



Comhairle Cathrach  
& Contae **Luimnigh**

**Limerick City  
& County Council**

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**19<sup>th</sup> March 2021**

**To: The Cathaoirleach and each member of the Metropolitan District of Limerick**

**Re: Proposed Southern Environs Local Area Plan 2021 – 2027**

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A Chomhairleoir, a chara,

I enclose herewith a copy of the Chief Executive's Report on the Material Alterations to the Proposed Southern Environs Local Area Plan 2021 – 2027 for your consideration.

The material amendments to the Proposed Southern Environs Local Area Plan 2021 – 2027 were placed on public display from Saturday 6<sup>th</sup> February 2021 to Monday 8<sup>th</sup> March 2021 inclusive. During the statutory display period, a total of 13 no. written submissions were received. A report consisting of a summary of the submissions received, together with responses and recommendations are attached as required by Section 20 of the Planning and Development Act, 2000 (as amended). The submissions can be inspected in the Forward/Strategic Planning Section during normal office hours on request or can be viewed online at [www.limerick.ie](http://www.limerick.ie).

**A virtual briefing session on the contents of the Chief Executive's Report will be held for Elected Members on Monday 12<sup>th</sup> April 2021 at 10.00am. An invite will issue under separate cover, closer to the date.**

It is recommended to the Elected Members of the Metropolitan District of Limerick that the Southern Environs Local Area Plan 2021 – 2027 be made in accordance with the details set out in the attached Chief Executive's Report at their meeting on April 19<sup>th</sup> 2021.

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

Mise le meas,

Vincent Murray

A/Director of Services – Economic Development Directorate

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

**Section 20(3)(k) of the Planning and Development Act 2000  
(as amended) to Members on Submissions and  
Observations received during the Material Alterations to  
the Draft Plan Public Consultation**

**19<sup>th</sup> March 2021**

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



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**Limerick** City  
& County Council

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## 1.0 Introduction

The Material Alterations to the Draft Southern Environs Local Area Plan 2021 – 2027 were on public display from 6<sup>th</sup> of February to 8<sup>th</sup> of March 2021 inclusive. This report sets out a summary of the submissions and observations received and the Chief Executive's responses to the issues raised. The report forms part of the statutory procedure for preparing a new Local Area Plan (LAP) that is set out in Section 20 of the Planning and Development Act 2000 (as amended). It is a key element of the process of bringing the proposed plan to final adoption, with or without amendments by the Members of the Metropolitan District of Limerick.

Thirteen valid written submissions were received within the statutory consultation period.

### 1.1 Structure of This Report

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

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

Part C outlines the Strategic Environmental Assessment Screening and Appropriate Assessment Screening of the amendments recommended to the Draft Local Area Plan.

Part D Updated Strategic Flood Risk Assessment information to support local area plan decision making process.

### 1.2 Progress to Date and Next Steps

The steps in the process of preparation of the Plan for the Southern Environs are shown in the following table:

Date	Stage
15 <sup>th</sup> July 2020	Notification of official commencement of Local Area Plan
25 <sup>th</sup> July – 7 <sup>th</sup> Sept. 2020	First issues stage: Pre-draft submissions were invited
10 <sup>th</sup> October 2020 - 23 <sup>rd</sup> November 2020	Draft Plan on public display: Public submissions invited during statutory period
17 <sup>th</sup> December 2020	Chief Executive's Report on submissions received was issued to Members of the Metropolitan District of Limerick



18 <sup>th</sup> & 27 <sup>th</sup> January 2021	Meetings of the Metropolitan District of Limerick, Elected Members considered the Draft LAP and the Chief Executive's Report. Material Alterations were agreed.
6 <sup>th</sup> February – 8 <sup>th</sup> March 2021	Material Alterations on display for 4 weeks. Public submissions made on the proposed alterations only
19 <sup>th</sup> March 2021	Chief Executive's Report on Material alterations issued to Members
<b>The remaining stages of the Plan are as follows:</b>	
April 2021	Final adoption of Plan
May 2021	Plan comes into force 6 weeks from the time of adoption

Following consideration of this Chief Executive's report, the Local Area Plan shall be made or amended by resolution. The resolution shall be passed by not less than half the members of the Metropolitan District of Limerick. A further modification to the material alterations may be made, where it is minor in nature and therefore not likely to have significant effects on the environment or adversely affect the integrity of a European site. Further alterations shall not be made where it relates to an increase in the area of land zoned for any purpose.

When performing their functions, the members of the Metropolitan District of Limerick shall be restricted to considering the proper planning and sustainable development of the area, the statutory obligations of any Local Authority in the area and any relevant policies or objectives of the Government or of any Minister of the Government.

## **Part A - Submissions, Responses and Chief Executive's Recommendation**

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

Submission no.	Submission Received from:
1	Office of Planning Regulator (OPR)
2	Transport Infrastructure Ireland (TII)
3	National Transport Authority (NTA)
4	Office of Public Works (OPW)
5	Environmental Protection Agency (EPA)
6	Department of Education
7	Irish Water
8	Kerry County Council
9	Dr. Eamon Howard-Bowles
10	Cllr. Eddie Ryan
11	Tergnum Properties
12	Shannon Group
13	Jane FitzGearld

## 2.1 Submission Summaries, Chief Executive's Response & Recommendations

1	<b>Name/Group:</b>	Office of Planning Regulator
	<b>Submission:</b>	<b>Response</b>
	<p><b>1: Recommendation 1 of Draft LAP Submission:</b> The amendment of the zoning map from "Enterprise and Employment" to "Agriculture" on lands at Junction 30 Rosbrien is satisfactory to address this recommendation.</p> <p><b>2: Objective TM O24:</b> Regional Policy Objective 167 of the RSES lists the Limerick Southside Accessibility Project M20/M7 Interchange project, with a group of other projects that <i>"... are also supported as strategic regional priorities to achieve NSO Enhanced Regional Accessibility subject to the recommendations of the three MASPs, the preparation of associated Metropolitan Area Transport Strategies and the preparation of Local Transport Plans for key settlements and other urban centres where applicable"</i>. However, there is no government commitment for the project in the National Development Plan, which would require a motorway order and assessment of environmental impacts.</p> <p>Section 2.7 of the <i>Spatial Planning and National Road Guidelines for Planning Authorities (2012)</i> states <i>"...in certain circumstances, additional junctions, or enhancements to existing junctions on national roads, may become necessary to service development needs of national and strategic importance or in cases where a proposed development is demonstrated by the Planning Authority to be more appropriately located proximate to such junctions"</i>. The guidelines also outline 9 no. criteria to be met where the National Transport Authority will support such</p>	<p><b>1: Recommendation 1 of Draft LAP Submission:</b> Noted.</p> <p><b>2: Objective TM O24:</b> The Planning Authority notes the concerns raised by the OPR, TII and NTA in relation to the objective for Limerick Southside access.</p> <p>Having regard to the submissions received in relation to this item, the Planning Authority considers that the issues raised in the submission can be addressed in Objective TM O24 and shall include the following:</p> <ul style="list-style-type: none"> <li>• Requirement for a Motorway Order;</li> <li>• Demonstration of consistency with Section 2.7 of the DoCLG Spatial Planning and National Roads Guidelines, including that additional traffic loading can be satisfactorily accommodated at the junction and on the national road network;</li> <li>• The special requirements of the tolling scheme (N18 and Limerick Tunnel Scheme) and the financial implications for the Exchequer of new road schemes in that context and evaluate the consequences of same;</li> <li>• An Assessment of Environmental Impacts.</li> </ul>

