

# **Material Alterations**

## **Draft Southern Environs Local Area Plan 2021 – 2027**

**In accordance with Section 20(3)(e) of the Planning and  
Development Act, 2000 (as amended)**

**Public Display Period: 6<sup>th</sup> February 2021 – 8<sup>th</sup> March 2021**

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



Comhairle Cathrach  
& Contae **Luimnigh**

---

**Limerick** City  
& County Council



## Contents

1	Introduction .....	4
2	Material Alterations to Local Ares Plan Written Statement .....	5
3	Material Alterations to Local Area Plan Maps .....	12

# 1 Introduction

This report sets out the proposed Material Alterations to the Draft Southern Environs Local Area Plan (LAP) 2021 - 2027, following consideration of submissions received during the public display period of the Draft LAP. The report forms part of the statutory procedure for preparing a new LAP set out under Section 20 of the Planning and Development Act 2000 (as amended). It is a key element in the process of bringing the draft Plan to adoption.

This report comprises three parts:

1. Introduction;
2. Material Alterations to Local Area Plan Written Statement;
3. Material Alterations to Local Area Plan Maps.

The updated SEA/AA and SFRA are set out in the supporting documents.

The Draft LAP was placed on public display for a period of not less than 6 weeks from 10<sup>th</sup> October 2020 to 23<sup>rd</sup> November 2020 inclusive. A total of 33 no. written submissions were received within the statutory timeframe for public display.

The 33 no. submissions were considered by the executive and changes to the Draft LAP were recommended and presented in a Chief Executive's report, dated the 17<sup>th</sup> of December 2020, to the Elected Members of the Metropolitan District of Limerick. Briefing meetings with the Elected Members of the Metropolitan District of Limerick were held on 11<sup>th</sup> and 27<sup>th</sup> of January 2021.

Having considered the Draft LAP and the Chief Executive's report of the 17<sup>th</sup> December 2020, and the recommendations on the written submissions received, the Elected Members of the Metropolitan District of Limerick at their meeting on the 27<sup>th</sup> of January 2020, passed a resolution to accept the Draft LAP and the Chief Executive's report in respect of the Draft LAP, subject to the Alterations in the Chief Executive's report and subsequent Alterations proposed by the Elected Members.

In accordance with the Planning & Development Act 2000 (as amended), written submissions with respect to the proposed Material Alterations of the proposed Local Area Plan **only** can be considered. **The closing date for the submissions on the Material Alterations is 5pm on 8<sup>th</sup> March 2021.** This display period will be followed by the preparation of a second Chief Executive's Report to the Members on any submissions received on the proposed Material Alterations. Members may then decide to make the LAP, with or without the proposed alterations or with modifications to the proposed alterations, subject to the provisions of the Planning and Development Act, 2000 (as amended). The formal making of the LAP is by resolution of the Elected Members. During the LAP process, the Members of the Metropolitan District of Limerick 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 Material Alterations to LAP Written Statement

The following sets out wording to be omitted ~~struck through in green~~ and wording to be inserted underlined in red. Where policies or objectives are proposed to be included or altered, the policy / objective numbers of those in the Draft may need to be revised.

### **Chapter 6: Economic Development:**

#### **1. Amend Section 6.3.2 Availability of Zoned Lands text as follows:**

Given the high demand for employment type lands in the Metropolitan Area additional land has been included for Enterprise and Employment uses. In this regard, an area of 204ha. of “High Tech/ Manufacturing”, ~~110ha~~ 69.16ha. of “Enterprise and Employment” and 340ha. of “Industrial” zoned land is available for development in the Southern Environs.

#### **2. Amend Section 6.7 District Centre text as follows:**

~~Pending the completion of the new Limerick Shannon Metropolitan Retail Strategy,~~ limited ~~no~~ additional retail floor space and services will be permitted and re-investment and upgrade works supported at the Crescent. Any proposed retail development shall comply with the new Limerick Shannon Metropolitan Retail Strategy on completion.

### **Chapter 7: Housing:**

#### **1. Amend Objective H O5 as follows:**

The Design Manual for Urban Roads and Streets, DTTS and DECLG (2019) ~~(2013)~~.

#### **2. Amend Objective H O15 as follows:**

Permit housing on agriculturally zoned land outside of Flood Zones A and B for the permanent habitation of farmers and the sons and/or daughters of farmers only and subject to the terms and conditions of the rural housing policy as set out in the Limerick County Development Plan 2010 – 2016 (as extended). Dwellings are categorised as ‘highly vulnerable development’ in the Section 28 The Planning System and Flood Risk Management Guidelines for Planning Authorities (2010) and will not be permitted in flood zones.

### **Chapter 8: Development Opportunities:**

#### **1. Amend text as follows:**

The Design Manual for Urban Roads and Streets, DTTS and DECLG (2019) ~~(2013)~~;

## **Chapter 10: Key Infrastructure:**

### **1. Amend text as follows:**

The Limerick Main Drainage Scheme has the capacity to cater for future population growth. Foul effluent is treated at the Bunlicky wastewater treatment plant, which is operating below its design capacity of 186,000 ~~130,000~~ population equivalents.

## **Chapter 11: Transport & Movement:**

### **1. Amend Strategic Policy as follows:**

To promote and facilitate a sustainable transport system that prioritises and provides for walking, cycling and public transport facilities while ensuring ~~sufficient~~ appropriate traffic management.

### **2. Amend Objective TM O1 as follows:**

~~Facilitate implementation and delivery of the proposals set out in the Draft Limerick Shannon Metropolitan Area Transport Strategy or any replacement thereof.~~

Facilitate implementation and delivery of the proposals that will be contained in the final Limerick Shannon Metropolitan Area Transport Strategy.

### **3. Amend Objective TM O3 as follows:**

Support and facilitate implementation of an integrated, multi modal and accessible public transport network catering for all members of society across the Metropolitan Area, in particular the proposed BusConnects program linking strategic residential and employment growth locations with the City Centre, and any future rail strategy for the city and suburbs.

### **4. Amend Objective TM O5 as follows:**

Improve and provide clear, safe and direct pedestrian linkages, cycle networks as identified in the ~~Draft~~ final Limerick Shannon Metropolitan Area ~~Strategic~~ Transport Strategy, including the greenways and primary segregated cycle routes between the employment zones, shopping areas and residential areas throughout the Environs.

### **5. Amend Objective TM O6 as follows:**

Improve and create additional facilities for pedestrians and cyclists, as part of a coherent and integrated active travel network, as opportunities arise as part of new developments.

**6. Amend Objective TM O7 as follows:**

Investigate the feasibility of the provision of “park and ride”, carpooling, car sharing and bike sharing facilities to incorporate car parking and a bus stop/terminus at appropriate locations, including in the area of Raheen Business Park ~~as indicated under the Draft L SMATS.~~

**7. Amend Objective TM O10 as follows:**

Require the submission of Mobility Management Plans and Traffic and Transport Assessments in accordance with the requirements of “Traffic and Transport Assessment Guidelines” (2014) for large-scale employment related developments, including at the Strategic Employment Locations of Raheen Business Park and University Hospital Limerick.

**8. Amend Objective TM O11 as follows:**

Protect the capacity of the national road network, having regard to all relevant Government guidance including DoECLG “Spatial Planning and National Roads Guidelines” (DoECLG, 2012) in the carrying out of Local Authority functions and ensure development does not prejudice the future development or impair the capacity of the planned core network under TEN-T Regulations, which includes the N/ M20 Cork to Limerick Scheme and Foynes to Limerick Road (including Adare Bypass) projects.

**9. Amend Objective TM O12 as follows:**

Prevent inappropriate development on lands adjacent to the existing national road network, which would adversely affect the safety, current and future capacity and function of national roads and having regard to reservation corridors to cater for possible future upgrades of the national roads and junctions. ~~Support delivery of strategic road infrastructure identified in the RSES including:~~

~~-M20 Cork to Limerick Scheme;~~

~~-Foynes to Limerick Road Scheme (including Adare Bypass);~~

~~-Upgrade of arterial roads from the motorway network to increase capacity, including the provision of public transport infrastructure and Park and Ride facilities, including at the R527 Dock Road.~~

**10. Include Objective **TM O27** as follows:**

Support delivery of strategic road infrastructure identified in the RSES including:

-M20 Cork to Limerick Scheme;

-Foynes to Limerick Road Scheme (including Adare Bypass);

-Upgrade of arterial roads from the motorway network to increase capacity, including the provision of public transport infrastructure and Park and Ride facilities, including at the R527 Dock Road.

**11. Amend Objective TM O16 as follows:**

Improve the efficiency of junctions to enhance the free flow of ~~traffic~~ people within and through the Environs.

**12. Amend Objective TM O17 as follows:**

Facilitate and implement ~~appropriate measures to reduce or manage traffic associated with schools to regularise vehicular movements and alleviate congestion~~ school streets and school zones, including slow zones around schools, park and stride facilities and promote and facilitate active travel options for school children to reduce the health and safety risks associated with traffic congestion, pollution and inactive lifestyles.

**13. Amend Objective TM O21 as follows:**

Ensure that all future and retrofitted transport infrastructure is climate proofed, through design and construction, to function in a climate altered future and would, where possible, be multifunctional e.g. provide accessible routes for other services such as fibre optics or water, energy connections or other services and technologies that might come about during the lifetime of the infrastructure.

**14. Include Objective TM O22 as follows:**

Implement in full, the Cycle Network as will be set out in the final LSMATS, with priority given in the short term to delivering the primary cycle network and cycle routes serving schools.

**15. Include Objective TM O23 as follows:**

a) Ensure cycle parking is provided in all residential developments at a rate which will cater for all future residents”;

b) Ensure cycle parking is provided in all non-residential developments at a rate that will cater for 10-20% of all trips to be undertaken by bicycle.

**16. Include Objective TM O24 as follows:**

Explore improved accessibility to Limerick Southside, including the possible provision of a motorway interchange connection from the M20/M7 to Limerick Southside.

**17. Include Objective TM O25 as follows:**

Ensure all developments protect and safeguard the capacity and efficiency of the drainage regimes of the national road network.

**18. Retain the zoning of lands at Junction 2 Dock Road subject to the addition of the following specific objective: TM O26:**

Ensure Industrial and Enterprise and Employment lands adjacent to Junction 2, Dock Road:

- a) Shall be developed for uses with low levels of traffic movements only;
- b) Car parking shall be provided at a rate below that provided for in the Development Plan and provided on an area-wide basis rather than according to the requirements of individual developments;
- c) Cycle parking shall be provided in all developments at an appropriate level to encourage modal shift;
- d) All developments shall include end-of-trip cycling facilities for employees such as showers and lockers;
- e) All new roads shall incorporate segregated cycle tracks designed in accordance with the National Cycle Manual;
- f) All new roads shall seek, in the first instance, to provide filtered permeability, in order to avoid creating additional capacity for car traffic; and
- g) All development proposals shall include Mobility Management Plans, with clear targets and commitments to implementing measures to promote sustainable transport.

#### **Chapter 14: Climate Change & Flood Management:**

##### **1. Amend LAP text as follows:**

Climate Change: Context: “Implementation of the LAP will take into account relevant targets and actions arising from sectoral adaptation plans approved in 2019 ~~that will be prepared~~ to comply with the requirements of the Climate Action and Low Carbon Development Act 2015”.

##### **2. Amend Objective CC O2 as follows:**

Pursue modal shift to sustainable transport modes as the highest transport priority of the Council and support sustainable travel, energy efficient projects, green infrastructure and sustainable residential development projects.

##### **3. Include Objective CC O10 as follows:**

Ensure decisions around transport planning and operations (including traffic management) will be aligned with the government’s policy to reduce greenhouse gas emissions by more than 50% by 2030, its Climate Action Plan and the Paris Agreement objective to achieve net zero greenhouse gas emissions by 2050.

##### **4. Amend Flood Management: Context text as follows:**

“This Flood Scheme follows the Catchment Flood Risk Assessment and Management (CFRAM) programme, which is a medium to long-term strategy for the reduction and management of flood risk in Ireland covering a number of Units of Measures (as defined in the EU Floods Directive) ~~single National River Basin District~~”.

**5. Amend Objective FM 01 as follows:**

Manage flood risk in accordance with the requirements of “The Planning System and Flood Risk Management Guidelines for Planning Authorities”, DECLG and OPW (2009) and any revisions thereof and consider the potential impacts of climate change in the application of these guidelines.

**6. Amend Objective FM 04 as follows:**

Ensure development proposals within the areas outlined on the Flood Risk Map are subject to Site Specific Flood Risk Assessment as outlined in “The Planning System and Flood Risk Management Guidelines”, DECLG and OPW (2009). A Site Specific Flood Risk Assessment will be required for developments proposed on sites in areas at risk of flooding from groundwater, in particular in the vicinity of Monteen and Loughmore Commons Turloughs.

**7. Include Objective FM 08 as follows:**

Ensure that no development shall commence on these lands identified as being at flood risk adjacent to the Raheen Business Park in the townlands of Ballycummin/Rootiagh, zoned for High Tech/Manufacturing, until a site-specific flood risk assessment, including hydraulic model has been prepared for the lands, which demonstrates that the flood risk for the lands can be mitigated or that a less vulnerable use can be accommodated on site.

**8. Include Objective FM 09 as follows:**

Ensure that no development shall commence on the lands identified as being at flood risk, off Blackberry Lane in the townland of Ballykeeffe, zoned for Enterprise and Employment, until a site-specific flood risk assessment, including hydraulic model has been prepared for the lands, which demonstrates that the flood risk for the lands can be mitigated, or that a less vulnerable use can be accommodated on site.

**9. Amend Strategic Flood Risk Assessment as follows:**

OPW Preliminary Flood Risk Assessment Indicative fluvial flood map: “These maps have been produced under the PFRA ~~CFRAMS~~ programme.

**Chapter 15: Implementation:**

**1. Amend the Purpose of the Agriculture Objective as follows:**

“One off dwellings will only be considered on agriculturally zoned land outside of Flood Zones A and B for the permanent habitation of farmers and the sons and/or daughters of farmers only and subject to the terms and conditions of the rural housing policy as set out in the Limerick County Development Plan 2010 – 2016 (as extended)”.

**Appendix I: Land Use Zoning Matrix:**

**1. Alter the Land Use Zoning Matrix as follows:**

Health Clinic – Generally Permitted /

Health Practitioner – Generally Permitted /

Land Use Zone	District Centre	Local Centre	Existing Residential	New Residential	Educ. & Com. Infra.	High Tech/ Manuf.	Enterprise & Employment	Retail Warehousing	Industry	Open Space	Semi Natural Open Space	Utilities	Agriculture	Special Control Areas
Type of Use														
Health Centre	/	/	X	X	/	X	⚠	X	X	X	X	X	X	X
Health Practitioner	/	/	X	X	/	X	⚠	X	X	X	X	X	X	X

### 3 Material Alterations to Local Area Plans Maps

#### **Alterations to Land Use Zoning Map:**

1. Amend the land use zoning map from Enterprise and Employment to Agriculture as per the 2011 – 2017 Local Area Plan zoning at Junction 30 Rosbrien (Submission No's 1, 3, 20).
2. Amend the land use-zoning map from Existing Residential to Enterprise and Employment zoning at No. 1 Dooradoyle Road (Cllr. J. Leddin)

#### **Alterations to Flood Map:**

1. Amend the Flood Map to include Flood Zones A, B and C (Submission No. 5).

#### **Alterations to Transport Map:**

1. Amend Transport Map 4 to relocate the indicative link road outside of the observer's landholding (Submission No. 14).
2. Amend Transport Map 4 to include the existing and proposed cycle lane on the R510 (Submission No. 28).
3. Amend Transport Map 4 to include a new link road connecting the Dooradoyle Road and the Rosbrien Road, which had been included in the 2011 – 2017 (as extended) Local Area Plan (as extended) (Cllr. J. Leddin).

