green Wedge to Education and Community Facilities at the eastern boundary of SDB2</p> <p>(e) Amend Land Use Zoning Map, Flood Map and Transport and Amenity Map to re-alignment of the Towlerton/Garryglass to Bloodmill Road Link Road</p> <p>(f) Amend Land Use Zoning Map, Flood Map and Transport and Amenity Map junction connection at the north-eastern boundary of SDB2 to provide a revised connection</p>	

point to the new link road - Bloodmill Road to Parkway Valley

(g) No Change

(h) Include total site area of SDB2 in Chapter 10, Objective BM02 – Total Site area is 16.5 Hectares,  
Update Map in Chapter 10.4.2 – with revised site outline



(i) No Change

(j) Replace text of Objective BM01 point (c) as follows: ~~The area designated as Groody Valley Green Wedge, along the north of the site shall be incorporated into the overall masterplan~~ with The portion of land zoned Groody Valley Green Wedge within the SDB2 lands shall be incorporated into the SDB2 Masterplan

(k) Amend text of Objective BM03: Any car parking proposed shall be located underground or to the rear of the building

(l) No Change

(m) No Change

SEA/AA Response	N/A
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55	Name/Group:	Niall O' Shea
	Submission:	Response
	The lands parallel to Castletroy College should be converted from residential to educational use and used as a carpark to ease traffic congestion on College Road.	The Limerick Metropolitan Transport Strategy will examine all means of sustainable travel, it is necessary to examine the recommendations of this report, in advance of considering rezoning lands for car parking.
	Chief Executive's Recommendations:	No Change
	SEA/AA response	N/A

**Part B**

**Proposed Amendments to Proposed Castletroy Local Area Plan 2019- 2025**

(To be read in association with Part A)

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

## Chapter 1

Insert following text into Section 1.5.1.1

The Government announced the establishment of a new Urban Regeneration and Development Fund (URDF), developed from the NPF and Project Ireland 2040. Its function primarily is to support the compact growth and sustainable development of Ireland's five cities and other large urban centres. The DHPLG has responsibility for implementing the URDF, which has an allocation of €2 billion in the National Development Plan (NDP) to 2027. The fund will operate on a competitive bid – based Exchequer grant basis, it is hoped that the funding may deliver key infrastructural projects for Limerick City and Environs.

### Figure 2: Development Plan – links with other plans

Update Figure 2 in Chapter 1 to include:



### Include text in Section 1.5.2.1

#### 1.5.2.1 Regional Spatial and Economic Strategy

The Regional Spatial and Economic Strategies will provide a long-term regional level strategic planning and economic framework in support of the implementation of the National Planning Framework. The RSES is a link between the National Planning Framework, the City and County Development Plans and the Local Economic and Community Plans. The Strategy for the Southern Region is presently being prepared with an anticipated adoption in early 2019.

In addition to the RSES's providing a regional spatial and economic strategy for the region, the NPF also set out the requirement for Metropolitan Area Strategic Plans (MASP'S) to be prepared for the Dublin, Cork, Limerick, Galway and Waterford Metropolitan areas. It is anticipated that each Metropolitan Area Strategic Plan will set out a clear and concise strategy to:

- Identify the key change parameters for the city in question, i.e. population, employment, housing, retail, travel patterns and key renewal, development and amenity areas;
- Work out a sequence of infrastructure prioritisation, delivery and co-ordination;
- And deliver compact regeneration and growth.

## Chapter 2

Table 3.1 of the CDP outlines the settlement structure for the County with Castletroy designated at the top of the settlement hierarchy as a Tier 1 settlement and as part of the Limerick Gateway.

**Table 1: Castletroy within Settlement Hierarchy for County Limerick**

Settlement Structure for County Limerick	
Tier 1: <del>The Gateway</del> The City and City Environs	These locations are defined as the City Environs Area comprising the areas covered by the Castletroy Local Area Plan and the Southern Environs Local Area Plan.

### 2.4.1 Population

The total population of the area covered by the Castletroy Local Area Plan according to the 2016 census was 14,733. The population in 2011 covered by the Small Area Population set out in the Census was 13,841. This differs significantly from the 2006 population however, it is noted that the 2006 figures did not include the town of Annacotty, which is part of the plan boundary.

~~The total population residing in the Castletroy plan area in 2006 was 12,440, which made up 8.06% of the total population of County Limerick. It is clear that there has been a significant population increase in Castletroy(42%) between 2002 and 2016.~~

**Table 2: Population of the area covered by the Castletroy Local Area Plan**

Year	Castletroy Population	Population Increase	% Increase
1981	3,727	-	-
1996	7,000	3,273	87.8
2002	8,979	1,979	28.3

<b>2006</b>	<b>10,601*</b>	<b>1,622</b>	<b>18.1</b>
<b>2011</b>	<b>13,841</b>	<b>3,240</b>	<b>30.6</b>
<b>2016</b>	<b>14,733</b>	<b>892</b>	<b>6.4</b>

Source: CSO Census

\*Did not include the town of Annacotty which is part of the plan boundary

The total population residing in the Castletroy plan area in 2006 was 12,440, which made up 8.06% of the total population of County Limerick. It is clear that there has been a significant population increase in Castletroy (42%) between 2002 and 2016.

**Table 2: Population of the area covered by the Castletroy Local Area Plan**

<u>Year</u>	<u>Castletroy Population</u>	<u>Population Increase</u>	<u>% Increase</u>
<u>1981</u>	<u>3,727*</u>	<u>=</u>	<u>=</u>
<u>1996</u>	<u>7,000*</u>	<u>3,273</u>	<u>87.8</u>
<u>2002</u>	<u>10,321</u>	<u>3,321</u>	<u>47.4</u>
<u>2006</u>	<u>12,440</u>	<u>2,119</u>	<u>20.5</u>
<u>2011</u>	<u>13,841</u>	<u>1,401</u>	<u>11.3</u>
<u>2016</u>	<u>14,733</u>	<u>892</u>	<u>6.4</u>

Source: CSO Census

\*Did not include the town of Annacotty which is part of the plan boundary

### Chapter 3

Amend text as follows in Chapter 3

#### Section 3.2 Demographics

The County Development Plan puts forward the population targets for County Limerick allocated by the DEHLG at National level and distributed at regional level by the Mid West Regional Authority. The Mid West Regional Planning Guidelines have allocated a population target of 9,000 people to be accommodated within the City Environs areas of the Southern Environs and Castletroy by 2022. Chapter 2 of the Limerick County Development Plan, 2010-2016(as extended) provides an overall core strategy for the development of County Limerick taking into account these national and regional population targets.

The population targets as they apply to the **Gateway Environs** area of County Limerick are outlined in Table 3 below.

**Table 3: Population Targets for the Gateway**

Settlement Hierarchy				
Hierarchy position	Town	Pop 2006	2016 target	2022 target
Tier 1: Gateway The City and City Environs	Southern Environs	16,000	31,851	35,601

Note \* did not include the settlement of Annacotty

106 hectares are zoned for residential use in the existing Castletroy Local Area Plan, the draft plan proposes ~~80.03~~ 69 hectares for residential use.

**Table 4: ~~City & Environs Breakdown~~**

	<del>2016 Population</del>	<del>Additional Population to 2040</del>	<del>% split for additional population</del>
<del>Former City Council boundary</del>	<del>58,259</del>	<del>28,000</del>	<del>50%</del>
<del>Clare (undeveloped zoned lands 5 hectares)</del>	<del>4,521</del>	<del>560</del>	<del>1%</del>
<del>Southern Environs</del>	<del>19,065</del>	<del>15,120</del>	<del>27%</del>
<del>Castletroy</del>	<del>12,347*</del>	<del>12,320</del>	<del>22%</del>
<del>Total</del>	<del>94,192</del>	<del>56,000</del>	<del>100%</del>

~~\*Castletroy population does not include the town of Annacotty however Annacotty is part of the plan area.~~

~~While Mungret and Annacotty were excluded from the 2016 population areas it is considered reasonable that going forward the additional 56,000 population includes both of these.~~

~~12,320 population over the next 24 years resulting in:~~

- ~~— 513 additional people in Castletroy per annum~~
- ~~— 205 houses per annum (on the basis of a household size of 2.5)~~

~~1/3 of these households will be provided on lands where a density of 50 hectares applies within a 500m public transport corridor and 2/3 of these households will be provided on lands where a density of 35 units per hectare applies (see zoning map). Based on the above the residential zoned land requirements are calculated as follows:~~

- ~~— 68 houses per annum will be provided on lands where a density of 50 unit per hectare applies~~
- ~~— 1.4 hectares will be required annually (density of 50 units per hectare)~~
- ~~— 8.4 hectares residential lands required over the lifetime of the plan.~~
- ~~— Add 150% headroom as set out in chapter 5 of the Regional Planning Guidelines in 2010 – 21 hectares residential lands required where a density of 50 units will apply~~
- ~~— 137 houses per annum will be provide on lands where a density of 35 units per hectare applies~~
- ~~— 4 hectares will be required annually (density of 35 units per hectare)~~
- ~~— 24 hectares residential lands required over the lifetime of the plan~~
- ~~— Add 150% headroom as set out in chapter 5 of the Regional Planning Guidelines in 2010 – 60 hectares residential lands required where a density of 35 units will apply~~

~~**Total amount of land required for residential development 60+21=81 hectares of land.**~~

**Table 5: Lands zoned for residential development (includes lands zoned Mixed Use and Enterprise & Employment as per Site Development Briefs), number of units and population equivalent 2019-2025**

	Area	Number of units	Population equivalent
Total land zoned for residential use where a density of 35 units per hectare applies.	27.75	1,388	3,470
Residential portion of Site Development Briefs site 1 zoned for Enterprise & Employment Purposes (35 units per hectare)	52.32	1,831	4,578
Residential portion of Site Development Briefs site 1 zoned for Enterprise & Employment Purposes (50 units per hectare)	.75	37	93
Residential portion of Site Development Brief Site 2 zoned for Mixed Use purposes (35 units per hectare)	10	350	875
Total Residential lands and Site Specific Design Briefs	90.82	3,606	9,196

### 3.7.2 Land currently available for Housing Development

There is a total requirement for 81 hectares of lands needed for residential use over the plan period. The plan proposes to designate 80 hectares of residentially zoned lands and a further 10.75 hectares of land for residential use from a Mixed use site and an Enterprise and Employment zoned site. This could accommodate a population of up to circa 9,200 additional people where a density of 50 units per hectares is applied within the 500m public transport corridor and where a density of 35 units per hectares applied on the remaining lands.

**Table 4: Allocation to 2040 for Limerick City & Environs Breakdown**

	<u>2016 Population</u>	<u>NPF Population Growth Breakdown (56,000)</u>	<u>% split for additional population</u>
<u>Former City Council</u>	<u>58,259</u>	<u>28,000</u>	<u>50%</u>

<u>boundary</u>			
<u>Clare (undeveloped zoned lands 5 hectares)</u>	<u>4,521</u>	<u>560</u>	<u>1%</u>
<u>Southern Environs</u>	<u>19,065</u>	<u>15,120</u>	<u>27%</u>
<u>Castletroy</u>	<u>14,733</u>	<u>12,320</u>	<u>22%</u>

Based on the above it is assumed that 22% of the NPF population growth will be allocated to Castletroy. This equates to the following:

12,320 population over the next 24 years resulting in:

- 513 additional people in Castletroy per annum
- 3,080 additional people in Castletroy over the plan period (6 years)
- 1,232 houses required (on the basis of a household size of 2.5)
- 30.8 hectares residential lands required over the lifetime of the plan (based on 40 units per hectare)
- Add headroom of 50% as set out in the National Planning Framework Implementation Road Map 2018 = 46 hectares

Total amount of land required for residential development 46 hectares of land.

Table 5: Lands zoned for residential development (includes lands zoned Mixed Use and Enterprise & Employment as per Site Development Briefs), number of units and population equivalent 2019-2025

	<u>Area</u>	<u>Number of units</u>	<u>Population equivalent</u>
<u>Total land zoned for Phase 1 (Density of 35 units per hectare applies.</u>	<u>58.8</u>	<u>2,058</u>	<u>5,145</u>
<u>Total land zoned for Phase 2 (Density of 35 units per hectare applies.</u>	<u>23.3</u>	<u>816</u>	<u>2,038</u>
<u>Residential portion of Site Development Briefs site 3 zoned for Enterprise &amp; Employment Purposes (35 units per hectare)</u>	<u>.75</u>	<u>26</u>	<u>65</u>

<u>Residential portion of Site Development Brief Site 2 zoned for Mixed Use purposes (35 units per hectare)</u>	<u>10</u>	<u>350</u>	<u>875</u>
<u>Vacant units in Castletroy as per the Geo Directory</u>		<u>59</u>	<u>147</u>
<u>Total Residential lands and Site Specific Design Briefs</u>	<u>92.85</u>	<u>3,309</u>	<u>8,270</u>

Phasing of sites in line with the requirements of the National Planning Framework in terms of serviceability of sites.

3.7.2 Land currently available for Housing Development

There is a total requirement for 46 hectares of lands needed for residential use over the plan period. The plan proposes to introduce a phasing programme, which will be supported by an Objective in Chapter 4 Housing, whereby 50% of the lands in Phase 1 must be developed before development can proceed on lands identified in Phase 2. It is proposed to designate 58.8 hectares of lands for Phase 1 residential use. This is 12.8 hectares in excess of the 46 hectares required in line with the population projections set out in the NPF for the Limerick City and Environs area.

A detailed serviced lands assessment matrix was compiled as part of the plan preparation process in line with the requirements of the NPF to establish the suitability of the land for development within the plan boundary. As a result of this and having regard to the very young age profile of the area, whereby 71% of the population are under the age of 40 years, the historical growth patterns in the area over successive plans, the demand for housing in the area and the support of housing in certain locations will provide for the delivery of essential road infrastructure projects and community facilities. A further 10.75 hectares of lands are available for residential use from a Mixed Use site and an Enterprise and Employment zoned site. The development of residential lands zoned Phase 1 could potential accommodate 6,085 additional people, using a residential density of 35 units per hectares. The number of vacant units in the areas as identified in the latest Geo directory data is 59 units. This has been included in the population projection figures, which is an additional 147 people.

**Chapter 4**

**4.1 Introduction**

Based on the population and household projections in Chapter 3, 69 hectares of lands are zoned Phase 1 for residential use and can accommodate an additional population of circa ~~8,300~~ 6,085 people over the plan period to 2025. Chapter 3, Policy SSP1 Development of Gateways of the County Development Plan 2010-2016 (as extended) sets out that it is policy of the Council to recognise the role of the Limerick/Shannon Gateway region as a key driver of social and economic growth in the County and in the wider region and to promote the Gateway City region as the main growth centre.

Further, it is a policy of the County Development Plan to ensure that sufficient land is zoned within the city environs so that, as part of the Limerick Gateway City Region, they will act as the primary focus for investment in infrastructure, housing, transport, employment, education, shopping, health facilities and community.

Rename Objective H2 and add additional text

**Objective H2: Residential density, design, mix and Phasing:**

It is an objective of the Council to:

- (a) Ensure that proposals for residential development are planned coherently through the use of design briefs, master plans for larger landholdings where proposal involve the partial development of landholdings if appropriate, sustainability statements and social infrastructure assessments and any other supplementary documents deemed necessary by the Council.
- (b) Promote the concept of a compact district by encouraging appropriate densities in suitable locations and by resisting sporadic isolated developments.
- (c) Require a minimum net density of 35 units to the hectare on residentially zoned sites ~~within the plan area and 50 units per hectare within 500 m of a bus stop. Map 1 outlines the 500 meters radius where a minimum density of 50 dwelling per hectare will be required on residential development.~~
- (d) Ensure that the density of housing in any location is appropriate to the housing type.
- (e) Ensure a wide range of house types, sizes and tenures are provided to meet varying population requirements and needs.
- (f) Ensure that a variety of building heights is incorporated into residential development proposals to ensure that optimum use is made of residentially zoned lands at appropriate locations.
- (g) Ensure compliance with the policies and objectives of the County Development Plan Policy SS P1 and SS P6.
- (h) Ensure development of sites in Phase 2 can only proceed when at least 50% of all development in New Residential zoned Areas Phase 1 is completed

## Amend Objective H3 – Chapter 4

### **Objective H3: Infill Development, Restoration and Renewal**

It is an objective of the Council to:

- (a) Encourage living in the centre of the Castletroy area by the promotion of residential use over businesses;
- (b) Promote sensitive infill sites on vacant sites, which would not be required for access to backlands;
- (c) Consider on their merits proposals for residential development of rear plots where they can be adequately accessed and there they would not affect existing or proposed private amenities, storage or parking requirements. Such proposals should in general be part of larger masterplans involving contiguous plots.

(d) In line with the requirements of the National Planning Framework, ensure that at least 40% of all new housing development are delivered within the existing built up areas of cities, towns and villages on infill and or brownfield sites.

Amend Section 4.7 as follows:

#### **4.7 Derelict and Vacant Sites**

~~According to the 2016 census there was 359 vacant dwelling units in the areas, which accounts for 6.35% of the total housing stock.~~ According to the most recent Geodirectory figures, there are currently 59 vacant dwellings in the area.

## **Chapter 6**

Insert Strategic Policy for Transport

Policy T2: It is a policy of the Council to support the Trans - European Transport Networks (TENT-T) programme to ensure cohesion, interconnection and interoperability of the European wide transport network

Re-number existing T2 and T3 as a result of the insertion

Add additional text to 6.1 Introduction:

The M7 Motorway acts in part as a bypass to the area however the concentration of large employment centres and residential estates means that traffic congestion remains a serious issue in the wider plan area. This is highlighted in the Mid West Regional Planning Guidelines (MWRPGs) and the Mid West Area Strategic Plan (MWASP). The MWRPGs also highlight the need to prioritise the provision of the Northern Distributor Road as a major piece of infrastructure for the area. Any development in this area shall consider Chapter 3 of the DoECLG for Spatial Planning and National Roads Guidelines.

## **Chapter 7**

### Amend 7.3 Foul Sewerage

The provision of adequate water supply and wastewater treatment utilities is crucial to the continued expansion of Castletroy. The Castletroy Wastewater Treatment Plant has treatment facilities to cater for a population equivalent of 45,000. This is adequate to cater for the existing load and ~~committed~~ current industrial discharges from industry and is not discharging at the maximum load permitted by existing licenses at present.

### Section 7.6 – Flood Risk Management

~~This plan rezones land along the Shannon Banks in the National Technology Park and at Towlerton from Enterprise & Employment to Agricultural Use.~~

Insert the following Objective IN06

Objective IN 06: Monaclieo Stream upgrade

It is an objective of the Council to ensure that no development shall commence on these lands until a site-specific hydraulic model has been carried out, a detailed design complete and construction of remedial works to the Monaclieo Stream has taken place.

Renumbering of Objectives shall be carried out

Insert the following Objective IN07

Objective IN 07 National Technology Park River Shannon Flood Relief Works

It is an objective of the Council to ensure that no development shall commence on these lands until such time a site-specific flood risk assessment and detailed masterplan is prepared for the lands outlined on Map C - 19/25-01 and the upgrade has been complete to the embankments and the attenuation ponds are in place.

Renumbering of Objectives shall be carried out

## Chapter 9

Section 9.1 – Introduction shall include:

- National Youth strategy 2015 -2020
- Teenspace – National Recreation Policy for Young People 2007
- Better Outcomes Brighter Futures – the National Policy Framework for Children and Young people 2014 -2020
- The Limerick Cultural Strategy - A Framework 2016-2030

- Update Chapter 9 Objective C2

**Objective C2      Improve Open Space Provision and encourage active and passive open space use:**

It is the objective of the Council to:

(a) Co-operate with sports clubs, schools, cultural groups and community organisations to provide quality sports and recreational facilities to the community. The Council encourages a multi-use and co-use of facilities of a complementary nature to support more diverse range of sport and recreational opportunities. Proposed development shall demonstrate quality pedestrian and cyclist linkage.

(b) Ensure residential development incorporates appropriate provision of quality public open space and playlots in accordance to national guidance and any subsequent guidance within the timeframe of the proposed Plan. Open space provision will be proportional to the scale of the number of residential units proposed, consider access to existing open space and of a quality cogniscent of the principles of national guidance including accessibility, personal and child safety, linkage, place-making, and permeability and the hierarchy of open space.

(c) To ensure that proposals for largescale development on land zoned Enterprise and Employment incorporate active and passive recreational opportunities for employees.

## Chapter 10

Amend Objective BM01 as follows:

**Objective BM01: Masterplan**

(a) It is an objective of the Council to require the preparation of a masterplan, which shall be prepared by a suitable qualified person, with accompanying design statements showing how the design concepts are consistent with the design brief principles. These proposals shall demonstrate using drawings the internal organisation of land uses, amenities and the layout of each block; the detailed design of individual buildings and spaces including private and collective amenity areas; hard and soft landscaping; choice of materials, finishes, street furniture, signage and lighting. Finishes, materials and heights shall be consistent with the overall site development.

(b)The masterplan shall focus on the creation of a high quality environment in terms of overall design and layout, a mixture of functions, tenure types and unit sizes and the provision of a broad range of on-site facilities for existing and future residents and employees.

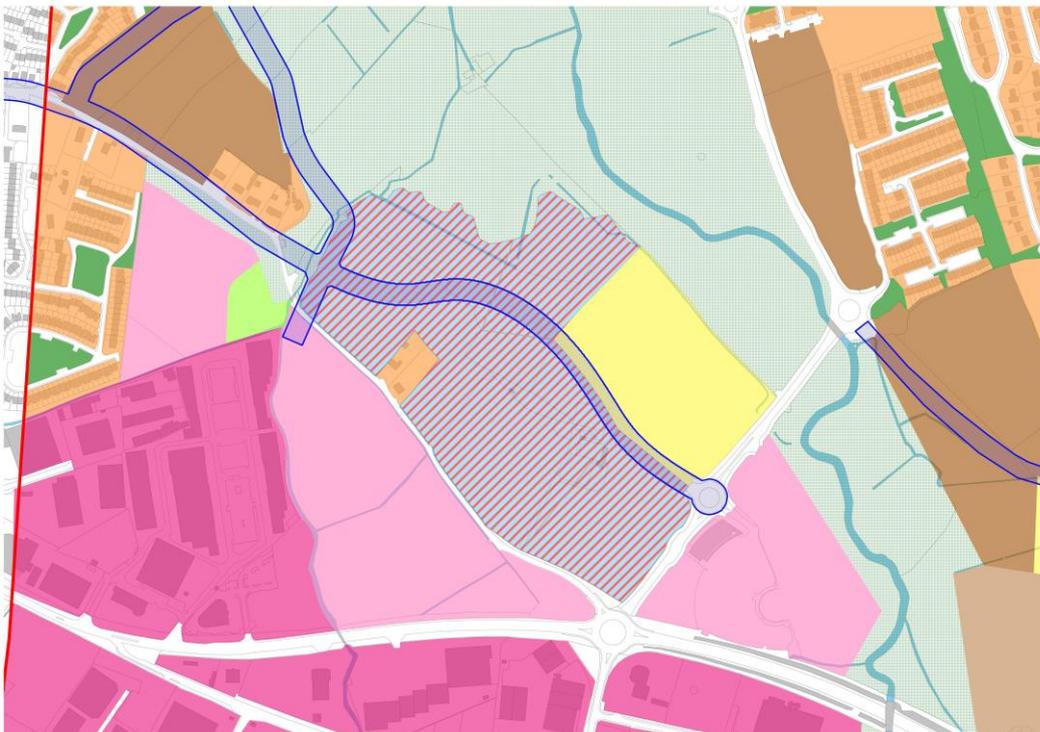
~~(c)The area designated as Groody Valley Green Wedge, along the north of the site, shall be incorporated into the overall masterplan.~~ The portion of land zoned Groody Valley Green Wedge within SDB 2 lands shall be incorporated into SDB 2 Masterplan.

(d)The development of any portion of this shall will be required to provide a masterplan for the intended further development of the entire site.

(e)The development of the link street will be required for access to the site – direct access from the L5173-1 will not be permitted

(f)All developments are subject to a Traffic and Transport Assessment and Road Safety Audit in accordance with Chapter 3 of the DoECLG Spatial Planning and National Roads Guidelines at planning application stage.

Amend 10.4.2 in Chapter 10 – Site Development Brief 2



Amend Objective BM02 as follows:

**Objective BM02: Provision of Mixed uses**

- (a) The masterplan shall clearly indicate the various mixed uses, which shall include residential, enterprise and employment uses, retail and education uses.
- (b) A maximum of 65% of the Mixed Use zoned lands shall be developed for residential purposes, as per Table 5, no more than 10 hectares shall develop for residential purposes and this shall include any use such as nursing home, residential care facility etc. (Total site area 16.5 Hectares)
- (c) (c)Retail development shall be of a scale to serve the local residential and working population and shall not be to such a scale that it will detract from higher order retail centres serving the area. The maximum gross retail convenience floor space shall be 900sqm and shall comprise of a number of units.
- (d) Retail warehousing will not be permitted at this location.
- (e) Complimentary uses such as Nursing Homes, Crèches etc. may also be considered at this location.