<p>capacity enhancement and development proposals.</p> <p><i>Observation 1:</i> Having regard to the Spatial Planning and National Roads Guidelines for Planning Authorities (2012), the Planning Authority is advised to clarify that the provision of an additional junction or enhancement to an existing junction on a national road, which is contemplated in policy objective TM O24, would need to satisfy the criteria in section 2.7 of the aforementioned Section 28 guidelines and undergo an assessment of its environmental impacts.</p> <p><b>3: Objective TM O26:</b> Welcomed, but would benefit from clarity in relation to the specific area affected and a commitment to prepare a local transport assessment/study with the relevant landowners, stakeholders and authorities to assess the implications of further development on the national road network.</p> <p><i>Observation 2:</i> Having regard to section 2.7 of the Spatial Planning and National Roads Guidelines for Planning Authorities (2012), the Planning Authority is requested to amend objective TM O26 to include a requirement to prepare a transport assessment regarding the lands zoned for industrial and employment uses along Dock Road (N69) and in proximity to its intersection with the N18.</p> <p>This assessment should examine the implications on the safe and efficient operation of the national road network in the area and determine</p>	<p><b>3: Objective TM O26:</b> The Planning Authority notes the concerns of the OPR, TII and NTA in relation to the zoning of lands at Dock Road. The Planning Authority recognise the congestion that exists at this junction and the quantum of zoned lands in the vicinity. The Planning Authority acknowledge the need for a traffic assessment/study and a coordinated approach to assessing the impact of development in the vicinity of the junction.</p> <p>However, concerns have been raised by the OPW in relation to the zoning of lands in this area. On the basis of the issues raised in relation to flooding in the submissions received, it is recommended that undeveloped lands within Flood Zones A and B, in the vicinity of the Interchange, be rezoned for Agriculture purposes.</p> <p>It is also recommended that Objective TMO 26 be altered to specify that the remaining areas of Industry and Enterprise and Employment zoned lands, in the vicinity of the Dock Road/ N18 Interchange, shall be developed for low intensity developments such as warehousing, logistics, data centres, etc.</p>
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<p>the quantum of development that can be supported at this location. The Planning Authority is also requested to map the area of zoned land affected by policy objective TM O26, to clarify the extent of land affected by same. The Planning Authority is advised to consult with TII and the NTA in this regard.</p> <p><b>4: Link Road from Dooradoyle Road to Rosbrien Road:</b> The link road objective is in an area affected by flood risk and would require a bridge crossing of the Ballinacurra Creek. Chapter 5 – Flood and Development Management of The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) states in respect of bridge structures: <i>“Where development proposals include the construction or amendment of bridges, culverts or similar structures the applicant should have regard to the requirements of Section 50 of the Arterial Drainage Act, 1945”.</i></p> <p><b>Observation 3:</b> Having regard to The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) and the location of the proposed link road (from Dooradoyle Road to Rosbrien Road), which is in an area at risk of flooding and would require a bridge crossing of the Ballinacurra Creek, the Planning Authority is requested to include a requirement for a flood risk assessment and hydraulic modelling regarding the proposed link road and reference to the requirements of Section 50 of the Arterial Drainage Act, 1945 in respect of the construction of bridge structures.</p>	<p><b>4: Link Road from Dooradoyle Road to Rosbrien Road:</b> The Planning Authority notes the concerns of the OPR in relation to the proposed Dooradoyle to Rosbrien Link Road.</p> <p>With respect to <b>Observation 3</b> additional text shall be included requiring a flood risk assessment and hydraulic modelling regarding the proposed link road and reference to the requirements of Section 50 of the Arterial Drainage Act, 1945 in respect of the construction of bridge structures.</p> <p>With respect to <b>Observation 4</b>, a requirement to design new and improved link roads in accordance with the requirements of Design Manual for Urban Roads and Streets 2019 is already included in Objective TM O13. However, Transport Map No. 4 shall be altered to include reference to DMURS.</p>
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<p>The proposed link road is located in an area part-zoned for open space, and is not identified as a new road in the Draft LSMATS. The principles for the provision of new roads are set out in Draft LSMATS, in particular the need for new roads to “...be designed to provide a safe and appropriate arrangements to facilitate walking, cycling and public transport provision”. In this respect, it is considered that the objective should be for a proposed road designed in accordance with the Design Manual for Urban Roads and Streets 2019.</p> <p><b>Observation 4:</b> Having regard to the principles for new roads in the Draft LSMATS and the location of the proposed link road from the Crescent Shopping Centre (Dooradoyle Road) to Rosbrien Road, and in an area part zoned for open space and at risk of flooding, the Planning Authority is requested to amend Transport Map 4 to indicate a requirement for a proposed road that is designed in accordance with the requirements of Design Manual for Urban Roads and Streets 2019 and include text in the final Local Area Plan to state that the requirement for the road would be subject to more detailed assessment including the implications for flooding in the area (MA Observation 3).</p> <p><b>5: Zoning Matrix:</b> The zoning matrix for Enterprise and Employment lands, with respect to Health Clinics and Health Practitioners is proposed to change from “open for consideration” to “generally permitted”.</p> <p>The proposed change to the zoning matrix is not justified and should be reconsidered having regard to the</p>	<p><b>5: Zoning Matrix:</b> The Planning Authority notes the concerns of the OPR in relation to the proposed alteration of the zoning matrix. The Planning Authority also notes the requirement of Observation 5 to delete the proposed change that Health Clinic and Health Practitioners be “Generally Permitted” in the Enterprise and Employment zone.</p>
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<p>purpose of the Enterprise and Employment zoning objective, which states “To accommodate compatible industry and employment activities that are incapable of being situated in the city centre, in a high quality physical environment” and the extent of land zoned for Enterprise and Employment in the LAP.</p> <p><i>Observation 5:</i> Having regard the extent of land zoned for Enterprise and Employment in the Local Area Plan and the purpose of the Enterprise and Employment zoning objective, which inter alia, seeks “...To accommodate compatible industry and employment activities that are incapable of being situated in the city centre, in a high quality physical environment”, the Planning Authority is requested to delete the proposed change to the zoning matrix regarding the land uses health clinic and health practitioner, as it is considered that the change has not been justified and is not of a nature that is generally commensurate with activities that are incapable of being situated in the city centre or a district centre.</p> <p><b>6: Miscellaneous:</b> Page 20 of the Draft LAP states in respect of the additional headroom allowed for Limerick in the National Planning Framework: “...in the absence of the adoption of the proposed Limerick Development Plan, the Local Authority has made assumptions with respect to population projections and allocation, additional residential units and zoned land requirements in accordance with the NPF, the Implementation Roadmap for the NPF and the RSES. In this respect, the assumed Southern Environs population growth allocation is an additional 7,420 persons to 2027.</p>	<p>The Planning Authority considers that Health Clinic and Health Practitioner are uses which should be “Open for Consideration” in the Enterprise and Employment zone. A use open for consideration is one which the Council may permit where it is satisfied that the suggested form of development will be compatible with the policies and objectives for the zone, will not conflict with existing uses or the proper planning and sustainable development of the area. The Open for Consideration designation allows individual planning applications to be assessed on their merits and on a case by case basis having regard to all relevant planning criteria. Therefore, it is recommended that the zoning matrix shall be amended accordingly.</p> <p><b>6: Miscellaneous:</b> The Planning Authority notes the comments of the OPR and the content of the Section 28 Guidelines: Housing Supply Target Methodology for Development Planning 2020. The Core Strategy for the Southern Environs will be reviewed in the context of the population projections and household targets (ESRI Household Targets received January 2021) as part of the preparation of the proposed Draft Limerick Development Plan. The text in relation to Core Strategy in the Draft LAP will be reviewed and a footnote to this effect included accordingly.</p>
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	<p>This equates to a projected requirement for an additional 2,968 residential units over the period up to 2027, based on 2.5 persons per household. These figures include headroom of 25% for the interim projection to 2026, permissible in Limerick under the Implementation Roadmap for the NPF”.</p> <p>Notwithstanding the interim nature of the LAP, the Planning Authority is advised that the population projections in the LAP (Table 1) which include an allowance of 25% headroom will need to be reviewed as part of the preparation of the core strategy for the forthcoming Limerick Development Plan, to ensure that the 25% headroom is appropriately considered at city and county level and consistent with the implications and safeguards in section 3(a) of the NPF Implementation Roadmap and any relevant adjustments as part of the Section 28 Guidelines: Housing Supply Target Methodology for Development Planning 2020.</p> <p>In this regard, the Planning Authority is advised to review the above text on page 20 of the LAP and include a footnote for Table 1 which states that the 25% headroom contained in the population projections will be reviewed as part of the preparation of the core strategy for the forthcoming Limerick Development Plan.</p>	
	<p><b>Chief Executive’s Recommendation:</b></p> <p><b>1: No Change</b></p> <p><b>2: Alter Objective TM O24 as follows:</b></p> <p>Explore improved accessibility to Limerick Southside, including the possible provision of a motorway interchange connection from the M20/M7 to Limerick Southside, <u>subject to:</u></p> <ul style="list-style-type: none"><li>• <u>The requirement for a Motorway Order;</u></li><li>• <u>Demonstration of consistency with the criteria in Section 2.7 of the Spatial Planning and National Roads Guidelines for Planning Authorities (2012),</u></li></ul>	

including that additional traffic loading can be satisfactorily accommodated at the junction and on the national road network;

- The special requirements of the tolling scheme (N18 and Limerick Tunnel Scheme) and the financial implications for the Exchequer of new road schemes in that context shall be evaluated;
- An assessment of environmental impacts.