**Zoning Map**

**LEGEND**

- Agriculture
- Existing Residential
- New Residential
- Education & Community Infrastructure
- Enterprise & Employment
- Retail Warehousing
- Industry
- High Tech/ Manufacturing
- Local Centre
- District Centre
- Open Space & Recreation
- Special Control Area
- Semi Natural Open Space
- Proposed Natural Heritage Area
- Utilities
- Proposed Link Roads (Indicative)
- Ecological Buffer Zone
- Special Area of Conservation
- Special Protection Area

Forward Planning  
Economic Development Directorate

A. Senior Planner  
Maria Woods  
Merchants Quay, Limerick  
Tel: (061) 556600  
E-mail: forwardplanning@limerick.ie

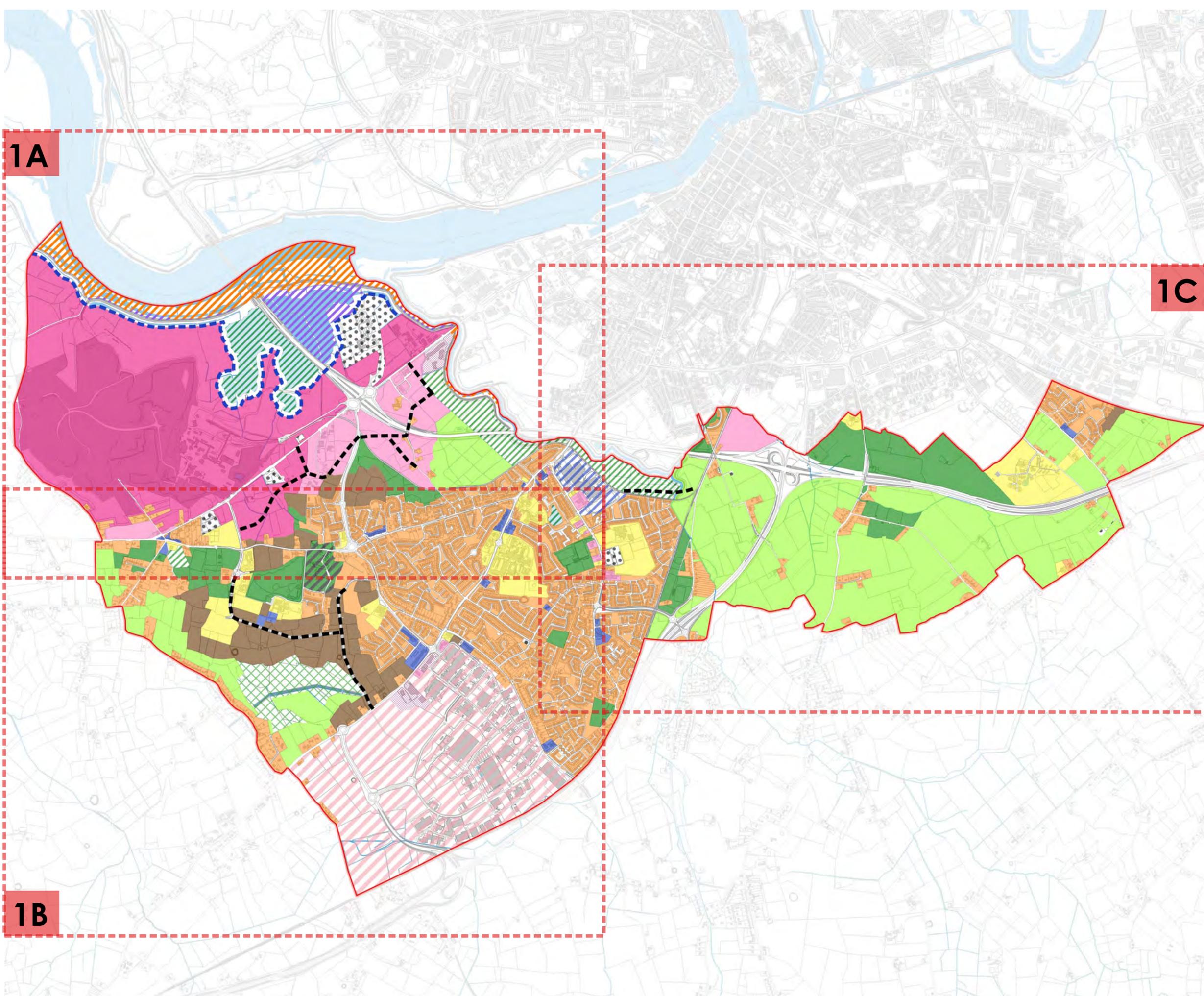
SCALE	NA	DWG. NO.	SE-21-27-01
DRAWN BY	C.O'Keefe	CHECKED BY	L. Bolger
DATE		DATE	Feb '21
<small>OSI LICENCE No. © Ordnance Survey Ireland. All rights reserved. Licence No. 2017/09/CCMA/Limerick City &amp; County Council</small>			



**1A**

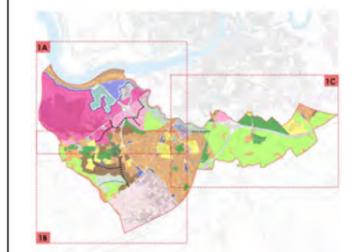
**1C**

**1B**



**Draft Southern Environs  
Local Area Plan  
2021 -2027  
Material Alterations**

**Zoning Map**



**LEGEND**

- Agriculture
- Existing Residential
- New Residential
- Education & Community Infrastructure
- Enterprise & Employment
- Retail Warehousing
- Industry
- High Tech/ Manufacturing
- Local Centre
- District Centre
- Open Space & Recreation
- Special Control Area
- Semi Natural Open Space
- Proposed Natural Heritage Area
- Utilities
- Proposed Link Roads (Indicative)
- Ecological Buffer Zone
- Special Area of Conservation
- Special Protection Area

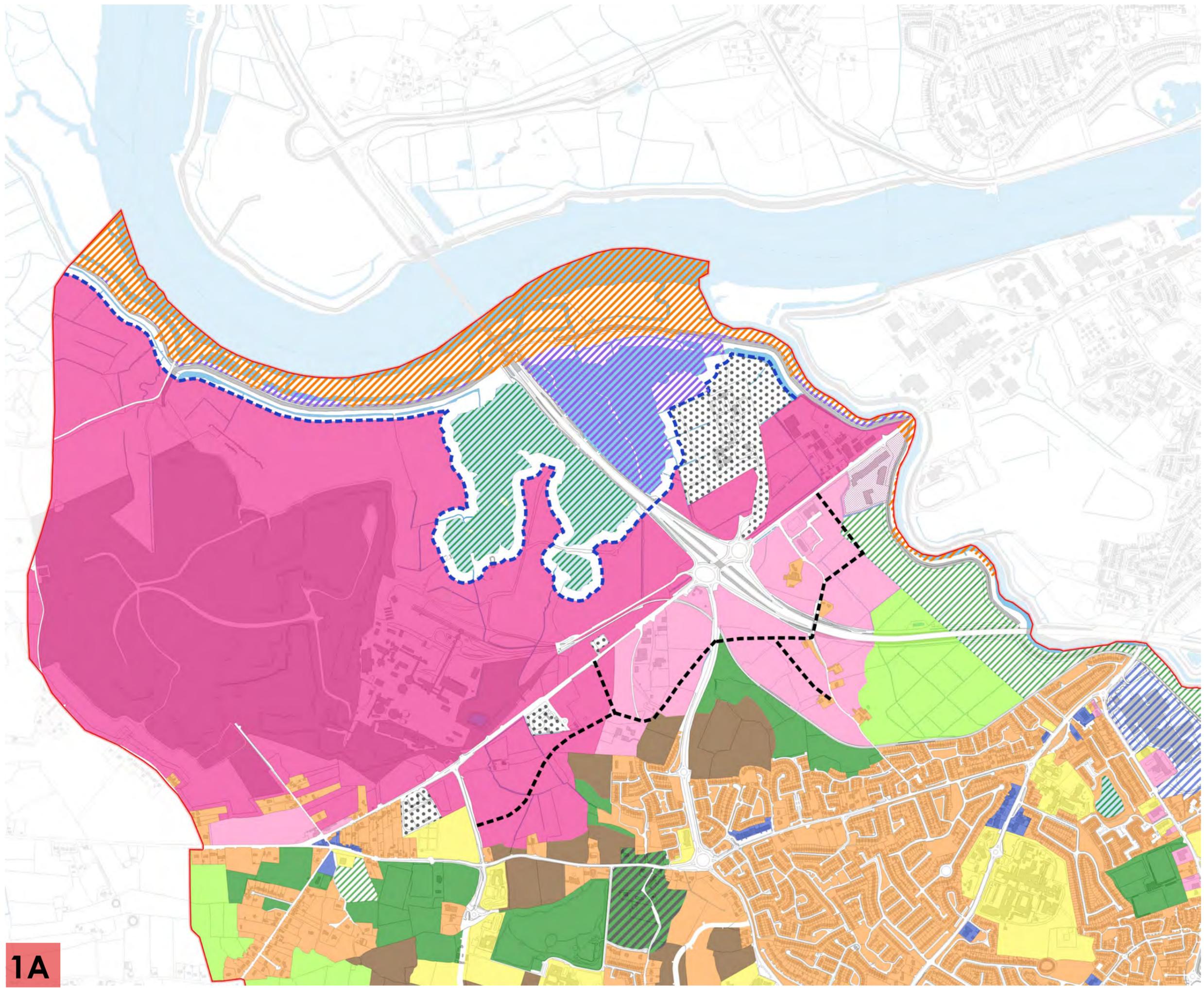
Forward Planning  
Economic Development Directorate

A. Senior Planner  
Maria Woods  
Merchants Quay, Limerick  
Tel: (061) 556600  
E-mail: forwardplanning@limerick.ie

SCALE	NA	DWG. NO.	SE-21-27-01A
DRAWN BY	C.O'Keeffe	CHECKED BY	L. Bolger
		DATE	Feb '21
<small>OSI LICENCE No. © Ordnance Survey Ireland. All rights reserved. Licence No. 2017/09/CCMA/Limerick City &amp; County Council</small>			

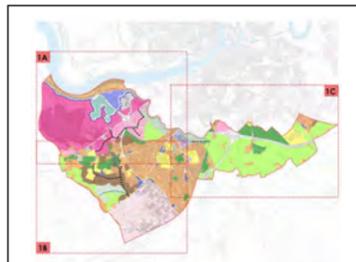


**1A**



**Draft Southern Environs  
Local Area Plan  
2021 -2027  
Material Alterations**

**Zoning Map**



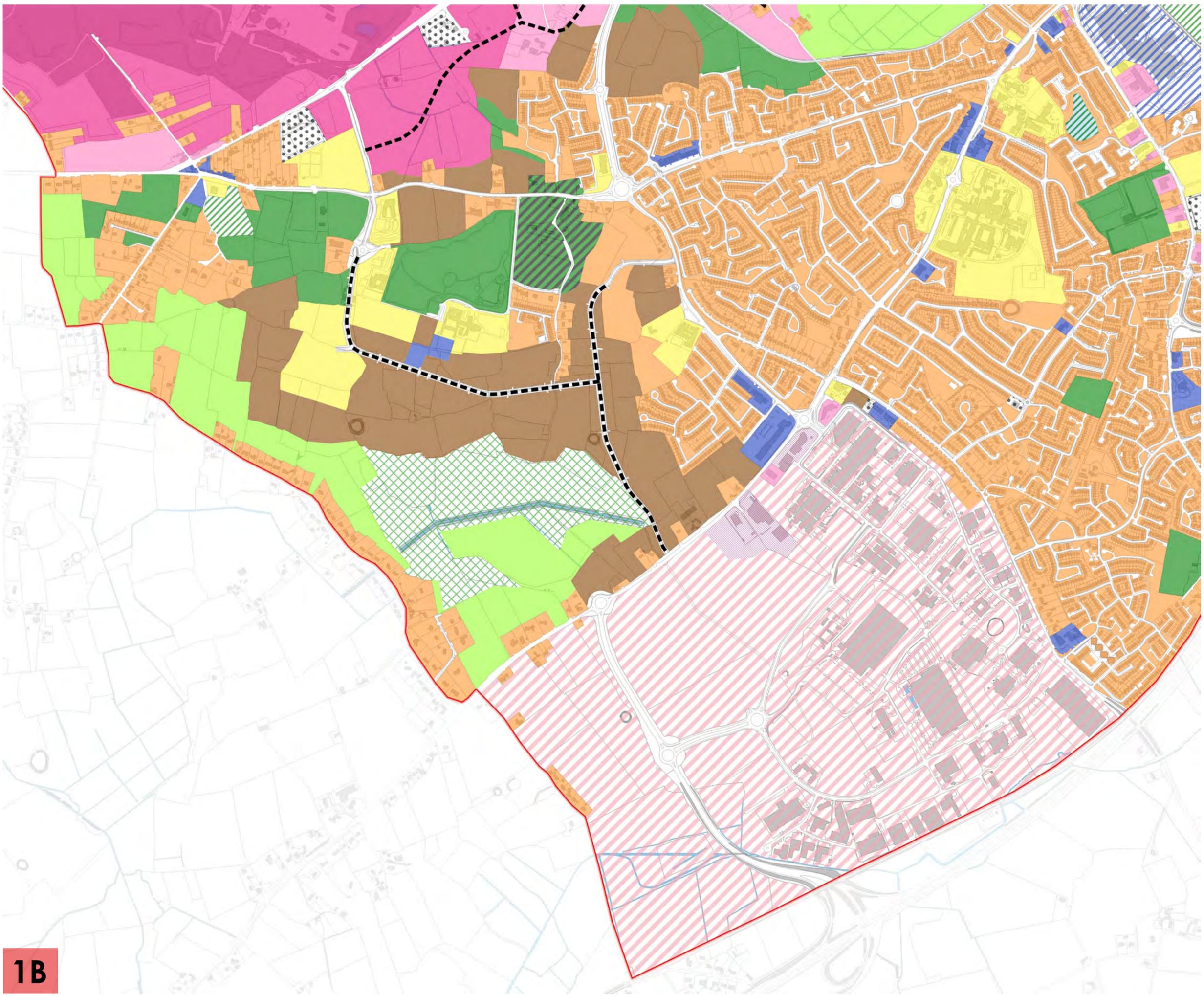
**LEGEND**

- Agriculture
- Existing Residential
- New Residential
- Education & Community Infrastructure
- Enterprise & Employment
- Retail Warehousing
- Industry
- High Tech/ Manufacturing
- Local Centre
- District Centre
- Open Space & Recreation
- Special Control Area
- Semi Natural Open Space
- Proposed Natural Heritage Area
- Utilities
- Proposed Link Roads (Indicative)
- Ecological Buffer Zone
- Special Area of Conservation
- Special Protection Area

Forward Planning  
Economic Development Directorate

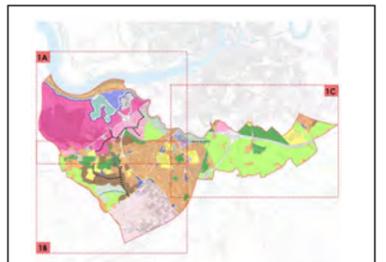
A. Senior Planner  
Maria Woods  
Merchants Quay, Limerick  
Tel: (061) 556600  
E-mail: forwardplanning@limerick.ie

SCALE	NA	DWG. NO.	SE-21-27-01B
DRAWN BY	C.O'Keeffe	CHECKED BY	L. Bolger
		DATE	Feb '21
<small>OSI LICENCE No. © Ordnance Survey Ireland. All rights reserved. Licence No. 2017/09/CCMA/Limerick City &amp; County Council</small>			



**1B**

Zoning Map



LEGEND

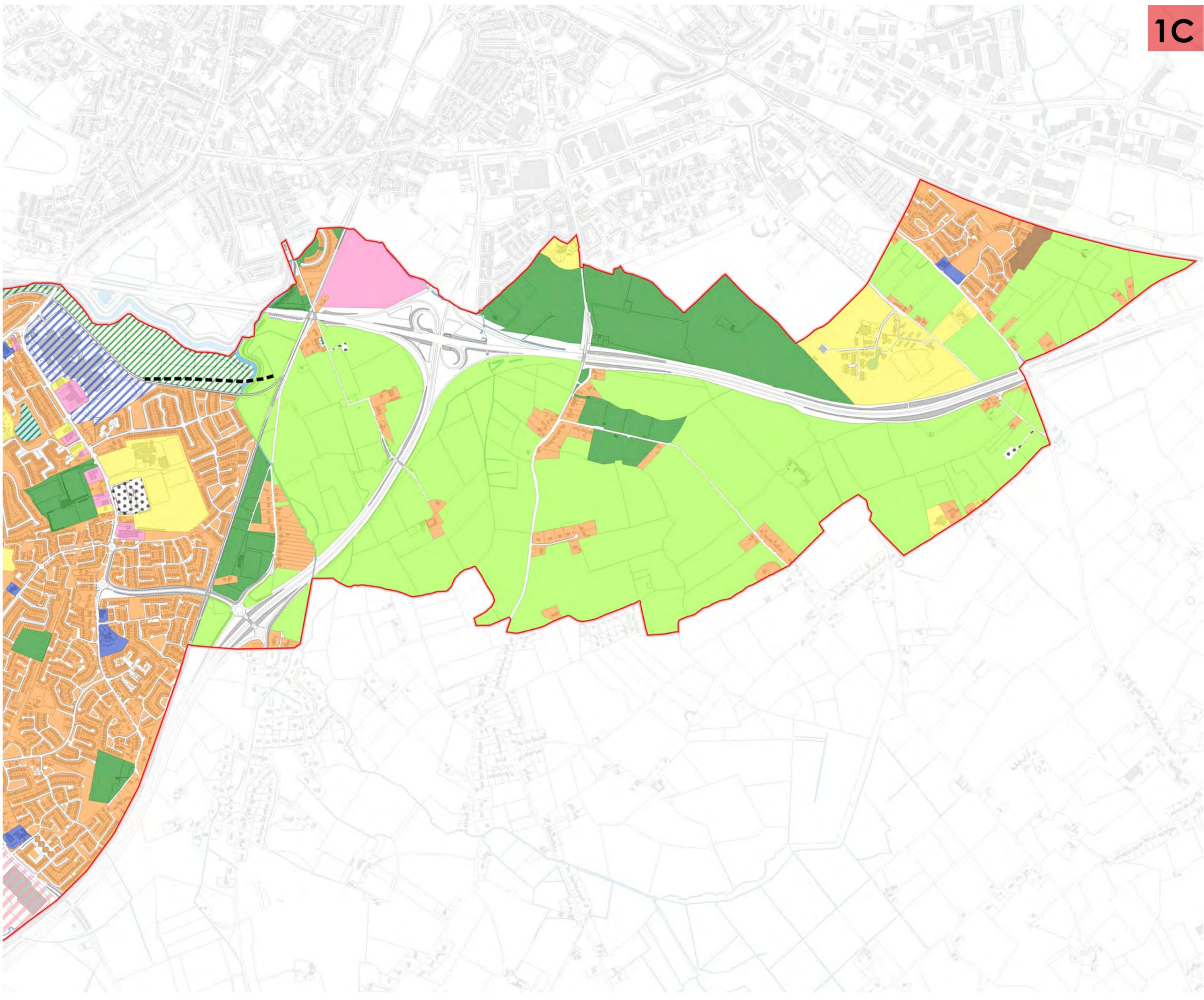
-  Agriculture
-  Existing Residential
-  New Residential
-  Education & Community Infrastructure
-  Enterprise & Employment
-  Retail Warehousing
-  Industry
-  High Tech/ Manufacturing
-  Local Centre
-  District Centre
-  Open Space & Recreation
-  Special Control Area
-  Semi Natural Open Space
-  Proposed Natural Heritage Area
-  Utilities
-  Proposed Link Roads (Indicative)
-  Ecological Buffer Zone
-  Special Area of Conservation
-  Special Protection Area