Update Figure 22 in Chapter 11 as follows

Zoning	Area designated in 2018 LAP (ha)	Area designated in 2009 LAP (ha)	% change
Agriculture	<del>93.94</del> <u>56.29</u>	53.92	<del>+88.6</del> <u>-4.4</u>
Education and Community Facilities	<del>36.24</del> <u>40.37</u>	121.95	<del>-70</del> <u>-66.9</u>
Existing Residential	<del>261.17</del> <u>260.08</u>	320.86	<del>-22.8</del> <u>18.9</u>
Groody Valley	<del>96.55</del> <u>95.71</u>	84.76	<del>+13.9</del> <u>-12.9</u>
Enterprise & Employment	<del>142.43</del> <u>183.05</u>	194.12	<del>-26.6</del> <u>-5.7</u>
Industrial	55.76	70.16	-20.5
Open Space	<del>42.37</del> <u>42.68</u>	67.09	<del>-36.8</del> <u>-36.4</u>
Sports Grounds	61.92	New use category	
Residential Development Area Phase 1	<del>80.03</del> <u>58.8</u>	106.63	<del>-25</del> <u>-44.8</u>
<u>Residential Development Area Phase 2</u>	<u>23.3</u>	New use category	
Retail	24.38	45.02	-45.8
Special Control Area	<del>-98</del> <u>-0.65</u>	.84	<del>+16</del> <u>+17</u>
Utility	6.56	6.23	-5.3
University	86.10	New use category – previously Education and Community	

		Facilities	
<b>Mixed Use</b>	<del>15.21</del> <u>12.98</u>	New use category	

## Zoning Matrix Castletroy Local Area Plan 2019 -2025

Amend Zoning Matrix as follows:

Development	Residential	Enterprise & Employment	Industrial	Public Open Space	Sports Grounds	Retail/ Commercial	Education/ Community Facilities	Agriculture	Special Control Area	Mixed Use	Goody Valley Green Wedge	University
Dwelling /Residential/apartments	/	X *	X	X	X	O	X	X***	X	O	X	O
Hotel/Hostel/Guesthouses	O	O	X	X	X	/	X	X	X	O	X	O
Local Shops	O	O	O	X	X	/	X	X	X	O	X	O
Retail Warehousing	X	O**	O	X	X	/	X	X	X	X	X	X
Supermarket >900 sq.m /Regional Shop	X	X	X	X	X	O	X	X	X	X	X	X
Take Away	X	X	X	X	X	/	X	X	X	O	X	O
Pub	X	X	X	X	X	/	X	X	X	O	X	O
Restaurant/Café	O	O	O	X	X	/	X	X	X	O	X	O
Cinema/Theatre /Dance Hall	X	O	X	X	O	/	X	X	X	O	X	O
Community Hall	O	O	O	O	O	O	/	X	X	O	X	O
Conference Facilities	X	O	X	X	X	/	X	X	X	O	X	O
Nursing Home / Nursing home integrated with retirement homes	O	O	X	X	X	O	X	X	X	O	X	X
Health Centre/Clinic	O	O	X	X	X	O	O	X	X	O	X	O
Hospital	X	O	X	X	X	O	O	X	X	O	X	X
Church	/	/	O	X	X	O	/	X	X	O	X	O
Church/School	/	/X	O	X	X	O	/	X	X	O	X	O
Open space/Recreational/Leisure	O	O	X	/	/	O	/	X	X	O	O	O
Office	O	/	O	X	X	/	X	X	X	O	X	O
Car Repair/Sales	X	O**	/	X	X	O	X	X	X	X	X	X
Petrol Station	X	X	/	X	X	O	X	X	X	X	X	X
Industry- General	X	O	/	X	X	X	X	X	X	X	X	X
Industry - Light	O	/	/	X	X	O	X	X	X	O	X	O
Wholesale/Warehouse	X	/	/	X	X	O	X	X	X	X	X	X
Logistics	X	X	/	X	X	X	X	X	X	X	X	X
Agricultural Machinery	X	X	/	X	X	O	X	X	X	X	X	X
Garden Centre	X	X	/	X	X	O	X	X	X	X	X	X
Amusement Arcade	X	X	X	X	X	/	X	X	X	X	X	X
Advertising Panel	X	O	O	X	X	/	X	X	X	X	X	X
Hair Dressing Salon	O	O	X	X	X	/	X	X	X	O	X	O
Bank	O	O	X	X	X	/	X	X	X	O	X	O
Group Housing, Halting Sites & Transient sites for Travellers	O	O	O	X	X	X	X	X	X	X	X	X
Childcare Facilities	/	/	O	X	X	/	O	X	X	O	X	O
Bring Centre/Bank (e.g. Bottle Banks)	/	/	O	/	O	/	/	/	X	/	/	/
Burial Ground	O	O	O	O	O	O	/	/	X	X	X	X
Allotments	O	O	O	O	O	O	O	O	X	X	O	O

\*\* - Retail Warehousing & Car repairs/sales not permitted in the National Technology Park, the Parkway Valley and Site Development Brief Bloodmill Road

X\* – Residential not permitted on Enterprise and Employment except on the Parkway Valley as identified in Site Development Brief 3

X\*\*\*- Residential only permitted for son/daughter of farmers



**Changes to Maps as follows:**

**Amendments to Land Use Zoning Map C-19/25-01**

- Amend Land use Zoning Map C-19/25-01 to Change land use zoning from Agricultural Zoning to Existing Residential Zoning (Submission No. 20)
- Amend Land use Zoning Map C-19/25-01 to Omit the 500m public transport corridor from the zoning map and the text from the legend (Submission No. 42)
- Amend Land use Zoning Map C-19/25-01 to Change land use zoning from Agricultural To Enterprise and Employment (Submission No. 52)
- Amend Land use Zoning Map C-19/25-01 to Change land use zoning from Education and Community to Existing Residential Area (Submission No. 42)
- Amend Land use Zoning Map C-19/25-01 to include the Indicative Link Road proposed from PJ Matthews on the Old Ballysimon Road to Southill (Submission No. 6)
- Amend Land use Zoning Map C-19/25-01 to include an Objective IN 06, including a boundary (Submission No. 47)
- Amend Land use Zoning Map C-19/25-01 to include an Objective IN 07, including a boundary (Submission No. 52)
- Amend Land Use Zoning Map C-19/25-01 to relocate the indicative link road to run along the rear of the existing residential zoning (Submission No.28)
- Amend Land Use Zoning Map C-19/25-01 to include a junction on the Dublin Road (R445) in proximity to Gaelscoil Chaladh an Treoigh (Submission No.36)
- Amend Land use Zoning Map C-19/25-01 to amend zoning from Agriculture to Enterprise and Employment, including a boundary (Submission No. 47)
- Amend Zoning Land Use Map C-19/25-01 to include changes from Education and Community Facilities to Mixed Use at 2 locations within SDB2 (Submission No.54)
- Amend Zoning Land Use Map C-19/25-01 to include changes from Groody Valley Green Wedge to Education and Community Facilities at the eastern boundary of SBD2 (Submission No. 54)
- Amend Land Use Zoning Map C-19/25-01 to include junction connection at the north-eastern boundary of SDB2 will be amended to provide a revised connection point to the new link road - Bloodmill Road to Parkway Valley (Submission No. 54)
- Amend Zoning Use Map C-19/25-01 to re-alignment of the Towlerton/Garryglass to Bloodmill Road Link Road (Submission No. 54)
- Amend Land Use Zoning Map C-19/25-01 to include a small portion of the in the central section of SDB2 from Groody Valley Green Wedge to Mixed Use (Submission No. 54)

**Amendments to Flood Map C-19/25-02**

- Amend Flood Map C-19/25-02 to Change land use zoning from Agricultural Zoning to Existing Residential Zoning (Submission No. 20)

- Amend Flood Map C-19/25-02 to Omit the 500m public transport corridor from the zoning map and the text from the legend (Submission No. 42)
- Amend Flood Map C-19/25-02 to Change land use zoning from Agricultural To Enterprise and Employment (Submission No. 52)
- Amend Flood Map C-19/25-02 to Change land use zoning from Education and Community to Existing Residential Area (Submission No. 42)
- Amend Flood Map C-19/25-02 to include the Indicative Link Road proposed from PJ Matthews on the Old Ballysimon Road to Southill (Submission No. 6)
- Amend Flood Map C-19/25-02 to include an Objective IN 06, including a boundary (Submission No. 47)
- Amend Flood Map C-19/25-02 to include an Objective IN 07, including a boundary (Submission No. 52)
- Amend Flood Map C-19/25-02 to relocate the indicative link road to run closer to the existing residential zoning (Submission No.28)
- Amend Flood Map C-19/25-02 to include a junction on the Dublin Road (R445) in proximity to Gaelscoil Chaladh an Treoigh (Submission No.36)
- Amend Flood Map C-19/25-02 to amend zoning from Agriculture to Enterprise and Employment, including a boundary (Submission No. 47)
- Amend Flood Map C-19/25-02 to include changes from Education and Community Facilities to Mixed Use at 2 locations within SDB2 (Submission No.54)
- Amend Flood Map C-19/25-02 to include changes from Groody Valley Green Wedge to Education and Community Facilities at the eastern boundary of SDB2 (Submission No. 54)
- Amend Flood Map C-19/25-02 to include junction connection at the north-eastern boundary of SDB2 will be amended to provide a revised connection point to the new link road - Bloodmill Road to Parkway Valley (Submission No. 54)
- Amend Flood Map C-19/25-02 to re-alignment of the Towleron/Garryglass to Bloodmill Road Link Road (Submission No. 54)
- Amend Flood Map C-19/25-02 to include a small portion of the in the central section of SDB2 from Groody Valley Green Wedge to Mixed Use

### **Amendments to Transport and Amenity Map C-19/25-03**

- Amend Transport and Amenity Map C-19/25-03 Map to Indicative Link Road proposed from PJ Matthews on the Old Ballysimon Road to Southill (Submission No. 6)
- Omit the ~~“Existing cycle lanes”~~ along the University Road and to include Existing cycle lane along Walkers Road (Submission No. 5 and 18)
- Amend the Transport and Amenity Map C-19/25-03 to include the provision of a junction on the Dublin Road (R445).

- Amend Transport and Amenity Map C-19/25-03 to relocate the indicative link road to run closer of the existing residential zoning (Submission No.28)
- Amend Transport and Amenity Map C-19/25-03 to include a junction on the Dublin Road (R445) in proximity to Gaelscoil Chaladh an Treoigh (Submission No.36)
- Amend Transport and Amenity Map C-19/25-03 to include junction connection at the north-eastern boundary of SDB2 will be amended to provide a revised connection point to the new link road - Bloodmill Road to Parkway Valley (Submission No. 54)
- Amend Transport and Amenity Map C-19/25-03 to re-alignment of the Towlerton/Garryglass to Bloodmill Road Link Road (Submission No. 54)

**Amendments to the Groody River Valley Management Plan Map C -19/25-05**

- Amend text in legend in the Groody River Valley Management to Indicative Riverside Walkways/Cycle ways and links (Submission No. 34)
- Amend the boundary in the Groody River Valley Management Map to include the site at the junction of the R445 and the Groody Road (Submission No. 34)



## Serviced Land Assessment Matrix

Site No	Residential Development Area (ha)	Roads	Footpath	Water	Foul	Surface Water	Public Transport	Broadband	New Infrastructure required	Road	Time Line	Tier	Comments	Recommendation
1	2.5	✓	✓	✓	✓	✓	✓	✓	✗		Short Term	1	Formal pre planning on the site for Strategic Housing Development – July 2018	Phase 1
2	1.58	✓	✓	✓	✓	✓	✓	✓	✗		Short Term	1	Live permission on site granted until 2021 for 38 units, vacant sites register	Phase 1
3	0.47	✓	✓	✓	✓	✓	✓	✓	✗		Medium Term	1	In Local Authority ownership, currently operating as office use, however this is subject to change in the Short/Medium term	Phase 1
4	1.1	✓	✓	✓	✓	✓	✓	✓	✗		Short Term	1	No preplanning, no submission. Site on the Vacant Sites Register, consideration for phase 2 however lands at prime location and area is limited	Phase 1
5	0.11	✓	✓	✓	✓	✓	✓	✓	✗		Short Term	1	Live permission on site, applicants have commence work on the lower end of the site and have had pre planning on the remaining lands.	Phase 1
6	2.4	✓	✓	✓	✗	✗	✓	✓	✗		Short Term	2	Preplanning on site, in same ownership as site 7 where there is an active planning application, site is also on vacant sites register	Phase 1
7	4.1	✓	✓	✓	✓	✓	✓	✗	✗		Medium Term	1	Preplanning on site, in same ownership as site 6 where there is an active planning application, site is also on vacant sites register	Phase 1
8	1.2	✓	✓	✓	✗	✗	✓	✓	✗		Short Term	2	No preplanning, no submission. Site on the Vacant Sites Register	Phase 1
9	0.19	✓	✓	✓	✓	✓	✓	✓	✗		Short Term	1	Current Planning application for 4 no. dwelling houses - Reference No.18/748	Phase 1
10	16.1	✓	✓	✓	✗	✓	✓	✓	✗		Short Term	1	Planning application on part of the site and preplanning enquires on the other part of site. Planning application	Phase 1

												recently lodged 18/698 on site, application includes a masterplan for the development of the adjoining lands at site 7. Site on the Vacant Sites Register and the preplanning and application is in response to this. Delivery of water, wastewater and surface water by the developer.	
11	0.39	✓	✓	✓	✓	✓	✓	✓	✗	Short Term	2	Live permission on site for 6 no. dwelling houses, granted by An Bord Pleanála May 2014	Phase 1
12	2.1	✓	✓	✓	✓	✓	✓	✓	✗	Long Term	1	Submission received at Pre draft stage from the adjoining school seeking to have the residential zoning maintained on this site and the Community & Education Use	Phase 2
13	2.6	✓	✓	✓	✗	✓	✓	✓	✗	Medium Term	1	No preplanning, no submission.	Phase 1
14	17.3 – 8.5 Phase 1 and 8.7 Phase 2	✓	✓	✗	✓	✓	✓	✓	✓	Medium Term	2	No preplanning, no submission. LIHAF application made for development of Roadway, unsuccessful in 2017. Identified as necessary and will be subject to further applications for funding in line with the NPF as appropriate.	Phase 1 and Phase 2
15	3.2	✓	✓	✓	✓	✓	✓	✓	✗	Medium Term	2	Preplanning on site	Phase 1
16	1.4	✓	✓	✓	✓	✓	✓	✓	✗	Medium Term	1	No preplanning, no submission	Phase 1
17	17 – 4.6 Phase 1 and 12.4 Phase 2	✓	✓	✓	✓	✓	✓	✓	✗	Medium and Long Term	1	Site proposed for inclusion on the Vacant Sites Register and a response received to letter has set out that the intentions of the landowner is use the site for agricultural purposes and they do not intending on developing the site for residential purposes.	Phase 1 and Phase 2
18	1.4	✓	✓	✓	✓	✓	✓	✓	✗	Medium Term	1	No preplanning, no submission.	Phase 2

19	2.44	✓	✓	✓	✓	✓	✗	✓	✗	Long Term	1	Pre-draft submission, indications of interest in developing	Phase 1
20	6	✓	✗	✓	✗	✗	✓	✓	✓	Short Term	2	Current planning application on site with a proposal to construct part of the link street, submission made to Draft LAP. Application at FI stage for 99 units.	Phase 1
21	10	✓	✗	✗	✗	✗	✓	✓	✓	Short Term	2	Extensive preplanning on site, submission to draft plan. Part of the site has been purchased to the Dept of Education. There is a commitment by the developer to build the link road identified in the Draft Plan. Delivery of road, wastewater, water and surface water by the developer.	Phase 1

**Part C**  
**Strategic Environmental Assessment Environmental Report) and Appropriate**  
**Assessment (Natura Impact Statement) of the Proposed Material Alterations**

The changes proposed are significant and therefore alterations to the Environmental and Appropriate Assessment screening report are required as follows.

**Updated Strategic Environmental Assessment Environmental Report -  
Review of the Castletroy Local Area Plan**

**Contents:**

**1.0 Introduction: Castletroy Local Area Plan Review**

**1.1 Environmental issues arising in this review**

**1.2 Strategic Environmental Assessment Process**

**2.0 Legal Context**

**2.1 SEA guidance**

**2.2 Interaction with Other relevant Plans, Policies and Programmes**

**2.3 Purpose of the Environmental Report**

**2.4 Consultation with Environmental and Planning Authorities**

**2.5 Appropriate Assessment**

**2.6 2.6 Zoning changes**

**3.0 Environmental Baseline**

**3.1 Biodiversity, Flora and Fauna**

**3.2 Population and Human Health**

**3.3 Soil**

**3.4 Water and Waste Management**

**3.5 Air**

**3.6 Climatic Factors**

**3.7 Material Assets**

**3.8 Cultural heritage**

**3.9 Landscape**

**3.10 Inter-relationship between these issues**

**4.0 Alternatives**

**5.0 Monitoring**

**6.0 Conclusions**

**Appendix 1 Plan objectives with assessment of their effects**

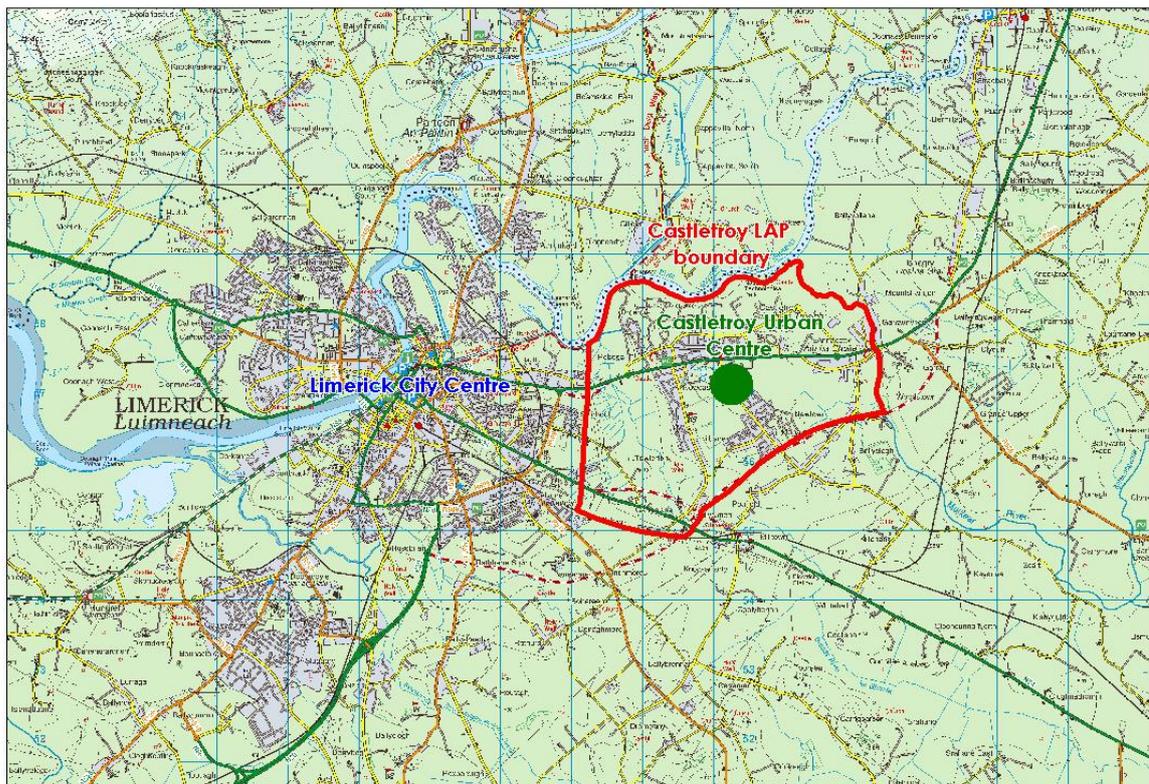
**Appendix 2 Non-Technical Summary**

## 1.0 Introduction: Castletroy Local Area Plan Review

Limerick City and County Council is carrying out a review of the Local Area Plan (LAP) for Castletroy and will make a new LAP under the Planning and Development Act 2000 (Amended). An outline map of the area under consideration is included in Figure 1.

Article 14A(1) of the Planning and Development (Strategic Environmental Assessment) (SEA) (Amendment) Regulations 2011 require that an SEA is carried out on any Local Area Plan where the population (or target population) is more than 5,000 persons. The population of Castletroy is currently 14,733 people. The population has grown significantly in the period since the 2011 Census. The population is substantially above the 5,000 threshold that triggers the need for Strategic Environmental Assessment (SEA). The Planning Authority moved straight to the scoping stage of the SEA process. SEA is the formal, systematic evaluation of the likely significant effects of implementing the plan, before a decision is made. The process includes preparing an Environmental Report where the likely significant effects are identified and evaluated.

Castletroy is located within the eastern environs of Limerick City, approximately 3 kilometres from Limerick City Centre. It is bisected by the Dublin Road (R445) through the centre of the plan area and the (N24) Tipperary Road to the south of the plan area.



**Figure 1:** Location of Castletroy relative to Limerick City.

Castletroy contains a number of distinct components i.e. Castletroy North containing the University of Limerick and the National Technology Park, Castletroy South which largely contains residential areas and the Dublin road. The area is bounded to the north by the River Shannon, to the east by the River Mulkear, while the Groody River Valley forms the westward boundary. The Southern ring road (M7) forms the southern boundary.

**Environmental issues arising in this review:** As Local Area Plan reviews take place every six years or so it is to be expected that new environmental issues will arise. In this situation one of the biggest issues is that of noise. One of the biggest generators of traffic noise is the Southern Ring road that runs to the south of the plan area. With increasing traffic levels and its proximity to residentially zoned lands it is to be expected that the noise issue would emerge as a concern. This issue has been added to the list of environmental protection objectives that will inform the contents of the plan. So too has the issue of climate change and responses in the plan have varied from the addition of policy content dealing with specific issue of climate change.

**No specific difficulties were encountered in the preparation of this report.**

## **1.2 Strategic Environmental Assessment Process**

Strategic Environmental Assessment (SEA) is the formal, systematic evaluation of the likely significant environmental effects of implementing a plan or programme before a decision is made to adopt the plan or programme. Article 1 of the SEA Directive states:

*“The objective of this Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development, by ensuring that, in accordance with this Directive, an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment.”* It is a systematic, ongoing process for evaluating, at the earliest possible stage, the environmental quality and consequences of implementing certain plans and programmes on the environment

The SEA process is comprised of the following stages:

- (i) Screening: Decision on whether or not SEA of the Plan review is required. In this case because of the importance of the Castletroy area as part of the overall metropolitan area and its population of 14,733 people it was decided to proceed directly to the scoping stage as it was deemed that SEA was necessary.
- (ii) Scoping: Consultation with the defined statutory bodies on the scope and level of detail to be considered in the environmental assessment;
- (iii) Preparation of an Environmental Report ;
- (iv) Consultation on the proposed review and associated Environmental Report (and the Non-Technical Summary thereof);
- (v) Evaluation of the submissions and observations made on the proposed review and Environmental Report; (current stage) and,

- (vi) Issue of an SEA Statement identifying how environmental considerations and public consultation have been integrated into the final variation/plan.

SEA informs decision-making by systematically testing the performance of proposed plans/programmes against certain criteria. This Environmental Report follows the scoping stage, set out in Regulation 13M of the Planning and Development (Strategic Environmental Assessment) Regulations, 2004 (SI No. 436/2004), as amended by the Planning and Development (Strategic Environmental Assessment) (Amendment) Regulations, 2011 (SI No. 201/2011), hereafter construed together as “the SEA Regulations”. This Article requires the planning authority to give notice of its intention to carry out an environmental assessment of the proposed review of the Local Area Plan.

The Guidelines for Regional Authorities and Planning Authorities (2004) state that SEA is intended to improve the quality of the plan making process by:

- *Facilitating the identification and appraisal of alternative plan strategies.*
- *Raising awareness of the environmental impacts of plans: while it will not always be possible to eliminate all potentially significant negative effects in balancing policy options, SEA at least helps to clarify the likely consequences of such choices, and makes specific provision for mitigation measures where some negative impacts cannot be avoided.*
- *Encouraging the inclusion of measurable targets and indicators: which will facilitate effective monitoring of implementation of the plan, and thus make a positive contribution to subsequent reviews.*

The purpose of the SEA is to systematically identify and evaluate the likely significant environmental effects on the plan area and its environs due to the implementation of the proposed review of the Castletroy Local Area Plan. The SEA process informs Limerick City and County Council during the plan making process of the likely and significant environmental effects.

## **2.0 Legal Context**

The Directive on Strategic Environmental Assessment (SEA) (2001/42/EC) came into force in July 2001 requiring each Member State to assess and consider the ‘likely significant environmental effects’ of public plans prior to their adoption. All land-use plans in Ireland are subject to SEA procedures and environmental considerations must be assessed at an early stage in the decision-making process.

The Directive was transposed into Irish Law in 2004 by two sets of Regulations which were both amended in 2011, as follows:

- European Communities (Environmental Assessment of Certain Plans and Programmes) (Amendment) Regulations 2011, (S.I. No. 200 of 2011), amending the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (S.I. No. 435 of 2004), and;

- Planning and Development (Strategic Environmental Assessment) (Amendment) Regulations 2011, (S.I. No. 201 of 2011), amending the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. No. 436 of 2004).

This legislation requires mandatory Screening of variations to Development Plans. Where Screening identifies that proposals are likely to give rise to significant environmental effects full SEA is required to be undertaken. The legislation also identifies thresholds for SEA. In this case because of the size of target population is over 5000 it has been decided to proceed to full SEA not just because of the population but because of Castletroy's importance in the context of the overall Limerick metropolitan area.

### **2.1 SEA Guidance.**

The methodology used in the preparation of this SEA Environmental Report is based on the following requirements and guidance documents:

- SI No. 435/2004 (as amended by SI No. 200/2011) and SI No. 436/2004 (as amended by SI No. 201/2011);
- Implementation of SEA Directive (2001/42/EC): Assessment of the Effects of Certain Plans & Programmes on the Environment Guidelines for Regional Authorities & Planning Authorities (Section 28 Guidelines) (2004) Department of Environment Community and Local Government;
- EPA (2013) SEA Pack. Environmental Protection Agency, Wexford; and,
- EPA (2016) SEA Scoping Guidance Document. Environmental Protection Agency, Wexford.
- Development of Strategic Environmental Assessment (SEA) Methodologies for Plans & Programmes in Ireland - Synthesis Report (2003) Environmental Protection Agency;
- SEA Resource Manual for Local and Regional Planning Authorities – Integration of SEA Legislation and Procedures for Landuse Plans (2013) Environmental Protection Agency & Mid-West Regional Authority;
- Integrating Climate Change into Strategic Environmental Assessment in Ireland – A Guidance Note (2015) Environmental Protection Agency;
- Developing and Assessing Alternatives in Strategic Environmental Assessment (2015) Environmental Protection Agency;
- EPA Scoping Template Web Version (2016) Environmental Protection Agency.

## 2.2 Interaction with Other relevant Plans, Policies and Programmes:

The Castletroy Plan sits in a hierarchy of plans and is informed by them and other guidance documents and legislation. Amongst the plans and programmes that will be considered are those listed in table 2.1 below.

**Table 2.1 Relevant Plans and Programmes that have Influenced the SEA Process**

<ul style="list-style-type: none"> <li>• <b>International Level</b></li> </ul>
<ul style="list-style-type: none"> <li>• Paris Agreement (UNFCCC, 2015)</li> <li>• European Union Biodiversity Strategy to 2020</li> <li>• Habitats Directive (92/43/EEC) (the Habitats Directive)</li> <li>• Birds Directive (2009/147/EC)</li> <li>• Floods Directive (2007/60/EC)</li> <li>• EU Water Framework Directive (2000/60/EC)</li> <li>• Groundwater Directive (2006/118/EC)</li> <li>• Drinking Water Directive (98/83/EC)</li> <li>• Noise Directive (2002/49/EC)</li> <li>• The Clean Air for Europe Directive (2008/50/EC) and the Fourth Daughter Directive (2004/107/EC)</li> <li>• EIA Directive (2011/92/EU as amended by 2014/52/EU)</li> <li>• European Convention on the Protection of the Archaeological Heritage, 1992 (the Valletta Convention)</li> <li>• Environmental Noise Directive 2002</li> <li>• Climate Change Programme (ECCP II)</li> </ul>
<ul style="list-style-type: none"> <li>• <b>National Level</b></li> </ul>
<ul style="list-style-type: none"> <li>• National Planning Framework</li> <li>• Roads Act 2015</li> <li>• Smarter Travel – A Sustainable Transport Future 2009-2020</li> <li>• Building on Recovery: Infrastructure and Capital Investment 2016 - 2021</li> <li>• Smarter Travel: A Sustainable Transport Future 2009 – 2020</li> <li>• Ireland 2040 National Planning Framework (2018)</li> <li>• The National Spatial Strategy 2002 – 2020</li> <li>• Road Safety Strategy 2013 – 2020</li> <li>• National Mitigation Plan 2017</li> <li>• National Biodiversity Action Plan 2017-2021</li> <li>• European Communities (Natural Habitats) Regulations, SI 94/1997, as</li> </ul>

amended S.I. 233/1998 and S.I. 378/2005

- The Planning System and Flood Risk Assessment Guidelines, Guidelines for Planning Authorities (2009)
- National Transport Authority Integrated Implementation Plan 2013-2018
- Investing in our Transport Future: A Strategic Framework for Integrated Land Transport
- Delivering a Sustainable Energy Future for Ireland - The Energy Policy Framework 2007-2020

• **Regional**

- Mid-West Regional Planning Guidelines 2010-2022
- Mid-West Area Strategic Plan (MWASP) 2012 – 2030
- Shannon Study Catchment Flood Risk Assessment and Management (CFRAM) Study
- River Basin Management Plans and Programme of Measures (2nd Cycle in preparation DCCA/E)
- Strategic Integrated Framework Plan for the Shannon Estuary (SIFP) 2013 – 2020
- It should be noted that the Regional Economic and Spatial strategy is currently being prepared and cannot yet inform the content of the Local Area Plan.

• **County & Local**

- Limerick County Development Plan 2010-2016 (as extended)
- Castletroy Local Area Plan 2009 – 2015 (As extended)
- Limerick Smarter Travel
- Noise Action Plan 2014
- Limerick Hinterland Report 2015
- Local Economic and Community Plan (LECP) for Limerick City and County 2016-2021
- Limerick 2030 – An Economic and Spatial Plan for Limerick (2013)

### 2.3 Purpose of the Environmental Report

The purpose of the Environmental Report is to examine the likely significant effects on the environment of implementing the Plan.

- The environmental report is required to include the information that may reasonably be required, taking into account-
  - (i) Current knowledge and methods of assessment (Section 3 and Section 4).
  - (ii) The contents and level of detail of the proposed review, (Section 1.1).
  - (iii) The stage of the proposed review in the decision-making process, and (Section 2 – Scoping Stage).
  - (iv) The extent to which certain matters are more appropriately assessed at different levels in the decision-making process in order to avoid duplication of environmental assessment, (Section 2.5).

Taking the above into consideration, the purpose of this report is, includes consultation with relevant prescribed environmental authorities, to include sufficient detail of the environmental information to assess the effects of the plan content. Scoping was undertaken to ensure that the relevant environmental issues are identified allowing them to be addressed appropriately in the Environmental Report.

The main objectives of the process to date were:-

- (a) To identify the key environmental issues/ problems to be addressed in the assessment and the appropriate level of detail to which they should be considered; and
- (b) To update the range of Strategic Environmental Objectives (SEOs). These were established previously in the SEA Environmental Report for the ‘Limerick County Development Plan 2010-2016’. These have been updated and adapted for the specific requirements of the Castletroy LAP review. The SEOs identified for the proposed review are generally consistent with the Development Plan and will facilitate ease of monitoring of the LAP. However, these SEOs have broadened and/ or amended slightly to include additional objectives relevant to the specifics of the proposed review and the likely significant effects. The SEOs are outlined in Table 2.2 and are used in Appendix 1 of the Environmental Report to assess the environmental effects of the policies and objectives of the Proposed Plan.
- (c) To use Strategic Environmental Objectives (SEOs) to assess the policy content of the proposed LAP review (Appendix 1).

The following are the draft Strategic Environmental Objectives. Please note that these have been reviewed and updated and from previous work on both County Development Plan variations and Local Area Plan reviews. The issue of noise has been included. This was one of the issues raised by the EPA in their initial submission of May 1<sup>st</sup> 2018.