### **3: Alter Zoning Map to:**

**Alter the indicated area of Industry and Enterprise and Employment rezoned lands to Agriculture in the vicinity of the Dock Road Interchange.**

#### **Delete FM09**

~~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.~~

#### **Alter Objective TM O26 as follows:**

Ensure Industrial and Enterprise and Employment lands adjacent to Junction 2, Dock Road as outlined on the Land Use Zoning Map:

- Shall be developed for uses with low levels of traffic movements such as warehousing, logistics, data centres etc. only;
- 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;
- Cycle parking shall be provided in all developments at an appropriate level to encourage modal shift;
- All developments shall include end-of-trip cycling facilities for employees such as showers and lockers;
- All new roads shall incorporate segregated cycle tracks designed in accordance with the National Cycle Manual;
- All new roads shall seek, in the first instance, to provide filtered permeability, in order to avoid creating additional capacity for car traffic; and
- All development proposals shall include Mobility Management Plans, with clear targets and commitments to implementing measures to promote sustainable transport.

#### **4: Alter Objective TM O13 as follows:**

- Support and complete delivery of new and improved link roads and junctions accommodating public transport, cycle and pedestrian connections, such as the Mungret Loughmore Area Link Road/ Mungret Link Streets project and indicative proposals outlined on Map No. 4. The layout and design of such works shall have cognisance to the context and interface with surrounding land uses in compliance with the Design Manual for Urban Roads and Streets (DoECLG 2019);

	<p>b) Ensure proposals make provision for the accommodation of bus services along the most significant link routes, which shall include identification of bus stopping and turning areas, as well as carriageway capacity and through routes.</p> <p>It should be noted that the alignment of the new roads in the plan is indicative only. These roads shall definitely be aligned as part of the detailed design and development process. Similarly, the location of junctions is indicative and the exact position for construction purposes will be dependent on detailed design. <u>With respect to the indicative Link Road from Dooradoyle Road to Rosbrien Road, a flood risk assessment and hydraulic modelling is required. Development of this road shall be in accordance with the requirements of Section 50 of the Arterial Drainage Act, 1945 in respect of the construction of bridge structures.</u></p> <p><b>Alter Transport Map 4 to:</b>  <b>Indicate a requirement for indicative link roads to be designed in accordance with the requirements of the Design Manual for Urban Roads and Streets 2019.</b></p> <p><b>5: Alter Zoning Matrix to:</b>          Include Health Clinic and Health Practitioner as uses which are “Open for Consideration” in the Enterprise and Employment zoning.</p> <p><b>6: Include Footnote to Table 1: Population Projections for Southern Environs as follows:</b>          The 25% headroom contained in the population projections will be reviewed as part of the preparation of the core strategy for the forthcoming Limerick Development Plan.</p>
	<p><b>SEA/AA Response:</b></p> <p><b>2: TM O24:</b> This will ensure that any activities relating from the objective will be consistent with current good practice. In addition, the inclusion of the assessment of environmental effects is welcomed as this will be an essential part of any future infrastructure appraisal.</p> <p><b>3:</b> The removal of Industry and Enterprise and Employment zoning will prevent increased traffic congestion and avoid development within Flood Zones A and B, in accordance with proper planning and development and is considered to be the appropriate response in this instance.</p> <p><b>TM O26:</b> The inclusion of objectives for low intensity traffic uses, which seek to increase permeability and support low carbon transport modes, will have benefits for urban permeability and human health as well as environmental benefits, in terms of a reduction in transport emissions.</p> <p><b>4: TM O13:</b> The inclusion of a requirement to carry out a flood risk assessment, with hydraulic modelling, is expected to be beneficial from an ecological perspective. The results of such an assessment would inform development of the roadway within potential flood zones and thereby reduce chances of altering overland flows and also reduce any potential impact the River Shannon and associated designations.</p>

	<p><b>Transport Map 4:</b> This point of clarification will ensure that the road is designed to current best standards.</p> <p><b>5: Zoning Matrix:</b> This is a minor alteration to the land use zoning matrix which applies to lands previously zoned and assessed as suitable for development purposes within the plan area.</p> <p><b>6: Population Projections:</b> This will ensure that the population projections will be in line with those of the Core Strategy, for the Proposed Limerick Development Plan 2022 – 2028, when it is completed. This will ensure compliance with higher tier plans such as the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES), which is consistent with good planning practice and sustainable development.</p>
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<b>2</b>	<b>Name/Group:</b>	Transport Infrastructure Ireland
	<b>Submission:</b>	<b>Response</b>
	<p><b>1: General:</b> Welcomes the proposed material alterations, including removal of zoning at Junction 30 Rosbrien (MA No.1).</p> <p><b>2: Material Alteration No. 10:</b> Welcomes provision for National Development Plan national road scheme objectives in proposed Objective TM O27. The upgrade of arterial roads from the motorway network should be complementary to safeguarding the strategic function and safety of the national road network. Where there are implications for the strategic national road network, TII would welcome consultation with LCCC.</p> <p><b>3: Material Alteration No. 16:</b> Proposed Objective TM O24 states “Explore improved accessibility to Limerick Southside, including the possible provision of a motorway interchange connection from the M20/M7 to Limerick Southside”. TII considers that there are a number of critical issues to be addressed prior to the adoption of this Material Alteration in the interests of safeguarding the investment in and the strategic function and safety of the existing M20/M7 including:</p>	<p><b>1: General:</b> Noted</p> <p><b>2: Material Alteration No. 10:</b> Noted. Limerick City and County Council will continue to consult with TII in relation to the upgrade of arterial roads from the motorway.</p> <p><b>3: Material Alteration No. 16:</b> The Planning Authority notes the concerns raised by the OPR, TII and NTA in relation to the objective for Limerick Southside access. See Response to Submission No.1 above.</p>

	<p>-Requirement for a Motorway Order;          -Demonstration of consistency with Section 2.7 of the DoCLG Spatial Planning and National Roads Guidelines, including demonstration that the additional traffic loading can be satisfactorily accommodated at the junction concerned and on the national road network;          -The special requirements of the tolling scheme (N18 and Limerick Tunnel Scheme) and the financial implications for the Exchequer of new road schemes in that context and evaluate the consequences of same.</p> <p>TII considers that the M7/M20/N18 Limerick Southern Ring Road (SRR) fulfils objectives relating to both the wider national and regional strategic function, providing accessibility to Limerick City and Environs.</p> <p>There are four existing junctions on the SRR, therefore it may not be technically feasible to safely design additional connectivity in the manner proposed.</p> <p><b>4: Material Alteration No. 18:</b> Notes proposals to retain zoning at Junction 2 Dock Road subject to proposed Objective TM O26. TII addressed this in the submission to the Draft Plan and advised:</p> <ul style="list-style-type: none"> <li>• LSMATS recognises localised congestion on the junctions along the M7/N18 Limerick City Bypass, noting, in particular, Mackey (Newport) Roundabout, Ballysimon Interchange and Dock Road Interchange;</li> <li>• A significant extent of lands are zoned in the vicinity of the Dock Road Junction for Enterprise and Employment and Industry;</li> </ul>	<p><b>4: Material Alteration No. 18:</b> The Planning Authority notes the concerns of the OPR, TII and NTA in relation to the zoning of lands at Dock Road. See Response to Submission No.1 above.</p>
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	<ul style="list-style-type: none"><li>• The Authority is not aware that an evidence base has been developed to demonstrate that the zoning of the lands accords with the provisions of official policy.</li></ul> <p>It is recommended that the Council address this issue in the consideration of the current Local Area Plan.</p> <p>TII recommends that the area for the application of proposed Objective TM O26 should be clearly identified on zoning maps.</p> <p>To address the piecemeal development of these strategic lands, a development framework should be developed by the Council, in consultation with TII and the NTA.</p> <p>TII recommends that consideration should be given to identifying the area to be subject to detailed Area Based Transport Assessment (ABTA) in accordance with the NTA and TII ABTA Guidelines (TII Publications Technical Standard PE-PDV-02046) be undertaken by the Council. This would provide clarity for developers and could be developed in a manner complementary to safeguarding the strategic function, safety and investment in the national road network in the area. Such an approach could also support the more strategic level objectives included in LSMATS.</p>	
	<b>Chief Executive's Recommendation:</b> <b>1:</b> No Change  <b>2:</b> No Change  <b>3: Alter Objective TM O24 as follows:</b>	