Forward Planning  
Economic Development Directorate

A. Senior Planner Maria Woods	Merchants Quay, Limerick Tel: (061) 556600 E-mail: forwardplanning@limerick.ie
----------------------------------	--

SCALE: NA	DWG. NO.: SE-21-27-01C
DRAWN BY: C.O'Keefe	CHECKED BY: L. Bolger
	DATE: Feb '21

OSI LICENCE No. © Ordnance Survey Ireland. All rights reserved.  
Licence No. 2017/09/CCMA/Limerick City & County Council



**Draft Southern Environs  
Local Area Plan  
2021 -2027  
Material Alterations**

**Flood Map**

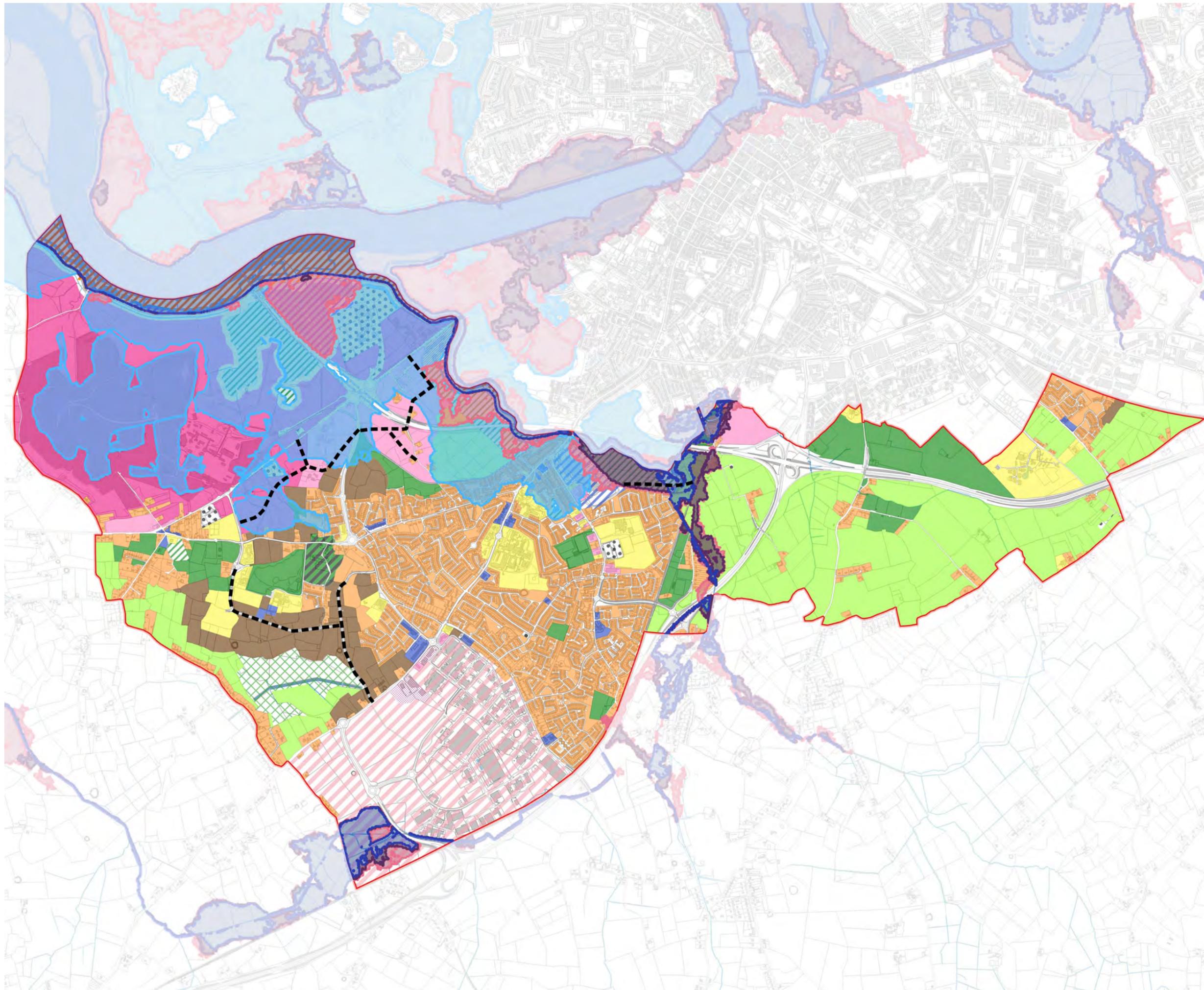
**LEGEND**

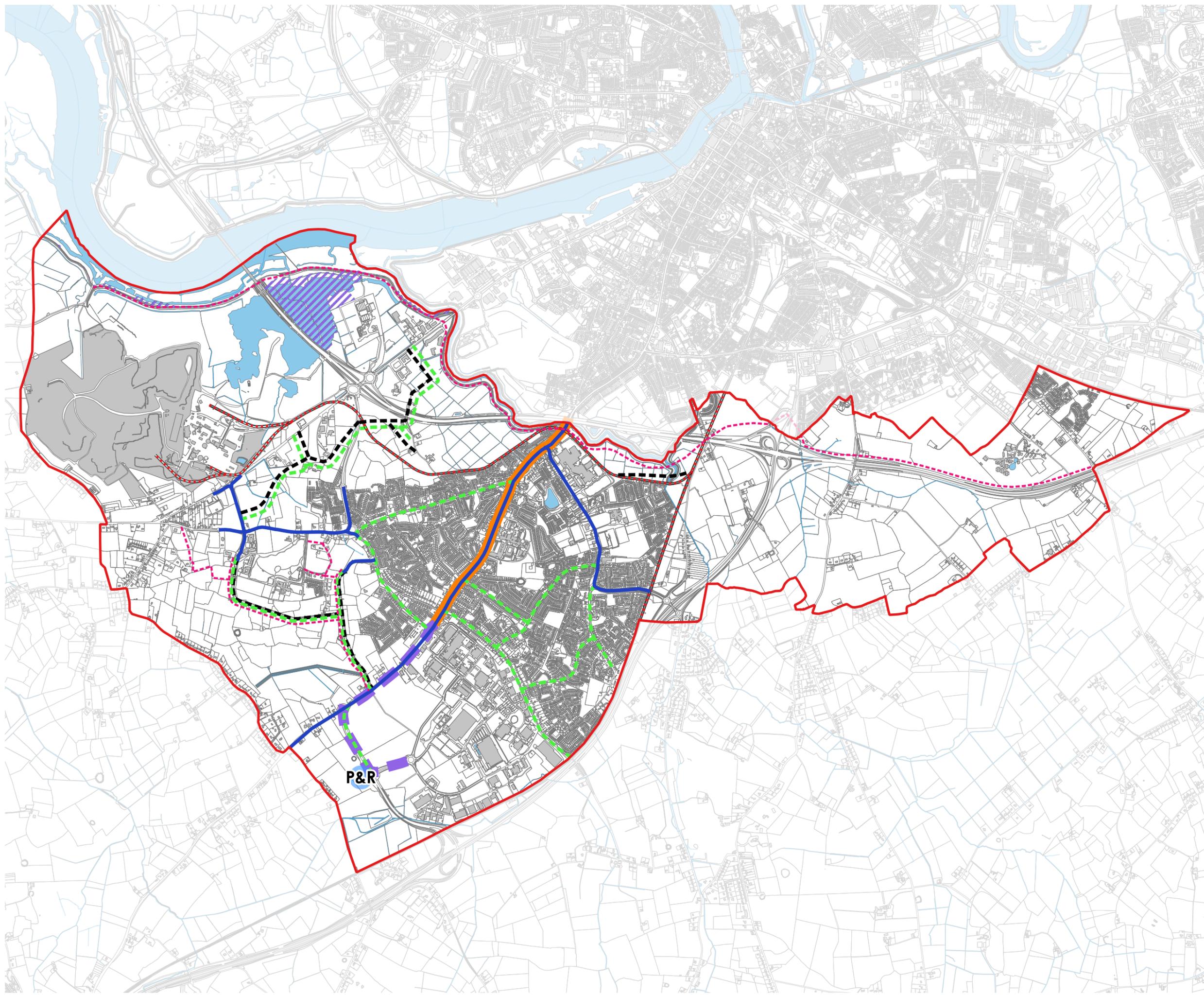
- Agriculture
- Existing Residential
- New Residential
- Education & Community Infrastructure
- Enterprise & Employment
- Retail, Warehousing
- Industry
- High Tech/ Manufacturing
- Local Centre
- District Centre
- Open Space & Recreation
- Special Control Area
- Semi Natural Open Space
- Proposed Natural Heritage Area
- Utilities
- Proposed Link Roads (Indicative)
- Ecological Buffer Zone
- Special Area of Conservation
- Special Protection Area
- Flood Zone A
- Flood Zone B
- Flood Zone C
- OPW Defended Areas

Forward Planning  
Economic Development Directorate

A. Senior Planner Maria Woods	Merchants Quay, Limerick Tel: (061) 556600 E-mail: forwardplanning@limerick.ie
----------------------------------	--

SCALE NA	Dwg. No. SE-21-27-02	DRAWN BY C.O'Keeffe	CHECKED BY L. Bolger	DATE Feb '21
<small>OSI LICENCE No. © Ordnance Survey Ireland. All rights reserved. Licence No. 2017/09/CCMA/Limerick City &amp; County Council</small>				





**LEGEND**

- Proposed Link Roads (Indicative)
- SE Proposed Walks
- Existing Cycleways
- Proposed Cycleways
- Existing & Disused Rail lines
- Existing Bus Lanes
- Indicative Bus Lanes
- P&R Indicative Location of Park & Ride Facility

Forward Planning  
Economic Development Directorate

A. Senior Planner  
Maria Woods  
Merchants Quay, Limerick  
Tel: (061) 556600  
E-mail: forwardplanning@limerick.ie

SCALE	NA	DWG. NO.	SE-21-27-04
DRAWN BY	C.O'Keefe	CHECKED BY	L. Bolger
		DATE	Feb '21
<small>OSI LICENCE No. © Ordnance Survey Ireland. All rights reserved. Licence No. 2017/09/CCMA/Limerick City &amp; County Council</small>			



# **Material Alterations Strategic Environmental Assessment and Appropriate Assessment Screening Report**

## **Draft Southern Environs Local Area Plan 2021 – 2027**

**In accordance with Section 20 (3)(e) of the Planning and  
Development Act, 2000 (as amended)**

**Public Display Period: 6<sup>th</sup> February 2021 – 8<sup>th</sup> March 2021**

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



Comhairle Cathrach  
& Contae **Luimnigh**

**Limerick** City  
& County Council



## Contents

1.0	Strategic Environmental Assessment Screening .....	4
1.1	Proposed Alterations to the Draft Plan .....	4
1.2	Material Alterations to LAP Maps.....	13
1.3	Screening Statement.....	14
1.4	Stage Two – Summary, Conclusions and Recommendation .....	21
2.0	Appropriate Assessment Screening.....	23
2.1	Proposed alterations that have the potential for ecological effects:.....	23
2.2	Screening Matrix.....	25
2.3	Finding of No Significant Effects Matrix.....	29

## 1.0 Strategic Environmental Assessment Screening

This screening document is for Material Alterations to the Draft Southern Environs Local Area Plan, which followed the first public display period. This document should be read in tandem with the Section 20 (3)(c) Chief Executive’s Report to Members on Submissions received during the Draft Plan public consultation. The Chief Executive’s report was issued to Elected Members on 17<sup>th</sup> December 2020 and contains details of submissions received during the public consultation period and a response of the Chief Executive to each submission. Material Alterations proposed by the Elected Members are also contained in that document. The Draft Southern Environs Local Area Plan was on public display during the period 10<sup>th</sup> October 2020 to 23<sup>rd</sup> November 2020 inclusive.

### 1.1 Proposed Alterations to the Draft Plan

The proposed Material Alterations are presented below. These have been taken from Section B of the Chief Executive’s Report dated 17<sup>th</sup> December 2020 and as presented and agreed by Elected Members of the Metropolitan District of Limerick, at their meeting on 27<sup>th</sup> January 2021. A Screening Response to the proposed alterations to each chapter is set out below.

Please note that the changes to the text are presented in a different colour than the original text. The following sets out wording to be omitted ~~struck through in green~~ and wording to be inserted underlined in red.

#### Chapter 6: Economic Development:

##### 1. Amend Section 6.3.2 Availability of Zoned Lands text as follows:

Given the high demand for employment type lands in the Metropolitan Area additional land has been included for Enterprise and Employment uses. In this regard, an area of 204ha. of “High Tech/ Manufacturing”, ~~110ha~~ 69.16ha. of “Enterprise and Employment” and 340ha. of “Industrial” zoned land is available for development in the Southern Environs.

##### 2. Amend Section 6.7 District Centre text as follows:

~~Pending the completion of the new Limerick Shannon Metropolitan Retail Strategy,~~ limited ~~no~~ additional retail floor space and services will be permitted and re-investment and upgrade works supported at the Crescent. Any proposed retail development shall comply with the new Limerick Shannon Metropolitan Retail Strategy on completion.

### **Screening Response:**

In Section 6.3.2, the reduction in the area of land zoned for Enterprise and Employment purposes is for clarification, in response to the alteration to de-zone a parcel of land at Junction 30 Rosbrien. The reduction in the amount of land zoned for this purposes would not have any environmental effects.

In Section 6.7, the alteration refers to lands previously zoned for District Centre located in a highly modified environment. Any limited extensions would likely occur within the existing footprint. Any such extensions would be subject to individual assessments, for example flood risk, that would examine their effects and ensure an appropriate type and amount of development. In terms of compliance with higher tier plans and guidance.

### **Chapter 7: Housing**

#### **1. Amend Objective H O5 as follows:**

The Design Manual for Urban Roads and Streets, DTTS and DECLG [\(2019\)](#) ~~(2013)~~.

#### **2. Amend Objective H O15 as follows:**

Permit housing on agriculturally zoned land [outside of Flood Zones A and B](#) for the permanent habitation of farmers and the sons and/or daughters of farmers only and subject to the terms and conditions of the rural housing policy as set out in the Limerick County Development Plan 2010 – 2016 (as extended). [Dwellings are categorised as ‘highly vulnerable development’ in the Section 28 The Planning System and Flood Risk Management Guidelines for Planning Authorities \(2010\) and will not be permitted in flood zones.](#)

### **Screening Response:**

The alteration adds clarity in Objective H O5, in that it refers to the complete titles and dates of guidance manuals and ensures that the plan uses guidance documents that are current and not outdated in terms of technical content.

In the case of H O15 it is drawn directly from “The Planning System and Flood Risk Management Guidelines”, November 2009. This ensures clarity in plan content but also helps to ensure compliance with higher tier guidance. The effects are considered to be positive from an SEA perspective, by ensuring dwellings are located outside of flood risk areas, minimising both risk to humans and lessening possible effects on flood plains with consequential environmental benefits.

## **Chapter 8: Development Opportunities:**

### **1. Amend text as follows:**

The Design Manual for Urban Roads and Streets, DTTS and DECLG ~~(2013);~~ (2019);

### **Screening Response:**

The alteration adds clarity in that it refers to the complete titles and dates of guidance manuals and ensures that the plan refers to the most updated technical content.

## **Chapter 10: Key Infrastructure:**

### **1. Amend text as follows:**

The Limerick Main Drainage Scheme has the capacity to cater for future population growth. Foul effluent is treated at the Bunlicky wastewater treatment plant, which is operating below its design capacity of ~~130,000~~ 186,000 population equivalents.

### **Screening Response:**

The new figures indicate that the capacity of the WWTP is greater than previously thought, which is very useful in that it means there will be more than sufficient capacity for the lifetime of the Local Area Plan. This is beneficial from an environmental perspective.

## **Chapter 11: Transport & Movement:**

### **1. Amend Strategic Policy as follows:**

To promote and facilitate a sustainable transport system that prioritises and provides for walking, cycling and public transport facilities while ensuring ~~sufficient~~ appropriate traffic management.