**Table 2.2 Strategic Environmental Objectives for the Plan Review.**

<b>Environmental Topic/ Receptor</b>	<b>Strategic Environmental Objectives (SEOs)</b>
<b>Biodiversity</b>	B1 Maintain and enhance bio-diversity. B2 Protect, conserve and enhance habitats, species and areas of European, national and local importance.
<b>Population and Human Health</b>	P1 Promote compact settlement patterns and high quality residential development in appropriate locations. P.2 Take the issue of noise into account in terms of its effects on the population of the plan area. P.3 Ensure adequate provision for open space and exercise areas. P.4 Ensure the provision of adequate community facilities.
<b>Water &amp; Flood Risk</b>	W1 Prevent deterioration in surface and ground water quality, achieve improvement in water quality. W2 Promote good practice in flood risk management
<b>Soils and Geology</b>	S1 Conserve and sensitively exploit geological resources. Preserve sensitive geological sites. S2 Assist in soil conservation by encouraging the development of brown field sites.
<b>Air &amp; Climate</b>	AC1 Reduce air pollution, implement climate change aspects of plan.
<b>Material Assets</b>	MA1 Sensitively manage natural and manmade material assets to meet the needs of existing and future populations in a sustainable manner. MA2 Ensure balanced and flexible zoning pattern that caters for suitable urban uses. MA3 provide for adequate and sustainable transport links.
<b>Cultural Heritage</b>	C1 Protect and conserve cultural heritage including architecture, archaeology and heritage items.
<b>Landscape</b>	L1 Protect historic and natural features of note in landscapes. Sensitively manage landscape change.

#### **2.4 Consultation with Environmental and Planning Authorities**

This draft plan and its accompanying Environmental Report follow the first public display period and is informed by the responses received. The following Environmental Authorities have been contacted with the intention of informing input into the environmental assessment:

- Environmental Protection Agency (EPA)
- Minister for the Housing Planning and Local Government
- Minister for Communications, Climate Action and Environment
- Department of Culture, Heritage and the Gaeltacht
- Minister for Agriculture, Food and the Marine.

In terms of the Environmental Authorities responses were received from the EPA and the Department of Housing, Planning and Local Government.

Amongst the concerns expressed by the Department of Housing Planning and Local Government were the following:

- Zoning of 80 ha of residential land based on assumptions on the percentage spilt from the National Planning Framework figures without the Regional Spatial and Economic Strategy and the Metropolitan Area Strategic Plan. This is matter of timing, the plan is being prepared before the completion of the RSES. Without the RSES the MASP cannot commence. The statutory time frame for review of the Castletroy LAP comes before any of these. It was therefore necessary to commence the review of the LAP prior to the completion of the RSES. The Castletroy LAP will be revoked when the City and County Development Plan is prepared.

To deal with the Department's concerns, the following changes have been made to the current draft of the plan.

- Phasing has been introduced meaning that 50% of phase 1 lands will have to be developed prior to any consideration of development for Phase 2 lands. A serviced lands assessment has informed the phasing of the residential lands.
- The use of vacant dwellings into land use requirement both through updating of the vacant site register and ongoing surveys in order to obtain up to date estimates of vacancy in the metropolitan area as a whole have been included.
- Completed the Serviced Land Assessment and completed a tiered approach in accordance with the NPF.

The Environmental Protection Agency mentioned the following:

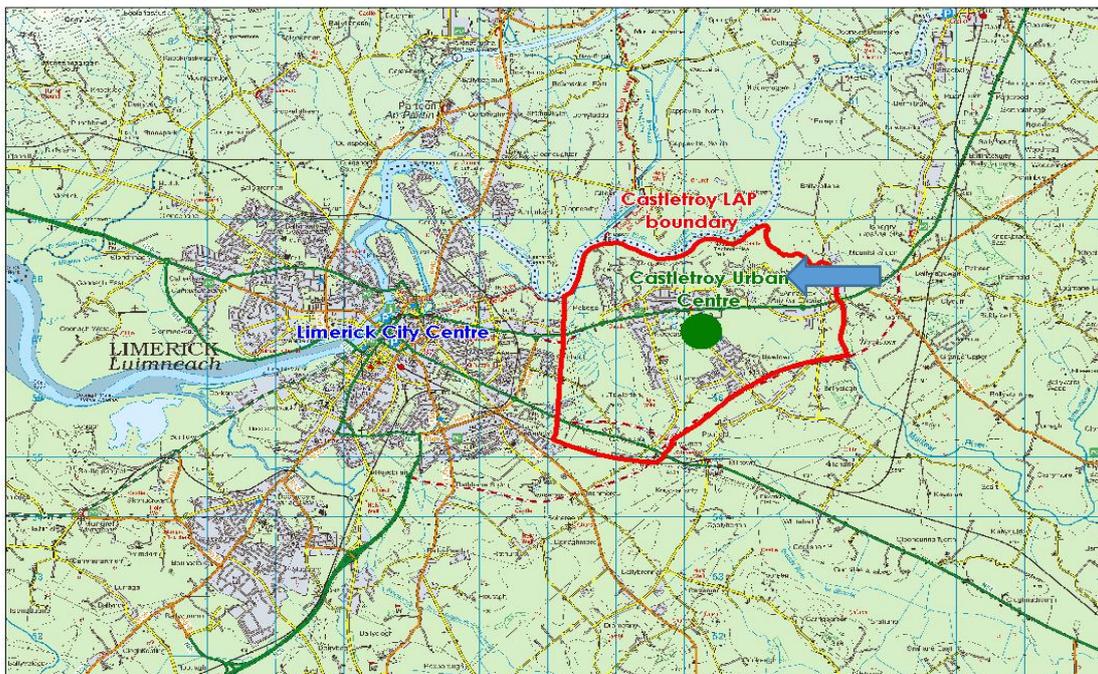
- That the full range of environmental effects including cumulative effects be assessed.
- That alternatives (i.e. alternatives to the plan as presented) be fully assessed.
- That mitigation measures be fully integrated into the plan where significant effects are identified.
- That monitoring measure be flexible to take into account specific issues as they arise.

To address the EPAs concerns the following has been included in this Environmental Report.

- In order to assess the content of the policies and objectives of the plan they have been assessed against updated Strategic Environmental Objectives (SEOs). This is a necessary first step in examining policy alternatives but also important in informing a monitoring regime in that any possible environmental issues that may rise as result of the implementation of plan policies are flagged at an early stage. The assessment of the policy content of the plan is in Appendix 1.
- The plan content has been updated following responses from Irish Water. This is important as they are the providers of key prices of environmental i.e. water and wastewater services.
- Cross reference with the Natura Impact Assessment of the new plan and its mitigation measures is included in this draft of the Environmental Report.

## 2.5 Appropriate Assessment

Potential impacts on the Natura 2000 network (SACs and SPAs) are examined through a separate Appropriate Assessment process (under Article 6 of the Habitats Directive) of the Draft Local Area Plan. In response to submission received, certain ecological issues emerged that resulted in the preparation of a Natura Impact report. This was due to proposed construction of flood defence works around the IDA lands which are located along the banks of both the Shannon and the Mulkear. Both of these rivers are part of the Lower River Shannon Special Area of Conservation site. A planning application has been lodged for these works.



**Figure 2:** The location of the IDA lands is indicated by the arrow above.

The proposed flood works consist of the raising of the level of the existing berm running along the eastern and southern boundaries of the Industrial Development Authority lands, together with the addition of a further 170m length of berm to add to an existing berm at the eastern edge of the area of works. Four new attenuation ponds are proposed and there is to be an upgrade and alteration to existing drainage works. Current discharge points to the Mulkear River are to be closed off and this is to be diverted to main River Shannon Channel by being pumped to attenuation ponds.

**Designated sites:** the River Mulkear on the north and eastern boundary and the River Shannon on the western boundary are part of the Lower River Shannon SAC site. Of particular note is the presence of Sea Lamprey spawning areas or redds in the Mulkear River. There are approximately 56 redds in question (AA screening /NIS Appendix 1 p.1p.19-20 part of Submission No. 52). While the closing of discharges to the Mulkear River is to be welcomed as part of the works (FRA S6, p.38 part of Submission No. 52) the issue of disturbance during the construction phase remains one of the greatest threats to the Sea Lamprey. They are particularly sensitive to vibrations. In *“certain circumstances, for example in construction or other development related activities, it may be necessary to restrict the timing of such activities or to put in place mitigation measures”* (Mulkear LIFE best practice guide no.2)).

**Mitigation measures:**

- A management and maintenance regime for both flood defences and associated infrastructure e.g. drains, valves and pumps in necessary
- Works are to be confined to the period 7<sup>th</sup> July to end of October.
- All mitigation measures set out in the submission should be included

## **2.6 Zoning changes**

Apart from the residential zoning and phasing changes mentioned in S.2.5 above the other two major zoning changes has been in both the IDA lands and the Shannon Commercial Properties lands at Towlerton. Both of these had been de-zoned in the previous draft from Enterprise and Employment to Agriculture on flooding grounds. On receipt of Flood Risk Assessments and supporting documentation, it has been decided to change the zoning of both areas back to Enterprise and Employment based on the flood mitigation works put forward. Further details are in the accompanying Strategic Flood Risk Assessment.

## **3.0 Environmental Baseline**

The SEA Directive provides for flexibility concerning the scope of information to be included in the environmental report. Only the information listed in Annex 1 (of the Directive) that is reasonably required should be included, taking into account:

- I. Current knowledge and methods of assessment,

- II. The contents and level of detail in the plan,
- III. The stage of the plan in the decision-making process, and
- IV. The extent to which certain matters are more appropriately assessed at different levels in the decision-making process in order to avoid duplication of environmental assessment.

An 'Environmental Assessment' of a Local Area Plan must examine the likely significant effects on the environment. The issues to be assessed include:

- Biodiversity, Flora and Fauna
- Population and Human Health
- Soil
- Water
- Air
- Climatic factors
- Material Assets
- Cultural Heritage (architectural and archaeological)
- Landscape
- The inter-relationship between these issues

Each of these topics is considered in the sections that follow;

### **3.1 Biodiversity, Flora and Fauna**

#### **3.1.1 Designated sites**

The EPA, in their initial submission of 1<sup>st</sup> of May identified the SAC sites and non designated bio-diversity sites as being amongst their areas of concern. The Lower River Shannon Special Area of Conservation (SAC) site runs along the Northern and Eastern boundaries of the plan area. The River Shannon forms the northern boundary and the River Mulkear is the eastern boundary of the plan area.

In terms of site protection in the original draft de-zoning has taken place in two locations which reduces the intensity of potential land use close to both the Mulkear and the Shannon. As indicated in Sections 2.6 and 2.7 above it has been decided following submissions and supporting documents to re-zone the IDA land as Enterprise and Employment. Part of the reason for this alteration is the construction of flood defence works. As outlined above with mitigation measures it has been decided that there would not be any significant ecological effects.

**Table 3.0 Natura 2000 Sites**

Site Code	Site Name	Qualifying Interests (* indicated priority habitat)
002165	Lower River Shannon Special Area of Conservation (SAC)	<ul style="list-style-type: none"> <li>• Freshwater pearl mussel</li> <li>• Sea lamprey</li> <li>• Brook lamprey</li> <li>• River lamprey</li> <li>• Salmon</li> <li>• Sandbanks</li> <li>• Estuaries</li> <li>• Mudflats and sandflats</li> <li>• Coastal lagoons*</li> <li>• Large shallow inlets and bays</li> <li>• Reefs</li> <li>• Perennial vegetation of stony banks</li> <li>• Vegetated sea cliffs</li> <li>• Salicornia and other annuals colonizing mud and sand</li> <li>• Spartina swards</li> <li>• Atlantic salt meadows</li> <li>• Bottle-nosed dolphin</li> <li>• Otter</li> <li>• Mediterranean salt meadows</li> <li>• Water courses of plain to montane levels with the Ranunculus fluitantis</li> <li>• Molinia meadows</li> <li>• Alluvial forests*</li> </ul>

The mitigation measures set out in the submission set out to avoid encroachment on the Riparian zones of both the Shannon and the Mulkear. This, coupled with the inclusion of a 30m buffer along the Shannon and a 25m buffer along the Mulkear offer additional protection to riparian ecology. The buffer also serves as flood buffer/flood residence area and allows for the incorporation of Sustainable Urban Drainage Systems (SUDS). Two policies EH05 (Groody River Valley) and EH06 (Designated sites and nature conservation) seek to provide protection for designated sites and the Groody Valley and reflect concerns of the EPA and the SEOs B1 and B2 (Table 2.2) See Appendix 1 for the assessment of policy content against the SEOs.



**Figure 2:** Showing the Groody Valley (1) and the SAC site (2). The hatched area is the SAC site.

The Special Area of Conservation in this area runs along the main channel of the Shannon and the Mulkear Rivers. At this location the habitat is characterised by stretches of alluvial woodland, while both the Shannon and Mulkear in this location are host to populations of sea lamprey which use the area for spawning.

In terms of undesignated bio-diversity areas, the Groody Valley which is located to the west of the plan area (Figure 2) is of particular importance as it is a largely undeveloped river corridor with potential for both ecological and amenity usage. The plan includes mention of a master plan that provides for park in the Groody Valley. The master plan for the Groody valley will not result in the loss of any additional flood plain area. The development mentioned in the master plan is on existing fill land. The master plan relates to the provision of a public park and an adjacent park and ride facility. This would also help to answer the need for amenity areas within the plan boundary and in the longer term would complement the existing Castletroy Park. It is important to point out that the proposals also includes a buffer between the park area and the Groody River channel in line with Inland Fisheries Ireland recommendations in their Planning for Water Courses in the Urban Environment (2011).

Invasive species such as Japanese Knotweed, Himalyan Balsam Rhododendron, Sycamore and Laurel can cause major ecological changes and damage to habitats where they

become established. These are present along the main River Shannon Channel close to the University and also in portions of the Groody Valley. Discussions during the review indicate that the most appropriate policy response would be through the forthcoming City and County Development Plan that would be overarching through all planning policy documents and ensure a consistent response throughout all planning policy documents produced. The review of the City and County Development Plan will begin after the adoption of the Regional Spatial and Economic Strategy. .

### **3.2 Population and Human Health**

The main emphasis on plan policies and zonings has been to improve the physical environment of the plan with public health and amenity interests in mind. As indicated above the population of the area has grown substantially since the last plan with a current population total of 14,733. Largescale additional zoning of lands for residential purposes has not taken place due to the requirement to comply with the National Planning Framework (NPF). The zoning that has taken place has been to consolidate existing residential zoning patterns or to include an open space area within these areas.

There are no Seveso (Control of Major Accident Hazards Directive) site in the plan area. Another issue that will be considered during the preparation of the plan will be that of noise, mainly from traffic and its effect on residential amenity in particular.

From the point of view of human health one of the key zoning changes that has taken place is that which provides for designated active open space. This new description is tilted Sports Ground and while in the case of the Golf Club it is reflection of long established use its use elsewhere in the plan area shows a commitment to providing sufficient area for such active amenity within the plan boundaries. This is in line with policy content of Policy C1 and Objective C2 of Chapter 9 of the plan. This also reflects the emphasis of Strategic Environmental Objective P3 (Table 2.2). This SEO was updated to reflect this concern.

Another issue, which has arisen, is that of noise, particularly that of traffic generated noise. At this point in the plan process a policy response to the issue has been included in Chapter 6- see below. See also Appendix 1.

#### **Objective T11: Noise Mitigation**

It is the policy of Limerick City and County Council to adopt a strategic approach to managing environmental noise within its functional area, which will aim to prevent residents in new residential and other noise sensitive developments being exposed to undesirable noise levels. Developers will be required to ensure that appropriate noise assessments are carried out and the principles of good acoustic design are applied in line with "Professional Practice Guidance on Planning & Noise" (2017) and that predicted internal and external noise levels are in keeping with World Health Organisation recommendations and guidance.

The Strategic Environmental Policy Objective P.2 which mentions the need to “take the issue of noise into account in terms of its effects on the population of the plan area” helped to inform this policy response.

### **3.3 Soil**

It is through the zoning template that the potential for large-scale alteration of soils takes place. It is considered that there is currently no need to expand the current development boundaries so this should ensure that existing zoned land would be the first to be developed. This would ensure that the development footprint of the plan area would not expand.

There are no active quarries within the plan area nor is there any designated geological sites.

One aspect that will reduce development pressure on the soil resource that is within the plan area is that some de-zoning has taken place adjacent to the River Mulcair. One area that had been zoned as residential had zoning altered to agricultural purposes. The inclusion of buffer zones along both the Mulcair and the Shannon in the plan policy content is expected to have benefits in terms of reduction of run off and soil erosion as inappropriate development is not permitted in these areas. In addition the use of phasing should ensure that development take space in a more coherent manner which would ensure that lands are developed more slowly.

### **3.4 Water and Waste Management**

This topic can be considered under different headings- see below:

#### **3.4.1 Waste Water Treatment**

Future development potential of the area will have implications for the capacity of wastewater treatment systems. The Irish Water submission envisages that there is adequate treatment capacity to accommodate the proposed population allocation of 3,078 people over the Draft LAP period. The current capacity of the Castletroy WWTP is 45,000-population equivalent and the load to the plant in 2017 was identified as 36,486-population equivalent. Currently an upgrade to the plant is being progressed and this will increase capacity to 80,000-population equivalent. This project is at design stage and has an anticipated completion date of 2024. IW are not aware of any bottlenecks in the wastewater network and it remains the case for the zonings proposed under the LAP. Connection applications will identify any need for local network reinforcement. Irish Water are aware of excessive infiltration of the network especially when the River Shannon is high. The Limerick and Castletroy DAP is to commence in 2018 and this will increase the understanding of the network.

### 3.4.2 Water supply schemes

The Castletroy area is serviced by the Clareville Water Treatment Plant and the Irish Water submission envisages that there is adequate treatment capacity and water capacity to accommodate the proposed population allocation of 3,078 people over the Draft LAP period. In terms of strategic water network there are no known bottlenecks that would prevent further growth. Connection applications will identify any need for local network reinforcement.

### 3.4.3 Surface Water and Ground Water Quality

The Water Framework Directive establishes a framework for the protection of all waters including rivers, lakes, estuaries, coastal waters, groundwater, canals and other artificial bodies for the benefit of everyone. Good ecological and chemical status for all waters must be achieved with no deterioration in existing status in the meantime.

Objective EH10 Compliance with the water framework directive seeks to ensure that all activities that come within the remit of planning policy will be compliant with the contents of the Directive.

The designation of the river Groody Green area will contribute to achieving this end as by preserving open space and natural hydrology in this area it will reduce development pressure on the Groody River and its riparian zone just prior to its confluence with the Shannon. The creation of buffers along both the Mulkear and the Shannon will also help in this regard. This will also comply with SEOs B1 and B2 P3, W1, W2 and L1

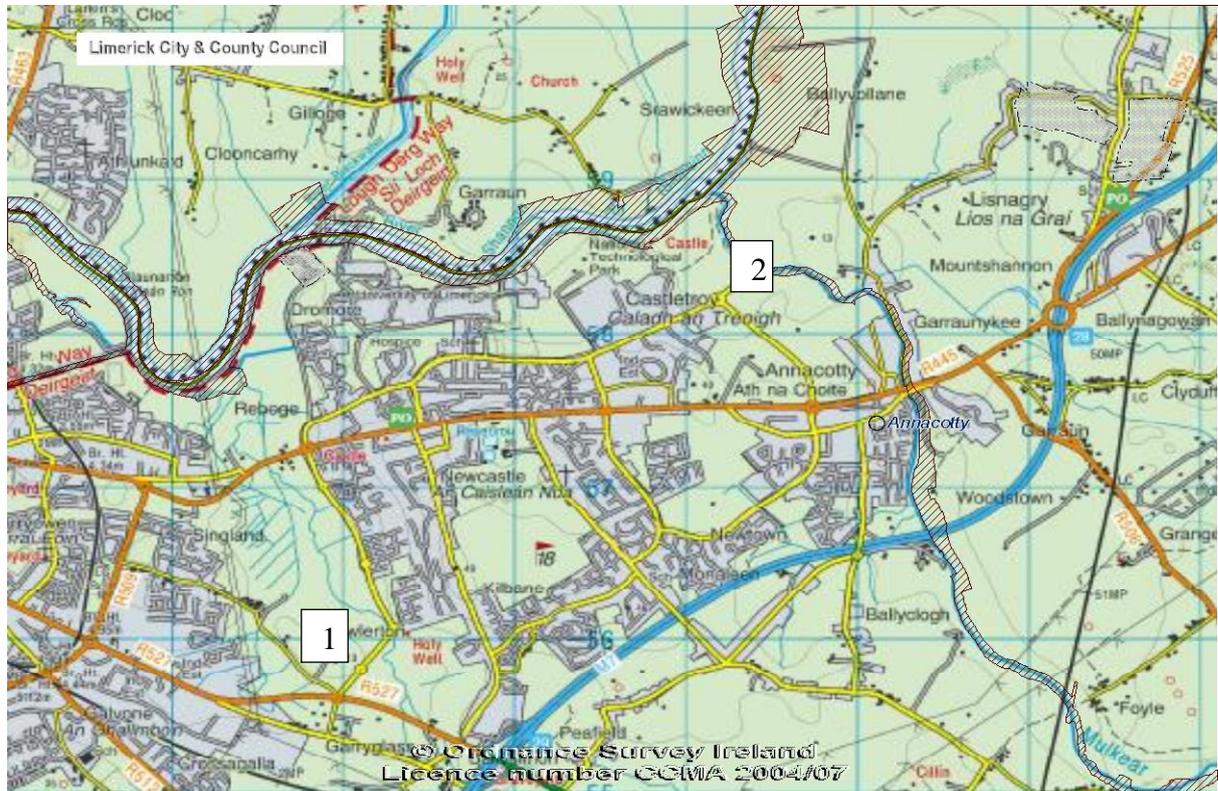
### **3.4.4 Flood Protection:**

As two large rivers, the River Mulkear and the River Shannon from the eastern and western boundaries fluvial flooding is major factor to consider. Also in the plan area the floodplain of the Groody, where it is not infilled, provides a flood residence function.

A Stage 1 Flood Risk Assessment as per the Technical Appendices of the Planning System and Flood Risk Management guidance (November 2009) has been prepared to guide development generally within the plan area. More detailed assessments are available for two sites, one in the Towlerton area and the other National Technological Park (NTP). These are indicated as 1 and 2 in Figure 4 below.

Since the plan has been prepared more information has become available on flooding issues. Two site-specific reports (mentioned above) informed policy responses to the sites located in the National Technology Park and the Towlerton area. In each case it has been decided to re-zone the lands as Enterprise and Employment rather than agriculture which they were in the draft of the Plan. The Towlerton site is low-lying and issues with local drainage have been identified. In addition to topography these include issues such as

culvert dimensions which would restrict run off. Information submitted indicated that these issues could be resolved. At this stage in the plan process, based on currently available information it was decided to take re-zone this land as Enterprise and Employment, subject to these works being completed.



**Figure 4:** Showing the locations of two sites for which detailed flood risk assessments will be required. The Towleron site is indicated as 1 while the NTP site is shown as 2.

The second site which has been re-zoned is that in the National Technology Park. A submission which details works to deal with the flooding issue has been received. The proposed flood works consist of the raising of the level of the existing berm running along the eastern and southern boundaries of the Industrial Development Authority lands, together with the addition of a further 170m length of berm to add to an existing berm at the eastern edge of the area of works. Four new attenuation ponds are to be constructed and there is to be an upgrade and alteration to existing drainage works. Current discharge points to the Mulkear River are to be closed off and this is to be diverted to main Shannon Channel by being pumped to attenuation ponds. Based on this it has been decided to rezone the lands as Enterprise and Employment. Development applications will not be considered unless they are accompanied by a detailed site specific flood risk assessment.

While on the issue of flooding, it is important to remember that areas in the plan such as the Groody Valley Green Valley perform an important flood residence function. This is

particularly the case where flooding in the main Shannon channel causes tributaries to back up. For this reason it recommended that this function be kept in mind when considering any development proposals in or close to the Groody Valley. Please see the Flood Risk Assessment Document.



**Figure 5:** Showing flooding in the Groody River Valley. This is looking east. The road to the right of the picture is the Dublin road. The flooding dates from 2011.

### **3.4.5 Waste Management**

The issue of waste is now dealt with on a regional basis, and there is a Regional Waste Management Plan in place for the Southern Region. The Southern Region Waste Management Plan 2015-2021 is the current plan. The policy content of the plan reflect the need to provide composting and adequate storage and management of waste, chiefly through the application of planning conditions on new development applications.

There are no issues in the plan area with non-licensed closed landfills.

### **3.5 Air**

Data on air quality is available from the EPA. EU legislation on air quality requires that member states divide their territory into zones for the assessment and management of air

quality. The monitoring station in Limerick is in the Fire Station in Mulgrave Street in Limerick City. Currently air quality is described as good.

### **3.6 Climatic Factors**

It is now recognised that Development Plans need to take account of factors caused by climate change in future land use planning. According to the National Climate Change Strategy 2007-2012, *“Local authorities can have a significant influence over emissions in their local areas, both directly in relation to reducing emissions through their own energy use and procurement activities, in raising awareness and stimulating action in local communities, and indirectly through the exercise of their housing, planning and other statutory functions”*.

This has been recognised in the plan with new policy content (Policy EH09) which takes into account the need for climate change adaptation and adherence to new guidance on the issue as it emerges. It should also be noted that another policy takes into account the need to provide for electrical points for vehicles.

Zoning responses to climate related issues such as flooding have already been referred to in this report.

### **3.7 Material Assets**

Material assets are taken to include infrastructure and utilities including rail, road and energy/telecommunications infrastructure. Some changes to current infrastructure such as new connecting roads are proposed in the plan. It is not anticipated that these would have significant environmental effects as they run through previously developed areas for the most part and are at a distance from designated sites or those of bio-diversity interest. The only exception to this is the park and ride proposed for the Groody valley (Figure 2). It should be noted through that this is to be located on previously filled land so there is no loss of flood plain area. There is also an ecological buffer to be put in place between the proposed park and ride site and the Groody River itself.

The National Transport Authority is to prepare a Limerick Metropolitan Transport Strategy, the preparation of which is to commence in the near future. This has been referenced in the Department of Housing Planning and Local Governments submission but work on this is to commence in September and any material from this is as yet unavailable. This will have significant implications for the transport infrastructure of the City and the Plan area as a whole and its contents will be taken into account in future plan reviews or amendments.

The Limerick Northern Distributor Road (LNDR), which though outside the plan area, will be an important future link in opening up the northern eastern parts of the city and Castletroy. To ensure a consistent approach to shared infrastructure such as the LNDR,

the zoning description of the university campus have been changed from Education and Community to University. This is the same designation that is in the Clare County Development Plan.

### **3.8 Cultural Heritage (architectural and archaeological)**

Heritage, by definition, means inherited properties, inherited characteristics and anything transmitted by past ages and ancestors. It covers everything, from objects and buildings to the environment. Cultural heritage includes physical buildings, structures and objects complete or in part, which have been left on the landscape by previous and indeed current generations. The Plan area has a wealth of architectural and archaeological heritage.

Information sources include the Record of Monuments and Places, the National Inventory of Architectural Heritage and local sources including the Record of Protected Structures. The LAP has the potential to impact on the cultural heritage in the area, and this will be a significant issue to be addressed in the Environmental Report. With rivers forming the boundaries of the area the question of riparian and underwater archaeology arises.

The record of protected structures has been updated with new additions from the County Development Plan. It should be noted that the addition of new protected structures is a function of the development plan and not local areas plans and it is from the County Development Plan that the protected structures listing is sourced. This is in line with SEO C1

### **3.9 Landscape**

While there are no views outlined in the plan area, the settings of the rivers and the Groody River Valley provide attractive areas in the LAP. In the amenity map, trees and groups of trees that are suitable for protection are outlined. These are important local features in the landscape and as such merit protection.

One important part of landscape management within urban areas is the use of masterplans. These, when used on plan scale have the benefit of ensuring coherent standards of development and also planned development of key sites which are often in prominent locations.

Four sites in the plan area have been designated as opportunity sites and as such will require the development of masterplans to ensure their orderly development.

The use of buffers around close to the Mulkear and Shannon rivers has already been referred to and the importance of the Groody valley has been acknowledged in the both the zoning template where there is a Groody related zoning but also in Objective EHO5 Groody valley where its landscape and ecological importance is emphasised. This complies with SEO L1.

### **3.10 Inter-relationship between these issues**

Environmental factors as outlined above cannot be considered in isolation from each other. Many of the topics as outlined above will have inter-relationships, most particularly the interaction between Population and Human Health and issues such as water quality and noise which can have effects on the wider population.

The issue of climate change is another example where different areas of the plan are linked. There has been an to policy content to recognise the need to respond to climate change,

The Strategic Environmental Objectives in Table 2.2 are a useful tool in dealing with issues that are inter-related. In Appendix 1 many of the policies and objectives are assessed against two or more SEOs. The SEOs will play an important part in monitoring the plan.