	<p>Explore improved accessibility to Limerick Southside, including the possible provision of a motorway interchange connection from the M20/M7 to Limerick <u>Southside subject to:</u></p> <ul style="list-style-type: none"> <li>• <u>The requirement for a Motorway Order;</u></li> <li>• <u>Demonstration of consistency with the criteria in Section 2.7 of the Spatial Planning and National Roads Guidelines for Planning Authorities (2012), including that additional traffic loading can be satisfactorily accommodated at the junction and on the national road network;</u></li> <li>• <u>The special requirements of the tolling scheme (N18 and Limerick Tunnel Scheme) and the financial implications for the Exchequer of new road schemes in that context shall be evaluated;</u></li> <li>• <u>An assessment of environmental impacts.</u></li> </ul> <p><b>4: Alter Zoning Map to:</b>  <b>Alter the indicated area of Industry and Enterprise and Employment zoned lands to Agriculture in the vicinity of the Dock Road Interchange.</b></p> <p><b>Delete FM09</b>  <del>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.</del></p> <p><b>Alter Objective TM O26 as follows:</b>          Ensure Industrial and Enterprise and Employment lands adjacent to Junction 2, Dock Road as outlined on the Land Use Zoning Map:</p> <ol style="list-style-type: none"> <li>a) Shall be developed for uses with low levels of traffic movements such <u>as warehousing, logistics, data centres etc.</u> only;</li> <li>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;</li> <li>c) Cycle parking shall be provided in all developments at an appropriate level to encourage modal shift;</li> <li>d) All developments shall include end-of-trip cycling facilities for employees such as showers and lockers;</li> <li>e) All new roads shall incorporate segregated cycle tracks designed in accordance with the National Cycle Manual;</li> <li>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</li> <li>g) All development proposals shall include Mobility Management Plans, with clear targets and commitments to implementing measures to promote sustainable transport.</li> </ol>
	<p><b>SEA/AA Response:</b>  <b>3: TM O24:</b> This will ensure that any activities relating from the objective will be consistent with current good practice. In addition, the inclusion of the assessment of</p>

	<p>environmental effects is welcomed as this will be an essential part of any future infrastructure appraisal.</p> <p><b>4:</b> The removal of Industry and Enterprise and Employment zoning will prevent increased traffic congestion and avoid development within Flood Zones A and B, in accordance with proper planning and development and is considered appropriate in this instance.</p> <p><b>TM O26:</b> The inclusion of objectives for low intensity traffic uses, which seek to increase permeability and support low carbon transport modes, will have benefits for urban permeability and human health as well as environmental benefits with a reduction in transport emissions.</p>
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<b>3</b>	<b>Name/Group:</b>	National Transport Authority (NTA)
	<b>Submission:</b>	<b>Response</b>
	<p><b>1: General:</b> Welcomes broadly the Material Alterations, notably the removal of the proposed zoning of lands at the Rosbrien Interchange.</p> <p><b>2: Objective TMO 3:</b> Recommends the amendment of the proposed TMO3 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, including a future BusConnects Limerick programme and investment in the rail network that will be identified in the LSMATS".</p> <p><b>3: Objective TMO 10:</b> Recommend that the following documents should be included as guidance for the preparation of Mobility Management Plans:</p> <ul style="list-style-type: none"> <li>• Toolkit for School Travel;</li> <li>• Workplace Travel Plans – A Guide for Implementers; and</li> <li>• Achieving Effective Workplace Travel Plans – Guidance for Local Authorities.</li> </ul> <p><b>4: Objective TMO 24:</b> Recommends that the views of Transport</p>	<p><b>1: General:</b> Noted</p> <p><b>2: Objective TMO 3:</b> Objective TMO 3 will be altered accordingly.</p> <p><b>3: Objective TMO 10:</b> Objective TMO 10 will be altered accordingly.</p> <p><b>4: Objective TMO 24:</b> The Planning Authority notes the concerns raised by the OPR, TII and NTA in relation to the objective for Limerick</p>



	<p>Infrastructure Ireland are taken into account in relation to the issues that are required to be addressed prior to the adoption of this proposed material alteration.</p> <p>Concerns in relation to the potential for a new motorway interchange connection at this point, inducing car trips into the local road network at Southill and Roxboro, giving rise to increased traffic and potential for congestion in these areas.</p> <p><b>5: Objective TMO 26:</b> Welcomed, but reiterate support for a masterplan, accompanied by an Area Based Transport Assessment.</p> <p>Not clear what comprises “uses with low levels of traffic movements only”. The following is recommended:</p> <ul style="list-style-type: none"> <li>-The area to which TMO26 applies should be clearly identified in the Land Use Zoning map for the Local Area Plan;</li> <li>- Bullet point (a) should be reworded to specify that this location is appropriate for employment-extensive uses only, such as warehousing, logistics, data centres etc. and would not be developed for uses that are more appropriately sited in the city centre, such as offices or retail, other than retail warehousing; and</li> <li>- An additional bullet point should be added which states that the development of this site would be governed by a Masterplan agreed between the landowners, Limerick City and County Council and supported by a local transport plan agreed with TII and NTA.</li> </ul>	<p>Southside access. See Response to Submission No. 1 above.</p> <p><b>5: Objective TM O26:</b> The Planning Authority notes the concerns of the OPR, TII and NTA in relation to the zoning of lands at Dock Road. See Response to Submission No. 1 above.</p>
	<p><b>Chief Executive’s Recommendation:</b></p> <p><b>1: No Change</b></p>	

**2: Alter 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~~ including a future BusConnects Limerick programme and investment in the rail network that will be identified in the LSMATS.

**3: Alter 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) and subject to the guidance provided in the Toolkit for School Travel, Workplace Travel Plans – A Guide for Implementers and Achieving Effective Workplace Travel Plans – Guidance for Local Authorities, for large-scale employment related developments, including at the Strategic Employment Locations of Raheen Business Park and University Hospital Limerick.

**4: Alter 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, subject to:

- The requirement for a Motorway Order;
- Demonstration of consistency with the criteria in Section 2.7 of the Spatial Planning and National Roads Guidelines for Planning Authorities (2012), including that additional traffic loading can be satisfactorily accommodated at the junction and on the national road network;
- The special requirements of the tolling scheme (N18 and Limerick Tunnel Scheme) and the financial implications for the Exchequer of new road schemes in that context shall be evaluated;
- An assessment of environmental impacts.

**Alter Objective TM O26 as follows:**

Ensure Industrial and Enterprise and Employment lands adjacent to Junction 2, Dock Road as outlined on the Land Use Zoning Map:

- a) Shall be developed for uses with low levels of traffic movements such as warehousing, logistics, data centres etc. 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.
	<p><b>SEA/AA Response:</b></p> <p><b>2: TM O3:</b> The emphasis on public transport and rail is considered positive, in that it places an emphasis on sustainable transport modes, rather than on the private car.</p> <p><b>3: TM O10:</b> The submission of such mobility plans should lead, over a period of time, to better traffic flows and move towards more sustainable means of transport, such as increased use of walking, cycling and public transport.</p> <p><b>4: TM O24:</b> This will ensure that any activities relating from the policy will be consistent with current good practice. In addition the inclusion of the assessment of environmental effects is welcomed as this will be an essential part of the any future infrastructure appraisal.</p> <p><b>5: TM O26:</b> The inclusion of objectives for low intensity traffic uses, which seek to increase permeability and support low carbon transport modes, will have benefits for urban permeability and human health as well as environmental benefits as transport emissions would fall as a result.</p>