### **2. Amend Objective TM O1 as follows:**

~~Facilitate implementation and delivery of the proposals set out in the Draft Limerick Shannon Metropolitan Area Transport Strategy or any replacement thereof.~~

Facilitate implementation and delivery of the proposals that will be contained in the final Limerick Shannon Metropolitan Area Transport Strategy.

**3. Amend Objective TM O3 as follows:**

Support and facilitate implementation of an integrated, multi modal and accessible public transport network catering for all members of society across the Metropolitan Area, in particular the proposed BusConnects program linking strategic residential and employment growth locations with the City Centre, and any future rail strategy for the city and suburbs.

**4. Amend Objective TM O5 as follows:**

Improve and provide clear, safe and direct pedestrian linkages, cycle networks as identified in the ~~Draft~~ final Limerick Shannon Metropolitan Area ~~Strategic~~ Transport Strategy, including the greenways and primary segregated cycle routes between the employment zones, shopping areas and residential areas throughout the Environs.

**5. Amend Objective TM O6 as follows:**

Improve and create additional facilities for pedestrians and cyclists, as part of a coherent and integrated active travel network, as opportunities arise as part of new developments.

**6. Amend Objective TM O7 as follows:**

Investigate the feasibility of the provision of “park and ride”, carpooling, car sharing and bike sharing facilities to incorporate car parking and a bus stop/terminus at appropriate locations, including in the area of Raheen Business Park ~~as indicated under the Draft L-SMATS.~~

**7. Amend Objective TM O10 as follows:**

Require the submission of Mobility Management Plans and Traffic and Transport Assessments in accordance with the requirements of “Traffic and Transport Assessment Guidelines” (2014) for large-scale employment related developments, including at the Strategic Employment Locations of Raheen Business Park and University Hospital Limerick.

**8. Amend Objective TM O11 as follows:**

Protect the capacity of the national road network, having regard to all relevant Government guidance including DoECLG “Spatial Planning and National Roads Guidelines” (DoECLG, 2012) in the carrying out of Local Authority functions and ensure development does not prejudice the future development or impair the capacity of the planned core network under TEN-T Regulations, which includes the N/ M20 Cork to Limerick Scheme and Foynes to Limerick Road (including Adare Bypass) project.

**9. Amend Objective TM O12 as follows:**

Prevent inappropriate development on lands adjacent to the existing national road network, which would adversely affect the safety, current and future capacity and function

of national roads and having regard to reservation corridors to cater for possible future upgrades of the national roads and junctions. ~~Support delivery of strategic road infrastructure identified in the RSES including:~~

~~-M20 Cork to Limerick Scheme;~~

~~-Foynes to Limerick Road Scheme (including Adare Bypass);~~

~~-Upgrade of arterial roads from the motorway network to increase capacity, including the provision of public transport infrastructure and Park and Ride facilities, including at the R527 Dock Road.~~

**10. Include Objective TM O27 as follows:**

Support delivery of strategic road infrastructure identified in the RSES including:

-M20 Cork to Limerick Scheme;

-Foynes to Limerick Road Scheme (including Adare Bypass);

-Upgrade of arterial roads from the motorway network to increase capacity, including the provision of public transport infrastructure and Park and Ride facilities, including at the R527 Dock Road.

**11. Amend Objective TM O16 as follows:**

Improve the efficiency of junctions to enhance the free flow of ~~traffic~~ people within and through the Environs.

**12. Amend Objective TM O17 as follows:**

Facilitate and implement appropriate measures to reduce or manage traffic associated with schools to regularise vehicular movements and alleviate congestion school streets and school zones, including slow zones around schools, park and stride facilities and promote and facilitate active travel options for school children to reduce the health and safety risks associated with traffic congestion, pollution and inactive lifestyles.

**13. Amend Objective TM O21 as follows:**

Ensure that all future and retrofitted transport infrastructure is climate proofed, through design and construction, to function in a climate altered future and would, where possible, be multifunctional e.g. provide accessible routes for other services such as fibre optics or water, energy connections or other services and technologies that might come about during the lifetime of the infrastructure.

**14. Include Objective TM O22 as follows:**

Implement in full, the Cycle Network as will be set out in the final LSMATS, with priority given in the short term to delivering the primary cycle network and cycle routes serving schools.

**15. Include Objective TM O23 as follows:**

- a) Ensure cycle parking is provided for in all residential developments at a rate which will cater for all future residents”;
- b) Ensure cycle parking is provided in all non-residential developments at a rate that will cater for 10-20% of all trips to be undertaken by bicycle.

**16. Include Objective TM O24 as follows:**

Explore improved accessibility to Limerick Southside, including the possible provision of a motorway interchange connection from the M20/M7 to Limerick Southside.

**17. Include Objective TM O25 as follows:**

Ensure all developments protect and safeguard the capacity and efficiency of the drainage regimes of the national road network.

**18. Retain the zoning of lands at Junction 2 Dock Road subject to the addition of the following specific objective: TM O26:**

Ensure Industrial and Enterprise and Employment lands adjacent to Junction 2, Dock Road:

- a) Shall be developed for uses with low levels of traffic movements only;
- b) Car parking shall be provided at a rate below that provided for in the Development Plan and provided on an area-wide basis rather than according to the requirements of individual developments;
- c) Cycle parking shall be provided in all developments at an appropriate level to encourage modal shift;
- d) All developments shall include end-of-trip cycling facilities for employees such as showers and lockers;
- e) All new roads shall incorporate segregated cycle tracks designed in accordance with the National Cycle Manual;
- f) All new roads shall seek, in the first instance, to provide filtered permeability, in order to avoid creating additional capacity for car traffic; and
- g) All development proposals shall include Mobility Management Plans, with clear targets and commitments to implementing measures to promote sustainable transport.

**Screening Response:**

The inclusion of the above objectives seek to increase permeability and supporting low carbon transport modes, will have benefits for urban permeability and human health, as well as environmental benefits, as well as supporting a reduction in transport emissions.

The alterations also support objectives is to safeguard the efficiency of what are both regionally and nationally important transport schemes in the case of both the M20 and

Foynes to Limerick schemes. These transport connections will in the course of their lifetime play a larger role in facilitating the movement of electrically powered traffic than is currently the case, a factor that must be borne in mind. Improved transport links lead to reduced travel times and greater transport efficiency. Properly managed, this can lead to less traffic emissions and greater economic linkages both nationally and regionally. It should also be noted, that the Foynes scheme enhances linkages with Foynes port. Foynes port is also part of the TEN-T European port network, which will assume greater importance post Brexit.

## **Chapter 14: Climate Change & Flood Management:**

### **1. Amend LAP text as follows:**

Climate Change: Context: “Implementation of the LAP will take into account relevant targets and actions arising from sectoral adaptation plans approved in 2019 ~~that will be prepared~~ to comply with the requirements of the Climate Action and Low Carbon Development Act 2015”.

### **2. Amend Objective CC O2 as follows:**

Pursue modal shift to sustainable transport modes as the highest transport priority of the Council and support sustainable travel, energy efficient projects, green infrastructure and sustainable residential development projects.

### **3. Include Objective CC O10 as follows:**

Ensure decisions around transport planning and operations (including traffic management) will be aligned with the government’s policy to reduce greenhouse gas emissions by more than 50% by 2030, its Climate Action Plan and the Paris Agreement objective to achieve net zero greenhouse gas emissions by 2050.

### **4. Amend Flood Management: Context text as follows:**

“This Flood Scheme follows the Catchment Flood Risk Assessment and Management (CFRAM) programme, which is a medium to long-term strategy for the reduction and management of flood risk in Ireland covering a number of Units of Measures (as defined in the EU Floods Directive) ~~single National River Basin District~~”.

### **5. Amend Objective FM O1 as follows:**

Manage flood risk in accordance with the requirements of “The Planning System and Flood Risk Management Guidelines for Planning Authorities”, DECLG and OPW (2009) and any revisions thereof and consider the potential impacts of climate change in the application of these guidelines.

**6. Amend Objective FM 04 as follows:**

Ensure development proposals within the areas outlined on the Flood Risk Map are subject to Site Specific Flood Risk Assessment as outlined in “The Planning System and Flood Risk Management Guidelines”, DECLG and OPW (2009). A Site Specific Flood Risk Assessment will be required for developments proposed on sites in areas at risk of flooding from groundwater, in particular in the vicinity of Monteen and Loughmore Commons Turloughs.

**7. Include Objective FM 08 as follows:**

Ensure that no development shall commence on these lands identified as being at flood risk adjacent to the Raheen Business Park in the townlands of Ballycummin/Rootiagh, zoned for High Tech/Manufacturing, until a site-specific flood risk assessment, including hydraulic model has been prepared for the lands, which demonstrates that the flood risk for the lands can be mitigated or that a less vulnerable use can be accommodated on site.

**8. Include Objective FM 09 as follows:**

Ensure that no development shall commence on the lands identified as being at flood risk, off Blackberry Lane in the townland of Ballykeeffe, zoned for Enterprise and Employment, until a site-specific flood risk assessment, including hydraulic model has been prepared for the lands, which demonstrates that the flood risk for the lands can be mitigated, or that a less vulnerable use can be accommodated on site.

**9. Amend Strategic Flood Risk Assessment as follows:**

OPW Preliminary Flood Risk Assessment Indicative fluvial flood map: “These maps have been produced under the PFRA ~~CFRAMS~~ programme.”

**Screening Response:**

Text changes acknowledge the sectoral climate adaptation plans, which were produced in 2019 and also refer to the OPW unit of measures which is the basis for much of OPW’s work. Another text alteration refers to the PFRA maps, which predated the CFRAM maps and clarifies where these maps originated from. The text changes are for clarification purposes and have no environmental or ecological implications.

The alteration to FM 04 recognises the risk of groundwater flooding in an area close to Loughmore Common turlough. The assessment of such flooding patterns should have environmental benefits in that it will prevent development within the flooding boundaries of the turlough and its environs, which are a pNHA. This is dealt with in more detail in the AA Screening further below. The alterations to FM 08 reflect flood risk in two specific locations and the need for site-specific flood assessment; this is designed to inform development decisions and is regarded as good practice.

**Chapter 15: Implementation:**

**1. Amend the Purpose of the Agriculture Objective as follows:**

“One off dwellings will only be considered on agriculturally zoned land outside of Flood Zones A and B for the permanent habitation of farmers and the sons and/or daughters of farmers only and subject to the terms and conditions of the rural housing policy as set out in the Limerick County Development Plan 2010 – 2016 (as extended)”.

**Screening Response:**

The alterations adds clarity and are drawn directly from “The Planning System and Flood Risk Management Guidelines”, November 2009. This ensures clarity in plan content but also helps to ensure compliance with higher tier guidance. The effects are considered to be positive from an SEA perspective, by ensuring that dwellings are outside of flood risk areas, it minimises both risk to humans and lessens possible effects on flood plains, with consequently environmental benefits.

**Appendix I: Land Use Zoning Matrix:**

**1. Alter the Land Use Zoning Matrix as follows:**

On lands that are zoned Enterprise ns Employment  
Health Clinic – Generally Permitted /

Health Practitioner – Generally Permitted /

Land Use Zone	District Centre	Local Centre	Existing Residential	New Residential	Educ. & Com. Infra.	High Tech/ Manuf.	Enterprise & Employment	Retail Warehousing	Industry	Open Space	Semi Natural Open Space	Utilities	Agriculture	Special Control Areas
Type of Use														
Health Centre	/	/	X	X	/	X	⚠	X	X	X	X	X	X	X
Health Practitioner	/	/	X	X	/	X	⚠	X	X	X	X	X	X	X

**Screening Response:**

This alteration represents slight changes in land uses that are open for consideration on previously zoned lands and do not have any environmental implications.

## **1.2 Material Alterations to Local Area Plan Maps**

### **Alterations to Zoning Map:**

1. Alter the land use zoning map from Enterprise and Employment to Agriculture as per the 2011 – 2017 (as extended) LAP zoning at Junction 30 Rosbrien (Submission No's 1, 3, 20).
2. Alter the land use-zoning map from Existing Residential to Enterprise and Employment zoning at No. 1 Dooradoyle Road (Cllr. J. Leddin).

### **Screening Response:**

The alteration from enterprise and employment to agriculture zoning will result in less intensive land usage in this area with consequent environmental benefits. It will also ensure that the area will remain permeable which would assist with surface water management.

The alteration from residential to enterprise and employment relates to a change in the type of zoning on a previously developed site. There are no environmental effects associated with this alteration.

### **Alterations to Flood Map:**

1. Amend the Flood Map to include Flood Zones A, B and C (Submission No. 5).

### **Screening Response:**

This alteration adds clarity to the Flood Map and outlines more clearly the extent of flood risk, this is beneficial from an environmental perspective.

### **Alterations to Transport Map:**

1. Amend Transport Map 4 to relocate the indicative link road outside of the observer's landholding (Submission No. 14).
2. Amend Transport Map 4 to include the existing and proposed cycle lane on the R510 (Submission No. 28).
3. Amend Transport Map 4 to include a new link road connecting the Dooradoyle Road and the Rosbrien Road, which had been included in the 2011 – 2017 Local Area Plan (as extended)

## Screening Response:

The routes lie within zoned areas of the plan and the alterations are minor, there are no environmental effects as the areas are already developed. They are also at a distance from any designated Natura 2000 sites.

### 1.3 Screening Statement

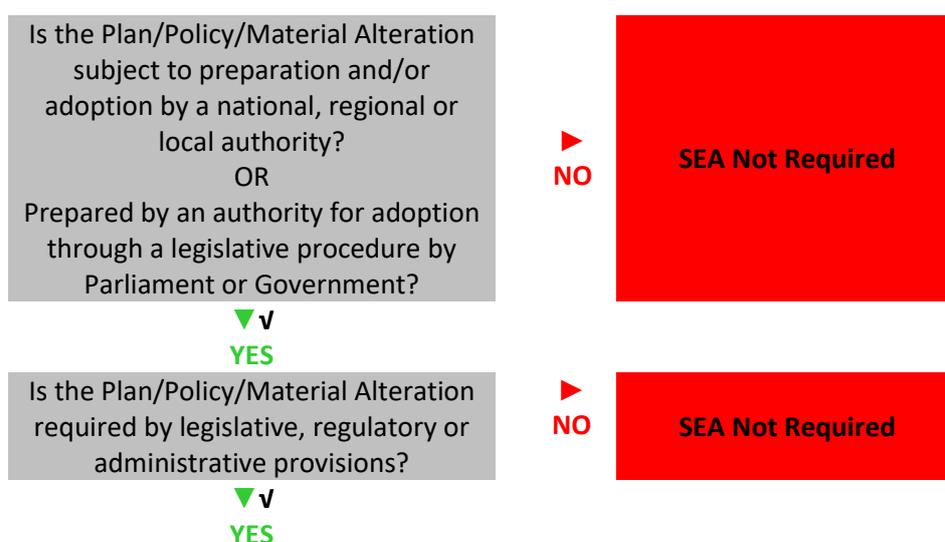
The Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. No. 436 of 2004) require a case by case screening of individual plans and associated material alterations, based on the criteria in Schedule 2A to the Planning and Development Regulations 2001 (as amended). These criteria must be taken into account in determining whether or not significant effects on the environment would be likely to arise.

#### Stage One - Pre-Screening

The first step in determining whether the material alterations require an SEA involves a pre-screening check. It allows rapid screening-out of policies and material alterations that are clearly not going to have any environmental impact and screening-in of those that definitely do require SEA. The material alterations to the plan have been outlined in the previous section and a response given to each.

It is necessary to conduct screening to determine if a Strategic Environmental Assessment of the alterations is required. The Plan, of which the alterations are part, will provide a framework for development, therefore it was necessary to determine whether an SEA would be required by testing it against environmental significance screening criteria.

**Figure 1 Pre-Screening Decision Tree**





### Stage Two - (A) Environmental Significance Screening

The application of environmental significance criteria is important in determining whether an SEA is required for small Plans/Policies or modifications to Plans/Policies. Annex II (2) of Directive 2001/42/EC sets out the “statutory” criteria that should be addressed when undertaking this stage.

## Criteria for Determining the Likely Significance of Environmental Effects

### *Characteristics of the Plan/ Programme*

- i. *The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources:*

It is the purpose of the review of the LAP to establish an updated Local Area Plan for the development of the Southern Environs, that will be based on appropriately zoned land. The LAP is informed by the County Development Plan 2010-2016 (as extended), the National Planning Framework and the Regional Spatial and Economic Strategy for the Southern Region, which lie above them in the hierarchy of plans. Any projects or other activities that fall within the remit of the Planning Act 2000 (as amended) and its associated regulations will be subject to the policy content of the plan and in terms of location will be guided by the zoning matrix which is part of the plan.

- ii. *The degree to which the plan or programme influences other plans and programmes including those in a hierarchy:*

The Local Area Plan is set within the context of the Limerick County Development Plan 2010-2016 (as extended), the National Planning Framework, Regional Spatial and Economic Strategy for the Southern Region and the provisions of relevant planning guidelines issued by the DoEHLG. These influence the SELAP rather than the other way around, but the LAP and its alterations serve as planning policy guidance for the Southern Environs area.