### **4.0 Alternatives.**

Article 5 of the SEA Directive requires the plan-making authority to identify, describe and evaluate alternative ways of realising the objectives of the plan. As stated in the Directive;

*“an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated.”*

With the Local Area Plan process subject to the legislative provisions of the Planning Acts, the “do nothing” alternative was never an option as the plan could not be extended further and would therefore pass its allotted timeframe. This draft plan that has been presented with revised and consolidated zoning and new policy content reflecting current issues such as climate change, phasing of residential land flooding and noise is regarded as being the best alternative to date.

The plan is an unique situation as its renew ale comes prior to the preparation of the Metropolitan plan which will follow from the preparation of the Regional Spatial and Economic Strategy. The Castletroy plan will be absorbed into the larger metropolitan area, which will form part of Limerick City and County Development Plan, when this occurs. The advantage of the plan preparation at this stage is that the policy content of the plan will be updated and more topical and be in a better position to inform the content of the Metropolitan Plan.

The option of extending the plan boundaries was rejected early in the review process as it was decided that there was ample zoned land within the plan boundaries for development purposes over the six years of the plan. The current boundaries with rivers to the east and the north and the motorway to the south have the advantage of being natural and easily defined boundaries. Progressing beyond these would lead to urban sprawl and perhaps result in the under-utilisation of zoned lands closer to the centre of the plan area.

## 5.0 Monitoring

### 5.1 Introduction

As part of the SEA process, measures envisaged for monitoring the likely significant effects of implementing the review to the Local Area Plan must be included in the Environmental Report. The review of the Castletroy LAP will include monitoring of any significant environmental effects.

Monitoring is often based on indicators, which measure changes in the environment, especially changes which are critical in terms of environmental quality. The Department of Environment Heritage and Local Government SEA Guidelines state that indicators that can be easily and realistically measured should be used. "Environmental indicators are key statistics, which describe an environmental issue. Their purpose is to communicate information on environmental issues in a simplified manner and over time to create a benchmark against which future progress towards sustainable development can be measured. To be effective they should be representative of the issue and be based on scientifically valid information. In this manner they can support policy development and reflect the interrelationship between society, the economy and the environment."

Several kinds of indicators may be used to fulfil particular functions and measure the quality/quantity of environmental resources:

- 1 State of the environment indicators reflect environmental quality, or quantity of physical and biological or chemical phenomenon;
- 2 Stress indicators reflect development effects;
- 3 Performance indicators may be used to evaluate long-term achievements in environmental management and protection;
- 4 Sustainable development indicators introduce a new dimension to the provision of information, in that they seek to describe and measure key relationships between economic, social and environmental factors.

In all cases, indicators should both quantify and simplify information, thereby making it more accessible to policy-makers and the public.

Where new or improved monitoring measures come to light during the course of the updating or addition of Section 28 guidelines they will inform monitoring for SEA, to ensure that monitoring of effects during the course of implementing the guidelines can be meaningful and effective. The following measures are proposed as part of this SEA process, to monitor the effects on the environment of implementing the review of the LAP, presented in terms of the achievement of the strategic environmental objectives and the impact on the environmental factors that the SEA legislation requires to be considered. Measures include targets and thresholds that determine where remedial

action may be required in order to achieve that target and fulfil the environmental protection objective.

**Table 6.1 Monitoring Measures**

<b>Environmental Category</b>	<b>Potential impact</b>	<b>Indicators</b>	<b>Comments</b>
Bio diversity, flora and fauna	Fragmentation, loss of habitats, species.	Known losses, reports, surveys by relevant bodies, NPWS Fisheries	Requires cooperation liaison with other bodies.
Population and Human Health	Ground surface/ water pollution. Traffic accidents. Noise.	Pollution incidents, Traffic reports	Could be obtained through Traffic impact assessments produced as part of planning applications.
Soil	Contamination	Reports/Surveys	Local contamination may occur as a result of pollution.
Water	Pollution of ground and surface waters, estuary waters. Excessive abstraction	Water pollution surveys, incidents as brought to light as a result of complaints, sampling	Cooperation with other bodies such as Fisheries NPWS and Health Board required.
Air and Climate factors	Local air pollution. Green house gas emissions	Traffic volumes. Comments in individual EISs submitted.	Contents of EIS submitted to the Planning Authority in the monitoring time frame may be indirect sources of data
Material assets	Use of brown field sites	Planning applications.	Nil
Cultural heritage.	Development in or close to protected sites, habitats or structures.	Known loss of sites or structures.	Increased liaison with other bodies required.

## **6.0 Conclusions:**

The purpose of the SEA process is to provide a clear understanding of the likely significant effects on the environment regarding the making of the proposed review. Reasonable

alternatives were identified and assessed against the Strategic Environmental Objectives (SEOs) developed as part of the SEA process.

The SEA process has been informed by the previous and ongoing studies relating to the proposed Castletroy LAP and public submissions in order to establish the current state of the environment and existing environmental problems, issues or threats. This baseline assessment was used to facilitate the identification and evaluation of the likely significant environmental effects of carrying out the plan review and how these likely significant effects can be avoided, reduced or mitigated. The SEA is informed by the separate AA and SFRA process, which were undertaken in parallel with SEA process. As a result, the SEA outlines existing policies and objectives of the LAP and additional mitigation measures required in order to address identified likely significant adverse effects and how the environmental effects will be monitored over the lifetime of the Plan.

On the basis of the objective information provided in the SEA and separate NIR and SFRA assessments and with the adoption of the additional mitigation measures, which will be implemented in any following planning application for flood defence works it is not considered that the review of the plan will not, either alone or in-combination, have likely significant adverse effects on the environment and no further mitigation measures are required to be included as part of the proposed Variation.

The Environmental Report provides the decision-makers, the members of the Metropolitan District of Limerick, who decide whether or not to make the Plan, as well as the public, with a clear understanding of the likely environmental consequences of the plan review.

### Appendix 1.0 Plan objectives with assessment of their effects

The policies are listed as they are outlined in the plan chapters are then assessed in the tables that follow. Policies are contained within Chapters 2 to 13. Environmental effects are categorised as being positive +, negative – or neutral = with the relevant Strategic Environmental Objectives following, together with comments where applicable. The Strategic Environmental Objectives are reproduced below to assist in reading Table A.1:

#### Strategic Environmental Objectives for the Plan Review

<b>Environmental Topic/ Receptor</b>	<b>Strategic Environmental Objectives (SEOs)</b>
<b>Biodiversity</b>	B1 Maintain and enhance bio-diversity. B2 Protect, conserve and enhance habitats, species and areas of European, national and local importance.
<b>Population and Human Health</b>	P1 Promote compact settlement patterns and high quality residential development in appropriate locations. P.2 Take the issue of noise into account in terms of its effects on the population of the plan area. P.3 Ensure adequate provision for open space and exercise areas. P.4 Ensure the provision of adequate community facilities.
<b>Water &amp; Flood Risk</b>	W1 Prevent deterioration in surface and ground water quality, achieve improvement in water quality. W2 Promote good practice in flood risk management
<b>Soils and Geology</b>	S1 Conserve and sensitively exploit geological resources. Preserve sensitive geological sites. S2 Assist in soil conservation by encouraging the development of brown field sites.
<b>Air &amp; Climate</b>	AC1 Reduce air pollution, implement climate change aspects of plan.
<b>Material Assets</b>	MA1 Sensitively manage natural and manmade material assets to meet the needs of existing and future populations in a sustainable manner. MA2 Ensure balanced and flexible zoning pattern that caters for suitable urban uses. MA3 provide for adequate and sustainable transport links.
<b>Cultural Heritage</b>	C1 Protect and conserve cultural heritage including architecture, archaeology and heritage items.
<b>Landscape</b>	L1 Protect historic and natural features of note in landscapes. Sensitively manage landscape change.

**Table A.1 Plan objectives and Assessment of their effects based on the Strategic Environmental Objectives (SEOs):**

Policy /Objective	Chapter 3: Plan Strategy.	Effects +	Effects -	Effects =
S1	<p>Sustainable Development</p> <p>It is the policy of the Council to support the sustainable development of Castletroy</p>	+ P1 Promote compact settlement patterns and high quality residential development in appropriate locations.		
S2	<p>Compliance with the Limerick County Development Plan</p> <p>It is the policy of the Council to ensure all proposals shall comply with the policies, objectives and development management standards of the Limerick County Development Plan 2010-2016 (as extended) and the objectives of this Plan.</p>	<p>+ P1 Promote compact settlement patterns and high quality residential development in appropriate locations.</p> <p>Ensures compliance with higher tier plans.</p>		

Policy /Objective	Chapter 4: Housing	Effects +	Effects -	Effects =
Policy H1	<p>It is the policy of the Council to provide appropriately zoned lands to cater for the sustainable growth of Castletroy and to ensure that all residents can enjoy a safe and accessible environment</p>	+ P1 Promote compact settlement patterns and high quality residential development in appropriate locations.		
Policy H2	<p>It is the policy of the</p>	+ P1 Promote		

	Council that quality shall underpin all new development by creating and maintaining a sense of place and local distinctiveness in established and new development areas.	compact settlement patterns and high quality residential development in appropriate locations		
Objective H1: New Housing	<p>(a) It is an objective of the Council on serviced land that is zoned for residential use to facilitate residential development in accordance with the principles and guidelines of the Design Manual for Urban Roads and Streets(2013), the Sustainable Residential Development in Urban Area (2009), the accompanying Urban Design Manual, Quality Housing for Sustainable Communities (2007) and the policies, objectives and Development Management Standards contained in the Limerick County Development Plan 2010-2016 (as extended).</p> <p>(b) It is an objective of the Council to promote the provision of community and other facilities such as childcare as an integral part of new developments.</p> <p>(c)It is an objective of the Council to identify site-specific considerations on the zoning map in this</p>	+ P1 Promote compact settlement patterns and high quality residential development in appropriate location		

	plan to guide the making of a planning application for residential development on identified sites.			
Objective H2: Residential, density, design and mix	<p>It is an objective of the Council to:</p> <p>(a) Ensure that proposals for residential development are planned coherently through the use of design briefs, master plans for larger landholdings where proposals involve the partial development of landholdings if appropriate, sustainability statements and social infrastructure assessments and any other supplementary documents deemed necessary by the Council.</p> <p>(b) Promote the concept of a compact district by encouraging appropriate densities in suitable locations and by resisting sporadic isolated developments.</p> <p>(c) Require a minimum net density of 35 units to the hectare on residentially zoned sites within the plan area</p> <p>(d) Ensure that the density of housing in any location is appropriate to the housing type.</p>	+ P1 Promote compact settlement patterns and high quality residential development in appropriate location		

	<p>(e) Ensure a wide range of house types, sizes and tenures are provided to meet varying population requirements and needs.</p> <p>(f) Ensure that a variety of building heights is incorporated into residential development proposals to ensure that optimum use is made of residentially zoned lands at appropriate locations.</p>			
Objective H3: Infill Development, Restoration and Renewal	<p>It is an objective of the Council to:</p> <p>(a) Encourage living in the centre of the Castletroy area by the promotion of residential use over businesses;</p> <p>(b) Promote sensitive infill sites on vacant sites which would not be required for access to backlands;</p> <p>(c) Consider on their merits proposals for residential development of rear plots where they can be adequately accessed and there they would not affect existing or proposed private amenities, storage or parking requirements. Such proposals should in general be part of larger masterplans involving contiguous plots.</p>	<p>+ P1 Promote compact settlement patterns and high quality residential development in appropriate location</p> <p>S2 Assist in soil conservation by encouraging the development of brown field sites.</p>		
Objective H5:	It is an objective of the	+ P1 Promote		

<p>Social Housing and Joint Housing Strategy</p>	<p>Council in compliance with Objective HOU 02 of the County Development Plan, to  (a) Require that developers comply with Part V of the Planning and Development Act 2000 Amended)  (b) Require developers to provide social housing on all lands zoned for residential use, in accordance with the "Joint Housing Strategy for the Administrative Areas of Limerick City &amp; County and Clare County Council" and any subsequent document</p>	<p>compact settlement patterns and high quality residential development in appropriate location   Ensures an inter county response to the housing issue.</p>		
<p>Objective H6: Joint Traveller Accommodation Programme</p>	<p>It is the objective of the Council to provide appropriate housing accommodation for the Traveller Community in accordance with the Joint Traveller Accommodation Programme 2014-2018 and any subsequent programme formally adopted by the Council.</p>	<p>+ P1 Promote compact settlement patterns and high quality residential development in appropriate location</p>		
<p>Objective H7: Vacant Sites</p>	<p>It is the objective of the Council in line with the Urban Regeneration and Housing Act 2015 to identify vacant sites in the Local Authority's area that are suitable for housing but not coming forward for development. These sites will be entered on a vacant sites</p>	<p>+ P1 Promote compact settlement patterns and high quality residential development in appropriate location   S2 Assist in soil conservation by encouraging the</p>		

	register and from January 2019 onwards will attract a vacant site levy.	development of brown field sites		
Objective H8: Rural Housing in Castletroy	It is the objective of the Council to permit housing on agriculturally zoned land for the long-term habitation of farmers and the sons and daughters of farmers only and subject to the terms and conditions of rural housing policy as set out in the Limerick County Development Plan.		- Promotes more extensive use of land within the boundary of a LAP.	
Objective H9: Student accommodation	It is the objective of the Council to permit high quality student accommodation on appropriately zoned lands, which are supported by smarter travel options and in line with relevant guidelines.	+ P1 Promote compact settlement patterns and high quality residential development in appropriate location.  Recognises the needs of the substantial student population with the LAP boundaries.		

Policy /Objective	Chapter 5: Economic Development.	Effects +	Effects -	Effects =
Policy ED 1	Provision of employment centres in accordance with the settlement strategy It is the policy of the Council to complement the aims of the County settlement hierarchy in a	+ MA2 Ensure balanced and flexible zoning pattern that caters for suitable urban uses.		

	mutually reinforcing and sustainable manner through the recognition of Castletroy as part of the Limerick/Metropolitan area, facilitating employment related development to support the population growth envisaged for the area.			
Policy ED 2: Compliance with Limerick County Development Plan	It is the policy of the Council to ensure all proposals for economic development shall comply with the policies, objectives and Development Management Standards of the Limerick County Development Plan, 2010-2016 (as extended) and the objectives outlined below.	+ MA2 Ensure balanced and flexible zoning pattern that caters for suitable urban uses.  Ensures compliance with higher tier plans.		
Objective ED 1: Economic Development Proposals	It is the objective of the Council to permit proposals for new industrial and enterprise development or extension to existing industrial development in appropriately zoned areas, where it can be clearly demonstrated that the proposal: (a) Is located on appropriately zoned land; (b) Is appropriate to the respective area in terms of size and type of employment generating development to be provided; (c) Would not result in adverse transport effects; (d) Would have no significant detrimental effect on the surrounding areas or on the amenity of adjacent and nearby occupiers; and (e) Can be serviced	+ MA2 Ensure balanced and flexible zoning pattern that caters for suitable urban uses.		

	efficiently and economically			
Objective ED 2: Enterprise & Employment Masterplans	Any Enterprise & Employment development proposed on lands identified, as Site Development Brief Sites on the zoning map shall take into account site-specific considerations set out in Chapter 10	+ MA2 Ensure balanced and flexible zoning pattern that caters for suitable urban uses		
Objective ED 3: Mixed Use Masterplans	Any Mixed Use development proposed on lands identified, as Site Development Brief Sites on the zoning map shall take into account site-specific considerations set out in Chapter 10.	+ MA2 Ensure balanced and flexible zoning pattern that caters for suitable urban uses		
Objective ED 4: Boundary Treatment	It is the objective of the Council to ensure that where industrial, enterprise or distribution activities are proposed sufficient lands shall be reserved around site boundaries, in both individual sites and industrial parks to accommodate landscaping to soften the visual impact and reduce the biodiversity loss of the development thereby improving the quality of the environment.	+ B1 Maintain and enhance bio-diversity.		
Objective ED 5: Small-Scale Businesses in Residential Area	It is an objective of the Council to: 1) Permit home based economic activities where, by virtue of their nature and scale, they can be accommodated without detriment to the amenities of residential areas and where: (a)The use of the house for business purposes is secondary to its use as a dwelling and the floor area	+ MA2 Ensure balanced and flexible zoning pattern that caters for suitable urban uses.  Allows the development of small businesses in eth urban area which diversifies the employment		

	<p>of the business should reflect this; and  (b) Adequate parking requirements are met.</p> <p>2) Permit non-residential uses in established and proposed residential areas where they comply with the zoning matrix and are of an appropriate nature and scale for the location proposed. In general, such uses will only be considered where they serve the needs of the neighbourhood within which they are situated.</p>	<p>base and provides local employment, reducing travel times.</p>		
Objective ED 5: Retail development	<p>It is the objective of the Council to facilitate retail development where it is in accordance with:</p> <p>(a) Retail Planning Guidelines, Department of Environment, Community and Local Government (DECLG) 2012 and the accompanying Retail Design Manual 2012.  (b) The Joint Retail Strategy for the Mid-West Region 2010.</p>	<p>+ ensures compliance with higher tier policy documents.</p>		
Objective ED 6: Neighbourhood and village centres, and local shops	<p>"It is an objective of Council in relation to Neighbourhood and village centres, to:</p> <p>(a) Support the provision of modern convenience goods stores, of an appropriate scale, and associated retail and service units to enable these centres to meet the day to day needs of their local catchment population.</p>	<p>+ ensures compliance with higher tier policy documents</p> <p>MA2 Ensure balanced and flexible zoning pattern that caters for suitable urban uses</p>		

	<p>In the context of Limerick City and its environs the priority shall be to locate large retail developments in town and city centre locations.</p> <p>Any future development in neighbourhood centres will be required to ensure that the neighbourhood centre complies with the definition of neighbourhood centres as set out in the Retail Planning Guidelines 2012, which is that neighbourhood centres “comprise a small group of shops, typically comprising newsagent, small supermarket/ general grocery store, sub-post office and other small shops of a local nature serving a small, localised catchment population”.</p> <p>(b) Within Neighbourhood Centres the entire gross convenience shopping floor area shall not exceed 900sqm in area, (600sqm in area, net). The role of neighbourhood centres should not be allowed to expand to encompass a materially broader range of comparison goods than currently exists in such areas as this could lead to further competition with the City Centre.</p>			
Objective ED 7: Retail Development	It is the objective of the Council to enhance the vitality and viability of Castletroy as a retail service centre and to improve the quality of the retail provision in the area by:	+ MA2 Ensure balanced and flexible zoning pattern that caters for suitable urban uses		

	<p>(a) Encouraging the upgrade of existing retail outlets within the plan area;</p> <p>(b) Ensuring that proposal at ground floor level in retail areas within the District and Neighbourhood Centres are restricted to shopping and service activities. Storage use will not be permitted as the primary use at this location;</p> <p>(c) Encouraging the use of upper floors in retail premises for commercial or residential use;</p> <p>(d) Ensure that retail development is of a high standard or architecture design, finish and layout;</p> <p>(e) Encourage the retention of traditional shop fronts within the District and discourage the use of external roller shutters, internally illuminated signs and inappropriate projecting signs;</p> <p>(f) Ensuring adequate car parking is available for all development in accordance with Parking Standards as defined in this plan;</p> <p>(g) Restrict the net retail floor area in petrol stations to 100sqm;</p> <p>Improve the quality of the public realm in any proposal including hard and soft landscaping and following the recommendations of the Design Brief for the area;</p> <p>(h) Enhancing the physical environment of the area as a location for shopping and business through measures aimed at improving conditions for pedestrians.</p>	<p>Ensures compliance with higher tier policy documents</p>		
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	(i) Limit the development in the designated Neighbourhood centre to such a scale that will not detract from the District Centres function.			
Objective ED 8: Out of Centre locations	In relation to Out of Centre locations it is an objective of the Council: a) Not to permit any more retail floor space; b) Not to permit any new food stores, including discount stores. They should be part of existing centres; c) To consider new neighbourhood centre and /or local shops where they would serve new areas of housing development or to meet areas of deficiency, on appropriately zoned sites	+ MA2 Ensure balanced and flexible zoning pattern that caters for suitable urban uses.		
Objective ED 9: Tourism	It is the objective of the Council to (a) Enhance the tourism potential of the Castletroy area on appropriately zoned lands, including the promotion of new environmentally sustainable tourism products and visitor accommodation including cooperation with the relevant bodies in the marketing and promotion of tourism in the area; and (b) Encourage new development for the tourist industry to be located near existing services and infrastructure to support the general economic vitality of the settlement. (c) Protect the natural, built and cultural heritage features from unwarranted encroachment of unsuitable development	+ C1 Protect and conserve cultural heritage including architecture, archaeology and heritage items		

Policy /Objective	Chapter 6: Transport	Effects +	Effects -	Effects =
Policy T1	It is the policy of the Council to improve accessibility; reduce dependency on private car transport and encourage the use of energy efficient forms of transport and alternatives to the private car.	+ AC1 Reduce air pollution, implement climate change aspects of plan		
Policy T2	It is a policy of the Council to promote the use of the Smarter Travel Network within the wider Castletroy area.	+ AC1 Reduce air pollution, implement climate change aspects of plan  MA3 provide for adequate and sustainable transport links		
Policy T3	It is the policy of the Council to ensure that all proposals shall comply with the policies, objectives and development management standards of the Limerick County Development Plan 2010-2016 (as extended) in relation to transport and infrastructure and the objectives outlined below.	+ ensures compliance with higher tier policy document		
Objective T1: Limerick Transport Strategy	It is an objective of the Council to ensure that any development in the area shall be consistent with the Limerick Transport Strategy once it is completed.	+ ensures compliance with higher tier policy documents		
Objective T2: Park and Ride	It is an objective of the Council to provide Park and Ride facilities in the area to relieve traffic congestion and to provide for the convenience and safety of road users.	+ ensures compliance with higher tier policy documents		
Objective T3: New link	It is an objective of the Council to ensure safe and adequate	+ MA3 provide for		

streets	<p>access to existing and developing districts within the Environs by seeking the provision/improvement of new link roads and junctions as shown on Map C-19/25-03. On the layout and design link roads attention shall be given to the context and interface with surrounding land uses in compliance with the Design Manual for Urban Roads and Streets(DoECLG, 2014).</p> <p>(a)Proposal should make provisions for the accommodation of bus services along the most significant link routes, which shall include identification of bus stopping and turning areas, as well as carriageway capacity and through routes.</p> <p>It should be noted that the alignment of the new roads in the plan are indicative only and they shall be aligned as part of the detailed design and development process. Similarly, the location of junctions is indicative and the exact position for construction purposes will be dependent on detailed design.</p>	adequate and sustainable transport links.		
Objective T4: Measures in support of public transport	<p>It is an objective of the Council to facilitate measures to improve transport infrastructure within Castletroy and networks to adjacent settlements and Limerick City. It is also an objective of the Council to support the provision of a bus corridor link from UL to the City Centre.</p> <p>All future development proposals shall incorporate the relevant objectives of the Mid West Area Strategic Plan (MWASP 2012-2030), the Smarter Travel Strategy and the promotion of enhanced public transport facilities and services.</p>	<p>+ AC1 Reduce air pollution, implement climate change aspects of plan</p> <p>MA3 provide for adequate and sustainable transport links</p> <p>Ensures compliance with higher</p>		

		tier policy documents.		
Objective T5: Movement and Accessibility	<p>It is an objective of the Council to:</p> <p>(a) Encourage the development of safe and efficient movement and accessibility networks that will cater for the needs of all users and to encourage priority for walking and cycling, public transport provision and accident reduction;</p> <p>(b) Ensure that adequate facilities and access provisions are provided for those with disabilities in the community. The Council will strive to ensure that the provision of such facilities will be in line with current good practice in relation to such issues;</p> <p>(c) Improve the efficiency of junctions in the District to enhance the free flow of traffic through the District;</p> <p>(d) Only permit development where a safe and secure access can be provided; Require that roads provided to serve private housing developments are designed to a high standard</p> <p>(e) Improve directional signposting in the District</p> <p>(f) Advertising signage adjacent to the M7 and the N24 and other major transport routes will be prohibited;</p> <p>(g) To promote and provide facilities to facilitate increase public transport, cycling and walking and deliver significant modal shift from private car usage to more sustainable transport modes;</p> <p>(h) Provision of clear and</p>	<p>+ AC1 Reduce air pollution, implement climate change aspects of plan</p> <p>MA3 provide for adequate and sustainable transport links</p> <p>Ensures compliance with higher tier policy documents.</p>		

	<p>unambiguous carriageway markings and associated directional signage indicating directional priorities for traffic;</p> <p>(i) Facilitate the improvement of junctions on Public Roads</p>			
<p>Objective T6: Network of pedestrian and cycle facilities</p>	<p>It is an objective of the Council to encourage walking and cycling as more convenient, popular and safe methods of movement in Castletroy and facilitate the provision of an attractive and coherent network of off road footpaths and cycle facilities. This will be achieved by:</p> <p>(a) Seeking secure cycle parking facilities at appropriate locations as opportunities arise;</p> <p>(b) Combined off-road footpath and cycleway links will be required and gaps will be identified in the network.</p> <p>(c) A pedestrian/cycle network will be encouraged where identified in Map C-19/25-03 linking existing and proposed residential areas to each other and to amenity areas and to provide permeability across the area.</p>	<p>+ AC1</p> <p>Reduce air pollution, implement climate change aspects of plan</p> <p>MA3 provide for adequate and sustainable transport links</p>		
<p>Objective T7: Car parking and traffic management</p>	<p>It is an objective of the Council to encourage the provision of off-street public parking areas as part of any application for development.</p>		<p>- In that new developments should encourage more sustainable forms of transport.</p>	
<p>Objective T8: Safeguard the capacity of the M7 and the R445</p>	<p>It is the objective of the Council to safeguard the capacity of the M7 and the R445 to ensure that any future developments do not compromise the strategic function of these roads.</p>			<p>= MA1</p> <p>Sensitively manage natural and manmade material assets to meet the needs of existing and future populations in a</p>

				sustainable manner.
Objective T9: Development of land requiring access onto the R445	Any future development proposal that require an access onto the R445 shall include a Traffic and Transport Assessment in accordance with Objective IN 02: Traffic and Transport Assessments of the County Development Plan, to ensure that junction(s) with the national road have sufficient capacity to facilitate the extent of the development planned. The costs of implementing mitigation measures arising from the traffic impact shall be borne by the developer.			= MA1 Sensitively manage natural and manmade material assets to meet the needs of existing and future populations in a sustainable manner
Objective T10: Limerick Northern Distributor Road	<p>It is an objective of Limerick City &amp; County Council to support the Limerick Northern Distributor Road(LNDR), which will connect the Coonagh to Knockalisheen Road Scheme to the existing R445 (old N7) and adjoining road network to the east of Limerick City which will incorporate Smarter Travel features in accordance with the requirements of the Habitats, Water Framework, Floods, and EIA Directives. Full consideration of all environmental requirements has been made in the progression of the scheme to date. This will continue up to and including project level.</p> <p>In relation to the LNDR, it is an objective of Limerick City &amp; County Council:</p> <p>a) To ensure all mitigation and monitoring measures outlined in the Environmental Report and Natura Impact Report shall be taken into account at project level. Section 11 of the Natura Impact Report (dated February 2017) for the Variation to the County Development Plan provides details of mitigation measures which shall apply to any future development of the</p>	+ MA1 Sensitively manage natural and manmade material assets to meet the needs of existing and future populations in a sustainable manner  The LNDR will play a huge role in alleviating traffic congestion in the city.		

	<p>LNDR.</p> <p>b) To ensure all mitigation and monitoring measures outlined in the Strategic Flood Risk Assessment shall be taken into account at project level.</p> <p>c) To support access to the National Technology Park and UL Bohemians</p>			
Objective T11: Noise Mitigation	<p>It is an objective of Limerick City and County Council to adopt a strategic approach to managing environmental noise within its functional area, which will aim to prevent members of the population in new residential and other noise sensitive developments being exposed to undesirable noise levels. Developers will be required to ensure that appropriate noise assessments are carried out and the principles of good acoustic design are applied in line with "Professional Practice Guidance on Planning &amp; Noise" (2017) and that predicted internal and external noise levels are in keeping with World Health Organisation recommendations and guidance.</p>	+ P.2 Take the issue of noise into account in terms of its effects on the population of the plan area.		