<b>4</b>	<b>Name/Group:</b>	Office of Public Works
	<b>Submission:</b>	<b>Response</b>
	<p><b>1: Flood Risk Management (FRM) General Guidance:</b> The SFRA states that this is a Stage 1 Flood Risk Assessment. A more detailed assessment is recommended and should be at a minimum a Stage 2 SFRA. It is understood that LCCC do not intend to produce a more detailed SFRA for this LAP. The Guidelines set out that land use zoning, informed by the suitable level of FRA and if necessary a Justification Test should be concluded at plan making stage. Section 3.10 also highlights the need for FRAs as they are integrated with the SEA process.</p> <p><b>2: Flood Zones:</b> The Flood Map has been updated with the Flood Zones, however the map is still not as set out in the Guidelines. Flood Zone A are difficult to see with Flood Zone B underlain. Flood Zone A should be visually the clearest on the Map.</p>	<p><b>1: Flood Risk Management (FRM) General Guidance:</b> A Strategic Flood Risk Assessment has informed the preparation of the LAP, including any alterations to the Zoning Map proposed in this report.</p> <p><b>2: Flood Zones:</b> An updated Flood Map has been prepared for the Southern Environs area, having regard to the concerns raising in the submission.</p> <p>The benefiting lands are those that indicate lands that benefit from protection for</p>

<p>The 1% or 1 in 100 year fluvial flood extents are shown as Flood Zone B, whereas these should be Flood Zone A. The 0.1% or 1 in 1,000 year fluvial flood extents are shown as Flood Zone C, whereas these should be Flood Zone B.</p> <p>A defended area has been represented on the map and as such the 0.1% or 1 in 1,000 year and 0.5% or 1 in 200 year coastal extents have been omitted in producing the Flood Zones. As the defences still carry a residual risk of flooding the presence of flood protection structures should be ignored in determining Flood Zones. Therefore, the Flood Zones are produced as if there is no flood defence scheme and the Flood Zone extents will be much larger than are currently shown on the map.</p> <p>Flood Zone C may be omitted from the map and a note inserted on the map and in the documents that Flood Zone C covers all areas not in Flood Zones A and B.</p> <p><b>3: Existing Flood Defences:</b> There has been no change to the text on defended areas in the discussion on the National CRFAM Programme in the SFRA. The defences are of varying standards of protection and were built to protect agricultural lands and may be prone to failure. The benefitting areas cannot be considered as defended and cannot be relied upon as providing protection to the benefitting areas.</p> <p><b>4: Justification Tests:</b> Less vulnerable land uses are not considered to be appropriate in Flood Zone A. Substantial areas in Flood Zone A zoned for less vulnerable land uses, might be reviewed and ensure that</p>	<p>agricultural use and not for other forms of development. The Flood Zones have been altered to reflect this updated information. Flood Zone C has been omitted and the note inserted as specified.</p> <p><b>3: Existing Flood Defences:</b> The Planning Authority acknowledge that the defences are of varying standards of protection and built to protect agricultural lands.</p> <p><b>4: Justification Tests:</b> The Planning Authority have prepared Justification Tests as part of the updated SFRA as follows:</p>
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<p>avoidance is not possible and that all steps of the Justification Test are fully addressed.</p> <p>The third criteria of the Justification Test requires that “flood risk to the development can be adequately managed”, has not been reported in the updated discussion on the Justifications Tests. In accordance with the Guidelines, the SFRA should set out how the risk to the proposed zoning will be managed, noting:</p> <ul style="list-style-type: none"> <li>- The limitations of the existing flood defences in area as set out above,</li> <li>- The need to address flood risk in this area at the plan-area level, rather than at individual plot (development management) level, given that most of the flooding in the area comprises one large flood cell, and,</li> <li>- That the Limerick Flood Relief Scheme proposed in the FRMPs does not include any new defences other than upstream of Rosbrien Road. While the existing defences will be assessed as part of the Limerick City and Environs FRS, currently at tender stage for engineering consultants, there is at this stage no commitment to an upgrade in standard or condition.</li> </ul> <p>Any development in this area may be deemed premature prior to the completion of any measures necessary to adequately manage the risk in this area, unless a polder or an independent sub-polder can be dealt with in its entirety by the developer.</p> <p><b>-Raheen Business Park:</b> The area prone to flooding is zoned for High Tech / Manufacturing. OPW welcomes Objective FM 08 requiring a site specific flood risk assessment. A Plan-making Justification Test has not been reported for this site in the SFRA.</p>	<p><b>(a) Lands at Raheen Business Park</b></p> <p>With respect to the lands at Raheen Business Park: The zoning of these lands located within Flood Zone A and B for water compatible uses ancillary to the Business Park, including the existing attenuation areas and open space passes the Justification Test. See Part D of this report. Objective FM 08 requires a site specific flood risk assessment and hydraulic model for the lands to demonstrate that flood risk can be mitigated or that a less vulnerable use can be accommodated.</p> <p><b>(b) Blackberry Lane in the townland of Ballykeeffe/lands adjoining N18 Interchange</b></p> <p>The SELAP is an interim plan and will be revoked once the proposed Limerick Development Plan is adopted with the incorporation of city and environs zoning objectives. This plan is currently being prepared including the preparation of a larger FRA, which is considering zoning and justification of sites, from the City Centre out and addresses flooding in a holistic approach to the overall City and Environs area. Having regard to the work undertaken in relation to the SFRA, the lands at the Dock Road, do not pass the justification test in terms of distance from the City core.</p> <p>Further issues in relation to these lands have also been identified in the OPR, TII and NTA submissions in relation to traffic congestion at the Dock Road Interchange. On this basis it is considered that the proposed zoning for Industry and Enterprise and Employment should be removed and the lands zoned for Agriculture use.</p> <p><b>(c) Enterprise and Employment zoned lands to the northwest of the M20/M7/N18 Junction</b></p> <p>With respect to Enterprise and Employment zoned lands to the northwest of the M20/M7/N18 Junction, a small section of this zoning is located within Flood Zone A. An</p>
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<p>The Guidelines set out that Vulnerable development is not appropriate in Flood Zone A, unless a Plan-making Justification Test can be satisfied.</p> <p><b>-Lands to the rear of the Crescent Shopping Centre:</b> OPW welcomes that “any development proposed would need to be cognisant of and compatible with the design proposed for the Limerick City &amp; Environs Flood Relief Scheme”.</p> <p>When determining flood zones, the presence of flood protection structures should be ignored, as flood defences can only reduce the risk of flooding and cannot eliminate it. Therefore, areas protected by a flood relief scheme still carry a residual risk of flooding from overtopping or breach of defences, as well as the defences not being maintained in perpetuity. The likelihood and extent of this residual risk needs to be considered in determining the appropriateness of particular land uses and development. As this area is at risk of flooding a Plan-making Justification Test is recommended if it is foreseen that these lands are to be rezoned for development, including that flood risk to the development can be adequately managed.</p> <p><b>-Blackberry Lane in the townland of Ballykeeffe:</b> OPW welcomes the addition of Objective FM 09 that lands zoned for Enterprise and Employment will require a site-specific flood risk assessment. These lands are situated in Flood Zone A. Less vulnerable development would not be considered appropriate in Flood Zone A under the Guidelines, unless a Plan-making Justification Test can be satisfied. As is the case for all existing and proposed</p>	<p>objective will be included requiring the sequential approach to be applied in site planning, to ensure that no encroachment onto, or loss of the flood plain, or that only water compatible development such as open space would be permitted for the lands that are identified as being at risk of flooding.</p> <p><b>(d) Lands to the rear of the Crescent Shopping Centre</b></p> <p>With respect to lands at the rear of the Crescent Shopping Centre, these lands are not being considered for zoning under this LAP.</p>
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	<p>development in the vicinity of the Dock Road, the Plan-making Justification Test should demonstrate how flood risk can be adequately managed.</p> <p><b>-Enterprise/Employment Site near M20/M7/N18 Junction:</b> A small proportion of the site is situated in Flood Zone A, with no Justification Test reported for the site. A policy objective might require that the sequential approach be applied in the site planning, to ensure no encroachment onto, or loss of the flood plain, or that only Water-Compatible development, such as Open Space would be permitted for the lands which are identified as being at risk. Planning permission might then be subject to the sequential approach having been adopted and applied as above, following a detailed FRA.</p> <p><b>5: Surface Water:</b> The need for a comprehensive drainage strategy for surface water runoff and specific objectives that limit the allowable runoff limits remains. The cumulative effect of developments can further exacerbate the flood risk associated with the storage back drains (both those under the auspices of OPW and those that are located on private lands). This cannot be assessed by an applicant on an individual basis and can only be assessed by the local authority by way of a comprehensive drainage strategy. It is preferable that the Local Authority fully assess the surface water issues and propose objectives and development management requirements in the Plan-making Stage, to ensure that the problems are not further exacerbated and flood risk increased.</p>	<p><b>5. Surface Water:</b> A comprehensive drainage strategy is currently being prepared for the City and Environs. The proposed Limerick Development Plan will include objectives and development management standards in relation to surface water management.</p>
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<p><b>6: Consideration of Climate Change Impacts:</b> Welcomes Objective FM01 to “consider the potential impacts of climate change in the application of these guidelines”. However, the updated SFRA does not appear to refer to the potential impacts of climate change and how these are considered. Flood maps prepared under the CFRAM Programme and the ICPSS include maps for two potential future scenarios taking account of different degrees of climate impact.</p> <p><b>7: Historic Flood Events:</b> The OPW website <a href="http://www.floodmaps.ie">www.floodmaps.ie</a> is no longer available and historic flood events are now available on <a href="http://www.floodinfo.ie">www.floodinfo.ie</a>.</p> <p><b>8: Zoning Responses to Flood Risk:</b> SFRA states that site C8 has been rezoned from Residential to Enterprise/ Employment with Open Space element on Flood Zone A. However, on the Flood Map these lands are shown as Industry and Open Space.</p> <p><b>9: SELAP Text:</b> Page 71, Section 14.3, Para 2: Update reference from “Units of Measures” to “Units of Management”.</p> <p><b>10: SFRA Text:</b> Page 5, Source 1, Para. 1 and Figure 1: Indicative fluvial flood maps were developed through the PFRA.</p>	<p><b>6: Consideration of Climate Change Impacts:</b> Noted. The Climate change scenarios in the CFRAM maps will be incorporated into site specific decisions.</p> <p><b>7: Historic Flood Events:</b> Noted.</p> <p><b>8: Zoning Responses to Flood Risk:</b> Noted, the new maps will clarify this.</p> <p><b>9: SELAP Text:</b> Noted. Updated text will be inserted.</p> <p><b>10: SFRA Text:</b> Text will be updated accordingly.</p>
<p><b>Chief Executive’s Recommendation:</b></p> <p><b>1:</b> Updated SFRA – See Part D of this Report.</p> <p><b>2: Alter Flood Map:</b> Update Flood Maps.</p> <p><b>3:</b> No Change</p> <p><b>4: Alter Zoning Map:</b></p>	