- iii. *The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development:*

The Local Area Plan and its material alterations is being prepared under the Planning and Development Act 2000, as amended, and therefore must adhere to the principles of planning and development of the area. It also comes under the remit of the County Development Plan 2010 – 2016 (as extended). Section 12(2)(c) of the Act states that a Development Plan shall include objectives for:

*“The conservation and protection of the environment including, in particular, the archaeological and natural heritage and the conservation and protection of European sites and any other sites..”.*

In this regard, the ecological buffer zones that had been in place in the previous plan have been retained and continue to afford protection to sites such as Bunlicky Lake, the eastern part of which is within the River Shannon and Fergus Estuary Special Protection Area. This part of the lake is a roosting area for cormorants.

*iv. Environmental problems relevant to the plan or programme:*

The underlying environmental issues of the material alterations to the LAP relate to the following:

- Avoidance of encroachment on the River Shannon and parts of its tributaries in the plan area and Loughmore Common pNHA.

The status of Loughmore Common continues to be recognised in the existing zoning plan. The draft LAP does not show any encroachment on the River Shannon and its SAC and SPA designations.

At this stage in the plan preparation process, no strategically significant environmental problems can be identified in relation to the above issues.

*v. The relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection):*

These plans and programmes are considered under the Limerick County Development Plan 2010-2016 (as extended), that has been informed by the series of guidance documents issued by the Department. The County Development Plan, in particular in Chapters 1 and 7, outlines both planning guidance and community based environmental legislation within which planning policy documents operate.

***Characteristics of the Effects and of the Area Likely to be Affected***

*i. The probability, duration, frequency and reversibility of the effects:*

It is anticipated that the key objectives and principles to be adopted as part of the Southern Environs LAP will ensure that the effects of the resulting changes to the existing environment will be controlled and governed by planning legislation, which will seek to consolidate development patterns. The consolidation of development and increased use of brownfield sites are central themes of both the National Planning Framework and the Regional Spatial and Economic Strategy and have been carried forward into this plan. There are no expansions of the development boundaries, which ensures that development will not take place outside the boundaries of the plan area that was established under the 2011 plan. It is expected that the effects of the Plan in environmental terms will be controlled, both through plan policies and appropriate environmental and ecological guidance as laid down both in the LAP and the County Development Plan. While the effects of development within the boundaries of the plan are likely to be long term and not readily reversible, there is a tradeoff in that the concentration of development will lead to development patterns that are more easily serviced.

*ii. The cumulative nature of the effects:*

Cumulative negative environmental effects are likely to be localised within the plan boundaries and limited in nature. Development of zoned land that had been in agricultural use for instance will lead to the loss of semi-natural habitats, but this has to be balanced against the need for concentrated development patterns. A key aim of the plan will be to attain a balance between growth and the need to conserve the best aspects of the environment. Particular attention for instance has been paid to the sensitive historical landscape of Mungret. It should also be noted that there is increased emphasis on climate action in the draft plan. When coupled with development activities and zonings within the wider Southern Environs Plan, it is likely that more brownfield and undeveloped sites will be built on during the course of the plan period, and that pressure on existing infrastructure will increase. As indicated elsewhere, there is sufficient capacity within the wastewater treatment plant (WWTP) to deal with this.

*iii. The transboundary nature of the effects:*

Transboundary effects, if any, are likely to be limited.

*iv. The risks to human health or the environment (e.g. due to accidents):*

None. It is expected that the draft plan will place development activities on a more coherent footing by updating the policies of the existing plan. It is anticipated that the overall effects on human health and social issues, in as much as they are affected by the plan, will be largely positive. The emphasis on more sustainable transport modes as a key element of the plan will contribute to these positive benefits. The facilitation of development within zoned areas subject to the policies of the Local Area Plan is expected to offer an environmentally beneficial alternative to more dispersed forms of development.

*v. The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected):*

The wider area that will be affected is within the development boundary of the Southern Environs, with an area of approximately 21km<sup>2</sup>. The population of the Southern Environs Local Area Plan area in 2016, i.e. the last census period, was 19,073.

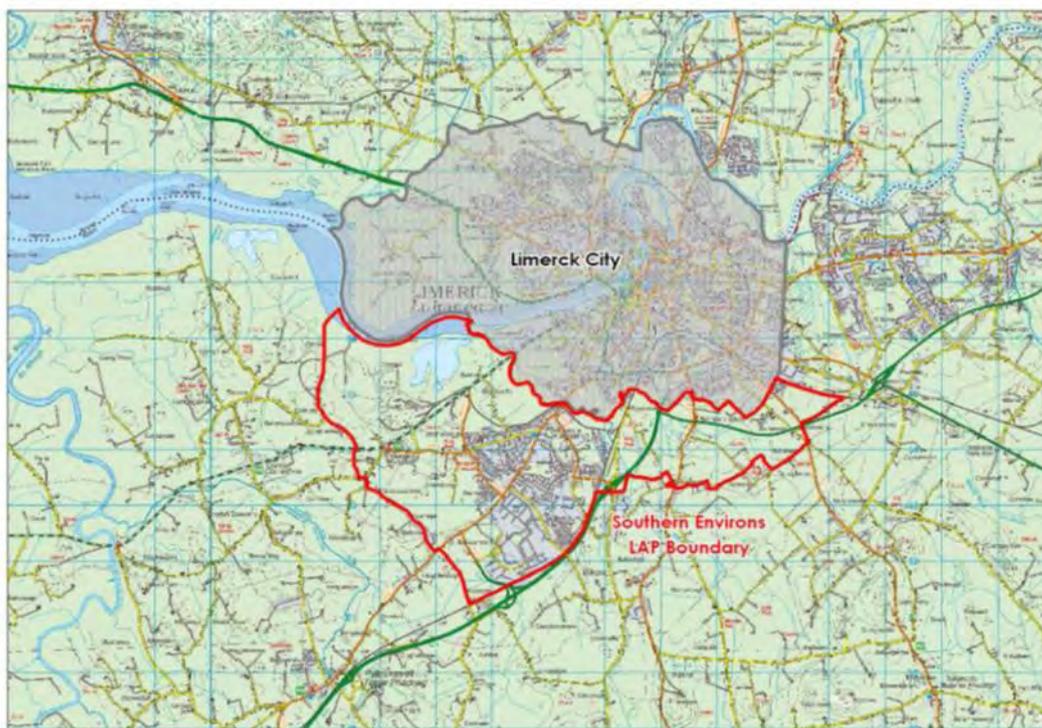


Figure 2: Area of the Southern Environs

vi. *The value and vulnerability of the area likely to be affected due to:*

- *Special natural characteristics or cultural heritage;*

The Development Plan and the Local Area Plan identify the following protected areas/elements of the natural/ cultural heritage:

- Protected Structures;
- Sites of Archaeological Significance;
- Areas with natural history designations.

The issue of both Natura 2000 sites and Proposed Natural Heritage Area sites has already been dealt with above. The area in question is of historical and architectural importance and this is reflected in the amount of archaeological and historical features that are present in the area.



Figure 3: showing seven protected structures within the Mungret College area

Mungret College and the nearby ecclesiastical site are important local landmarks in the area and it is currently used by a number of organisations such as Educate Together, which has accommodation in the college grounds. The main building is currently unused. In the north east corner of the above picture, Mungret Church and its associated graveyard are visible. This archaeological complex is listed on the Record of Protected Structures and also on the Record of Monuments and Places.



Figure 4: Mungret College- front view, the building is facing north

The draft plan shows the archaeological zone as a Special Control Area and the importance of this area continues to be protected in this plan.

- *Exceeded environmental quality standards or limit values:*

It is not expected that any environmental quality standards will be exceeded or that the value of vulnerable areas will be limited as a result of the Southern Environs Local Area Plan. The sewage system as to cater for further development.

Based on climate action policy set out in the NPF and RSES, Climate Adaptation and Mitigation measures are included in the proposed plan. The Local Area Plan, by acknowledging the importance of climate action adopts these national and regional policies for use at local level. The approach to development density, land use, design and movement is consistent with broader measures to address climate change in the areas of housing, sustainable travel, green infrastructure, flood risk adaption and renewable energy sources.

- *Intensive land-use:*

It is a key objective of the Southern Environs Local Area Plan framework to ensure that future expansion of the settlement and a controlled intensification of land uses does not undermine the area's physical or natural environment. Chapters 12 and 13 which deal with the built and natural heritage of the Southern Environs, contains objectives which protect items of natural or cultural interest from inappropriate development. It should also be noted that the plan policy content reflects the emphasis placed on infill and brownfield development that is present in both the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES).

vii. *The effects on areas or landscapes which have a recognised national, Community or international protection status:*

See (vi) above.

#### **1.4 Stage Two – Summary, Conclusions and Recommendation**

At this point in time no strategically significant environmental issues can be identified in relation to the proposed Material Alterations. Building on the lessons learned from the preparation of Local Area Plans, environmental improvements are expected as a result of the proposed Southern Environs Local Area Plan, primarily through the concentration of development in an area where it can be more easily serviced by appropriate infrastructure.

Concentration of development is expected to reinforce the role of Limerick City and Suburbs in the region as identified in the National Planning Framework (NPF). Appropriate services and infrastructure exist to service growth in the plan boundaries. Dispersed development would increase overall environmental pressures such as car use, use of

individual treatment systems and the associated difficulties and cost of servicing one off houses and isolated developments of other types with modern facilities and infrastructure.

Following the screening process, whereby the specific context of the Southern Environs Local Area Plan and the material alterations outlined above have been assessed against the environmental significance criteria as contained in Annex II (2) of the SEA Directive, **it is concluded that a Strategic Environmental Assessment is not required for the material alterations to the Southern Environs Local Area Plan.**

## 2.0 Appropriate Assessment Screening

This is an Appropriate Assessment Screening of the Material Alterations proposed to the Draft Southern Environs Local Area Plan, in accordance with the requirements of Article 6(3) of the EU Habitats Directive (92/43/EEC). The material alterations have resulted from submissions received during the recent public display period for the draft plan and proposed alterations by Elected Members following consideration of the Chief Executive’s Report on submissions received - see the SEA screening document, which precedes this AA screening.

The Material Alterations to the Draft Southern Environs LAP have been assessed to determine if an ‘Appropriate Assessment’ is required. Based on the Methodological guidance on the provision of Article 6(3) and (4) of the Habitats Directive 92/43/EEC, a ‘Screening Matrix’ and a ‘Finding of No Significant Effects Matrix’ have been completed.

The principal consideration for an Appropriate Assessment would be if the LAP were likely to have significant effects on a Natura 2000 site – Special Areas of Conservation and Special Protection Areas (SACs and SPAs). The River Shannon SAC site and River Shannon and River Fergus Estuaries (004077) Special Protection Area (SPA) form the northern boundary of the Southern Environs Local Area Plan. The Local Area Plan has been formulated to ensure that land uses, developments and effects arising from permissions based upon this Plan (either individually or in combination with other plans or projects) will not give rise to significant adverse impacts on the integrity of any Natura sites, having regard to their conservation objectives.

### 2.1 Proposed alterations that have the potential for ecological effects:

With respect to the alterations that have been presented in the SEA screening, it is considered that only two alterations may have the potential to exert an influence on the Natura 2000 site network in the plan area. These alterations are set out below:

1) *-Amend Objective FM O4 as follows:*

*Ensure development proposals within the areas outlined on the Flood Risk Map are subject to Site Specific Flood Risk Assessment as outlined in “The Planning System and Flood Risk Management Guidelines”, DECLG and OPW (2009). [A Site Specific Flood Risk Assessment will be required for developments proposed on sites in areas at risk of flooding from groundwater, in particular in the vicinity of Monteen and Loughmore Commons Turloughs.](#)*

It is considered that this alteration might have an effect as some of the vegetation in the Loughmore Common area is considered to be subject to saline influence, which might

result from a connection to the River Shannon, which is 2.93 km to the north and is tidal in this location.

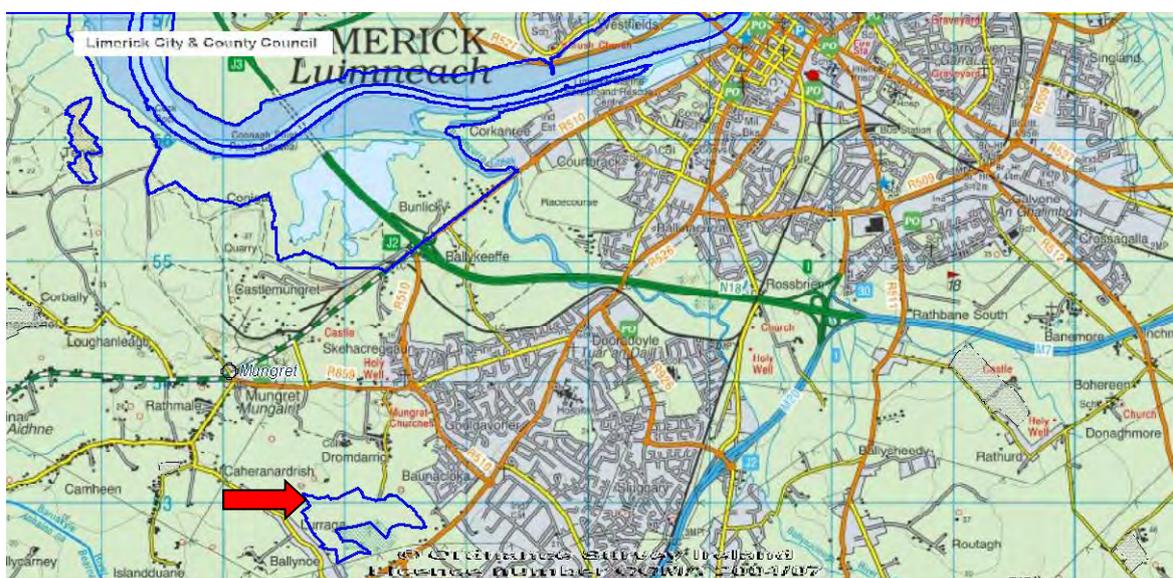


Figure 5: Showing location of Loughmore Turlough (red arrow) and the Shannon to the north

The inclusion of a requirement to carry out a flood risk assessment, with an emphasis on groundwater flooding, as this is the flooding pattern associated with turloughs, is expected to be beneficial from an ecological perspective. The results of such an assessment would prevent development within the flood zone of the turlough and thereby reduce chances of contamination from such proposals reaching groundwater and hence the River Shannon.

- 2) *Amend Transport Map 4 to include a new link road connecting the Dooradoyle Road and the Rosbrien Road, which had been included in the 2011 – 2017 Local Area Plan (as extended).*

This objective is included in the current plan. As it heads away from the Natura 2000 sites, it is not considered that there will be any significant effects. There is also a degree of separation of approximately 2km at its closest to the Lower River Shannon SAC site, which is considered to provide an adequate buffer.

**Progression to Stage 2 is not judged necessary as the change in relation to flood risk assessment will be beneficial and will not have detrimental ecological effects. It will lead to specific groundwater flooding assessment in these areas, which should ensure that development in these areas of flood risk would not take place, and allow these seasonally flooded areas to function in as natural a form as possible. The alteration to the Transport Map will also not have significant effects, as it is already in the current plan and subjected to SEA and AA, and at its closest would be 2km from a Natura 2000 site with intervening developed land between it and the SAC/SPA site.**

## 2.2 Screening Matrix

<p><b>Brief description of the project or plan:</b></p> <p>This is the review of the Southern Environs Local Area Plan 2011 – 2017 (as extended), which is reaching the end of its statutory period.</p>
<p><b>Brief description of the Natura 2000 sites:</b></p> <p>The Lower River Shannon SAC site forms the northern boundary of the environs along with the Shannon and Fergus Estuary SPA. This site has been selected because of a range of riparian habitats and species such as wet woodlands, tidal mudflats, estuaries and for species such as otter, salmon and lamprey. Bunlicky Lake has been added because of its importance for wildfowl, particularly as a roosting area for cormorants. Maintenance of high water quality is an important factor in ensuring the preservation of these habitats.</p>
<p><b>Describe the individual elements of the plan or project (either alone or in combination with other plans or projects) likely to give rise to impacts on the Natura 2000 site:</b></p> <p>The main way in which impacts could be created is through pollution that would affect water quality downstream in the Lower River Shannon SAC site, or by development that would encroach directly onto the Shannon estuary or Bunlicky Lake. As indicated in the SEA screening, which preceded this document, the capacity of the Bunlicky Waste Water Treatment Plant (WWTP) is 186,000 rather than the 130,000 which had been indicated previously. This ensures that there is sufficient capacity to deal with development needs during the lifetime of the plan.</p> <p><b>Note:</b> There has been no expansion of the development boundaries of the plan, which means that there has been no encroachment on the Natura 2000 sites in the plan area.</p>
<p><b>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:</b></p> <ul style="list-style-type: none"> <li>• <b>Size and scale;</b></li> </ul> <p>The area of the plan has been indicated in Figure 2 above. It is 21km<sup>2</sup> in area.</p> <ul style="list-style-type: none"> <li>• <b>Land-take;</b></li> </ul> <p>The development boundaries of the plan area have not been expanded. This fact, combined with the designation of the eastern portion of Bunlickey lake as an SPA and the imposition of a buffer zone, means that the possibility of land take from the designated sites will not occur. The pNHA designation of Loughmore Common has also been emphasised in this review.</p> <p>The land use around the common will remain agricultural, which will mean that in this area there will not be a change in run off rates and local hydrology. The residentially zoned</p>

lands to the north will be subject to design elements, which will reflect the contents of the Flood Risk Management Guidelines, requiring the implementation of Sustainable Urban Drainage measures. It should also be noted that these measures will incorporate both sediment and oil traps, which will prevent the issue of pollutants to the local water courses and water features.