Policy /Objective	Chapter 7: Infrastructure	Effects +	Effects -	Effects =
Policy IN 01	<p>It is the policy of the Council in co-operation with Irish Water to provide for adequate water and sewerage facilities in Castletroy and raise awareness of energy efficiency, and waste management including the minimisation, re-use, recycling/recovery of waste.</p>	+ MA1 Sensitive manage natural and manmade material assets to meet the needs of existing and future populations in a sustainable manner		
Policy IN 02: Compliance with	<p>It is the policy of the Council to ensure all</p>	+ ensures compliance with		

Limerick County Development Plan	proposals shall comply with the policies, objectives and development management standards of the Limerick County Development Plan 2010-2016(as extended) in relation to infrastructure and the objectives outlined below.	higher level plans.		
Objective IN 01: Water supply and storage	It is an objective of the Council working with Irish Water to: (a) Facilitate improvements to the existing water supply system to cater for the needs of an expanding population in a sustainable manner. (b)Ensure that development proposals provide adequate water infrastructure to facilitate sustainable development of the Castletroy Local Area Plan.	+ MA1 Sensitively manage natural and manmade material assets to meet the needs of existing and future populations in a sustainable manner		
Objective IN 02: Water Conservation	It is an objective of the Council to promote awareness of sustainable water use and to encourage water conservation and demand minimisation by: (a)Metering and control of leaks in the Water Conservation programme; (b)Promoting Sustainable Urban Drainage Systems and grey water recycling in developments (c)Minimising the potential for wastage through appropriate design and layout of pipe networks.	+ MA1 Sensitively manage natural and manmade material assets to meet the needs of existing and future populations in a sustainable manner		
Objective IN 03: Sewerage facilities	It is the objective of the Council to: (a)Ensure that adequate and appropriate waste	+ MA1 Sensitively manage natural and manmade		

	<p>water infrastructure is provided for further development to avoid any deterioration in the receiving waters. In this regard account shall be taken of existing outstanding permission in assessing impact.</p> <p>(b)Ensure that development proposals provide adequate waste water infrastructure to facilitate the proposed development. This includes the separation of foul and surface water through the provision of separate sewerage networks.</p> <p>(c)Ensure that discharge meets the requirements of the Water</p>	<p>material assets to meet the needs of existing and future populations in a sustainable manner</p>		
<p>Objective IN 04: Surface water disposal</p>	<p>It is the objective of the Council to:</p> <p>(a)Require that all applications for development demonstrate that appropriate Sustainable Urban Drainage Systems (SUDS) are examined and where feasible provided.</p> <p>(b)Require the submission of surface water design calculations establishing the suitability of drainage between the site and a suitable outfall in order to establish whether the existing surface water drainage system can accommodate an additional discharge generated by a proposed development(s).</p> <p>(c)Require applicants to investigate the potential for the provision of porous surfaces where car parking and hard landscaping is proposed.</p> <p>(d)Protect the surface</p>	<p>+ W1 Prevent deterioration in surface and ground water quality, achieve improvement in water quality.</p> <p>W2 Promote good practice in flood risk management</p>		

	<p>water resources of the plan area and in individual planning applications request the provision of sediment and grease traps, and pollution control measures where deemed necessary.</p> <p>(e)Surface water runoff to be designed to agricultural runoff rates, subject to agreement with the Local Authority.</p>			
Objective IN 05: Flood Risk Management	<p>It is an objective of the Council to:</p> <p>(a)Implement the recommendations of the Department of the Environment Heritage and Local Government and the Office of Public Works Guidance Documents (November 2009)', and any subsequent guidelines.</p> <p>(b)Require any development proposal in a location identified as being subject to flooding to:</p> <p>Carry out a flood risk/catchment analysis for the development to assess the likely level of flood hazard that may affect the site to the satisfaction of the Council;</p> <p>(c)Design the development to avoid flood levels, incorporating building design measures and materials to assist evacuation and minimise damage to property from flood waters;</p> <p>(d)Demonstrate that the proposal will not result in increased risk of flooding elsewhere, restrict flow across floodplains, where compensatory storage/storm water</p>	<p>+ W1 Prevent deterioration in surface and ground water quality, achieve improvement in water quality.</p> <p>W2 Promote good practice in flood risk management</p>		

	<p>retention measures shall be provided on site and will not alter the hydrological regime up stream or downstream or at the development location so as to pose an additional flood risk or to increase flood risk;</p> <p>(e)Proposals should have provision to reduce the rate and quantity of run-off i.e. minimisation of concrete surfaces and use of semi permeable materials and include adequate measures to cope with flood risk, e.g. sustainable drainage systems.</p> <p>(f)Have regard to the Office of Public Works Planning Policy Guidance in the design and consideration of development proposals; and</p> <p>(g)Preserve riparian strips free of development and ensure adequate width to permit access for river maintenance.</p> <p>(h)All flood risk assessment should have regard to national flood hazard mapping, predicted changes in flood events resulting from climate change and the River Shannon Catchment Flood Risk and Management Plan Studies (CFRAM) when completed by the OPW and the Shannon International River Basin Management Plan. The 'development management justification test' and the 'plan – making justification test' as detailed in The Planning System and Flood Risk Guidance document will guide</p>			
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	Council responses to development proposals in areas at moderate or high risk of flooding.			
Objective IN 06: Provision of composting facilities	It is an objective of the Council to ensure developers provide new housing with effective composting facilities by applying suitable planning conditions to new residential developments.	+ MA1 Sensitively manage natural and manmade material assets to meet the needs of existing and future populations in a sustainable manner		
Objective IN 07: Shared bin spaces	It is an objective of the Council to require all commercial and residential developments to be provided with adequate internal and external space for the correct storage of waste and recyclable materials. This is particularly important in relation to shared bin spaces such as apartment developments. In such cases the following must be provide for: (a)Adequate space must be given for waster to be segregated and stored in an appropriate manner. (b)A multi-occupancy development will require a designated, ventilated waste storage area of sufficient size which allows for the segregation of waste. (c)New and re-designed commercial buildings and apartment complexes should have waste facilities designed in a manner that waste can be collected directly from them and where possible waste and recyclables should not have to be collected on the street or	+ MA1 Sensitively manage natural and manmade material assets to meet the needs of existing and future populations in a sustainable manner		

	at the front of the premises			
Objective IN 08: Broadband	It is the objective of the Council to ensure that all new development proposals, incorporate communications service infrastructure broadband including ducting on an open access basis.	+ may contribute to the growth of small business and working from home which would result in less transport requirements and lead to an increase in local employment.		
Objective IN09: Smart Homes and Smart Buildings	It is an objective of the Council as included in the Limerick Digital Strategy 2017-2020 to support the development of Smart Homes and Smart Buildings and to set the foundation for Smart Limerick, the city region where data, automation and artificial intelligence will fuel the knowledge and digital economies and lead to better services and improved quality of life for all.	+ may contribute to the growth of small business and working from home which would result in less transport requirements and lead to an increase in local employment.  MA1 Sensitively manage natural and manmade material assets to meet the needs of existing and future populations in a sustainable manner		
Objective IN 10: Telecommunications	It is the objective of the Council to facilitate proposals for telecommunications masts antennae and ancillary equipment where it can be established that there would be no negative impact on the surrounding area and that no other mode or location can be identified which would provide adequate telecommunication cover to the standard required by local land uses.	+ MA1 Sensitively manage natural and manmade material assets to meet the needs of existing and future populations in a sustainable manner		

Objective IN 11: Charging Points for Electric Vehicles	It is the objective of the Council to facilitate proposals for the provision and delivery of recharging points for electric powered vehicles within public car parks and at other appropriate locations in Castletroy for domestic, transition and end of journey type travel.	+ AC1 Reduce air pollution, implement climate change aspects of plan  MA3 provide for adequate and sustainable transport links		
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Policy /Objective	Chapter 8: Environment and Heritage.	Effects +	Effects -	Effects =
Policy EH 1	It is the policy of the Council to ensure that the archaeological, architectural, natural and built heritage of Castletroy is protected.	C1 Protect and conserve cultural heritage including architecture, archaeology and heritage items.		
Policy EH 2	It is the policy of the Council to ensure that all proposals shall comply with the policies, objectives and development management standards of the Limerick County Development Plan 2010-2016 (as extended).	+ ensures compliance with higher level plans.		
Objective EH 01: Protected Structures	It is an objective of the Council to protect structures entered onto the Record of Protected Structures, or listed to be entered onto the Record and to encourage their appropriate re-use and restoration. The Council shall resist; (a) Demolition of protected structures, in whole or in part; (b) Removal or modification of features or architectural importance; (c) Development that would adversely affect the setting of the protected structure	C1 Protect and conserve cultural heritage including architecture, archaeology and heritage items.		
Objective EH 02: Architectural Conservation Area (ACA)	It is the objective of the Council to protect, conserve and where appropriate enhance the ACA as identified in Map C-19/25-04. Proposals for development	+ L1 Protect historic and natural features of note in landscapes. Sensitively		

	<p>within the ACA shall:</p> <p>(a) Safeguard the parklands associated with Plassey House in order for the evolved university complex to retain significant tree cover, green areas and vistas down to the River Shannon;</p> <p>(b) Safeguard views out from, or in toward the University's principal buildings;</p> <p>c)Safeguard elements associated with the historical evolution of the site such as waterways and water control mechanisms such as sluices or pumps;</p> <p>(d)Ensure that the University's setting and amenities are safeguarded from unauthorised works and insensitive developments;</p> <p>(e)Reflect and respect the scale and form of existing structures within the ACA in proportioning, overall scale and use of material and finishes and seek to contribute to or enhance the character of the ACA;</p> <p>(f)Seek to retain/incorporate/replicate exterior features which contribute or enhance the character of the ACA;</p> <p>(g)Ensure priority is given to the pedestrian, to inclusive access, and to facilitate the improvement of the quality of the public realm.</p>	<p>manage landscape change</p> <p>C1 Protect and conserve cultural heritage including architecture, archaeology and heritage items.</p>		
Objective EH 03: Archaeology	<p>It is the objective of the Council:</p> <p>(a)To seek the preservation (in situ, or at a minimum, preservation by record) of all known sites and features of historical and archaeological interest. This is to include all sites listed in the Record of Monuments and Places as established under Section 12 of</p>	<p>+ C1 Protect and conserve cultural heritage including architecture, archaeology and heritage items</p>		

	<p>the National Monuments (Amendment) Act 1994.</p> <p>(b)To protect and preserve (in Situ, or at a minimum, preservation by record) all sites and features of historical interest discovered subsequent to the publication of the Record of Monuments and Places.</p> <p>(c)To ensure that any proposed development shall not have a negative impact on the character or setting of an archaeological monument.</p> <p>(d)That the area of a monument and the associated buffer areas shall not be included as part of the open space requirement demanded of a specific development, but shall be additional to the required open spaces. If appropriate, where such a monument lies within a development, a conservation and/or management plan for that monument shall be submitted as part of the landscape plan for that development</p>			
Objective EH 04: Special Control Area	It is an objective of the Council to maintain the integrity of the Special Control areas within the plan boundary and accordingly no development is permitted within these zones and any development adjoining these areas will be required to maintain an agreed buffer	+ L1 Protect historic and natural features of note in landscapes. Sensitively manage landscape change		
Policy EH 05: Groody Valley Green Wedge	It is the policy of the Council to preserve and protect the River Groody Green Wedge from inappropriate development in order to maintain its significance as an important ecological role, as a natural wildlife corridor and as a flood risk management zone. The protection of this area is also considered necessary to act as a natural amenity area both for the immediate area, and the nearby city. The management	+ L1 Protect historic and natural features of note in landscapes. Sensitively manage landscape change		

	<p>techniques outlined in the Groody River Valley Management Plan in Appendix 2, Map C-19/25-05 of this LAP shall be adhered to.</p> <p>The Groody is an important riverside amenity and the area around the Groody River is a particularly quiet area in the midst of otherwise noisy surrounding. With this in mind it is the policy of the council to ensure that the area is traversed only by cycleways and walkways.</p> <p>However, it is the policy of the council to facilitate the provision of a Park and Ride, recreational, amenity and low intensity agricultural use at this location.</p>			
Objective EH 06: Designated Sites and Nature Conservation	<p>It is the objective of the Council to:</p> <p>(a)Protect the integrity of the downstream Lower River Shannon Special Area of Conservation site, through the establishment of buffer zones around the river.</p> <p>(b)Ensure that appropriate waste water infrastructure is provided in advance of new developments thus ensuring that discharges to the river are within correct environmental limits.</p> <p>(c)Ensure that development projects likely to have significant effects on the Lower River Shannon Special Area of Conservation site are subject to appropriate assessment and will not be permitted under this plan unless they comply with Article 6 of the Habitats Directive.</p> <p>(d)No projects which will be reasonably likely to give rise to significant adverse direct, indirect or secondary impacts on the integrity of any Natura 2000 sites having regard to their conservation objectives</p>	<p>+ L1 Protect historic and natural features of note in landscapes. Sensitively manage landscape change</p> <p>B1 Maintain and enhance bio-diversity.</p> <p>B2 Protect, conserve and enhance habitats, species and areas of European, national and local importance</p>		

	<p>arising from reduction in species diversity, shall be permitted on the basis of the plan(either individually or in combination with other plans or projects).</p> <p>(e)In terms of general nature conservation, the Council will protect undesignated habitats such as notable tress and hedgerows and ponds/wetlands and other natural features of local importance.</p>			
Objective EH 07: Trees on residentially zoned lands	<p>There are a significant proportion of existing trees on land zoned for residential development in the townland of Castletroy. Any future development on these lands shall incorporate as many of the trees as possible into the scheme. A comprehensive tree survey carried out by a suitably qualified person shall be submitted with any future planning application.</p>	<p>+ B1 Maintain and enhance bio-diversity</p> <p>L1 Protect historic and natural features of note in landscapes. Sensitively manage landscape change</p>		
Objective EH 08: Tree Protection and Nature Conservation	<p>It is the objective of the Council to protect natural stone boundary walls, mature trees, woodlands and hedgerows. Development that requires the felling or harming of such trees shall not normally be permitted unless otherwise supported by a tree survey report establishing that the subject trees are of no ecological or amenity value. Such report shall be undertaken by a suitably qualified and competent person.</p>	<p>+ B1 Maintain and enhance bio-diversity</p> <p>L1 Protect historic and natural features of note in landscapes. Sensitively manage landscape change</p>		
Objective EH 09: Climate Change & Adaption	<p>It is an objective of the Council to support the National Climate Change Strategy and follow on document the National Climate Change Adaption Framework Building Resilience to Climate Change 2012 (or any updated/superseding document) including the</p>	<p>+ AC1 Reduce air pollution, implement climate change aspects of plan</p>		

	transition to a low carbon future, taking account of flood risk, the promotion of sustainable transport, soil conservation, the importance of green infrastructure, improved air quality, the use of renewable resource and the re-use of existing resources.			
Objective EH 10: Compliance with the Water Framework Directive	All development activities governed by the plan shall be carried out in accordance with the provisions of the EU Water Framework Directive and associated regulations and guidance documentation.	+ W1 Prevent deterioration in surface and ground water quality, achieve improvement in water quality.		
Objective EH 11: Compliance with Environmental Impact Assessment (EIA) Directive	Any developments that fall within the ambit of the EU EIA Directive 2011/92/EU(as amended by the EU directive 2014/52/EU) and associated regulations shall be subject to the contents of the revised directive and the updated regulations.	+ Ensures compliance with higher tier plans and directives.		

Policy /Objective	Chapter 9: Community and Recreation.	Effects +	Effects -	Effects =
Policy C1: Community and Recreational Facilities	It is the policy of the Council to ensure that community infrastructure and a range of open space opportunities for passive and active recreation contribute to a vibrant, prosperous urban settlement. This is conducive to ethical principles of healthy communities, inclusivity and accessibility to facilities for all abilities, and sustainability to ensure that Castletroy is a greener, cleaner, more welcoming place to live, work and attract investment.	+P.3 Ensure adequate provision for open space and exercise areas.		

<p>Policy C2: Compliance with Limerick County Development Plan</p>	<p>It is the policy of the Council to ensure that all developments in relation to community infrastructure, education, childcare, health facilities, open space, and recreational facilities comply with the policies, objectives and development management standards of the Limerick County Development Plan 2010 – 2016(as extended) and the objectives outlined below.</p>	<p>+ ensures compliance with higher tier plans.</p>		
<p>Objective C1:Protection of lands zoned for open space</p>	<p>It is the objective of the Council to:</p> <p>(a)Protect existing open space, by not permitting development which encroaches on open space by reducing the recreational value to the public.</p> <p>(b)Protect semi-natural open space areas from inappropriate development in the interest of recreational enjoyment, community health and well-being, flood protection and biodiversity.</p> <p>(c)Seek in partnership with other agencies to develop active and passive recreational opportunities, such as the Groody Road recreational linkway, and/or where the need arises considering demographic profile and future demand.</p>	<p>+P.3 Ensure adequate provision for open space and exercise areas.</p>		
<p>Objective C2 Improve Open Space Provision</p>	<p>It is the objective of the Council to:</p>	<p>+P.3 Ensure adequate provision for</p>		

<p>and encourage active and passive open space use</p>	<p>(a)Co-operate with sports clubs, schools and community organisations to provide quality sports and recreational facilities to the community. The Council encourages a multi-use and co-use of facilities of a complementary nature to support more diverse range of sport and recreational opportunities. Proposed development shall demonstrate quality pedestrian and cyclist linkage.</p> <p>(b)Ensure residential development incorporates appropriate provision of quality public open space and playlots in accordance to national guidance and any subsequent guidance within the timeframe of the proposed Plan. Open space provision will be proportional to the scale of the number of residential units proposed, consider access to existing open space and of a quality cogniscent of the principles of national guidance including accessibility, personal and child safety, linkage, place-making, and permeability and the hierarchy of open space.</p> <p>(c) To ensure that proposals for largescale development on land zoned Enterprise and Employment incorporate active and passive recreational</p>	<p>open space and exercise areas.</p>		
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	opportunities for employees.			
Objective C3: Open space hierarchy and playground provision	<p>It is the objective of the Council to:</p> <p>(a) Require residential development to adhere to the requirements regarding open space within housing estates in accordance with Table 9 Open Space Hierarchy in Residential Estates.</p> <p>(b) Require applications for residential developments to demonstrate clearly that sufficient consideration by the developer has been given to the provision of functional open space as per DEHLG 2009 guidelines on design of urban residential development.</p> <p>(c) The Council will seek to ensure that every new residential unit in new housing estates is located within 100m walking distance of a pocket park / play lot, small park, or local park. Such facilities must be clearly delineated on planning application drawings and demarcated in advance of the sale of any of the units.</p>	+P.3 Ensure adequate provision for open space and exercise areas.		
Objective C4: New amenity areas and walkways	<p>It is an objective of the Council to:</p> <p>(a) Continue to facilitate the development of walkways as indicated on the Amenity &amp; Transport Map in co-operation with local interested parties including the private, voluntary and public sector. Any proposed</p>	+P.3 Ensure adequate provision for open space and exercise areas		

	<p>development adjacent to such walkways must incorporate connecting pathways into the designated walkway in their design. Developments shall be designed to ensure that properties overlook proposed walkways.</p> <p>(b) Co-operate with other agencies to enhance and provide recreational and amenity facilities in the area.</p>			
Objective C5: Allotments and Community Gardens	<p>It is the objective of the Council to facilitate opportunities for food production through allotments or community gardens at appropriate locations.</p>	+P.3 Ensure adequate provision for open space and exercise areas		
Objective C6: Educational Facilities	<p>It is the objective of the Council to:</p> <p>(a) Reserve lands to facilitate the delivery of a new National School in the area.</p> <p>(b) Ensure that there are sufficient educational places to meet the needs generated by proposed residential developments by requiring the completion of a Sustainability Statement and Social Infrastructure Assessment for residential development of 5 or more dwellings.</p> <p>(c) Ensure that all proposal for childcare facilities shall comply with the development management standards of the County Development Plan.</p>	+ P.4 Ensure the provision of adequate community facilities		
Objective C7: Provision of a	It is the objective of the	+ P.4 Ensure the provision of		

Library	Council to support the provision of a library in the Castletroy area	adequate community facilities		
Objective C8: Provision of Healthcare Facilities	It is an objective of the Council to: Support the Health Service Executive and other statutory and voluntary agencies and private healthcare providers in the provision of appropriate healthcare facilities and the provision of community based care facilities, at appropriate locations, subject to proper planning considerations and the principle of sustainable development	+ P.4 Ensure the provision of adequate community facilities		

Policy /Objective	Chapter 9: Community and Recreation.	Effects +	Effects -	Effects =
Policy UD1: Urban Design	It is the policy of the Council to promote high quality design through the LAP area and ensure that future development in Castletroy is guided by principles of best practice and sustainability.	+MA1 Sensitively manage natural and manmade material assets to meet the needs of existing and future populations in a sustainable manner		
Policy UD2: Compliance with Limerick County Development Plan Development Management Guidelines	It is the policy of the Council to determine applications for development in accordance with the policies, objectives and development management standards set out in the Castletroy LAP and the Limerick County Development Plan in order to ensure the proper planning and sustainable development of the area.	+ ensures compliance with higher tier plans.		
Objective UD 1: Landmark locations on the approaches to Limerick City	It is the objective of the Council to require development proposals at landmark locations within Castletroy and on the approach to the City to demonstrate high	L1 Protect historic and natural features of note in landscapes.		

	quality innovative design in and adjacent to these locations.	Sensitively manage landscape change		
Objective UD 2: Design of Landmark Locations	Landmark locations/focal points/gateway buildings i.e. street corners or road junctions should be emphasized by form and massing and/or a complementing detail (i.e. higher density development/an additional storey, design feature etc). In housing developments in particular this would also act as a natural method of traffic calming where there is not full visibility around a corner	+MA1 Sensitively manage natural and manmade material assets to meet the needs of existing and future populations in a sustainable manner		
Objective GV 01: High quality residential development	<p>It is an objective of the Council to facilitate the following on the Groody Valley site:</p> <p>(a) The area of the site zoned for residential purposes at a focal point on entry to the City should be looked at in the context of a planning application for high quality landmark residential units and should include for the redevelopment of the fuel depot site along the R445 Dublin Road.</p> <p>(b) Due to the proximity to the University the site maybe appropriate for student accommodation.</p> <p>(c) Opportunities for increased building heights within the site shall be considered in any application submitted. Any building heights proposed must take account of the properties in the vicinity.</p> <p>(d) Any car parking proposed shall be located to the rear of the building and shall be adequately screened and sympathetically integrated within the development site.</p> <p>(e) Access is required to provide for complimentary development</p>	<p>+MA1 Sensitively manage natural and manmade material assets to meet the needs of existing and future populations in a sustainable manner.</p> <p>Note that the area for development is already a brown field site at the northern end of the Groody Valley close to the roadway.</p>		

	on the Groody Valley which is supported by Objective GV02 below.			
Objective GV02: Park and Ride and amenity use	It is an objective of the Council to provide a Park and Ride facility in the area.			= the area in which the park and ride facility is proposed is in filled.
Objective GV03: Improved Permeability:	It is an objective of the Council to facilitate the provision of a network of pedestrian and cycle routes and active and passive open space use through this area.  Provision needs to be made in any planning application submitted for development on these lands to facilitate any road widening that supports public transport which may be required along the Groody Road.	+ MA3 provide for adequate and sustainable transport links		
Objective GV04: Semi – natural area	It is an objective of the Council to support the function of the area as a low intensity agricultural zone with grazing and forage production with capacity in places for planting of native species. The area also fulfills a very important function as a floodplain and it is an objective of the Council not to compromise this role through inappropriate development at this location.	+ B1 Maintain and enhance bio-diversity		
GV05: Open Space	It is an objective of the Council to support the provision of an area for recreational use near the proposed park and ride site.	+P.3 Ensure adequate provision for open space and exercise areas		
Objective BM01: Masterplan	(a)It is an objective of the Council to require the preparation of a masterplan, which shall be prepared by a suitable qualified person, with accompanying design statements showing how the design concepts are consistent with the design brief principles. These proposals shall demonstrate using drawings the internal organisation of land uses, amenities and the layout of each block; the detailed design of	+MA1 Sensitively manage natural and manmade material assets to meet the needs of existing and future populations in a sustainable manner		

	<p>individual buildings and spaces including private and collective amenity areas; hard and soft landscaping; choice of materials, finishes, street furniture, signage and lighting. Finishes, materials and heights shall be consistent with the overall site development.</p> <p>(b)The masterplan shall focus on the creation of a high quality environment in terms of overall design and layout, a mixture of functions, tenure types and unit sizes and the provision of a broad range of on-site facilities for existing and future residents and employees.</p> <p>(c)The area designated as Groody Valley Green Wedge, along the north of the site, shall be incorporated into the overall masterplan.</p> <p>(d)The development of any portion of this shall will be required to provide a masterplan for the intended further development of the entire site.</p> <p>(e)The development of the link street will be required for access to the site – direct access from the L5173-1 will not be permitted</p>			
<p>Objective BM02: Provision of Mixed uses</p>	<p>(a)The masterplan shall clearly indicate the various mixed uses, which shall include residential, enterprise and employment uses, retail and education uses.</p> <p>(b)A maximum of 65% of the Mixed Use zoned lands shall be developed for residential purposes.</p> <p>(c)Retail development shall be of a scale to serve the local residential and working population and shall not be to such a scale that it will detract from higher order retail centres serving the area. The maximum</p>	<p>+MA1 Sensitively manage natural and manmade material assets to meet the needs of existing and future populations in a sustainable manner</p>		

	<p>gross retail convenience floor space shall be 900sqm and shall comprise of a number of units.</p> <p>(d)Retail warehousing will not be permitted at this location.</p> <p>(e)Complimentary uses such as Nursing Homes, Crèches etc may also be considered at this location.</p>			
Objective BM03: Provision of high quality design	<p>(a)This is a key site on approach to the City zoned for Mixed Use. Reference for development of this site should be drawn from the Northern Trust buildings directly to the south.</p> <p>(b)A high quality contemporary design will be encouraged to give the new development a distinct identity, with a high quality architecturally designed land mark building along the southern section of the site.</p> <p>(c)Any building proposed on these lands should respect the established building height in the vicinity and complement the building finishes.</p> <p>(d)Any car parking proposed shall be located to the rear of the building and shall be adequately screened and sympathetically integrated within the development site.</p>	+MA1 Sensitively manage natural and manmade material assets to meet the needs of existing and future populations in a sustainable manner		
Objective BM04: Provision of a School	<p>The Council have made zoning provision to accommodate a school at this location. The design and siting of the school shall adhere to the requirements for the 'The Provision of Schools and the Planning System', Department of Education &amp; Science, DEHLG 2008, and will be subject to normal planning considerations such as traffic safety, residential amenity and public health. The development of the link street will be required</p>	<p>+ P.4 Ensure the provision of adequate community facilities</p> <p>MA3 provide for adequate and sustainable transport links</p>		

	for access to the site – direct access from the L5173-1 will not be permitted. The development of this site should make provision for pedestrian and cycleway linkages to the Groody Valley.			
Objective BM05: Density and housing type mix	<p>It is an objective of the Council to:</p> <p>(a) To require a minimum density of 35 units per hectares.</p> <p>(b) To provide for a range and type of houses.</p> <p>(c) Where apartments are proposed they should be planned with a range of apartment sizes and shall be consistent with DECLG guidance under S28, 'Sustainable Urban Housing: Design Standard for New Apartments' (DECLG, December 2017) in all respects including size, internal storage, private amenity space, ceiling heights and aspect and communal facilities etc.</p> <p>It is an objective of the Council to require developers to prepare detailed development proposals prepared by a suitably qualified person, with accompanying design statements showing how the design concepts are consistent with the Masterplan principles. These proposals shall demonstrate using drawings the internal organisation of land uses, amenities and the layout of each block; the detailed design of individual buildings and spaces including private and collective amenity areas; hard and soft landscaping; choice of materials, finishes, street furniture, signage and lighting. Finishes, materials and heights shall be consistent with the overall site development.</p> <p>Due to the sites strategic location along the R445 Dublin Road it is recognised that there is potential</p>	<p>+ MA2 Ensure balanced and flexible zoning pattern that caters for suitable urban uses</p> <p>+MA1 Sensitively manage natural and manmade material assets to meet the needs of existing and future populations in a sustainable manner</p>		
Objective PV01: Masterplan				

	for increased building heights at this location. A masterplan which indicates building heights to include landmark buildings should be provided in any planning application made on this site.			
Objective PV02: Provision of high quality Enterprise & Employment	The Council will support the development of the area as a major employment centre with supporting facilities such as crèches and amenity areas for employees and visitors. A high standard of urban design will be required throughout the site in order to create a high quality environment with a defined sense of place, functionally and physically connected to the existing and permitted development on surrounding lands.	+ P.4 Ensure the provision of adequate community facilities		
Objective PV03: Public Realm	The Council will support the development of civic square and streets with active frontage. The public realm will be characterised by a high standard of quality finishes and treatments. A network of high quality spaces formed by quality buildings, paving and landscaping is required. Architecturally designed buildings and open plazas, using high quality finishes will define civic spaces. Development shall be double fronted and shall address the Groody Park and the Dublin Road and streets and civic spaces within the development	+MA1 Sensitively manage natural and manmade material assets to meet the needs of existing and future populations in a sustainable manner		
Objective PV04: Residential Development	Any development proposals on this site shall demonstrate a sufficient mix of uses and a maximum 15% of any development/redevelopment on this site shall be for residential use and shall be appropriately integrated with other proposed development on site to ensure the creation of a successful mixed use development.	+ MA2 Ensure balanced and flexible zoning pattern that caters for suitable urban uses		

Objective PV05: Parking	Where parking is provided, the use of underground parking will be encouraged and shall be sensitively located and adequately screened.		- as it caters for car borne transport and does not provide an incentive for use of public transport	.
Objective PV06: Improved Permeability	A network of pedestrian and cycle routes shall be provided through the lands and shall provide appropriate links to the Groody Valley Wedge. Details of these linkages will be required in the masterplan submitted for this site.	MA3 provide for adequate and sustainable transport links		
Objective PV07: Access	Access to the site shall be via one entry point only along the R445 Dublin Road with potential for a new access point to link with the Tipperary Road as indicated on Map C-19/25-03	+MA3 provide for adequate and sustainable transport links		
Objective GI 01: Provision of Community facilities	It is an objective of the Council to facilitate the provision of community use at this location to include a playing pitch, a network of pedestrian and cycleways and ancillary works which shall connect the R445 Dublin Road with the L1165 Newtown road.	+MA3 provide for adequate and sustainable transport links  + P.4 Ensure the provision of adequate community facilities		

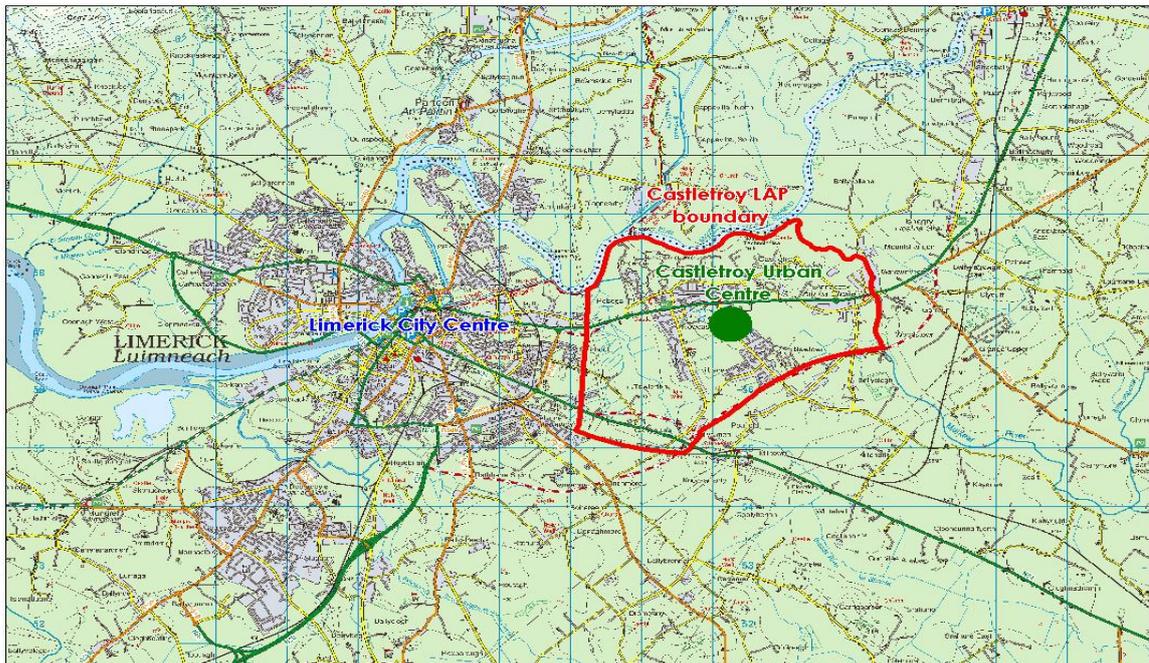
## Appendix 2 Non - Technical Summary

### 1.0 Introduction: Castletroy Local Area Plan Review

Limerick City and County Council is reviewing the Local Area Plan (LAP) for Castletroy and will make a new LAP under the Planning and Development Act 2000 as amended. An outline map of the area under consideration is included in Figure 1. A copy of the zoning map is included with the Local Area Plan draft.