	<p><b>Alter the indicated area of Industry and Enterprise and Employment zoned lands to Agriculture in the vicinity of the Dock Road Interchange.</b></p> <p><b>Delete FM09</b>  <del>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.</del></p> <p>Insert objective in relation to the lands to the northwest of the M20/M7/N18 junction as follows:  <u>On the lands located to the northwest of the M20/M7/N18 junction, ensure that no encroachment onto, or loss of the flood plain occurs at this location, and that only water compatible development should be permitted for the lands that are identified as being at risk of flooding.</u></p> <p><b>5:</b> No Change</p> <p><b>6:</b> No Change</p> <p><b>7:</b> No Change</p> <p><b>8:</b> Updated Flood Map included will clarify this situation.</p> <p><b>9: Alter Written Statement of LAP as follows:</b>  Update reference from “Units of Measures” to <u>“Units of Management”</u> on page 71, Section 14.3, Para 2.</p> <p><b>10: Alter Written Statement of SFRA as follows:</b>  Update text inserted on SFRA Page 5, Source 1, Para. 1 and Figure 1 to indicate that <u>Indicative fluvial flood maps were developed through the PFRA.</u></p>
	<p><b>SEA/AA Response:</b>  It is considered that the approach taken in relation to flooding in terms of dezoning lands that are at risk of flooding is positive in terms of safeguarding and minimising impacts on the environment. The updated flood map will provide a clearer overview of the flood position. The necessity for the use of the justification test for sites that would be suitable for zoning is also stressed, this is in line with good environmental practice and the proposed plan will be updated accordingly.</p>

5	<b>Name/Group:</b>	Environmental Protection Agency (EPA)
	<b>Submission:</b>	<b>Response</b>
	<b>1:</b> The SEA Environmental Authority focuses on promoting the full and transparent integration of the findings of the Environmental Assessment into the Plan and advocates that the key	<b>1:</b> Noted

<p>environmental challenges are addressed as relevant.</p> <p><b>2: Proposed SEA Determination:</b> Note the determination that SEA is not required for the Alterations. The SEA of Local Authority Land Use Plans – EPA Recommendations and Resources should be considered as appropriate and relevant to the Alterations.</p> <p><b>3: Sustainable Development:</b> The Council should ensure that the Plan as altered is consistent with proper planning and sustainable development. Adequate and appropriate service infrastructure should be in place, or required to be put in place, to service any development proposed during the lifetime of the plan. The need to align with commitments on climate change mitigation and adaption as well as incorporating any recommendations in sectoral, regional and local climate adaptation plans should be considered.</p> <p>The Council should ensure that the alterations are consistent with key relevant higher-level plans and programmes.</p> <p><b>4: Future Modifications to the Draft Plan:</b> Further changes should be screened for likely significant effects in accordance with SEA Regulations.</p> <p><b>5: SEA Statement “Information on the Decision”:</b> Following adoption of the plan an SEA Statement should be prepared summarising: -How environmental considerations have been integrated into the Plan; -How the Environmental Report, submissions, observations and consultations have been taken into</p>	<p><b>2: Proposed SEA Determination:</b> Noted</p> <p><b>3: Sustainable Development:</b> Noted</p> <p><b>4: Future Modifications to the Draft Plan:</b> Noted</p> <p><b>5: SEA Statement “Information on the Decision”:</b> Noted</p>
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	<p>account during the preparation of the Plan; -The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and -The measures decided upon to monitor the significant environmental effects of implementation of the Plan. The SEA Statement should be sent to the Environmental Authorities.</p> <p><b>6: Environmental Authorities:</b> Under the SEA Regulations you should consult with: -EPA, -Minister for Tourism, Culture, Arts, Gaeltacht, Sport and Media; -Minister for Environment, Climate and Communications; - Minister for Agriculture, Food and the Marine; -Any adjoining Planning Authority whose area is contiguous to the area of a Planning Authority which prepared a draft plan, proposed variation or Local Area Plan.</p>	<b>6: Environmental Authorities:</b> Noted
	<p><b>Chief Executive's Recommendation:</b></p> <p>1: No change 2: No Change 3: No Change 4: No Change 5: No Change 6: No Change 7: No Change 8: No Change</p>	
	<p><b>SEA/AA Response:</b></p> <p>As noted above, EPA publications have been useful in informing the SEA process and also in terms of including climatic factors. The guidance in these publications and on the relevant websites is welcomed and continues to be useful.</p>	

<b>6</b>	<b>Name/Group:</b>	Department of Education
	<b>Submission:</b>	<b>Response</b>
	Notes and acknowledges proposed amendments, particularly Amendment No. 12 regarding Objective TM O17. No further comments.	Noted
	<p><b>Chief Executive's Recommendation:</b></p> <p>No Change</p>	
	<b>SEA/AA Response</b>	

	N/A
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<b>7</b>	<b>Name/Group:</b>	Irish Water
	<b>Submission:</b>	<b>Response</b>
	No additional observations	Noted
	<b>Chief Executive's Recommendation:</b> No change	
	<b>SEA/AA Response:</b> N/A	

<b>8</b>	<b>Name/Group:</b>	Kerry County Council
	<b>Submission:</b>	<b>Response</b>
	No observations	Noted
	<b>Chief Executive's Recommendation:</b> No change	
	<b>SEA/AA Response:</b> N/A	

<b>9</b>	<b>Name/Group:</b>	Dr. Eamon Howard-Bowles
	<b>Submission:</b>	<b>Response</b>
	<p><b>1: Zoning:</b> Supports alteration of the zoning at No. 1 Dooradoyle Road from Existing Residential to Enterprise and Employment as set out in the Material Alterations document and maps.</p> <p><b>2: Zoning Matrix:</b> Supports alterations to the Land Use Zoning Matrix identifying Health Clinic and Health Practitioner as being Generally Permitted in the Enterprise and Employment land use zone.</p>	<p><b>1: Zoning:</b> Noted</p> <p><b>2: Zoning Matrix:</b> Noted. The Planning Authority notes the concerns of the OPR in relation to the proposed alteration of the zoning matrix. The Planning Authority also notes the requirement of OPR Observation 5 to delete the proposed change that Health Clinic and Health Practitioners be "Generally Permitted" in the Enterprise and Employment zone.</p> <p>The Planning Authority considers that Health Clinic and Health Practitioner are uses which should be "Open for Consideration" in the Enterprise and Employment zone. A use open for consideration is one which the Council may permit where it is satisfied that the suggested form of development will be compatible with the policies and objectives</p>