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

The River Shannon SAC site forms the northern boundary. Bunlicky Lake, now designated as a Special Protection Area, lies within the plan area. These are over 2km distant from the area that is the subject of the alteration.

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

No policies within the plan indicate the need for abstraction of water from the River Shannon.

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

In the plan there are policies designed to ensure that the pace of development does over-reach the capacity of the available treatment systems. Work on the plan has also indicated that the capacity of the Bunlicky Wastewater treatment system is higher than had been previously indicated, 186,000 PE rather than 130,000 PE, which lessens chances of any untreated emissions being discharged and is sufficient for development needs during the plan period.

- **Excavation requirements;**

Any excavation will take place outside the Natura 2000 boundaries and will be sufficiently distant from the designated sites to ensure that there will be no effect on the sites, based on the zoning maps. It should be noted that any development activity will be the subject to assessment at planning application stage. Measures to prevent damage to Natura 2000 sites are included in the plan policies.

- **Transportation requirements;**

It is not envisaged that any of the transport policies put forward in the plan will have any effect in terms of encroachment on either of the designated sites, i.e. either the SAC or SPA sites.

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

No construction projects within the plan area will encroach upon designated sites due to the presence of buffer zones and the fact that they are protected by the plan policies.

- **Other**

None

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

- **Reduction of habitat area:**

Not likely, as the plan has buffer areas in place and policies which protect the Natura 2000 site network. As indicated elsewhere, there has been no expansion of the plan boundaries or development zonings into the Natura 2000 site network.

- **Disturbance to key species;**

No projects giving rise to disturbance to key species for Natura 2000 sites are likely to be granted within the boundaries of the plan. The specific inclusion of Bunlicky Lake as a Special Protection Area confers additional protection to it. Buffer zones around the lake put in place in the last plan also reduce the possibility of disturbance.

- **Habitat or species fragmentation;**

The presence of buffer zones and the presumption in the plan against development that would cause ex-situ effects will help to prevent fragmentation of non –designated habitats and the species that are contained within them. As indicated above there has been no expansion of the development boundaries of the plan.

- **Reduction in species density;**

It is not envisaged that any reductions in species density would take place, given that policies ensure potential discharges to the River Shannon are controlled and that the integrity of natural features within the boundary are respected. Policies also exist within the plan to conserve tree stocks within the plan boundary and ensure that emphasis is placed on the use of native species in landscaping. The increase in semi-natural open space zoning also helps to provide additional habitat space within the plan area, which will help by providing habitat areas, which should retain numbers of wildfowl in particular.

- **Changes in key indicators of conservation value;**

No projects giving rise to significant adverse changes in key indicators of conservation value for Natura 2000 sites are likely given that policies are in place to control possible ex-situ effects and because of the presence of a buffer around Natura sites within the plan boundaries.

- **Climate change:**

The consolidation of development within the boundaries of the LAP, while at the same time recognising the importance of the conservation sites inside and outside the plan

boundaries, is not expected to result in climate change issues that would affect the sites. As noted in the SEA screening, there is now a new chapter in the plan which deals specifically with climate issues. This is not present in the current plan.

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

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

None - See comments regarding improvement of sewage facilities, which would reduce chances of ex-situ effects on the SAC site. The material alterations do not affect this objective. The inclusion of Bunlicky Lake as a Special Protection Area will help to ensure that the site structure will be respected.

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

With the consolidation of development by the updating of the plan and the overall conservation objectives set out by the County Development Plan and the new LAP, it is not expected that the various factors that help designated sites function as particular habitats will be affected. See above in relation to increased capacity of Bunlicky Waste Water Treatment Plant.

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

- **Loss;**

Not applicable

- **Fragmentation;**

Not applicable

- **Disruption;**

Not applicable

- **Disturbance;**

Not applicable

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

Not applicable

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

Not applicable

### 2.3 Finding of No Significant Effects Matrix

<p><b>Name of Project or Plan:</b> Southern Environs Draft Local Area Plan, Material Alterations.</p>
<p><b>Name and location of Natura 2000 sites:</b> Lower River Shannon SAC (Site Code 00216) on the northern boundary and River Shannon and Fergus Estuaries (004077) part of which is Bunlicky Lake, which lies within the northern part of the plan area.</p>
<p><b>Description of the Project or Plan</b> As given in Screening Matrix above.</p>
<p><b>Is the Project or Plan directly connected with or necessary to the management of the site (provide details)?</b> No. The LAP and the Material Alterations are intended to provide for the proper planning and sustainable development of the Southern Environs and includes policies and objectives to protect and manage in a suitable manner the natural heritage of the area.</p>
<p><b>Are there other projects or plans that together with the project or plan being assessed could affect the site (provide details)?</b> The LAP and the material alterations have been formulated to ensure that the uses, developments and effects arising from proposals and/or permissions based upon the policies and objectives of the Plan (either individually or in combination with other plans or projects) will not give rise to significant adverse impacts on the integrity of Natura 2000 sites, having regard to their conservation objectives. These concerns are also reflected in the County Development Plan.</p>
<p><b>The Assessment of Significance of Effects of the Material Alterations</b></p>
<p><b><i>Describe how the project or plan (alone or in combination) is likely to affect the Natura 2000 sites:</i></b>  The Material Alterations have not affected polices relating to nature conservation. In addition, the treatment capacity of the Waste Water Treatment Plant is greater than had been previously indicated. This minimises pollution risk to the designated sites. The</p>

eastern portion of Bunlicky Lake has been included as a Special Protection Area and the ecological buffer area around it has been retained. The inclusion of buffers and additional zoning of semi-natural open space is also expected to have beneficial effects in this regard.

***Explain why these effects are not considered significant:***

Policies, including those set out in the CDP (2010 – 2016 as extended), should ensure that pollution, nuisance or other environmental effects that are likely to significantly and adversely affect the integrity of the Natura 2000 sites are not permitted.

***List of Agencies Consulted: Provide contact name and telephone or email address:***

*Screening Reports were sent to:  
The Manager, Development Applications Unit  
DoEHLG, Newtown Road, Wexford  
(T:053 9117382)*

***Response to consultation***

*Awaited.*

***Data Collected to Carry out the Assessment***

<b><i>Who carried out the Assessment?</i></b>	<b><i>Sources of Data</i></b>	<b><i>Level of assessment Completed</i></b>	<b><i>Where can the full results of the assessment be accessed and viewed</i></b>
Heritage Officer, Forward/Strategic Planning Section, Limerick City and County Council.	Existing NPWS Site Synopsis  Site visits during plan preparation process.	Desktop study, site visits. AA screening, stage 1.	On display with the LAP.

**Stage 1 Flood Risk Assessment**

**Draft Southern Environs Local Area Plan**  
**2021 – 2027**

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



Comhairle Cathrach  
& Contae **Luimnigh**

---

**Limerick** City  
& County Council



## 1.0 Contents

1.0	Introduction Flood Risk and the LAP Process .....	4
2.0	Flood Risk Identification .....	4
3.0	Justification Test in determining the zoning pattern to be employed .....	14
4.0	Zoning Responses to Flood Risk.....	16
5.0	Conclusions .....	18

## 2.0 Introduction Flood Risk and the Local Area Plan Process

This is the Stage 1 Flood Risk Assessment for the review of the Draft Southern Environs Local Area Plan. The SFRA should be read in tandem with the Draft Local Area Plan and the SEA Environmental Report. The Southern Environs is at particular risk from tidal flooding. The proximity of the estuary to the north bears witness to this. Another factor, which complicates the flooding picture, is the underlying limestone geology of much of the area. This results in the presence of natural drainage features including turloughs, which also have to be considered in the possible flood regime of the area. With the issue of tidal flooding, which may cause tributaries of the Shannon to back up when they cannot drain to the main channel, and the underlying geology, the issue of potential flooding risk in the Southern Environs is a complex one.

This process is designed to identify areas at risk of tidal or fluvial flooding, or where surface water might need to be managed.

It should be noted that the content of the plan has been altered in response to submissions received from the OPW following the first public display period. These can be seen in the Chief Executive's Report to the Draft Local Area Plan issued on 17<sup>th</sup> December 2020.

## 3.0 Flood Risk Identification

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

1. OPW Preliminary Flood Risk Assessment Indicative fluvial flood map: "These maps have been produced under the PFRA programme";
2. National Coastal Protection Strategy Study flood and coastal erosion risk maps;
3. Predictive and historic flood maps and benefiting land maps;
4. Predictive flood maps produced under CFRAM studies;
5. River Basin Management Plan and reports;
6. Indicative assessment of existing flood risk under Preliminary Flood Risk Assessment;
7. Previous flood risk assessments and predictive flood maps;
8. Advice from Office of Public Works;
9. Internal consultation with Local Authority personnel;
10. Topographical maps - in particular LIDAR;
11. Information on flood defence condition and performance;
12. Alluvial deposition maps;

13. 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;
14. Local Libraries and newspaper reports;
15. Local consultation e.g. local groups;
16. Walkover surveys to assess potential sources of flooding and likely routes of flood waters and flood defences;
17. National, regional and local spatial plans and previous planning applications;
18. Previous planning applications during the lifetime of the Southern Environs Local Area Plan 2011-2017 (as extended).

**Sources used:**

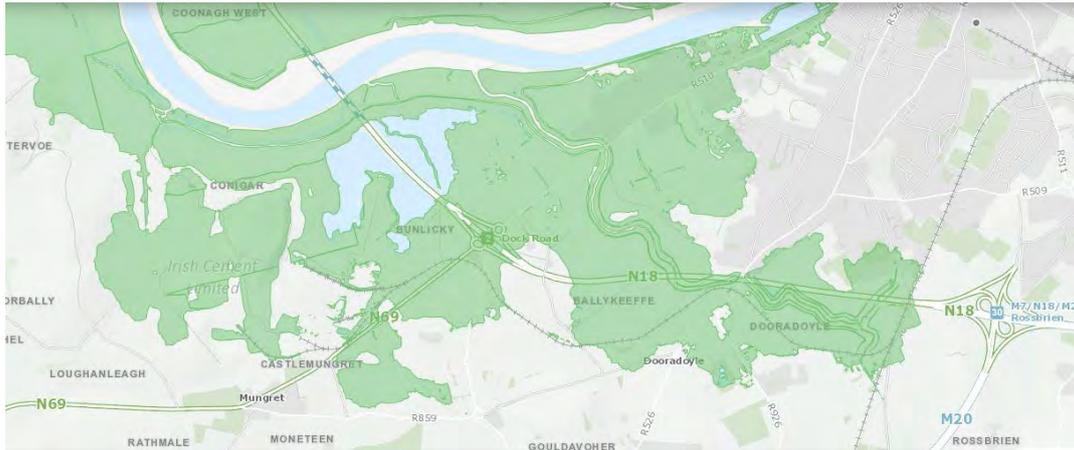
**1. OPW Preliminary Flood Risk Assessment indicative fluvial flood maps:**

These maps indicate that it is not fluvial, but coastal flooding, which is the main issue to consider in the Southern Environs Local Area Plan area. However, it does have localised implications, particularly in the area of the Barnakyle River - See Figure 1 below.



**Figure 1:** Taken from the LCCC planmap, this shows the extent of CFRAMs fluvial risk in the Southern Environs

## 2. National Coastal Protection Strategy Study flood and coastal maps:

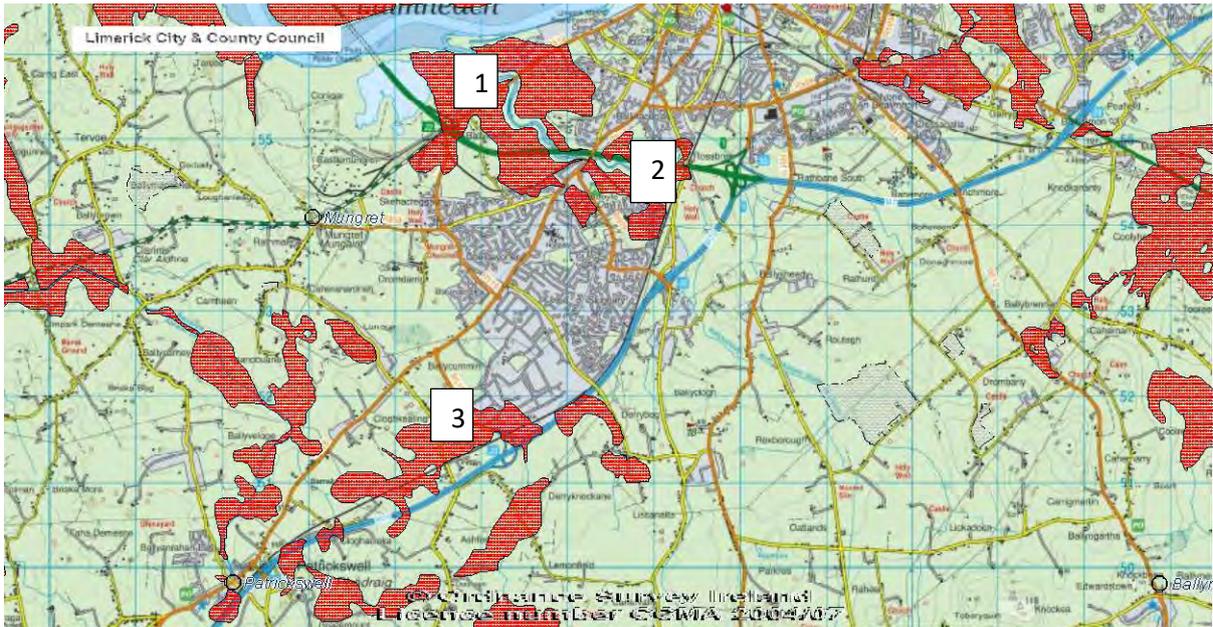


**Figure 2:** Taken from the NPCSS website, this shows the possible extent of coastal flooding in the Southern Environs.

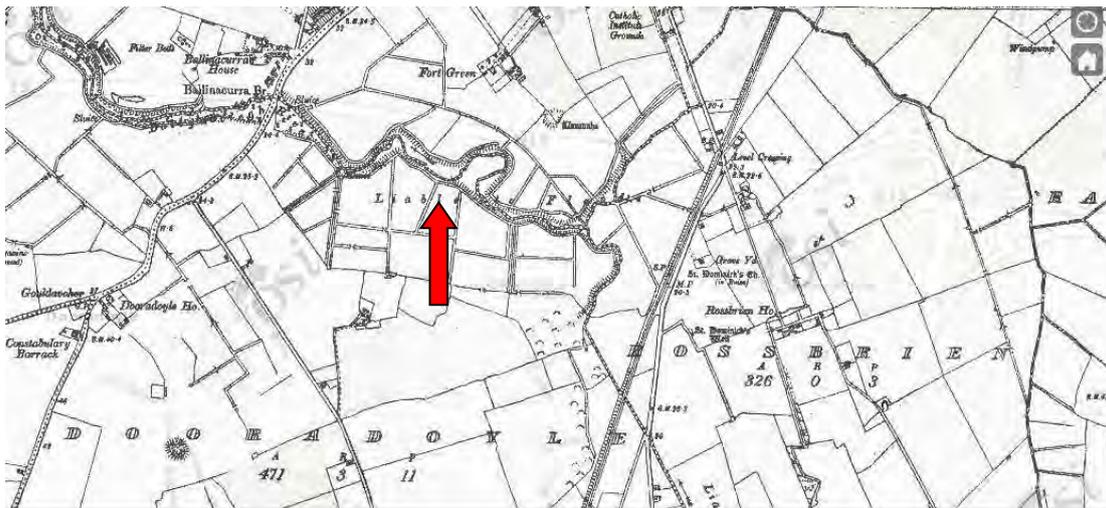
The map shows the area along the Ballinacurra Creek as being vulnerable to coastal flooding, as is the area around the cement factory and Bunlicky Lake. Much of this area is zoned as industrial to reflect both the existing uses and because this use is regarded as “a less vulnerable” use (Table A4 of Technical Appendices).

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

These maps were consulted, and together with discussions with local OPW engineering staff, areas that are more likely to flood were identified. Benefiting lands i.e. lands that would benefit from drainage works for agricultural purposes, can be related to river flood plains. It has to be emphasised that this means the drainage and flood defence works are to facilitate agricultural development, and not other more vulnerable land uses. The benefitting lands occur along Ballinacurra Creek running northwards to the River Shannon and are also to the south, in the western portion of the land zoned for High Tech/ Manufacturing use at the Raheen Business Park. In the case of the Ballinacurra Creek, additional open space has been put in place in the zoning template, while in the case of the Raheen Business Park, a specific policy has been put in place for Site Specific Flood Risk Assessment and the use of the flood benefitting area as an attenuation area for development in the business park. It also shows the land to the northeast of the Crescent Shopping Centre as being within the flood benefitting area.



**Figure 3:** The red areas on the map are flood benefiting areas. 1 is the area close to Ballinacurra Creek, 2 is the land bank close to the Crescent Shopping Centre and 3 Raheen Business Park.