Article 14A(1) of the Planning and Development (Strategic Environmental Assessment) (SEA) (Amendment) Regulations 2011 require that an SEA is carried out on any Local Area Plan where the population (or target population) is more than 5,000 persons. The population of Castletroy is currently 14,733 people. The population has grown significantly in the period since the 2011 Census. This is substantially above the 5000 threshold that triggers the need for Strategic Environmental Assessment (SEA). The Planning Authority has moved straight to the scoping stage of the SEA process. SEA is the formal, systematic evaluation of the likely significant effects of implementing the plan, before a decision is made. The process includes preparing an Environmental Report where the likely significant effects are identified and evaluated.

Castletroy is located within the eastern environs of Limerick City, approximately 3 kilometres from Limerick City Centre. It is bisected by the R445 Dublin road through the centre of the plan area and the (N24) Tipperary Road to the south of the plan area.



**Figure 1:** Location of Castletroy relative to Limerick City

Castletroy contains a number of distinct components i.e. Castletroy North containing the University of Limerick and the National Technology Park, Castletroy South which largely contains residential areas and the Dublin road. The area is bounded to the north by the River Shannon, to the east by the Mulkear River, while the Groody River Valley forms the westward boundary. The Southern Ring Road (M7) forms the southern boundary.

## **2.0 Main Environmental issues:**

### **2.1 Designated sites and bio-diversity and open space**

The EPA, in their submission of 1<sup>st</sup> of May identified the SAC sites and non designated bio-diversity sites as being amongst their areas of concern.

The Lower River Shannon Special Area of Conservation (SAC) site runs along the Northern and Eastern boundaries of the plan area. The River Shannon forms the northern boundary and the River Mulkear is the eastern boundary of the plan area.

In terms of site protection de-zoning has taken place in one location which reduces the intensity of potential land use close to both the Mulkear and the Shannon. While this has been done from the point of view of flood vulnerability it has ecological benefits as it ensures a continuation of the current hydrological regime and non-interference with existing flood residence areas.

Lands which had been previously de-zoned such as the Industrial Development Authority lands have been re-zoned as enterprise and employment. An assessment of the re-zoning has concluded that there will not be significant ecological or environmental effects. No new zoning has encroached on the designated sites which means that development pressure on these sites has not intensified elsewhere in the area of the draft plan.

Element of de-zoning and phasing has taken place in relation to residential development lands to address concerns of over zoning.

In terms of non-designated bio-diversity sites the importance of the Groody is recognised and the need for reserving its setting and its ecological importance is recognised in Chapter 9 of the plan. Its importance too as flood residence area is also noted.

Trees and groups of trees that are considered noteworthy also from part of the plan with an amenity map showing their location and their importance in the local landscape. With rivers forming important natural features in the plan area the inclusion of buffer areas of between 25 and 30m is an important factor in safeguarding the riparian zone.

One new departure in the plan is the identification of active open space areas which is designed to have a beneficial effects on human health. In addition other areas of open space have been designed close to residential areas which should have both active and passive amenity benefits.

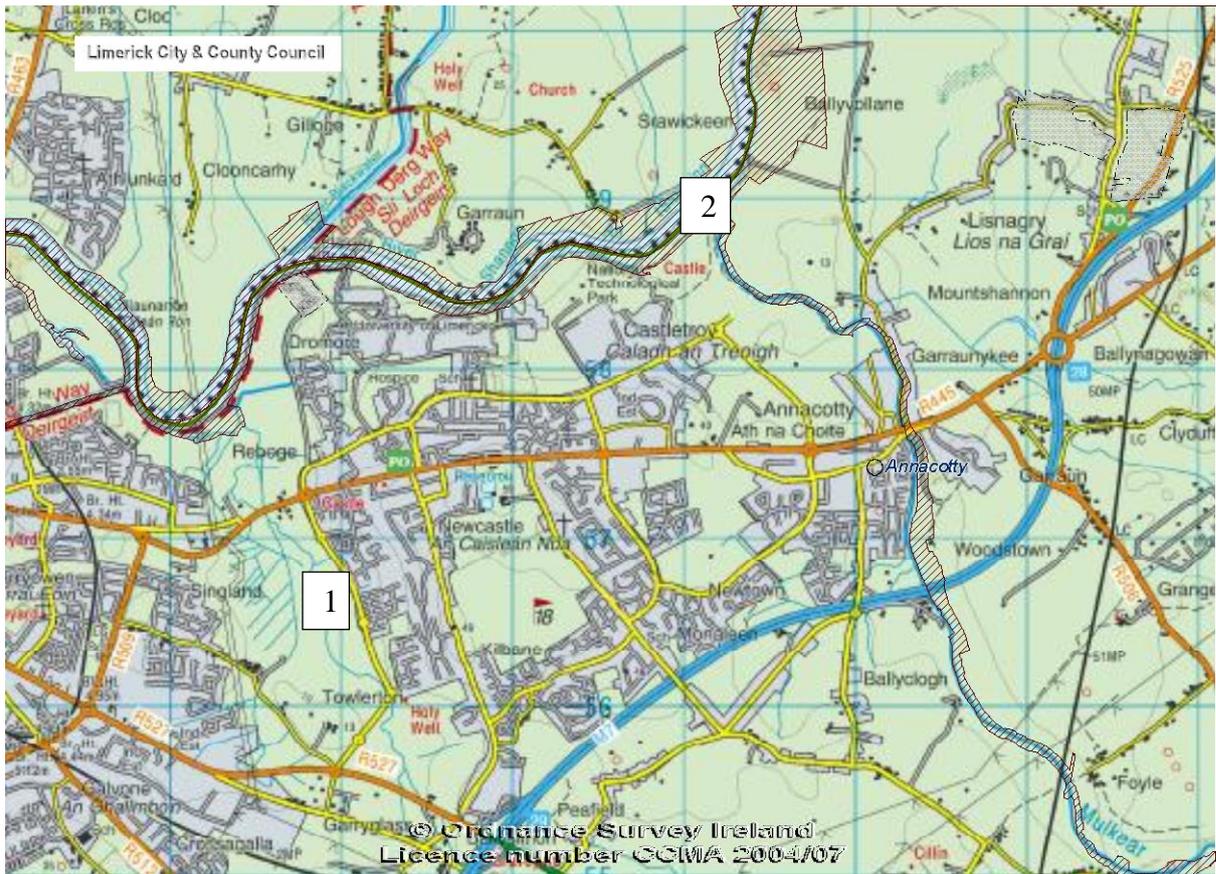


Figure 2: Showing (1) The Groody and (2) the Lower river Shannon SAC site., which is hatched.

### 2.2 Climate change responses:

Policy responses to the issue are included in Chapter 9 but such responses are spread throughout the Plan in that issues such as charging points for electric cars are included. In addition policies exist in the transport chapter to promote the use of sustainable transport. The role of Smarter Travel in developing cycle and pedestrian links is noted as an important link between the city and the university is currently in use.

### 2.3 Noise

One of the biggest generators of traffic noise is the Southern Ring Road that runs to the south of the plan area. With increasing traffic levels and its proximity to residentially zoned land it is to be expected that the noise issue would emerge as a concern. This issue has been added to the list of environmental protection objectives that will inform the contents of the plan. A policy response has been included in the Transport Chapter which calls for higher development standards to deal with the issue.

### 3.0 Monitoring measures

The following measures are proposed as part of this SEA process, to monitor the effects on the environment of implementing the review of the LAP, presented in terms of the achievement of the strategic environmental objectives and the impact on the environmental factors that the SEA legislation requires to be considered. Measures

include targets and thresholds that determine where remedial action may be required in order to achieve that target and fulfil the environmental protection objective.

**Table 3.1 Monitoring Measures**

<b>Environmental Category</b>	<b>Potential impact</b>	<b>Indicators</b>	<b>Comments</b>
Bio diversity, flora and fauna	Fragmentation, loss of habitats, species.	Known losses, reports, surveys by relevant bodies, NPWS Fisheries	Requires cooperation liaison with other bodies.
Population and Human Health	Ground surface/ water pollution. Traffic accidents. Noise.	Pollution incidents, Traffic reports	Could be obtained through Traffic impact assessments produced as part of planning applications.
Soil	Contamination	Reports/Surveys	Local contamination may occur as a result of pollution.
Water	Pollution of ground and surface waters, estuary waters. Excessive abstraction	Water pollution surveys, incidents as brought to light as a result of complaints, sampling	Cooperation with other bodies such as Fisheries NPWS and Health Board required.
Air and Climate factors	Local air pollution. Green house gas emissions	Traffic volumes. Comments in individual EISs submitted.	Contents of EIS submitted to the Planning Authority in the monitoring time frame may be indirect sources of data
Material assets	Use of brown field sites	Planning applications.	Nil
Cultural heritage.	Development in or close to protected sites, habitats or structures.	Known loss of sites or structures.	Increased liaison with other bodies required.

#### **4.0 Conclusions**

While at the outset of the plan preparation process it is difficult to estimate the effects of the policies of the plan, the preparation of the assessment ensures that at least the

policies at their initiation follow good environmental practice. This was the aim of Appendix 1 of the plan in which the policy content of the plan was assessed against Strategic Environmental objectives. One of the first steps in establishing this is ascertaining whether or not the policies are in accordance with national and EU legislation. This approach has been consistent throughout the plan in that the policies have sought to take into account national and EU guidelines and legislation.

The rationale behind the policies was that the cumulative effect of the development or other plan proposals on the area should maintain the balance of or improve the overall environmental stock of the area. Some losses to the natural environment may be inevitable but these are outweighed by such factors as concentration of development that is more easily serviced. In short the plan has created a backdrop for the coherent development of the Castletroy until the preparation of the Metropolitan Plan.

## **Updated Appropriate Assessment**

### **Natura Impact Report**

## **Contents:**

1.0 Introduction

2.0 Location of the Plan and nearby Natura 2000 sites

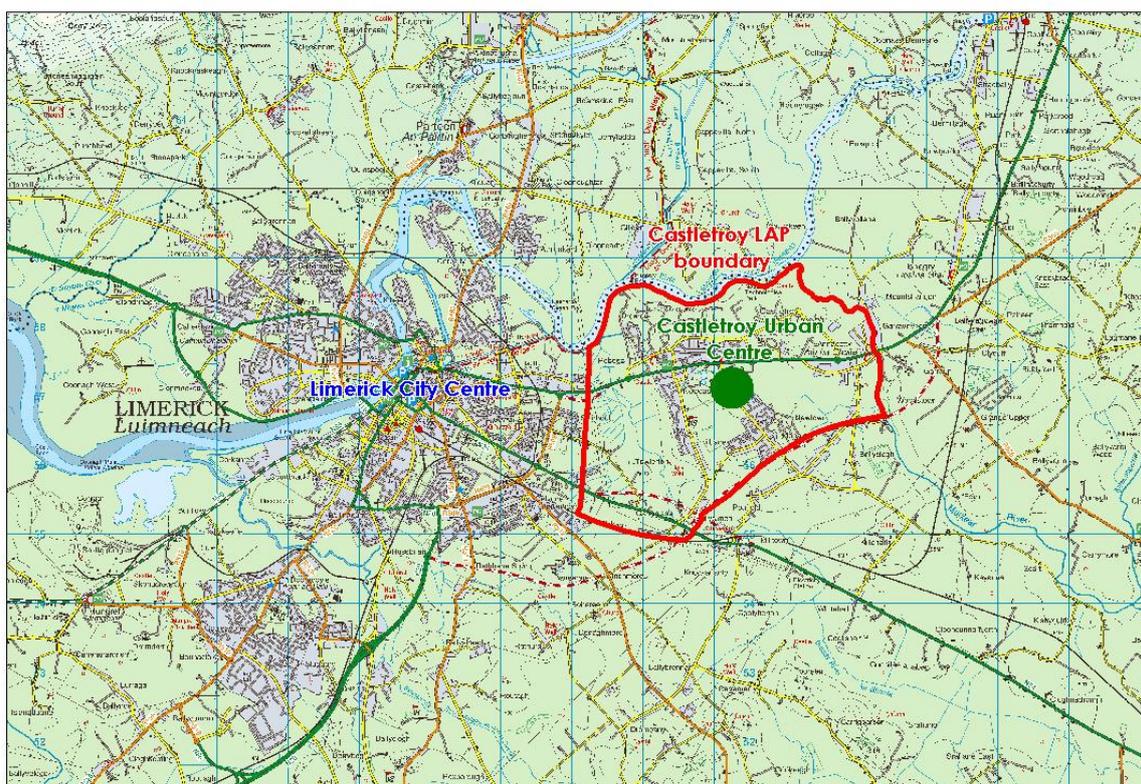
3.0 Discussion

4.0 Summary and Conclusions

## 1.0 Introduction:

This Natura Impact Report is for the review of the Castletroy Local Area Plan. This follows the draft display period during May/June 2018 and is a response to submissions received during this period.

Limerick City and County Council is reviewing the Local Area Plan (LAP) for Castletroy and will make a new LAP under the Planning and Development Act 2000 as amended. An outline map of the area under consideration is included in Figure 1.



**Figure 1:** Location of Castletroy relative to Limerick City.

Castletroy is located within the eastern environs of Limerick City, approximately 3 kilometres from Limerick City Centre. It is bisected by the R445 Dublin road through the centre of the plan area and the (N24) Tipperary Road to the south of the plan area.

## 2.0 Location of the Plan and nearby Natura 2000 sites:

The Special Area of Conservation in this area runs along the main channel of the Shannon and the Mulkear Rivers (See figure 3). Along the River Shannon, the habitat is characterised by stretches of alluvial woodland, while both the Shannon and Mulkear rivers in this location are host to populations of sea lamprey, which use the area for spawning. The qualifying interests of this site are shown in Table 1. The effects of this draft of the plan will be examined based on the qualifying interests shown in Table 1. Much of the information

that is used in this report has been provided by a report carried out on behalf of the Industrial Development Authority that wishes to have its land re-zoned for Enterprise and Employment. The land was zoned agricultural in the last draft of the plan. This report is entitled *Appropriate Assessment Screening report and Natura Impact Statement for the Proposed Flood Mitigation at the IDA National Technology Park Limerick* and was prepared by Fehily Timoney and Company in June of 2018. This is described as the Fehily Timoney Report (FT Report) when it is referred to in the document that follows.

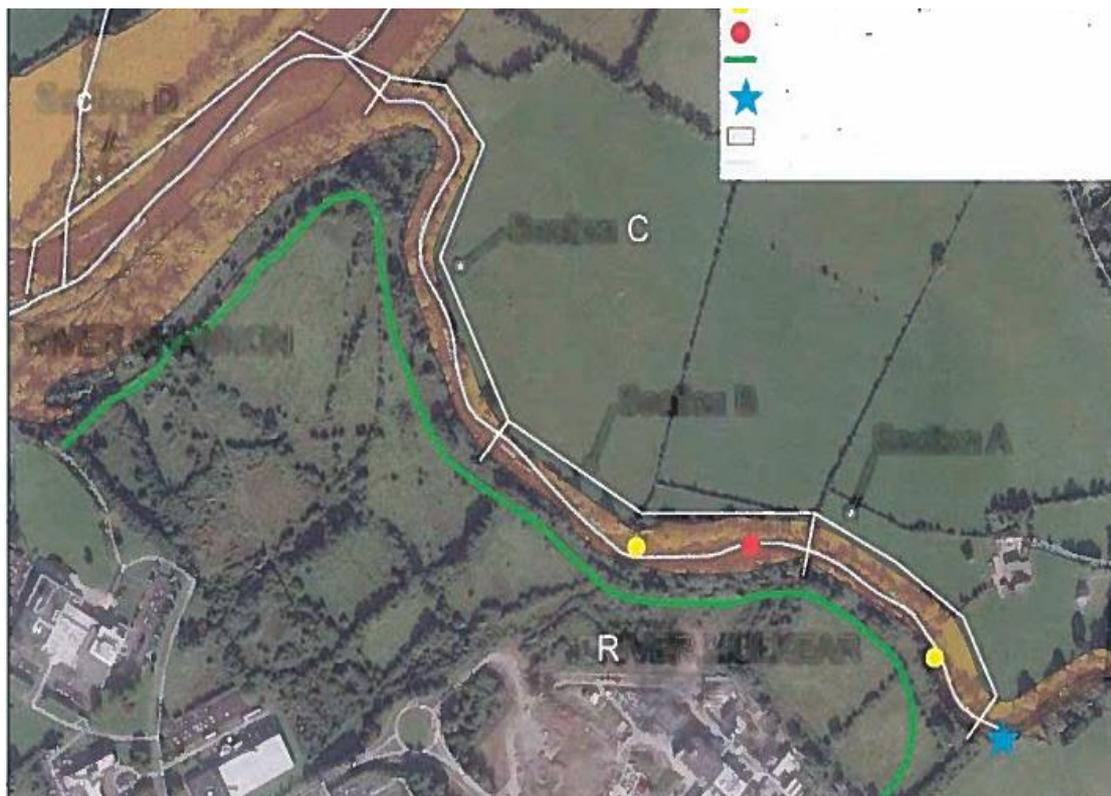
**Table 1 Qualifying interests Lower River Shannon SAC sites.**

Site Code	Site Name	Qualifying Interests (* indicated priority habitat)
002165	Lower River Shannon Special Area of Conservation (SAC)	<ul style="list-style-type: none"> <li>• Freshwater pearl mussel</li> <li>• Sea lamprey</li> <li>• Brook lamprey</li> <li>• River lamprey</li> <li>• Salmon</li> <li>• Sandbanks</li> <li>• Estuaries</li> <li>• Mudflats and sandflats</li> <li>• Coastal lagoons*</li> <li>• Large shallow inlets and bays</li> <li>• Reefs</li> <li>• Perennial vegetation of stony banks</li> <li>• Vegetated sea cliffs</li> <li>• Salicornia and other annuals colonizing mud and sand</li> <li>• Spartina swards</li> <li>• Atlantic salt meadows</li> <li>• Bottle-nosed dolphin</li> <li>• Otter</li> <li>• Mediterranean salt meadows</li> <li>• Water courses of plain to montane levels with the Ranunculus fluitantis</li> <li>• Molinia meadows</li> <li>• Alluvial forests*</li> </ul>

The Lower River Shannon Special Area of Conservation site has a number of qualifying interests in the Castletroy Local Area Plan boundaries. Along the banks of the Channel are stretches of alluvial woodland. The Mulkear River holds nationally important numbers of the

Sea Lamprey, Brook and River Lamprey are also present while both the Shannon and the Mulkear are used by salmon. Otters are also present in the plan area.

Based on this at least six qualifying interests from Table 1 are in the plan area. There are approximately 56 redds (lamprey spawning locations) in lower reaches of the Mulkear just above the confluence with the River Shannon. The habitat is favourable for spawning Sea Lamprey (*Petromyzon marinus*) in the reaches of the Mulkear River and the River Shannon in the vicinity of the National Technology Park with areas of suitable gravel present.



**Figure 2:** Though it suffered in the reproduction this illustration from the Fehily Timoney report shows the extent of the River Shannon and River Mulkear that borders the IDA Technology Park. The red circle indicates a riffle zone with no lamprey spawning while the yellow indicates a zone where lamprey spawn. The blue star indicates the location of a kingfisher nest.

The Sea Lamprey generally migrate upstream to spawn following rising water temperatures during late spring and early summer. In 2013 the migration season for lamprey movement upstream was in late June. The FTR report submitted with Submission No.52 (*Aquatic baseline survey of the Lower rivers Mulkear and Shannon Castletroy Co. Limerick*) also indicate that favourable locations of lamprey spawning would also be of use to salmonids though perhaps better sites would be available upstream. This is because better-gravelled sites with more optimum conditions for spawning are present in the upper reaches of the Mulkear. Another factor to be considered is the presence of areas that would be suitable nursery areas for Lamprey Ammocetes (juvenile lamprey). These are presents in the River Shannon Channel and in areas, where debris and fallen trees allow the build-up of sediment.

Such locations are suitable for lamprey ammocetes to remain buried during the early part of their life cycle. The site is perhaps the most important nationally for the Sea Lamprey and the presence of habitats that cater for differing stages of the life cycle emphasises this.

This area also contains sites that are suitable for the more common Lamprey species, Brook and River Lamprey to spawn.

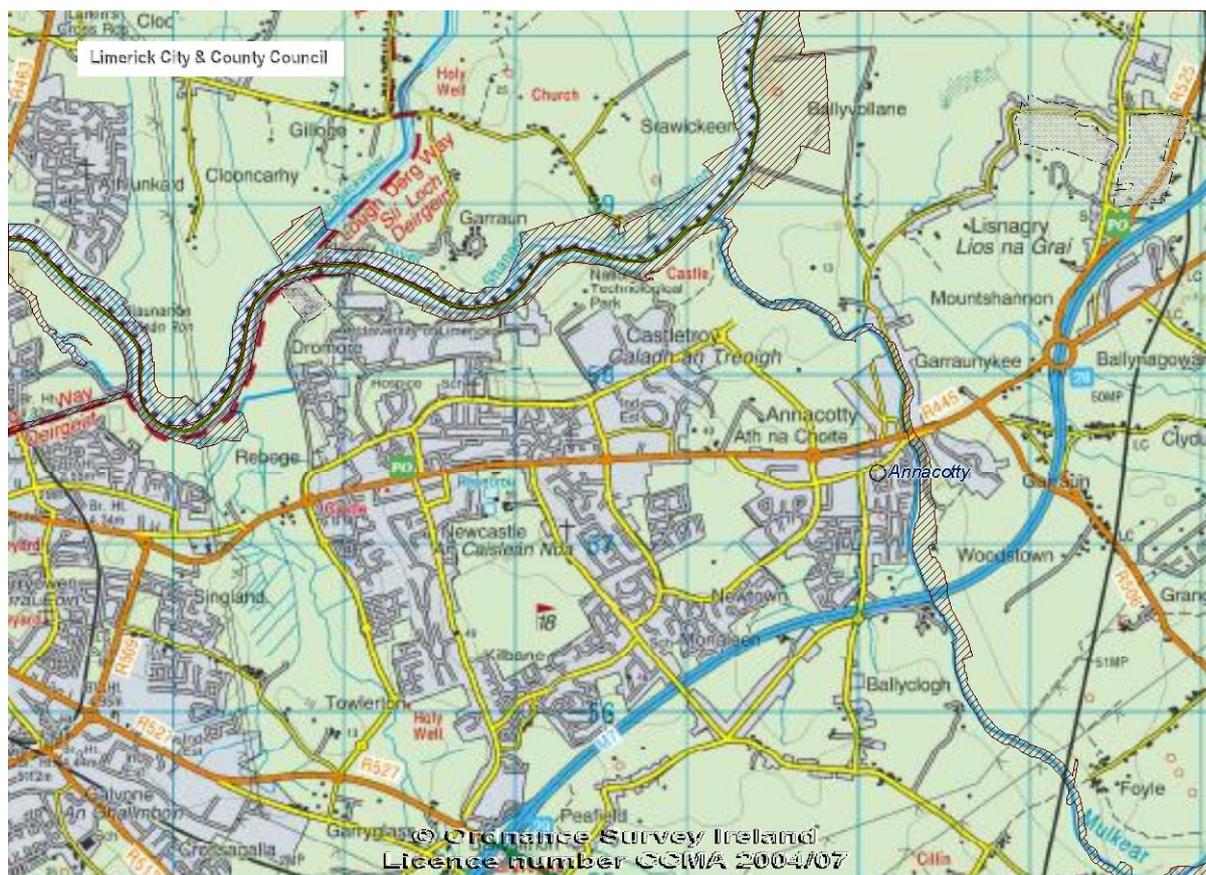
Otter are also likely to use the area. While no traces such as tracks spraints or prey remains were found during walkovers of the NTP, the Rivers Shannon and Mulkear provide a variety of habitats and food sources for the animals. The Fehily Timoney Report does note the presence of Otter spraints along the Mulkear River. Holts are likely along the main river channel where tree and vegetation cover would provide suitable concealment. The presence of in-stream islands also provides areas where holts could be located away from disturbance.

Though not part of the Natura 2000 sites qualifying interests, consideration needs to be given to other species. In terms of other species such as bats, earlier surveys along the main channel of the Shannon during 2014 have indicated that it was used by both species of Pipistrelle, Daubentons and Leislars and Brown Long Eared bats. It is also likely that other species would use the area as the combination of river channel and tree and vegetation conditions provide optimum conditions for many Irish bat species. The Mulkear River channel would also be within the range of locally occurring bat species so it is likely that similar species would be active along the Mulkear River channel. The removal of trees and vegetation as part of the clearance works associated with the proposal would have localised effects away from the rivers and within the blue area indicated in Figure 8 as it would lead to more exposed conditions which would limit foraging opportunities for the bats.

Other Mammals that are likely to use the site are the fox (*Vulpes vulpes*) and the hare (*Lepus timidus hibernicus*). No permanent traces of their presence was found though tracks through long grass did indicate that they move through the area. No badger (*Meles meles*) setts were found in the course of walkovers.