	<p>for the zone, will not conflict with existing uses or the proper planning and sustainable development of the area. The Open for Consideration designation allows individual planning applications to be assessed on their merits and on a case by case basis having regard to all relevant planning criteria.</p> <p><b>3: Other:</b> The alterations to the LAP will facilitate a new small business at this location subject to pre-planning and planning permission. Reuse of the site will bring it back to life and add vibrancy to the streetscape.</p>	<p><b>3: Other:</b> Noted</p>
	<p><b>Chief Executive's Recommendation:</b></p> <p><b>1:</b> No Change</p> <p><b>2: Alter Zoning Matrix to:</b> Include Health Clinic and Health Practitioner as uses which are "Open for Consideration" in the Enterprise and Employment zone.</p> <p><b>3:</b> No Change</p>	
	<p><b>SEA/AA Response:</b></p> <p><b>2: Zoning Matrix:</b> This is a minor alteration to the land use zoning matrix which applies to lands previously zoned and assessed as suitable for development purposes in the plan area.</p>	

<b>10</b>	<b>Name/Group:</b>	Cllr. Eddie Ryan
	<b>Submission:</b>	<b>Response</b>
	<p><b>1: General:</b> Supports the submission made by Dr. Eamon Howard-Bowles:</p> <p><b>2: Zoning:</b> Supports alteration of the zoning at No. 1 Dooradoyle Road from Existing Residential to Enterprise and Employment as set out in the Material Alterations document and maps.</p> <p><b>3: Zoning Matrix:</b> Supports alterations to the Land Use Zoning Matrix identifying Health Clinic and Health Practitioner as being Generally Permitted in the Enterprise and Employment land use zone.</p> <p><b>4: Other:</b> The alterations to the LAP will facilitate a new small business at this</p>	<p><b>1: General:</b> Noted</p> <p><b>2: Zoning:</b> Noted</p> <p><b>3: Zoning Matrix:</b> See Response to Submission No. 9 above.</p> <p><b>4: Other:</b> Noted</p>

	location subject to pre-planning and planning permission. Reuse of the site will bring it back to life and add vibrancy to the streetscape.	
	<b>Chief Executive's Recommendation:</b> <b>1:</b> No change  <b>2:</b> No Change  <b>3: Alter Zoning Matrix to:</b> Include Health Clinic and Health Practitioner as uses which are "Open for Consideration" in the Enterprise and Employment zone.  <b>4:</b> No change	
	<b>SEA/AA Response:</b> <b>2: Zoning Matrix:</b> This is a minor alteration to the land use zoning matrix which applies to lands previously zoned and assessed as suitable for development purposes in the plan area.	

<b>11</b>	<b>Name/Group:</b>	RPS on behalf of Tergnum Properties Ltd.
	<b>Submission:</b>	<b>Response</b>
	<p><b>1: Land Use Matrix:</b> The proposed alteration to change 'Health Centre' and 'Health Practitioner' uses from 'Open for Consideration' to 'Generally Permitted' is welcomed. The proposed alteration is an acknowledgement that the specified uses are in principle appropriate on all Enterprise &amp; Employment lands (subject to compliance with development management requirements).</p> <p>It is requested that the Planning Authority reconsider its proposal in the land use matrix that 'Nursing Home/Residential Care/Retirement Village' should be 'Generally Not Permitted' in the Enterprise and Employment Zone. The currently proposed Material Alteration to set 'Health Centre' and 'Health Practitioner' uses as 'Generally Permitted', now alters the principles established for the 'Enterprise &amp; Employment' zone and it is appropriate</p>	<p><b>1: Land Use Matrix:</b> The Planning Authority considers that the request to further alter the zoning matrix with respect to Nursing Home/Residential Care/Retirement Village on Enterprise and Employment zoned land does not relate specifically to a proposed Material Alteration (i.e. to alter the zoning matrix for Enterprise and Employment lands with respect to Health Centres and Health Practitioners) of the Draft Local Area Plan and therefore cannot be considered. Notwithstanding, the above the Planning Authority would not be in favour of the inclusion of these residential uses, including, Nursing Home/Residential Care/Retirement Village, on lands zoned Enterprise and Employment, are they are not compatible or complimentary uses.</p>

	<p>to reintroduce Nursing Home/ Residential Care facilities / Retirement Village as 'open for consideration'.</p> <p>A number of Enterprise and Employment zoned parcels of land are modestly sized and located in areas surrounded by and / or adjacent to residential uses and community and retail services, thereby achieving the criteria outlined in section 7.4 of the Draft LAP. The lands at Mungret owned by Tergnum Properties Ltd are one such example.</p>	
	<b>Chief Executive's Recommendation:</b> <b>1: No Change</b>	
	<b>SEA/AA Response:</b> N/A	

<b>12</b>	<b>Name/Group:</b>	Fehily Timoney & Company on behalf of Shannon Group PLC
	<b>Submission:</b>	<b>Response</b>
	<p><b>1: Zoning at Rosbrien:</b> Under the Draft LAP the lands were identified for Enterprise and Employment. The Material Alterations now propose the lands be zoned Agriculture following submissions from the NTA, TII and OPR. Shannon Group PLC acknowledge the location of the identified lands in respect of the M7/M20 Interchange and are aware of the contents of the Section 28 Spatial Planning and National Roads Guidelines (2012), in respect of 'Development at National Road Interchanges or Junctions'.</p> <p>SCP lands at Rosbrien are viable for the provision of 'Enterprise and Employment' land uses, especially in the context of the requirement to identify additional lands for 'Enterprise and Employment' within the Limerick area.</p> <p>The Submissions Map in the Chief Executive's Report incorrectly includes</p>	<p><b>1: Zoning at Rosbrien:</b></p> <p>The contents of the submission received are noted. These lands were dezoned after the publication of the Draft Plan, as a result of concerns raised by the OPR, TII and NTA, having regard to national guidance, regional and local policy, having regard to the location of the lands, inability to service the lands within the lifetime of the plan and the resultant traffic intensification, which would be created, as a result of any potential development on the lands.</p> <p>The National Planning Framework sets out the requirement to carry out a tiered approach to zoning of lands in NPO 72a to differentiate between i) zoned land that is serviced and ii) zoned land that is serviceable within the life of the plan. NPO 72c states that when considering zoning land for development purposes that cannot be serviced within the life of the relevant plan, such lands should not be zoned for development.</p>