**Figure 4:** This map is taken from the OSI map viewer and shows the area to the rear of the Crescent Shopping Centre as being prone to flooding. Also of note are the regular drainage patterns, which indicate lands subject to inundation and for which the drainage system was installed to shed water quickly.

Although the present flood embankments were constructed after the map was prepared, the drainage pattern, the flood benefiting map and the vegetation all help to indicate the possible extent of flood waters should a breach occur.

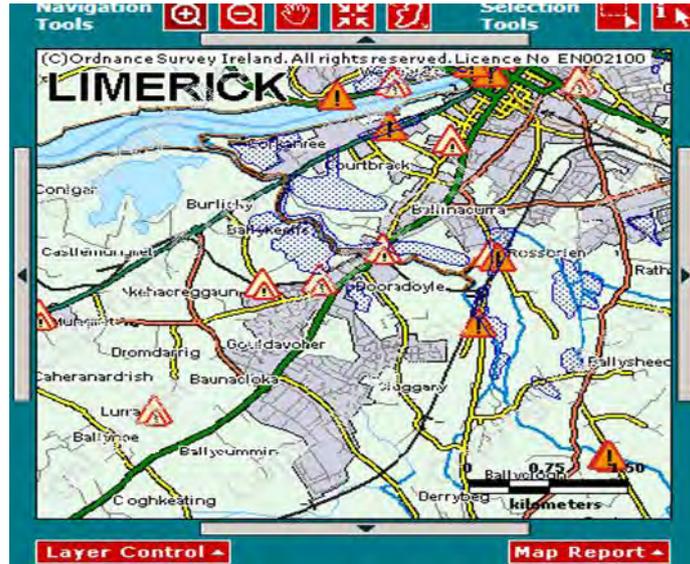


Figure 5: This screenshot is taken from the floodmaps.ie website and shows a series of flood events within the SELAP area.

#### 4. Predictive flood maps produced under CFRAM studies:

The CFRAM maps were used as part of the assessment process. The 1:1,000 year flood interval and the defended areas maps were used. The defended areas were used as the flood defence embankments are a feature of the Southern Environs. An extract from the combined map is shown below. The 1:1,000 zone is “where the probability of flooding from the rivers and sea is moderate (between 0.1% or 1 in 1,000 and 1% or 1:100 for river flooding and between 0.1% or 1 in 1,000 year and 0.5% or 1:200 for coastal flooding)... (DEHLG, 2009 p. 15). The picture in the Southern Environs is complicated by the fact that while coastal flooding is the main threat, the underlying geology of the area and the presence of two rivers, the Ballynacloogh and the Barnakyle Rivers have also to be considered.

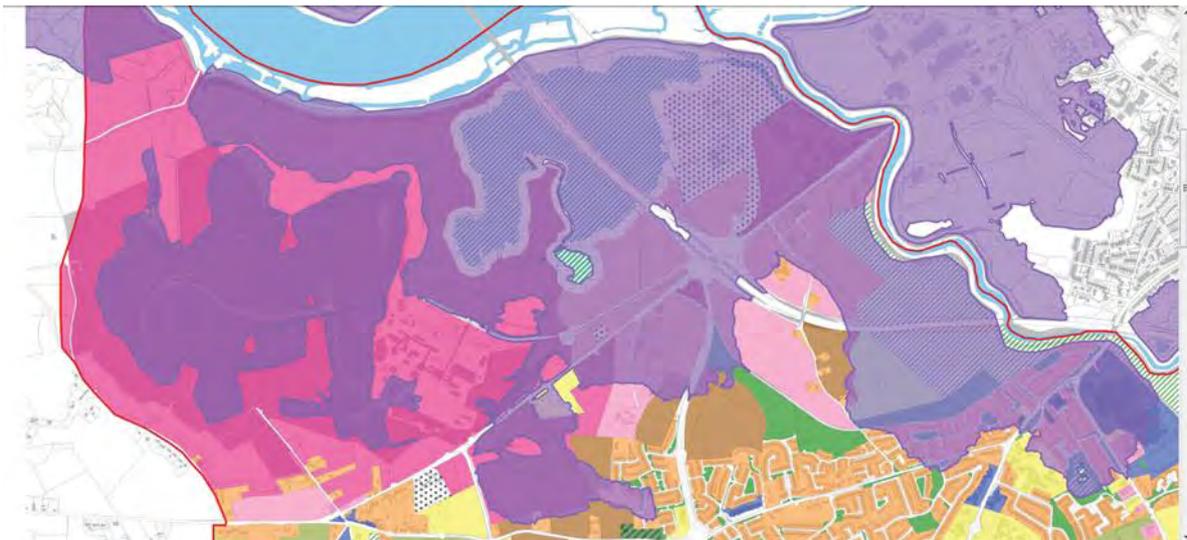


Figure 6: This is an extract from the maps based on the 1:1,000 and defended areas information taken from the CFRAMs. The shaded areas indicate the 1:1,000 flooding patterns and the defended areas combined.

The Planning System and Flood Risk Management Guidance (2009, p. 16) state “the presence of flood protection structures should be ignored in determining flood zones. This is because

areas protected by flood defences still carry a residual risk of flooding from overtopping or breach of defences and the fact that there may be no guarantee that the defences will be maintained in perpetuity". It is for this reason that areas protected by flood defences (the "defended areas") are included in determining the zoning pattern.

#### **5. River Basin Management Plan and reports:**

Insufficient information is available in the River Basin Management Plan 2018-2021 to inform plan contents in relation to flooding issues.

#### **6. Indicative assessment of existing flood risk under Preliminary Flood Risk Assessment:**

Existing areas of flood risk are identified at the Dock Road, Ballynaclogh Bridge and in the Rossbrien and Dooradoyle areas, which are both recurring. These maps have been supplemented by the "predictive maps" from Floodinfo.ie, a website launched in 2018. In addition, the National Preliminary Flood Risk Overview Report, issued in 2012 and updated in 2019 identifies storm water issues on Fr. Russell Road and in Mungret as an annual event (PFRA Overview Report Appendix C), which indicates the complexity of flooding issues in the plan area.

#### **7. Previous flood risk assessments:**

The flood reports for the nearby area of Limerick City provide insights into the wider flood regime of the area. It identifies five major historical flood events that also affected the Southern Environs:

- December 1954 a fluvial flood event;
- September 1961 coastal surge event which reached 4.2m AOD;
- December 1999 coastal surge and high fluvial event which reached 4.1 m AOD;
- February 2002 high fluvial event measuring 4.27m AOD.
- February 2014 highest event in Limerick caused by tidal surge.

#### **8. OPW advice:**

The OPW have indicated that combined fluvial and tidal flooding will have to be taken into account in the plan area. The vulnerability of sluices will also have to be considered. The flood defences, which are earthen embankments, are intended to protect agricultural land and have no rock armouring or internal reinforcement. The existing earth embankments are complimented by the land drainage systems. Some of this drainage system has residual storage capacity, but this is limited and dependant on the tide. These drains require the tide to be out to empty, via sluices, to watercourses such as the River Shannon and Ballinaclough River. The earthen embankments in some places have settled by up to 1m over the years. This is a reduction from the maximum design height, which is 5.6m AOD. In some locations, due to reinforcement work, the embankments exceed this height. Some of the flood defences are in private ownership, which is the case in the Irish Cement lands. Ballinaclough Bridge has

been described as a possible weak point in the flood defences, as it is at a lower level than the embankments and could provide access for flood waters.

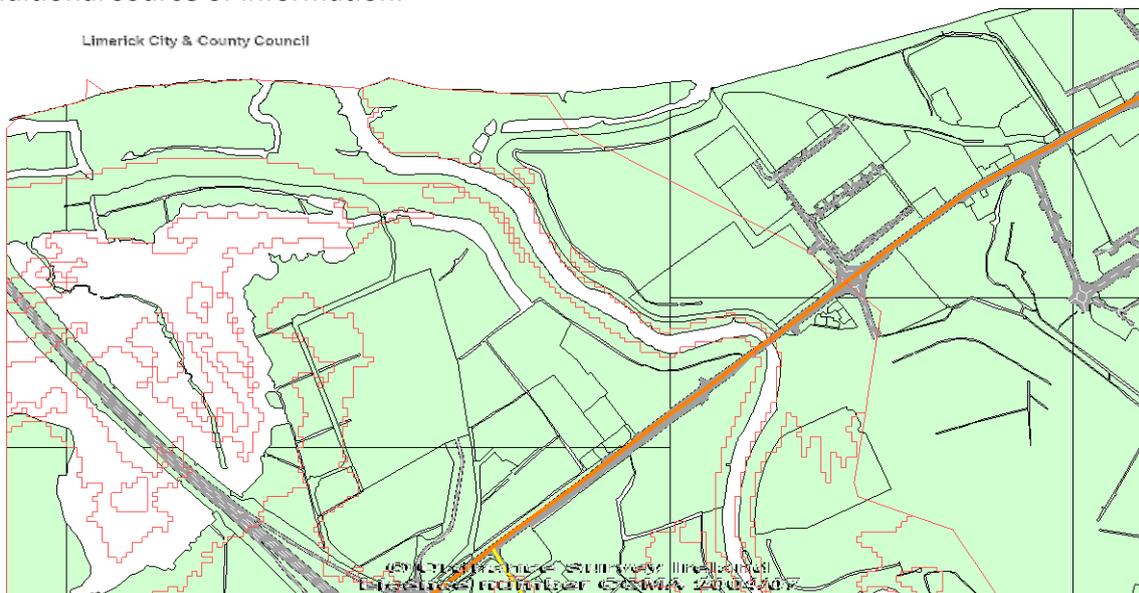
A meeting with the OPW (2<sup>nd</sup> October 2020) in relation to wider city and county flood risk issues, indicated the need for adequate SUDs and attenuation measures to ensure gradual run off of surface water, which might otherwise overload existing water courses and result in flooding downstream. The increasing intensity of rainfall events has made this more important than ever. This issue was also raised in the preparation of the Limerick Climate Change Adaptation Strategy. In response, a policy for the western most part of the land zoned as High Tech/Manufacturing has been included in the plan for both specific Flood Risk Assessment and suitable attenuation. This would help to facilitate the further development of the Raheen Business Park. As noted in the introduction, the formal submission from the OPW received during the public display period has led to several changes to the plan. Not least of these is the reference to the risk of groundwater flooding, which is relevant in the plan areas, such as in the Mungret Loughmore area.

### 9. Internal consultations with Council personnel:

Discussions regarding drainage and flooding issues took place with Local Authority engineers regarding the preparation of the Southern Environs Draft Local Area Plan 2021 - 2027. The Local Authority have appointed flood consultants (JBA Consulting) to carry out a Strategic Flood Risk Assessment to inform the proposed Limerick Development Plan, which is currently progressing, in consultation with the Local Authority knowledge on the ground.

### 10. Topographical maps LiDAR:

A LiDAR survey had been carried out, which indicates the limit of the maximum high tide level at 4.27m. This, had been used to inform a predictive mapping tool which had previously been used by Limerick County Council. This has since been superseded by the CFRAMs, but is still useful in that it is still present on Limerick City and County Council Plan map system and is an additional source of information.



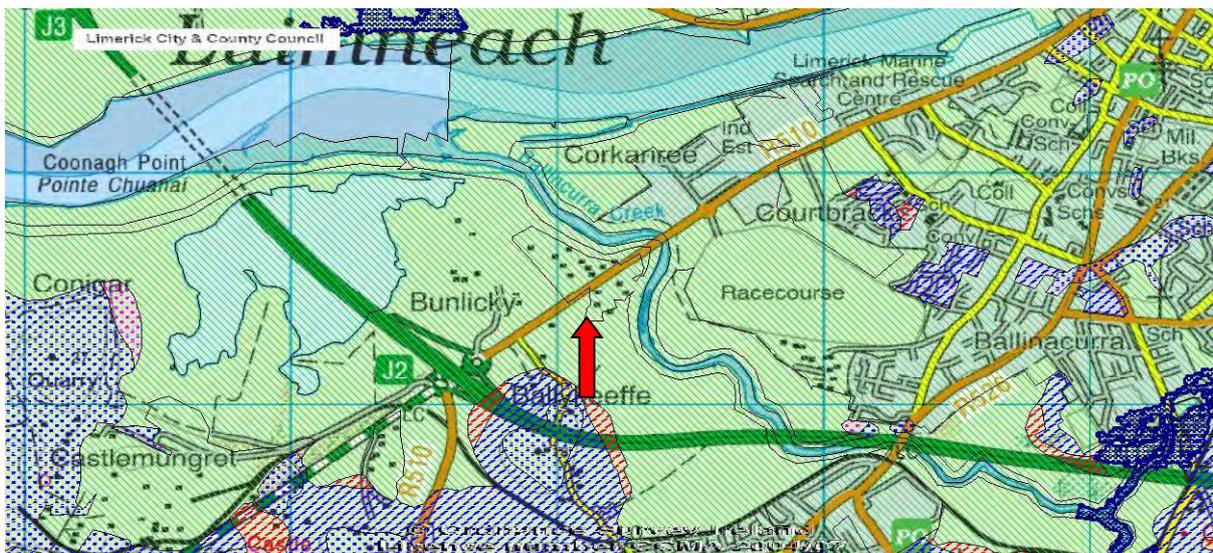
**Figure 7:** The red lines show the extent of LIDAR Flood Zone A mapping from the JBA predictive mapping tool.

## 11. Information on flood defences and condition:

Part of the CFRAM mapping series indicates the presence of flood defences in the plan area. As indicated above, these are earth banks and being under different ownerships have undergone different management and maintenance regimes. The quality of the embankments is variable. The embankments were intended to defend lands solely for agricultural production. This is a factor that has been raised in some of the Flood Risk Assessments, which accompanied planning applications - see 18 below. It is also worth noting that the guidelines state that defences are to be disregarded when determining flood zones.

## 12. Alluvial deposition maps:

Alluvial soils are those deposited by rivers. Their extent helps to indicate historic flood events. These maps have been aligned to benefiting areas and historic maps (first and later editions of the six inch maps) showing areas prone to flooding, indicating areas with higher risk of flooding. When these maps were consulted, they were only minor indications of alluvial soils, chiefly along the Barnakyle River and outside the plan area. Instead, what was found, particularly along the Ballynaclough River, especially as it neared the River Shannon, were marine sediments, which indicate an estuarine influence, presumably tidal.



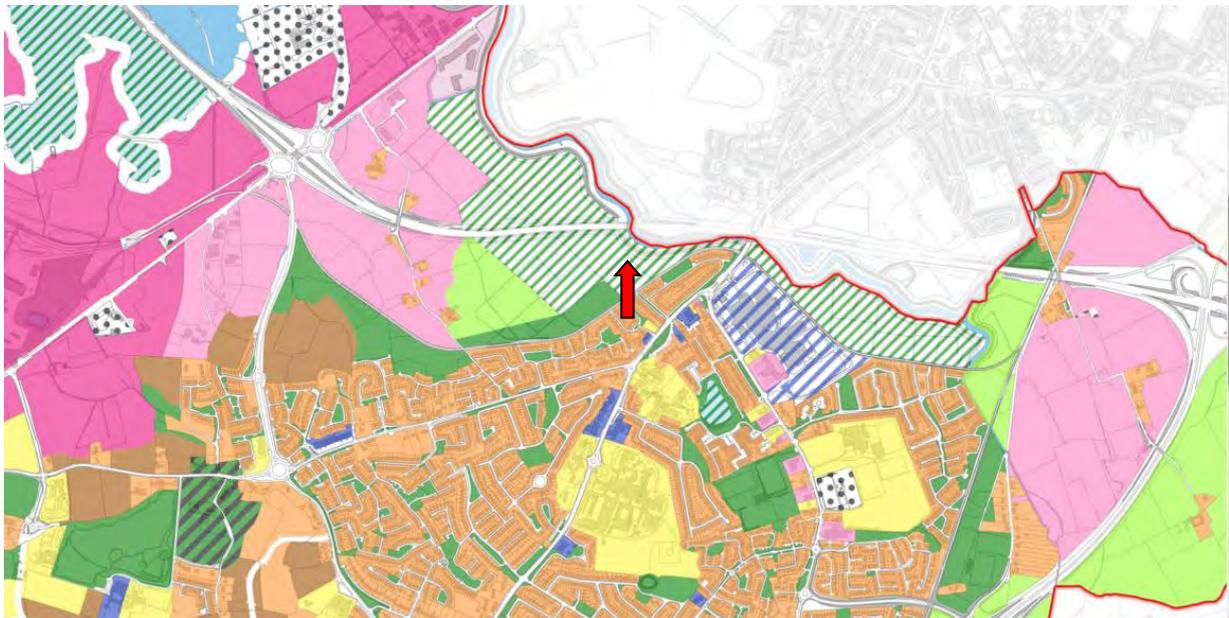
**Figure 8:** The red arrow indicates what is termed marine sediments and miscellaneous soils in this part of the plan area. It is likely, particularly in areas where there has been industrial activity over a long period of time that the underlying soils have been heavily modified.

## 13. Liable to flood markings on old 6-inch maps:

Areas liable to flooding are shown on the older first edition 6-inch maps and the editions dating from 1938. This area is immediately to the north east of the Crescent Shopping Centre. These maps are also useful in indicating historic drainage patterns, which would have indicated potential for flooding or water logging, or also past infrastructure, which would have been used to manage water levels such as sluices.