#### **Undesignated Bio-diversity areas:**

In terms of undesignated bio-diversity areas, the Groody Valley which is located to the west of the plan area (Figure 2) is of particular importance as it is a largely undeveloped river corridor with potential for both ecological and amenity usage. This is important as it drains to the Shannon immediately to the north. The Local Area Plan includes mention of a master plan that provides for a park in the Groody Valley. This will not result in the loss of any additional flood plain area as it is on existing fill land. The master plan relates to the provision of a public park and an adjacent park and ride facility. It is important to point out that the proposals also includes a buffer between the park area and the Groody river Channel in line with Inland Fisheries Ireland recommendations in their Planning for Water Courses in the Urban Environment (2011).



**Figure 3:** Showing the Lower River Shannon SAC site running to the north and east of the Plan area. The hatched area is the SAC site.

**Survey and Survey methodology:** Walkover surveys of the area were carried in April 2018 for the first draft of the Plan and in July 2018.

**Overall conclusions:**

- No further encroachment shall take place into the SAC. The zoning template of this plan at this stage is not likely to change further in any way that would significantly affect Natura 2000 sites. Though both the IDA lands and the Shannon Commercial Properties lands at Towlerton have been re-zoned back to Enterprise and Employment, an assessment of the possible effects of these changes indicates that any effects would not be significant. The IDA lands have been re-zoned as Enterprise and Employment lands based on a proposal to undertake flood defence works. See figure 6 below. This has been judged not to have a significant effect on the SAC site for the following reasons. The overall footprint of the berm will not move forward of its current location. A buffer will remain forward of the berm which will lessen its impact on the Mulkear River in particular- See Figure 4 below. Though the works about the SAC site they do not enter into it, a factor which is important in that Alluvial Woodland occurs just outside the footprint of the works.



**Figure 4:** shows the buffer between the existing berm and the Mulkear River Channel.

Surface water discharges to the Mulkear River from the existing drains will cease as part of the works proposed. Instead, they will be diverted to the River Shannon where the larger channel and the greater water volume will further dilute these discharges. It also means that these discharges will not be diverted into the important sea lamprey spawning area in the Lower Mulkear River.

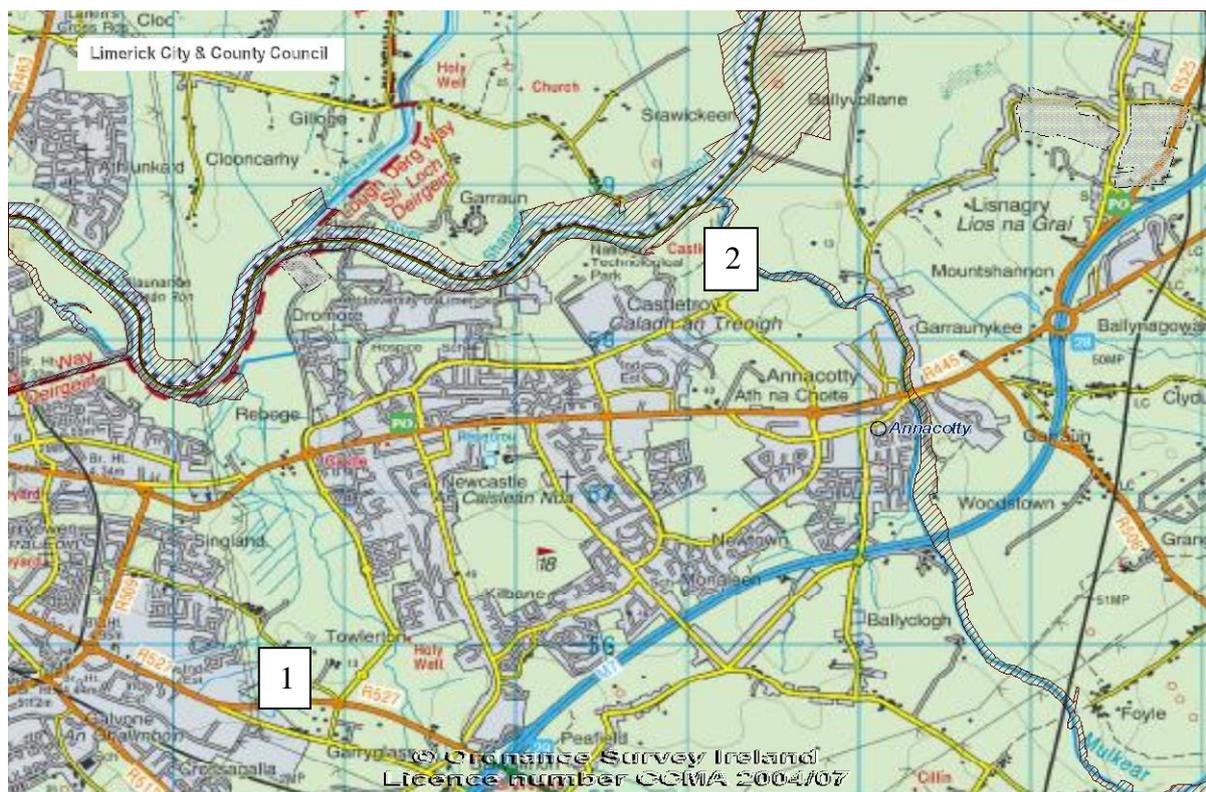
- This, coupled with the inclusion of a 30m buffer along the River Shannon and a 25m buffer along the Mulkear River offer additional protection to riparian ecology. The buffer also serves as flood buffer/flood residence area and allows for the incorporation of Sustainable Urban Drainage Systems (SUDS). The use of SUDS also minimises inflow to the Shannon, which reduces effects on the local hydrological regime. Two policy objectives EH05 (Groody River valley) and EH06 (Designated sites and nature conservation) seek to provide protection for designated sites and the Groody Valley.
- The importance of the Groody Valley as a flood residence and ecological area has been recognised in the Strategic Flood Risk Assessment that accompanies the plan and this has been reflected in the policy content of the plan.



**Figure 5:** showing the importance of the Groody as a flood residence and hence ecological area. This also plays an important buffer role in terms of local hydrology, controlling flows to the Shannon.

The Groody Valley with its flood plain, while not designated, has role to play in relation to wildfowl movement and feeding in the area and provides a valuable adjacent habitat to the River Shannon and Fergus Estuaries SPA which lies downstream. The river valley plays host to concentrations of wildfowl during the winter months in particular. One species that has been observed there in numbers in recent years were Green Plover (*Vanellus vanellus*, *personal observation*). Otters (*Lutra lutra*) have also been observed in the Groody valley and this species is part of the qualifying interests of the Lower River Shannon SAC site- see table 1 above. Both direct sightings and their spraints have occurred the length of the Groody Valley. One dead otter (*personal observation*) was found at the Groody, Shannon confluence in the summer of 2014. There was no obvious cause of death.

The re-zoning of the Towlerton lands (Figure 6) which drain into Groody River Valley are not considered to have significant effects on the flood function of the Groody Valley or to have any ecological effects that would transfer to the lower river Shannon SAC site.



**Figure 6:** The Towlerton site is shown as 1 in the illustration above

This is based on the fact that overall volumes from the Towlerton site are small in the context of the available flood residence area in the Groody Valley. In addition attenuation areas are proposed for the Towlerton site and measures to slow the rate of run off will also help to regulate flow levels and minimise their effects of site.

### 3.0 Discussion

#### Brief description of the project:

This is the review of the Castletroy Local Area Plan, a statutory process in which the policy content of the plan is updated. This will result in updates of planning policy and the zoning content of the Plan. As part of this review a submission was received which sought to re-zone the IDA lands in Castletroy as Enterprise and Employment. As part of this submissions, works are proposed to expand and enhance the existing flood defences in these lands. These lands are shown as No.2 in Figure 6 and are outlined in blue in Figure 8 below. These works have the potential to have significant effects on the Mulkear River and the River Shannon and as such merit progression to Stage 2 of the appropriate assessment process

#### Brief description of the Natura 2000 sites:

1 The Lower River Shannon SAC (002165) site, designated for a range of riparian habitats and species runs along the northern and eastern boundaries of the plan area. This has been designated for a range of riparian and instream habits and species.

2 Three kilometres downstream is the River Shannon and Fergus Estuaries Special Protection

Area (0040770) which is a huge intertidal complex with mudflats that provides valuable habitats for wintering wildfowl.

3 The Slieve Felim Special Protection Area (004165) is within 20km to the east This is a series of upland habitats, both open and forested which has been designated for the hen harrier.

4 At Glenstal Wood SAC site (001432) oak (*Quercus* sp.) woodland remnants occur which support a rich fern, bryophyte and lichen flora. This 18km to the east. The rare lichen, *Enterographa elabora*, a species known from only three other counties in Ireland, has been recorded at the site. Some oak woodland remnants are also found about Glenstal Abbey. The site is of conservation importance for the presence of Killarney Fern (*Trichomanes speciosum*), a rare species that is listed on Annex II of the E.U. Habitats Directive and that is also protected under the Flora (Protection) Order, 1999.

No effects are anticipated on sites numbered 2-4 above due to distance. The designation of the Groody green wedge is expected to benefit the River Shannon and Fergus Estuary SPA as it will provide an adjacent habitat for wildfowl. The non-infilled area of the Groody Valley has a huge role to play in this regard.

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

One aspect of the plan as it stands is that an area that had been zoned residential in the previous plan and zoned as agricultural in the current plan remains zoned as agricultural This helps avoid pressure on the Mulkear River, which runs along the eastern boundary of the site.

The IDA lands have been rezoned to Enterprise and Employment Zoning based on proposals to carry out flood defence works. It is this proposal, which has the potential to exert significant effects on the Mulkear and Shannon Rivers in the plan area. This is dealt with later in this report.



**Figure 7;** the land parcel indicated as A above remains zoned as agricultural. The Mulkear River is immediately to the east of this and the agricultural zoning reduces the development pressure and the probability of encroachment on the Lower River Shannon SAC in this location.

Ecological buffers of 25m in width are proposed along the Mulkear River, while 30m buffers are proposed along the Shannon. These are designed to protect these watercourses and would have beneficial ecological effects.

The designation of the River Groody Green Wedge and the recognition of its ecological and flood residence importance is also expected to have beneficial ecological effects.

**Additional notes:** Another environmental risk would be from largescale in fill or alterations to levels in the Groody Valley. This is non-designated but its proximity to the Shannon means that any inappropriate activity within it would have direct effects on the Shannon. The importance of the Groody as an ecological and flood storage area is recognised in the draft plan and appropriate policy protection has been included.

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

- **Size and scale**

The scale of the Castletroy Local Area Plan has been indicated in Figure 1. This is 12km<sup>2</sup> in area but only portions of this lie within the SAC site. As noted a submission to the plan has resulted in the re-zoning of the IDA lands for Enterprise and Employment Use. This has been accompanied

by a proposal to enhance the flood defence berms in these lands. The proposed works consist of the raising of the level of the existing berm running along the eastern and southern boundaries of the IDA lands, together with the addition of a further 170m length of berm to add to an existing berm at the eastern edge of the area of works. Four new attenuation ponds are to be constructed and there is to be an upgrade and alteration to existing drainage works. Current discharge points to the Mulkear are to be closed off and this is to be diverted to main Shannon Channel by being pumped to attenuation ponds. The area that is to be served by the proposed works is approximately 70ha, i.e. the undeveloped IDA lands within the National Technology Park.

- **Land-take**

Though the proposed flood defence works are close to the SAC site they do not enter into it. There is a requirement to indicate the limit of works in order to avoid the unnecessary passage of workers and machinery into the SAC site- see mitigation measures in Section 4.

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

The Lower River Shannon Special Area of Conservation (SAC) site runs along the Northern and Eastern boundaries of the plan area. The River Shannon forms the northern boundary and the River Mulkear River is the eastern boundary of the plan area- see Figure 2. The works mentioned in the IDA lands immediately about the SAC site.

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

There are no resource implications as it is not anticipated that any extraction of material –rock or soil would take place from the river. The Clareville water supply is abstracted from the Shannon 5km upstream. To date this has not had ecological effects.

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

In relation to the wider question of infrastructure in the plan a response from Irish Water indicates that there is sufficient capacity in the Waste Water Treatment Plant serving the Castletroy area. The submission envisages that there is adequate treatment capacity to accommodate the proposed population allocation of 3,078 people over the Draft LAP period. The current capacity of the Castletroy WWTP is 45,000-population equivalent and the load to the plant in 2017 was identified as 36,486-population equivalent. Currently an upgrade to the plant is being progressed and this will increase capacity to 80,000-population equivalent. This project is at design stage and has an anticipated completion date of 2024. IW are not aware of any bottlenecks in the wastewater network and it remains the case for the zonings proposed under the LAP. Connection applications will identify any need for local network reinforcement. Irish Water are aware of excessive infiltration of the network especially when the River Shannon is high. The Limerick and Castletroy DAP is to commence in 2018 and this will increase the understanding of the network.

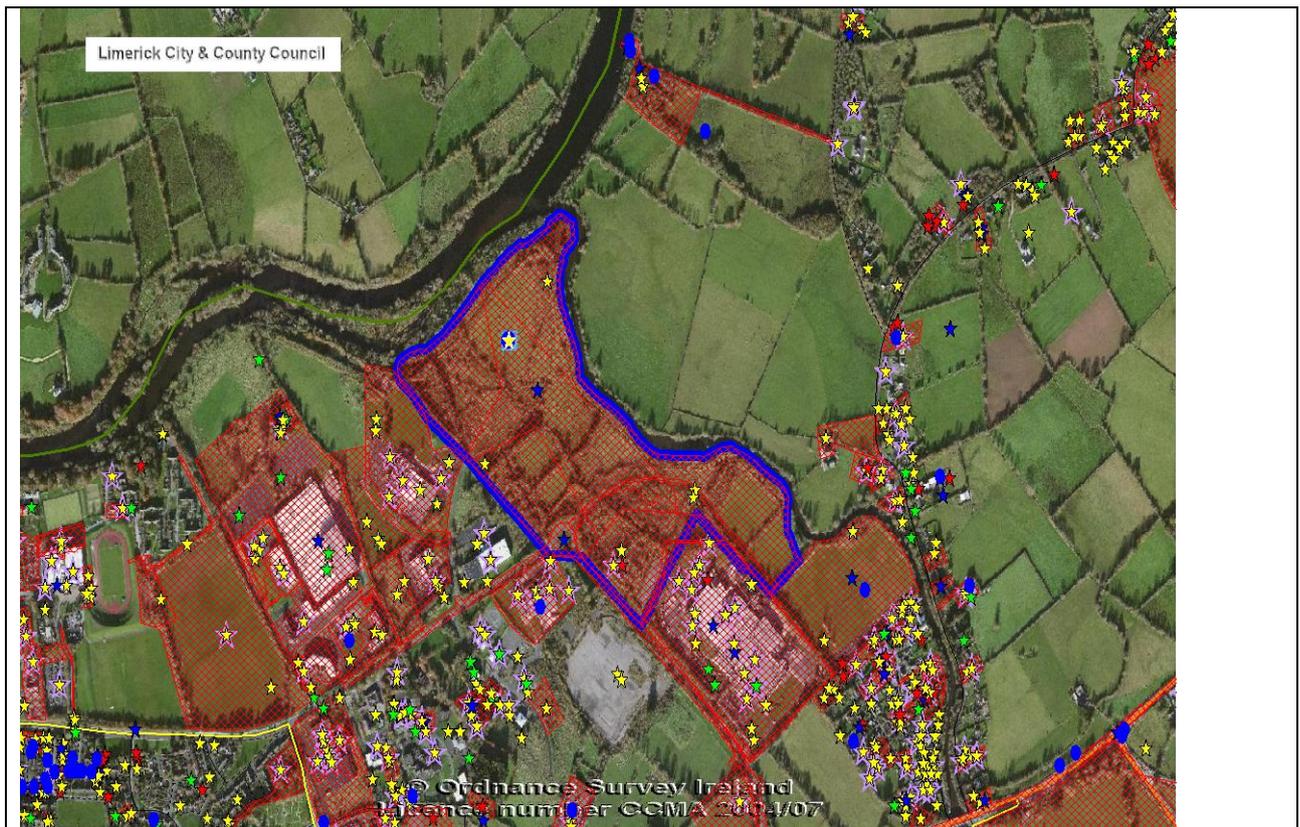
From the point of view of the flood defence works one of the issues that might arise is emissions during the construction phase in particular, as the berm is modified and lengthened with imported material. In addition the internal drainage system of the undeluded lands inside the berm is to be modified. This raises the possibility of the sediment-laden run off running into the Mulkear River.

There are approximately 56 redds in question (AA screening /NIS Appendix 1 p.1p.19-20 Submission No. 52). While the closing of discharges to the Mulkear is to be welcomed as part of the works (FRA S6, p.38 Submission No. 52) the issue of disturbance during the construction phase remains one of the greatest threats to the Sea Lamprey. They are particularly sensitive to vibrations. In *"certain circumstances, for example in construction or other development related activities, it may be necessary to restrict the timing of such activities or to put in place mitigation measures"* (Mulkear LIFE best practice guide no.2)).

Sea lamprey generally migrate upstream to spawn following rising water temperatures during late spring and early summer. In the 2013 migration season lamprey movement upstream was in late June. This means that works should not take place before July and preferably not until after the first week in July to allow an adequate time for lamprey to complete their spawning. Construction should therefore take place between mid-July and mid-October. This would also avoid up river movement of salmon that also use the Mulkear for Spawning.

Suitable measures to prevent emissions of sediment laden run off and other pollutants are required in this instance.

The operational phase of the development is not considered to pose any threat to the conservation status of the SAC site. This is for two reasons, the works are not expected to result in any increased flows as there is a large area of agricultural land to the north and east which will act as a flood residence area. Because of this it is not anticipated that there will be increased flow rates within the Mulkear River following the works, This would mean that there should not be an increase in scouring which might affect the substrate on which lamprey and salmon spawn.



**Figure 8:** The area outlined in blue indicates the extent of the site that is the subject of the flood defence proposal in the IDA lands.

Another issue to be considered, is the issue of invasive plant species. The works have the potential to spread the seed stock of invasive plants through inadequate management and treatment of the invasive plants on site.

The main areas of the invasive plants are those outside the existing flood defence berm which is not surprising given that the river would have been the main means of transporting seeds and plant fragments.

Significantly less amounts of invasive plants were recorded from areas inside the current flood relief berm (i.e. away from the Mulkear River-Triturus, 2018, part of the Fehily Timoney Report), with the majority of the records from the river side of this feature with the exception of a few smaller stands on the berm. Land usage to the south (i.e. outside) of the flood embankment is improved agricultural grassland (GAI) and subsequently soils here are heavily compacted in comparison, inclusive of the berm itself, making rooting more difficult. Species such as Himalayan balsam also favour partial shading and damp ground conditions making the riparian areas between the berm and the river side far more suitable. These characteristics would appear to be limiting the spread and colonisation of invasive plant species at the site. As such it is critical to limit works outside (i.e. the river side) of the flood relief berm to prevent the further spread of invasive plant species along the lower Shannon SAC. This should be reflected in any management plan to deal with these species.

- **Excavation requirements**

There are to be substantial works on the flood defence berm, in addition to works on the drainage system inside the berm on the undeveloped section of the IDA lands. The blue boundary in Figure 8 above indicates the extent of the site. The existing internal drainage system of the undeveloped area as shown, will be dug out and improved. It will be important to ensure that these would be dug out prior to any works on the berm in order to avoid any potential run off from this source entering the Mulkear River.

- **Transportation requirements**

None- again see above re buffers around the rivers Mulkear and Shannon. It will be necessary to clearly indicate the boundary of works in the IDA lands to prevent unnecessary encroachment into the SAC site- see mitigation measures in section 4.

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

It is anticipated that the works would take a maximum of six months. Bearing in mind the sensitivity of the site and the passage of both sea lamprey and salmon upstream it is recommended that that the work takes place between early July and Late October.

**On site habitats:**

The habitats description uses some material from the Fehily Timoney Report but also material from site visits during the plan preparation process. Both the River Mulkear and River Shannon bordering the proposed flood mitigation works represent lowland depositing watercourses (FW2). In general, the Mulkear channel becomes deeper and slower as it reaches its confluence with the Shannon. The section near the confluence is dominated by deep glide habitat with higher proportions of soft sediment. The sections further upstream parallel to the berm are also dominated by glide habitat although this is typically shallower and these areas feature localised pool and riffle habitat. The River Shannon section surveyed is far wider (60-100m), deeper (>2m) and dominated by faster glide habitat. Substrate is typically a matrix of medium-coarse gravel, cobble and boulders, with localised marginal slacks (especially near the Mulkear confluence) dominated by fine sediment.

A number of small surface water drains and drainage ditches (FW4) link to the Mulkear and Shannon channels through flap valves. Access for any fish species is restricted to the mouth of these channels due to valves although these areas, being typically low-flow areas dominated by fine sediment, may represent valuable areas for larval lamprey, especially along the Mulkear. During flood events these areas would also offer valuable refuges for various salmonid and coarse fish species seeking to avoid the main flow.

The existing berm separates the channel from rank grassy scrub areas corresponding to Dry meadows and grassy verges (GS2) and Improved agricultural grassland (GAI). Typical grassland species adjoining the proposed works area include creeping buttercup (*Ranunculus repens*), meadow buttercup (*Ranunculus acris*), red clover (*Trifolium pratense*), yellow rattle (*Rhinanthus minor*), broad-leaved dock (*Rumex obtusifolius*), annual meadow grass (*Poa annua*), cocksfoot (*Dactylis glomerata*), false oat grass (*Arrhenatherum elatius*), ribwort plantain (*Plantago lanceolata*), Yorkshire fog (*Holcus lanatus*), meadowsweet (*Filipendula ulmaria*), lesser stiltwort (*Stellaria graminea*), timothy grass (*Phleum pratense*) and meadow foxtail

*(Alopecurus pratensis)*.

The existing flood embankment typically grades as dry meadow & grassy verge habitat (GS2), supporting a low diversity of species such as nettle (*Urtica dioica*), cocksfoot, meadowsweet, Yorkshire fog, annual meadow grass, foxtail, timothy grass and occasional field bindweed (*Convolvulus arvensis*). The embankment is frequently bordered on the river (northern) side by broken mature treelines (WL2) and localised patches of woodland composed primarily of species including hazel (*Corylus avellana*), ash (*Fraxinus excelsior*), alder (*A/nus glutinosa*), white willow (*Salix alba*), sally willow (*Salix cinerea*), osier (*Salix viminalis*), hawthorn (*Crataegus monogyna*), sycamore (*Acer pseudoplatanus*) and crack willow (*Salix fragilis*).

### **Riparian and Aquatic Species (from the FT report)**

#### Sea lamprey

Two redd sites were recorded along the section of the lower Mulkear River running parallel to the berm alignment (see figures 3.1 and 3.2 in accompanying Sea Lamprey Survey report in Appendix 3). A concentration of c. 20 sea lamprey redds was observed at the margin an area of riffle and deep glide habitat grading into deeper pool, adjacent to the western end of the existing berm. These are shown as yellow dots in Figure 2.

A second concentration of c. 36 sea lamprey redds was observed 350m downstream In an area of glide habitat also grading into deeper pool similar to the first area, situated adjacent to the western end of the proposed M4 attenuation pond.

Good lamprey nursery areas are present downstream of the spawning sites described above, in the form of sand & silt accumulations, primarily along river margins and slacks.

Sea lamprey are one of the qualifying Interests of the Lower River Shannon SAC ( 002165) ; as such, their use of the lower Mulkear in the vicinity of the berm for spawning means that this area is particularly important within the wider SAC site for this species.

#### Other Aquatic Species

Suitable spawning areas for brook and river lamprey were present but localised in the further upstream sections of the Mulkear surveyed. Good lamprey nursery areas are present downstream of the spawning sites described above, and take the form of sand and silt accumulations, primarily along river margins and slacks.

Overall, the surveyed sections of the lower Mulkear and Shannon offered good salmonid habitat. Nursery habitat was particularly good throughout the Mulkear with the lowermost section near the Shannon confluence offering good holding water for migrating adults. The section of the lower Shannon survey also offered good nursery habitat. Whilst superior spawning areas are present further upstream in the Mulkear catchment, good quality Atlantic salmon spawning gravels are invariably present in the same areas selected by sea lamprey.

Two otter spraints and an **area** containing otter prints were observed along the section of the

Mulkear surveyed; no holts were present in the vicinity of the berm however (Triturus- from the FT report, 2018a).

**Potential Effects of the Proposed works:**

The potential for effects in the absence of mitigation is significant. The digging out of the old drainage system without suitable precautions being taken to minimise run off could easily lead to large emissions of sediment to the Mulkear Channel in particular. This could have the potential to smother lamprey spawning sites. The importation of material for the berms construction and enhancement coupled with the construction of the attenuation ponds would magnify these effects. As indicated earlier the timing of the works is crucial in that lamprey are sensitive to vibrations and this would be a consequence of the construction phase of the works.

The water quality in the Mulkear and the Shannon in this location is good and the works could exert a severely detrimental effect on this in the absence of proper management. Large scale excavation could also lead to the further expansion of invasive species along the downstream Shannon system.

In the longer term it should be remembered that the proposed works are designed to facilitate the eventual development of these lands, which in their current undeveloped state are a semi-natural habitat and provide a buffer between development and the Mulkear River Channel in particular. There is likely to be considerable cumulative effects, not just from current developments such as ongoing construction in the NTP and the recent construction of a wind turbine but over the medium term (ten to twenty years), as the lands which are currently undeveloped because of flood risk are developed as a result of these proposed works. This point is made again below.

**4.0 Summary and Conclusions:**

The lower Mulkear River is a very important area for sea lamprey and should be protected during all construction works associated with the remediation and expansion works to flood embankments and attenuation pond construction areas, inclusive of proposed outfalls. The construction and operational phases of the project should aim to avoid impacts to the sensitive spawning habitat areas of sea lamprey which may result due to deterioration in water quality associated with the proposed works.

Method statements for the works should be prepared in accordance with a prepared Construction Environmental Management Plan (CEMP) and Invasive Species Management Plan (ISMP). The CEMP should include details of fencing off the designated sites to reduce unnecessary access, pollution control measures and vehicle haul routes.

The details within these plans should be agreed with the NPWS and IFI in advance of commencement of works and relate to all of the ecological sensitivities of the site. Discussions with Inland Fisheries Ireland for instance on August 4<sup>th</sup> have indicated the importance of measures to stabilise the berm and other earthworks through specialised fast growing seed mixes in order to prevent run off reaching the river channels. These should be included in the mitigation measures for the works.

It also extremely important that an Ecological Clerk of Works (ECoW) remains onsite during the construction phase to ensure that works are conducted according to the CEMP, ISMP and according to sound environmental best practice. The ECoW should be commissioned independent of the contractor and ensure that environmental compliance is undertaken to the highest level. This would include a water quality monitoring during the construction phase. It would also be prudent to monitor water quality within the attenuation pond areas annually to ensure that with the expansion of the business park that surface water quality does not deteriorate as water drains from increased areas of impermeable surfaces.

The location of the Alluvial woodland should be clearly indicated on any CEMP and it should be fenced off and its location indicated to workers on site to prevent access or damage. This is of particular importance as it is an Annex habitat.

In conclusion it is considered that it is the construction phase of the works are the most likely to cause significant effects on the Lower River Shannon SAC site and in particular on the lamprey spawning grounds of the Mulkear. Once completed the already existing buffer between the berm and the river will remain which will continue to be used by otters.

The construction phase of the works needs to be carefully timed and managed in order to reduce the possible effects to lowest level possible. Once this is achieved it is considered that the risks posed to the SAC site are reduced to an acceptable level.

These measures should include the following

1 Timing of the works is to be between the second week of July and the end of October. This is to avoid both the peak Lamprey and Salmon spawning runs upriver in both the Shannon and the Mulkear.

2 Preconstruction wildlife survey to be carried out in order to update and inform any Construction and Environmental Management Plan (CEMP) and to suggest mitigation measures. This to be carried out in consultation with the NPWS and IFI and approved by the Planning Authority prior to commencement of construction. An Invasive Species Plan is to be prepared as part of this CEMP. Prevention of run off and pollutants reaching the river channels is to be a priority in this plan.

3 A suitably qualified and experienced ecologist is to be appointed to oversee works to ensure that they follow best practice.

4 All exposed earthwork to be reseeded as quickly as possible following completion of works to reduce the possibility of silt laden run off reaching the river.

5 No refuelling or servicing of vehicles to take place within 50m of any watercourse. All of these activities are to take place in a properly equipped site compound, the position of which will be indicated on the CEMP mentioned in 2 above.

**Sources:**

- European Union (2013) Interpretation Manual Of European Union Habitats European Commission DG Environment Brussels.
- Fehily Timoney and Company (2018) Appropriate Assessment Screening report and Natura Impact Statement for the Proposed Flood Mitigation at the IDA National Technology Park Limerick
- Fossitt J (2000) A Guide to Habitats in Ireland, Heritage Council Kilkenny.
- Little *et al* (2007) Native Riparian Woodlands – A Guide to Identification, Design, Establishment and Management Authors: Declan Little, Woodlands of Ireland; Kevin Collins, Forest Service; John Cross, National Parks & Wildlife Service; Declan Cooke, North western Regional Fisheries Board; and Philip McGinnity, Marine Institute. Native Woodland Scheme Information Note No. 4 Dublin.
- Shannon Regional Fisheries Board (2011) Planning for Water Courses in the Urban Environment, Limerick.