**Figure 9:** This shows the historic drainage patterns in Gouldavoher and Dooradoyle. The red arrows indicate the presence of sluices.



**Figure 10:** The same area today, the undeveloped areas are zoned as semi-natural open space.

#### **14. Local libraries and reports:**

Flooding reports from the OPW website were consulted in the preparation of this assessment. These gave further details on the flood incidents outlined above.

#### **15. Local consultation:**

Discussions with local groups indicated that flooding takes place in the Monteen Turlough to the rear of Mungret church. This was further supported with photographs, which indicate the extent and timings of some of the flood events, in particular in 2002 and 2009. These discussions indicate that both Monteen Turlough and Loughmore Common Turlough, may be linked as they both flood at the same time.

## **16. Walkover surveys:**

Walkover surveys were an important part of the groundwork associated with the draft plan. These informed the decisions taken in relation to the draft Southern Environs Local Area Plan. Such surveys helped to indicate the extent of vegetation associated with wetter ground conditions such as yellow flag iris, *Juncus* spp. and creeping buttercup. Surveys also gave indications of surface ponding of water.

## **17. National, regional and local spatial plans:**

The Regional Flood Risk Assessment (RFRA) which accompanied the Regional Spatial and Economic Strategy for the Southern Region was, by its nature, a high level document. However, it did indicate that the main source “of flooding is mostly coastal”. It also indicated that the Dock Road was vulnerable to flooding. The OPW mentioned, in a submission, that the draft RFRA had not mentioned the earthen flood defence embankments. While not constructed to modern specifications these embankments are part of the flood control infrastructure.

## **18. Previous planning applications:**

In relation to previous planning permissions one application in the area for housing, commercial units, crèche and associated site works (planning reference 99/1301) in Ballykeefe, was refused by An Bord Pleanála in June 2007 because of “the potential of the development being affected by flooding in the future”. The reason for refusal further cited location on the floodplain and inadequate consideration of climate change.

A later application in the Ballykeefe area (08/68) was refused by the Local Authority. Reports from water services were concerned about proposals to deal with runoff water storage. Further concerns were raised about the nature of the flood defence embankments, which were intended for the protection of agricultural lands and not urban development.

An application 13/487 for above ground gas installation by An Bord Gais at Bunlicky Mungret, stated that the design level of their installation was 4.7m OD which was above what was considered the 200 year flood level. However, this was based on an assessment of the flood embankment walls, which were deemed to be 5.05m high. A report from Local Authority engineers indicated that this is not the case throughout its length in this area, and mentioned the fact that the defences were intended for agricultural land only.

An application (16/678) was received for construction of a storage shed and retention for eight office porta-cabins. The development was located in Skehacreggaun, Mungret. This was granted planning permission. In terms of flooding, the flood risk assessment concluded that “the main risk to this development would be a storm surge in the estuary coinciding with high spring tides and high levels in the River Shannon”.

### 3.0 Justification Test in determining the zoning pattern to be employed

Limerick has been identified in the National Planning Framework as being the subject of a Metropolitan Area Strategic Plan, which emphasises the Metropolitan Area’s national importance, for significant additional growth. This is echoed in the Regional Spatial and Economic Strategy for the Southern Region, which mentions that the Limerick Shannon Metropolitan area is “a key economic driver for the region and Ireland”. This is the backdrop to the zoning pattern presented in the draft SELAP.

The zoning pattern is designed to facilitate development and in the case of the Bunlicky WWTP comprises “significant previously developed” lands (Flooding Guidelines p. 37 Justification Test for Development Plans). This area has been zoned utility to reflect current usage. The WWTP is also “essential in achieving sustainable urban growth” in that it provides the treatment capacity for sewage for Limerick City and its environs. In terms of suitable alternative lands for the location of the WWTP choice is constrained by: a) its existence in this location; b) the need to ensure that it is separated from residential developments and; c) the need to ensure adequate outflow for treated emissions – in this case the Shannon River.

In the case of “existing undeveloped zoned areas at risk of flooding” (Flooding Guidelines p. 40), such as the lands to the rear of the Crescent Shopping Centre, it was determined necessary to retain the zoning as semi-natural open space. This area was identified as benefiting lands and because they were indicated as liable to flood, both on first and later editions of six-inch maps (see Figures 2 and 3), this indicated that flood risk was a factor. This was borne out by the CFRAMS maps. Here too, the nature of the flood defences are intended to protect agricultural land and not more sensitive development proposals. In addition to being a buffer in the event of flooding, it makes a contribution to the area of semi-natural open space in the plan area. Large areas of the undeveloped lands lay within Flood Zones A and B. The main risk would be from tidal flooding and it was noted that parts of the defending embankment had degraded.

The conclusion is that any development proposed would need to be cognisant of and compatible with the design proposed for the Limerick City & Environs Flood Relief Scheme. Development cannot be approved in advance of the modelling and design of the Limerick City & Environs Flood Relief Scheme. Any development proposed to be advanced prior to the construction of the Limerick City & Environs Flood Relief Scheme would need to clearly demonstrate no increase in flood risk to adjacent lands.

The zoning pattern on the Dock Road in the draft plan consists of Industrial, Enterprise and Employment or Utilities zonings in areas that are subject to flood risk. The Justification Test for Development Plans (Guidelines p. 37) considers that the uses must be “essential to facilitate regeneration and or expansion of the centre of the urban settlement”. In this case, much of the activity along the Dock Road is long established and is a source of employment and comprises a continuation of employment related uses extending from the City. In the case of the Irish Cement factory, the use has been established over a period of almost 100 years. This is the second aspect of the justification test which considers if an area “comprises

significant previously developed...lands”. With respect to the Dock Road and Irish Cement, this is the case with decades of use to support the zoning.

The next factor to consider is whether or not the area is “within or adjoining the core” ...of a designated urban settlement. The designation of the Limerick and Shannon MASP in the NPF has been noted and in the proposed Limerick Development Plan, both the city and environs plans will combine. Already the Southern Environs Local Area Plan abuts the city plan and the Dock Road leads from the City through the plan area to Mungret. With the proposed Limerick Development Plan, this relationship will be reinforced. The further development of this area will help consolidate this long established area of economic activity which will ensure adequate redevelopment of brownfield sites and compact growth as the justification test demands.

In terms of other suitable lands as mentioned in the justification test, it should be noted that the uses here reflect existing land uses and it is not the development of greenfield sites that are in question. It should also be noted that buildings used for “retail, leisure, commercial, industrial and non-residential institutions” are regarded as “less vulnerable development” in terms of the justification test (Guidelines, p. 25). These are the uses that the building stock in the Dock Road comprise and the uses that the zoning matrix allows.

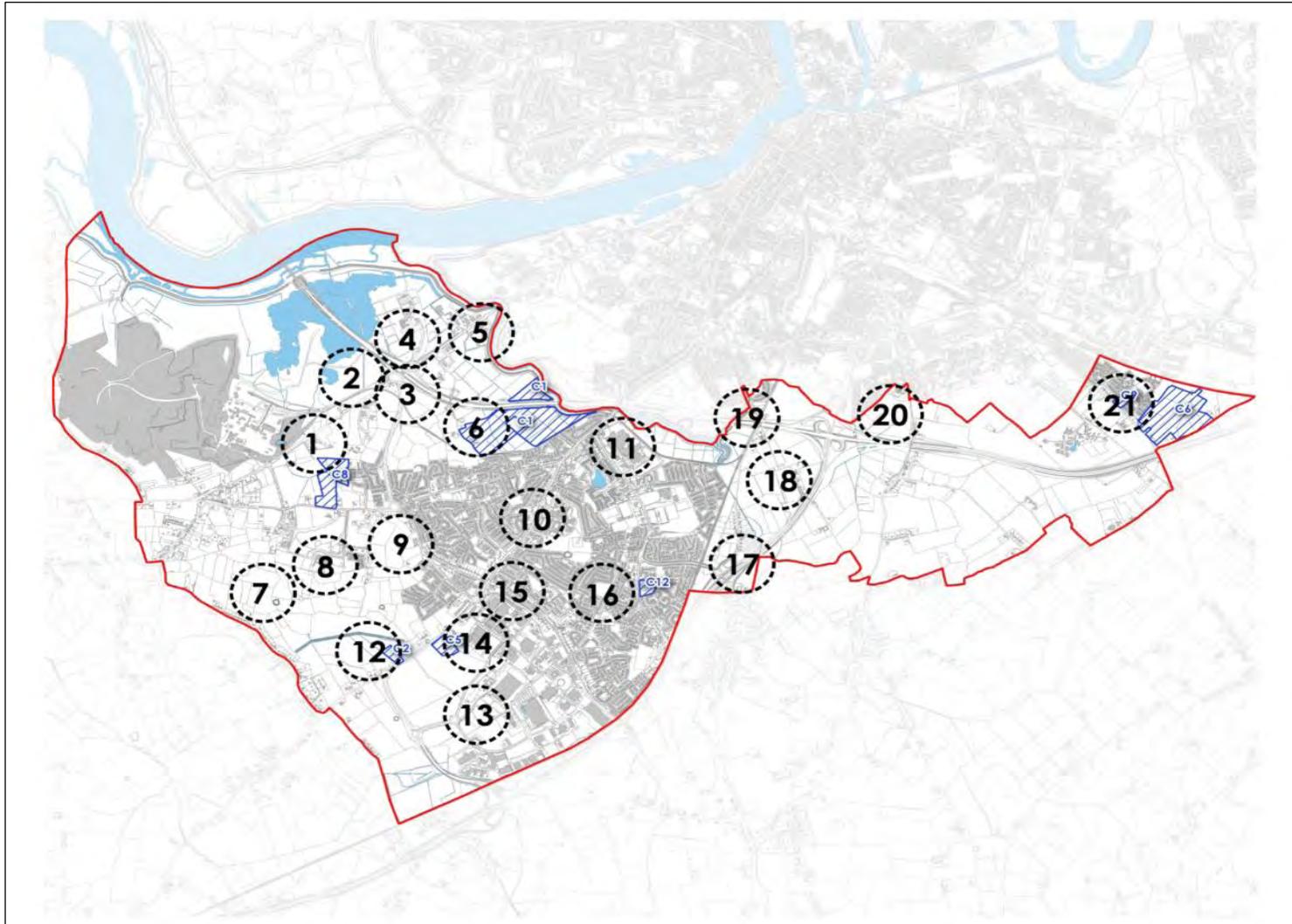
## 4.0 Zoning Responses to Flood Risk

A number of sites were re-zoned as a result of flooding considerations. These are listed below. In some situations additional factors other than flooding, such as noise for example, were also a factor in the decision.

**Table 1 Zoning Responses to Flood Risk**

Submission No.	Former zoning	Current Zoning	Comments
1	Enterprise/Employment	Utilities	This is a less vulnerable land use than enterprise and employment.
C8	Residential	Enterprise/Employment and open space	Less vulnerable land use than residential with open space element on flood zone A.
6	Residential	Enterprise/Employment and increase in Agriculture zoning	Less vulnerable uses and in the case of agriculture reflects existing land use.
C1	Agriculture	Increase in agricultural area	Reflects existing land usage and is less vulnerable.
13	Enterprise/Employment	High Tech/ Manufacturing	The zoning in this location has policy for site specific FRA for proposals in low-lying area, with consideration for SUDS and suitable attenuation.
17	Residential	Agriculture	Agriculture is the least vulnerable zoning.
19	Existing residential	Open Space/Recreation	Open space is an acceptable land use in flood vulnerable areas.

**Note:** See Figure 11 below for locations of the above submissions.



**Figure 11:** Showing all of the submissions numbered including the locations of submissions 6, 17, 18 and 19, which were flooding related.

## **5.0 Conclusion**

Based on Planning and Flood Risk Guidelines, fieldwork and the receipt of site-specific reports, it has been determined to amend zoning on the sites identified in Table 1 above. At this point in the plan making process and based on current information, it was considered the best practice and in line with the flooding guidance. This was based on considerations of flooding vulnerability, existing land uses and the nature of the flood defences in the Southern Environs area.



Comhairle Cathrach  
& Contae **Luimnigh**

**Limerick City**  
& County Council

***Data Protection Privacy Statement for the Material Alterations to the Draft  
Southern Environs Local Area Plan 2021 - 2027***

**Who we are and why do we require your information?**

Limerick City and County Council seeks to promote the economic, social and cultural development of Limerick City and County and in doing so contribute significantly to improving the quality of life of its people. The delivery of high quality services, tailored to meet the needs of all our customers, remains one of Limerick City and County Council's core objectives and is included in our Corporate Plan. This quality service includes not only the level and quality of service given to our customers, but also the quality of our decision-making processes, the efficiency and effectiveness of our corporate operations, standard of our facilities and our ability to adapt in an ever-changing environment. In order to provide the most effective and targeted range of services to meet the needs of the citizens, communities and businesses of Limerick City and County we will be required to collect, process and use certain types of information about people and organisations. Depending on the service being sought or provided, the information sought may include 'personal data' as defined by the Data Protection Acts and by the General Data Protection Regulation (GDPR) and may relate to current, past and future service users; past, current and prospective employees; suppliers; and members of the public who may engage in communications with our staff. In addition, staff may be required, from time to time, to collect process and use certain types of personal data to comply with regulatory or legislative requirements.

**Why do we have a privacy statement?**

Limerick City and County Council has created this privacy statement in order to demonstrate our firm commitment to privacy and to assure you that in all your dealings with Limerick City and County Council that we will ensure the security of the data you provide to us. Limerick City and County Council creates, collects and processes a significant amount of personal data in various multiple formats on a daily basis. Limerick City and County Council's commitment is that the personal data you may be required to supply to us is;

- Obtained lawfully, fairly and in a transparent manner
- Obtained for only specified, explicit and legitimate purposes
- Adequate, relevant and limited to what is necessary for purpose for which it was obtained
- Recorded, stored accurately and securely and where necessary kept up to date
- Kept only for as long as is necessary for the purposes for which it was obtained.
- Kept in a form which permits identification of the data subject

- Processed only in a manner that ensures the appropriate security of the personal data including protection against unauthorised or unlawful processing.

### **Data Protection Policy**

Limerick City and County Council has a detailed Data Protection Policy, which outlines how we as a public body are committed to ensuring the security of any personal data you provide to us.

### **What is the activity referred to in this Privacy Statement?**

Public display of the Material Alterations to the Draft Southern Environs Local Area Plan 2021 – 2027.

### **What is the basis for making the processing of personal data in this activity lawful?**

Section 20 of the Planning and Development Act 2000 (As Amended) requires this level of detail.

### **We require your contact details**

Please note that to help protect your privacy; we take steps to verify your identity before granting access to personal data. These contact details may also be used to verify your identity.

See above

### **What other items of personal data do we need to undertake this activity?**

Name and address/email address are required to be submitted with the submission.

### **Is the personal data submitted as part of this activity shared with other organisations?**

Limerick City and County Council may, to fulfil statutory or regulatory obligations or in the public interest, from time to time, have to share personal data with other organisations or entities (in Ireland or abroad). Where this is required Limerick City and County Council shall have regard to the security and integrity of the data and will minimise the data shared.

In this process, the data will be shared with the following recipients:

Submissions/Objections will be summarised in the Chief Executives Report and will be made publically available online, only the name of the individual making the submission/objection will be included.

In this activity, if the personal data is to be transferred to a different country, it will be transferred to the following countries (if there are no countries listed, it is not intended to transfer the personal data abroad).

It is not intended to transfer the personal data abroad.

**How long is this personal data held by Limerick City and County Council?**

Limerick City and County Council has a detailed record retention policy, which goes in to more detail of the time period for which your personal data will be retained by Limerick City and County Council and what will happen to it after the required retention period has expired.

The data processed as part of this activity will be retained for the following period(s):  
In accordance with the National Retention Policy.

**What will happen if the requested personal data is not provided?**

Details are required in accordance with the Planning and Development Act 2000 (As Amended), otherwise a submission cannot be accepted.

**Your Rights**

You have the right to request access to personal data held about you, obtain confirmation as to whether data concerning you exists, be informed of the content and source of data and check its accuracy. In addition, if the data held by us is found to be inaccurate you have the right to change, remove, block, or object to the use of, personal data held by Limerick City and County Council. You also have the right to data portability. In certain circumstances blocking access to data may delay or remove access to a service where the data is required by law or for essential purposes related to delivery of a service to you. To exercise these rights, you should contact Limerick City and County Council (Data Controller) at the following address:  
email: [dataprotectionofficer@limerick.ie](mailto:dataprotectionofficer@limerick.ie)

Data Protection Officer,  
Limerick City and County Council,  
Merchants Quay,  
Limerick

**Right of Compliant to the Office of the Data Protection Commissioner**

If you are not satisfied with the outcome of the response you received from Limerick City and County Council in relation to your request, then you are entitled to make a complaint to the Data Protection Commissioner who may investigate the matter for you.

The Data Protection Commissioner's website is [www.dataprotection.ie](http://www.dataprotection.ie) or you can contact their office at:

Lo Call Number: 1890 252 231

E-mail: [info@dataprotection.ie](mailto:info@dataprotection.ie)

Postal Address:  
Data Protection Commissioner  
Canal House  
Station Road  
Portarlinton, Co. Laois. R32 AP23