## **Updated Strategic Flood Risk Assessment**

**Contents:**

1.1 Introduction: Flood risk In Castletroy

1.2 Flood Risk Identification

2.0 Conclusions

## **FLOOD RISK ASSESSMENT**

This is the stage 1 flood risk assessment for the review of the Castletroy Local Area Plan 2019-2025. As the plan area has three rivers running through it, one minor and two major (the Groody, Mulkear and the Shannon) the examination of flooding issues has particular relevance for this plan.

### **1.2 Stage 1: Flood Risk Identification**

The Technical Appendices of the *Planning and Flood Risk Management Guidelines (November 2009 p.9)* identify the following sources of information:

- OPW Preliminary flood risk assessment indicative fluvial flood maps
- National Coastal Protection strategy study flood and coastal erosion risk map
- Predictive and historic flood maps and benefiting land maps
- Predictive flood maps produced under CFRAM studies
- River Basin Management Plan and reports
- Indicative assessment of existing flood risk under Preliminary Flood Risk Assessments
- Previous flood risk assessments
- Advice from Office of Public Works
- Internal consultation with Local Authority personnel, in particular water services engineers
- Topographical maps - in particular LIDAR
- Information on flood defence condition and performance.
- Alluvial deposition maps
- Liable to flood markings on old 6 inch maps. In addition these maps particularly the first edition, contain information on landscape features and infrastructure such as mills and weirs that can indicate hydrological features.
- Local Libraries and newspaper report
- Local consultation e.g. local groups
- Walkover surveys to assess potential sources of flooding and likely routes of flood waters and flood defences
- National, regional and local spatial plans and previous planning applications.

#### **OPW preliminary flood risk assessment indicative fluvial flood maps**

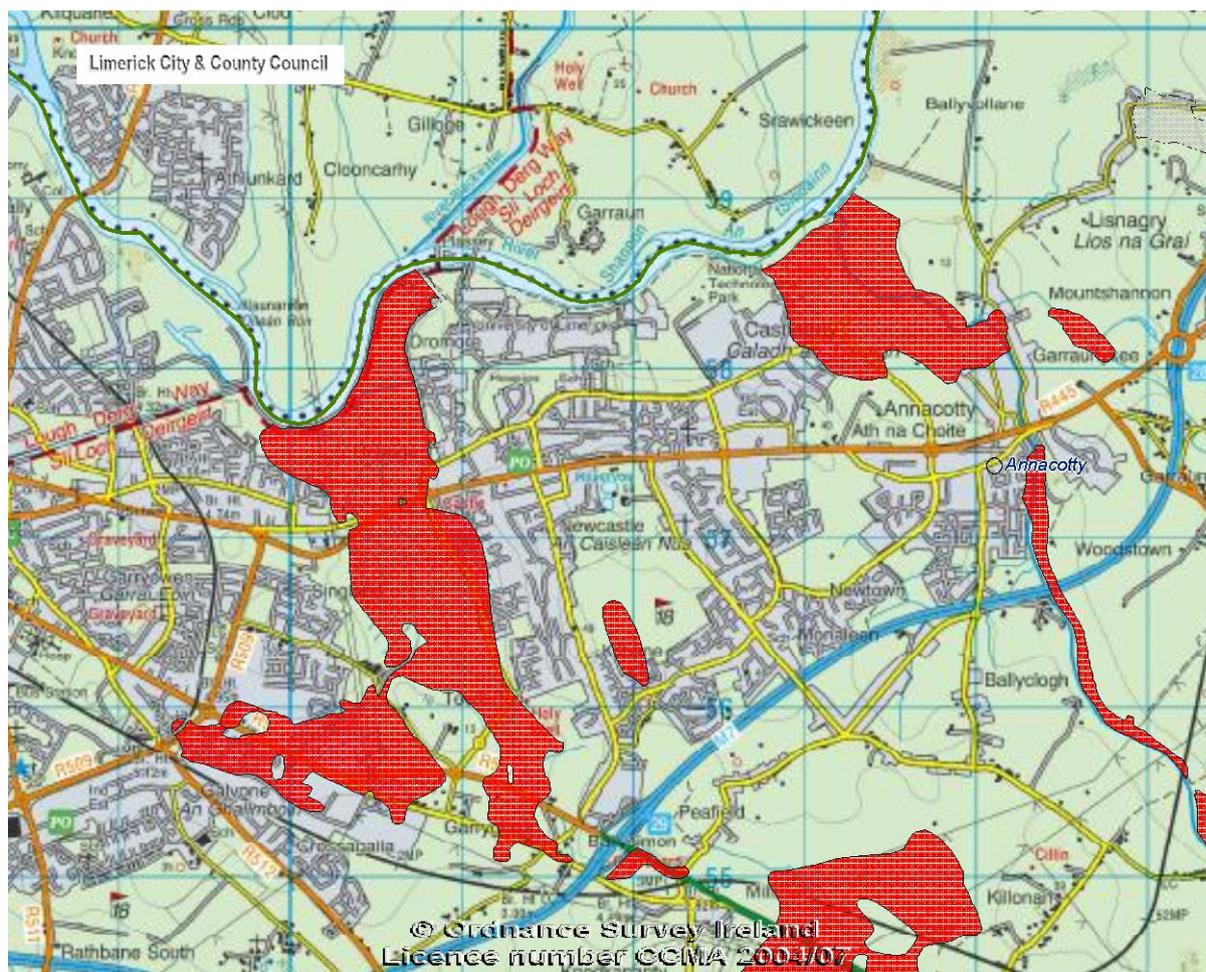
The Preliminary Flood Risk Assessment Report from 2011 indicates the presence of storm water flooding at the entrance to the university.

#### **National Coastal Protection Strategy Study flood and coastal maps**

Maps for this study would not be of any assistance in dealing with specific flooding issues in Castletroy.

### Predictive and historic flood maps and benefiting land maps (flood maps.ie)

Flood benefitting maps were consulted. Substantial areas of benefiting lands were located in the plan area, chiefly along the Groody Valley and also in the eastern portion of the plan area in the National Technology Park. The Groody has been designated for the most part as an amenity area so this use is not vulnerable to flooding. The National Technology Park had been zoned for Enterprise and Employment. The flood benefitting maps are a very useful approximation of flood extents and their presence in the plan area is an indicator of flood risk.



**Figure 1:** Showing flood-benefitting lands in the plan area and immediately outside.

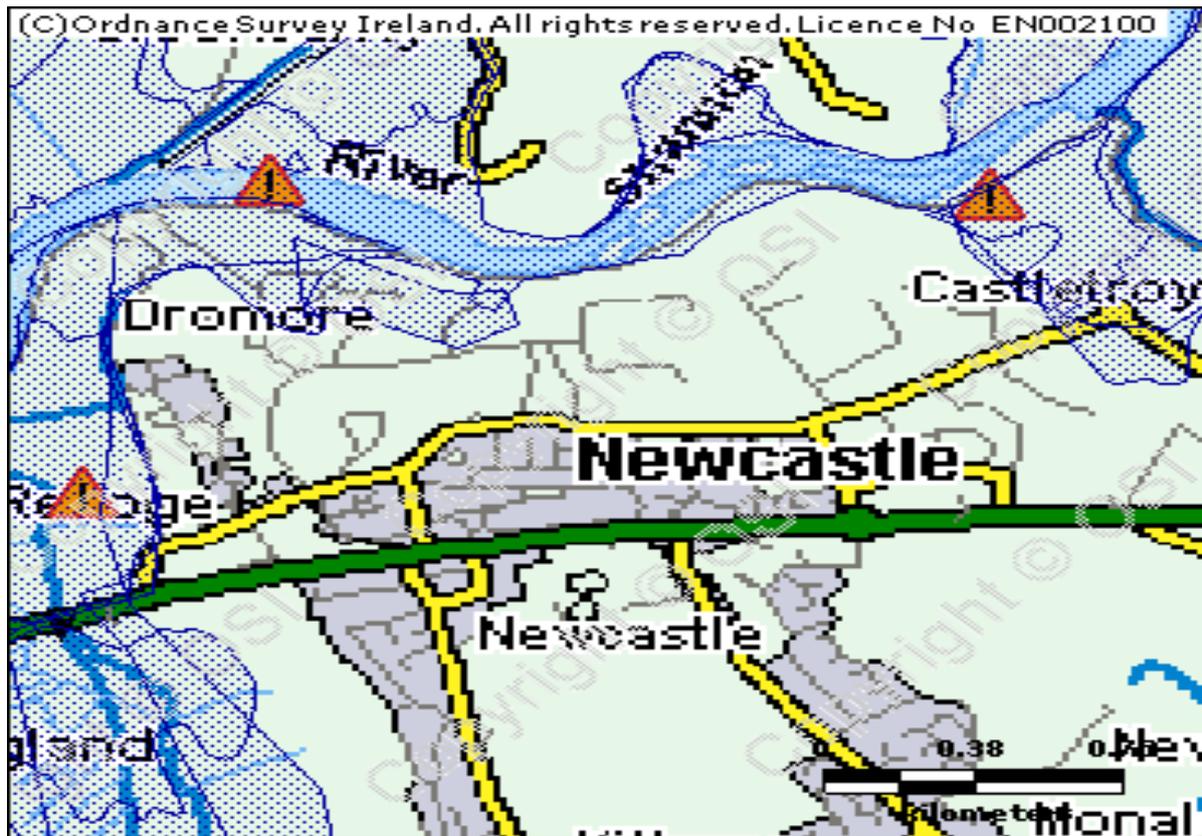
The older six inch map series was consulted and no areas were found that were marked liable to flood. The eastern portion of the Groody Valley was shown with a regular network of field drains indicating the need to shed water quickly-this was subsequently confirmed by walking the area. Such a drainage network is typical of areas that are subject to seasonal flooding and emphasise the importance of the Groody Valley as a flood residence area. See figure 3 below. The eastern area of the Groody Valley has been infilled to a great degree and cannot now perform this function.



**Figure 2:** Flooding in the Groody River Valley. This is looking east. The road to the right of the picture is the old Dublin road and the flooding dates from 2011.

The picture above indicates the Importance of the Groody as a flood residence area. The Monocline stream which drains the Towleron site drains into the Groody.

Floodmaps.ie was consulted. These showed flooding in a number of locations in the plan area. Areas such as the Groody valley, Dromore close to the university and in the technological park were indicated. These maps are indicators of past flood events and help paint a picture of flood trends in the area. Also on that flood maps website are series of reports which fill in further details of floods such as duration and extent.

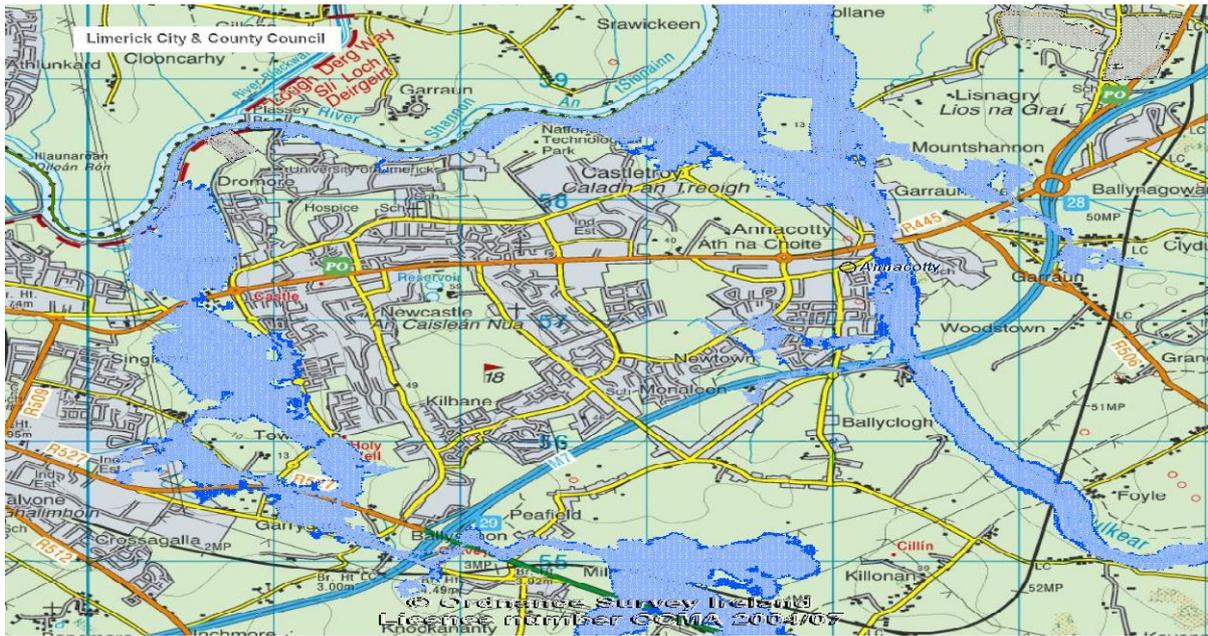


**Figure 3:** Flood incidents from Flood maps.ie

These show the flood events at Dromore, Castletroy and Rhebogoe between 1993 and 2006. These areas were also observed to have flooded in 2009.

While the JBA flood maps have been superseded by CFRAM they too were consulted. They offer an alternative mapping perspective on flooding issues. While generally it can be said that the CFRAMS maps are more cautious i.e. they can indicate lesser areas that are subject to flood risk, the JBA maps do offer valuable indications of flood prone areas. In this illustration they indicate the vulnerability of Towlerton site and part of the National Technology Park.

The JBA maps were used for a number of years by the council prior to the development of the CFRAMS to inform planning decisions, both for planning applications and planning policy documents.

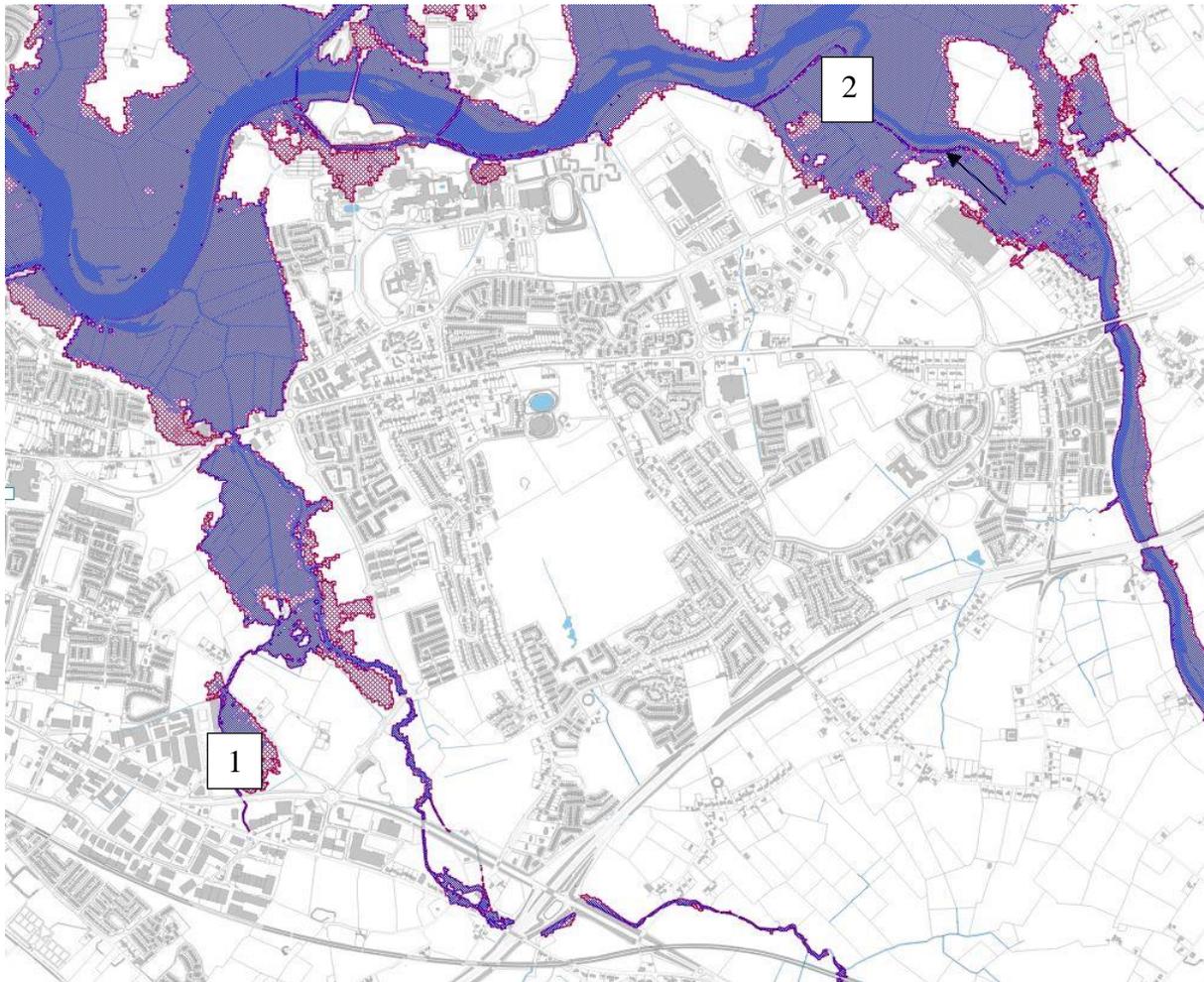


**Figure 4:** The JBA predictive flood maps. Light blue shows Flood Zone A while dark blue shows Flood Zone B.

#### **Predictive flood maps produced under CFRAM studies**

These were recently launched and the maps for the area were consulted. They also provided some of the background information for some of the reports that were commissioned by the council.

It is important that the CFRAMS maps are not used on their own and in this case the council commissioned specific reports on two sites which will be explained in section 7. In addition to this both sites were subject to walkovers and were assessed using the other sources of information presented in this report.



**Figure 5:** CFRAMS flood map of the plan area. The blue indicates 1;100, the red 1;1000 year flood patterns. Both show the Towlerton site (1) in the lower southwest corner and part of the National Technology Park (2) in the north east as being vulnerable to flooding.

#### **River Basin Management Plan and reports**

Insufficient detail available to inform responses at LAP level.

#### **Indicative assessment of existing flood risk under Preliminary Flood Risk assessment**

The National Preliminary Flood Risk Assessment (March 2012) recorded the number of past floods as 4 and the historic hazard category as 2.

#### **Previous flood risk assessments**

Two reports on specific sites in the plan area were commissioned by the Local Authority during the plan preparation stage

One was for the Towlerton site in the southwest of the plan area while the other was for the National Technology Park. See Figure 5 above. An earlier report from over 15 years ago

was also prepared for the Towlerton site. This report and the more recent report showed that the site is vulnerable to flooding due to a number of factors. These include its low-lying topography, the limited conveyance capacity of the Monocline stream which runs through the site and the fact that the local drainage system has silted up and capacity at the Bloodmill Road culvert. This slows run off from the site. This is due to the shallow gradient of the watercourse that results in slower flows and hence more deposition, which further reduces channel capacity. The stream's ability to convey floodwater from the site is also restricted by the dimensions of a culvert on the Bloodmill Road to the north that acts as a pinch point for waterflow.

Following on from these reports further reports were submitted by both the owners of the Towlerton Property and the IDA lands in the National Technology Park. Both wished to have the Enterprise and Employment Zoning restored on their lands. These reports were examined by the Local Authority engineers and their consultants and a number of meetings were held both to clarify issues and to obtain additional modelling and details of proposed works. The report was accompanied by a justification test.

In relation to the Towlerton site, shown as 1 in figure 5, the Local Authority commissioned an independent Flood Risk Assessment which determined a solution which would alleviate flood risk to both the subject site and the adjoining lands. This is in accordance with Circular PL2/2014 issued to Local Authorities to provide advice in relation to plan making in areas of existing vulnerable uses which now find themselves in Flood Zone A and B. The guidance required that in preparing a plan in areas located in flood zone A & B where the existing uses zoning is classified as a vulnerable use the Planning Authority should consider if the existing use zoning of the vulnerable use is still the appropriate zoning.

Where the Planning Authority considers that the existing use zoning is still appropriate the Planning Authority must specify the nature and design of structural or non-structural flood risk management measures required prior to future development in the area. These works involve the regarding, profiling and upgrading of the watercourse adjacent to the site from the Ballysimon Road upstream to a point 450m downstream of the Bloodmill Road culvert, inclusive of replacement of the Bloodmill Road culvert. The report concluded that the works would benefit the site and the adjacent land with probable minimal impact downstream and that it was in line with the requirement of the Guidelines to specify the nature and design of structural and non-structural flood risk management measures. In line with this report it is recommended that an objective is attached to the site which requires site specific hydraulic modeling, design and construction of remedial works to the Monocline Stream and that the site itself is zoned for Enterprise and Employment Use. It has been concluded that the proposed solution is a viable option and with these works carried out, the risk of flooding is removed from these lands. The following objective shall apply:

Objective IN 06: Monocline Stream upgrade

It is an objective of the Council to ensure that no development shall commence on these lands until a site-specific hydraulic model has been carried out, a detailed design complete and construction of remedial works to the Monocline Stream has taken place.

In relation to the IDA the proposal is for flood mitigation measures in the form of protective berms and flood attenuation onsite. The outcomes of the study proposed that the existing berms are partially retained and a new berm is constructed behind them and benched into the existing berm. It also mentions the need to extend the berm to provide more complete protection. It is also proposed that a dedicated attenuation areas, inside the berm is provided at designated low lying areas to serve future development at IDA lands. As per Section 4 of the Planning System & Flood Risk Management Guidelines, a justification test has been carried out and this supports the zoning of the site for Enterprise & Employment use. While the guidelines specifically mention that flood defence works are to be disregarded in this situation given the regional and indeed national importance of the National Technology Park, from both an employment, education and research and development perspective it is judged to satisfy the requirement of the Justification test. Page 26 of the Planning System and Flood risk management makes reference to “..patterns of development and their national and strategic value”. The Flood Risk Assessment demonstrates that flood mitigation works will improve the defences against flooding at the NTP and the flood mitigation strategy has evaluated the consequences of failure of each element of the proposed works. There are still finer elements to be clarified such as the exact location of attenuation ponds vis a vis infrastructure such as sewage and water pipes, but in the main the information submitted is sufficient to consider the re-zoning of the area from agriculture to Enterprise and Employment.

It has been concluded that the proposed solution is a viable option and with these works carried out, the risk of flooding is removed from these lands. The following objective shall apply:

Objective IN 07 National Technology Park River Shannon Flood Relief Works

It is an objective of the Council to ensure that no development shall commence on these lands until such time a site-specific flood risk assessment and detailed masterplan is prepared for the lands outlined on Map C - 19/25-01 and the upgrade has been complete to the embankments and the attenuation ponds are in place.

**OPW advice**

This will be sought as the review progresses.

**Internal consultations with Council personnel**

Discussions regarding drainage and flooding issues took place with Local Authority engineers, which provided background information on specific sites. Their input particularly in relation to both the IDA and the Towlerton site was very useful.

**Information on flood defences and condition**

Flood defences were constructed for the National Technology Park in the early 1990s. These are in poor condition and have been breached in subsequent floods. In their current format

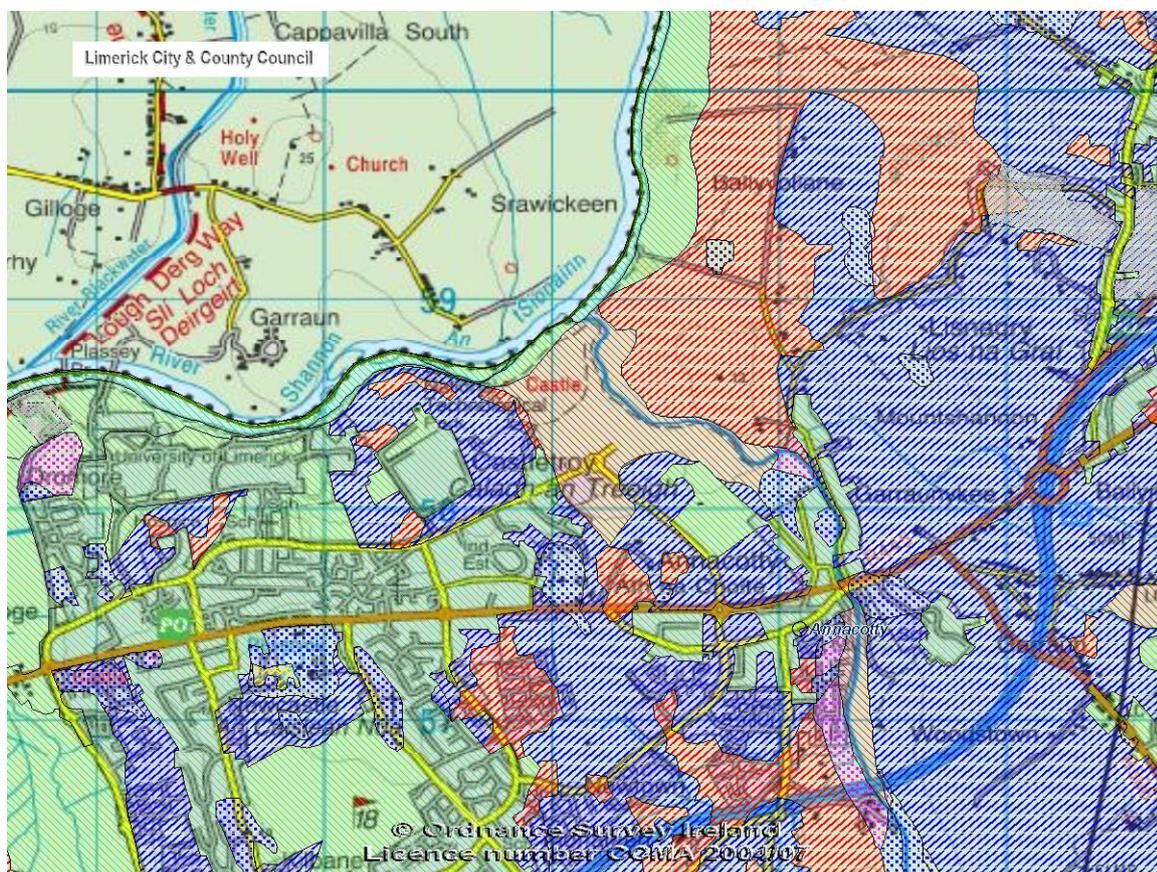
they are unsuitable as flood defences. Enhancement works for these have been proposed in submissions revoked by the Planning Authority.

### LIDAR maps

The Local Authority has purchased LIDAR mapping which has been used with the JBA study to provide more accurate information in relation to flooding risk. LIDAR maps also provided background information for flood reports commissioned by the Local Authority.

### Alluvial deposition maps

Deposits of alluvial soils are good indication of fluvial flood extents. It is interesting to note that there is close correlation between the flood benefitting area shown in Figure 6 below and the alluvial deposition in the National Technology Park.



**Figure 6:** The red hatched lines above show alluvial soils in the National Technology Park (NTP) area. These show possible flood extents as the alluvial load is deposited in such areas.

### Liable to flood markings on old 6-inch maps

Areas liable to flood were not shown on the 6-inch maps for the plan area.

### **Local libraries and reports**

None found

### **Local consultations**

Flood issues are summaries above the Chief Executive's report as a result of submissions received.

### **Walkover surveys**

Walk over surveys were an important part of the groundwork associated with the plan. Such surveys helped to indicate the extent of vegetation associated with wetter ground conditions and local topography, and were designed to inform zoning decisions. These were carried out in April and July 2018.

### **National, regional and local spatial plans**

Insufficient detail was present in other plans or strategies in order to inform the current survey. Earlier plans did not have the benefit of subsequent experience in implementing the 2009 flood risk guidance. In addition they did not have specific reports prepared for them to examine local flood patterns and their possible effects on development.

### **Previous planning applications**

A planning application outside and upstream from the plan area for a boat club contained valuable information on flooding patterns. Flood studies carried out for the Limerick Northern Distributor Road were also useful in providing background picture of flooding patterns.

## **2.0 Conclusions**

Based on fieldwork and the commissioning of site specific reports, it has been concluded to alter zoning on two sites. At this point in the plan making process and based on current information, it has been determined to change the zoning from Agriculture to Enterprise and Employment on two sites. These are the Towlerton site in the south west of the plan area and part of the National Technology Park in the north east of the plan area close to the confluence of the Mulkear and the Shannon Rivers.

**Chief Executive's Recommendation**

In accordance with Section 20(3) of the Planning and Development Act 2000 (Amended), it is recommended that proposed Local Area Plan is made in accordance with the draft published on the 19<sup>th</sup> May 2018 and the proposed amendments outlined in the Chief Executives Report above.

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Pat Daly,  
Deputy Chief Executive