<p>lands that did not form part of Shannon Group's original submission. The lands within the ownership of SCP and the wider Shannon Group PLC are not inclusive of the entirety of the lands indicated as Submission no. 20 on the map. Request that the location of the lands be rectified in the Chief Executive's Report.</p> <p>The lands which are the subject of this submission, are recessed from the national road junction. The area to the north-west of Junction 30 which are zoned for 'Enterprise and Employment' uses, are within a closer range (c. 240-metres) to the existing interchange. On this basis, the lands approximately 350m from the interchange would be viable for enterprise and employment uses and unlikely to be majorly impacted by any future potential upgrades or reconfiguration.</p> <p>Having considered the policy content of the Draft LAP and the site specific attributes, the Planning Authority should consider identifying a strategic land reserve, to take account of the anticipated economic growth. A location specific objective is required to address the strategic nature of the site and ensure it is safeguarded for future enterprise and employment uses, subject to analysis of transportation impacts and potential upgrades to the M7/M20 interchange (Junction 30).</p> <p>The SCP landbank has potential to support large scale employment uses and capacity to cater for greenfield investment, with access to an international airport and third level graduates. The lands have key attributes which constitute a future</p>	<p>Accordingly, the zoning of these lands would be contrary to Objective 72c of the NPF and would therefore be premature at this time and contrary to proper planning and sustainable development. In this regard, the Planning Authority are not in a position to include a Strategic Reserve zoning on these lands, as it is considered it would not comply with national policy.</p> <p>In addition to the above, and in accordance with Section 20 of the Planning and Development Act 2000 (as amended) which states that a further modification to the material alteration, can only be made, where it is minor in nature and therefore not likely to have significant effects on the environment or adversely affect the integrity of a European site and shall not be made where it refers to, an increase in the area of land zoned for any purpose.</p>
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	<p>strategic development location and designation should be considered.</p> <p>An additional location-specific local area plan objective should be incorporated which states: "It is the Objective of the Planning Authority to ensure that the c. 18-hectare site at Rosbrien, which is within the ownership of Shannon Commercial Properties, is safeguarded as a future strategic development location for the accommodation of enterprise and employment land uses following the completion of detailed assessments in relation to the proposed M20 Cork to Limerick study and site specific issues in respect of traffic movements, noise and flooding." This accords with the contents of the OPR submission to the Draft LAP which states 'The Planning Authority is advised to consider identifying the land as having potential for rezoning to a future strategic site subject to detailed analysis of transportation impacts and implications for the national road network and potential upgrades and other constraints such as flooding and noise, which would inform the determination of the appropriate land uses. This may require a site specific zoning objective, which addresses the strategic nature of the site but ensures consistency with national and regional policy.'</p> <p>The site is optimally located to provide for enterprise and employment uses, being strategically located in proximity to areas of population, employment centres, the national and regional road network and third-level institutions, meeting many of the key criteria as a business location of choice. The Draft LSMATS indicates that the Rosbrien Road is to be served by the proposed</p>	
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<p>2040 Bus Network, meaning the site will have access to high-frequency public transport services. The submission outlines the distances and travel times to key areas including Limerick City, UL and LIT.</p> <p>Section 8.4 of the Limerick-Shannon MASP, relates to 'Employment Distribution' within the Metropolitan Area. The Limerick-Shannon MASP identifies a number of strategic employment locations within the Metropolitan Area, achieving the ambitious growth targets set out within the NPF 'will require consideration of new locations and initiatives by each local authority. Additional locations may become available and this MASP recognises the need for flexibility to accommodate future growth opportunities that may emerge during the lifetime of the MASP.'</p> <p>SCP have a proven ability and necessary skills to successfully develop a land bank of this size. As a semi-state company SCP have the resources and access to capital to invest in such a venture.</p> <p><b>2: Flood Risk:</b> A Hydrological Assessment of the site has been undertaken with respect to the impacts of the Ballinacurra River. Any development proposals for the site shall be subject to a Site Specific Flood Risk Assessment. The western-most section of the lands, adjacent to Rosbrien Road, fall within Flood Zone B and Flood Zone C. Measures can be taken, subject to further detailed assessment, to mitigate any potential impact on the development of the site.</p> <p><b>3: Noise:</b> An assessment of day and night time noise levels across the site</p>	<p><b>2: Flood Risk:</b> Noted.</p> <p><b>3: Noise:</b> Noted.</p>
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	has been undertaken. The acoustic modelling and report concluded that with good acoustic design processes, the site would be suitable for development. The recommended processes and elements for undertaking good acoustic design were outlined.	
	<b>Chief Executive's Recommendation:</b> <b>1: No Change</b>  <b>2: No Change</b>  <b>3: No Change</b>	
	<b>SEA/AA Response:</b> N/A	

<b>13</b>	<b>Name/Group:</b>	Jane FitzGerald
	<b>Submission:</b>	<b>Response</b>
	<p><b>1: Zoning of lands on Rosbrien Road:</b> Requests to maintain the zoning of an infill residential site. The lands are proposed as Agriculture under the Material Alterations.</p> <p>The site has been highlighted in the PFRA any planning application would be accompanied by a full Flood Risk Assessment.</p>	<p><b>1: Zoning of lands on Rosbrien Road:</b> Concerns of the OPR, TII and NTA in relation to the zoning of lands for Enterprise and Employment including these lands which could provide potential access, national guidance, regional and local policy in relation to same at Junction 30 Rosbrien, were raised during the Draft LAP stage. This required the deletion of the Enterprise and Employment lands at this location.</p> <p>In accordance with Section 20 of the Planning and Development Act 2000 (as amended) which states that a further modification to the material alteration, can only be made, where it is minor in nature and therefore not likely to have significant effects on the environment or adversely affect the integrity of a European site and shall not be made where it refers to, an increase in the area of land zoned for any purpose.</p>

		In this regard, the Planning Authority are not in a position to alter the zoning on these lands. Zoning of these lands is not warranted and accordingly, justification cannot be determined.
	<b>Chief Executive's Recommendation:</b> <b>1: No Change</b>	
	<b>SEA/AA Response:</b> N/A	

## **Part B - Proposed Further Alterations to Draft Southern Environs Local Area Plan 2021 – 2027**

(To be read in tandem with Part A)

### 3.0 Further Alterations to Draft LAP Written Statement

The following sets out further alterations omitting the wording ~~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 5: Development Vision & Strategy:**

##### **1. Alter Section 5.4: Function, Population and Scale of Southern Environs to:**

Include Footnote to Table 1: Population Projections for Southern Environs as follows:

The 25% headroom contained in the population projections will be reviewed as part of the preparation of the core strategy for the forthcoming Limerick Development Plan.

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

##### **1. Alter 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~~ including a future BusConnects Limerick programme and investment in the rail network that will be identified in the LSMATS.

##### **2. Alter 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) and subject to the guidance provided in the Toolkit for School Travel, Workplace Travel Plans – A Guide for Implementers and Achieving Effective Workplace Travel Plans – Guidance for Local Authorities, for large-scale employment related developments, including at the Strategic Employment Locations of Raheen Business Park and University Hospital Limerick.

##### **3. Alter Objective TM O13 as follows:**

a) Support and complete delivery of new and improved link roads and junctions accommodating public transport, cycle and pedestrian connections, such as the Mungret Loughmore Area Link Road/ Mungret Link Streets project and indicative proposals outlined on Map No. 4. The layout and design of such works shall have cognisance to the context and interface with surrounding land uses in compliance with the Design Manual for Urban Roads and Streets (DoECLG 2019);

b) Ensure proposals make provision for the accommodation of bus services along the most significant link routes, which shall include identification of bus stopping and turning areas, as well as carriageway capacity and through routes.

It should be noted that the alignment of the new roads in the plan is indicative only. These roads shall definitely be aligned as part of the detailed design and development process. Similarly, the location of junctions is indicative and the exact position for construction purposes will be dependent on detailed design. With respect to the indicative Link Road from Dooradoyle Road to Rosbrien Road, a flood risk assessment and hydraulic modelling is required. Development of this road shall be in accordance with the requirements of Section 50 of the Arterial Drainage Act, 1945 in respect of the construction of bridge structures.

#### **4. Alter 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 subject to:

- The requirement for a Motorway Order;
- Demonstration of consistency with the criteria in Section 2.7 of the Spatial Planning and National Roads Guidelines for Planning Authorities (2012), including that additional traffic loading can be satisfactorily accommodated at the junction and on the national road network;
- The special requirements of the tolling scheme (N18 and Limerick Tunnel Scheme) and the financial implications for the Exchequer of new road schemes in that context shall be evaluated;
- An assessment of environmental impacts.

#### **5. Alter Objective TM O26 as follows:**

Ensure Industrial and Enterprise and Employment lands adjacent to Junction 2, Dock Road as outlined on the Land Use Zoning Map:

- a) Shall be developed for uses with low levels of traffic movements such as warehousing, logistics, data centres etc. 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

Delete FM09

~~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.~~

Insert New Objective as follows:

On the lands located to the northwest of the M20/M7/N18 junction, ensure that no encroachment onto, or loss of the flood plain occurs at this location, and that only water compatible development should be permitted for the lands that are identified as being at risk of flooding.

### Appendix 1: Land Use Zoning Matrix:

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

Health Clinic – Open for Consideration O

Health Practitioner – Open for Consideration O

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	O	X	X	X	X	X	X	X
Health Practitioner	/	/	X	X	/	X	O	X	X	X	X	X	X	X



### **3.1 Further Alterations to Maps:**

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

1. Alter the indicated area of Industry and Enterprise and Employment zoned lands to Agriculture in the vicinity of the Dock Road Interchange.

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

1. Alter the Flood Map detailing Flood Zones A and B. Insert note indicating all other areas are Flood Zone C.

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

1. Indicate a requirement for indicative link roads to be designed in accordance with the requirements of the Design Manual for Urban Roads and Streets 2019.

### **3.2 Further Alterations to SFRA:**

#### **1. Alter Written Statement of SFRA as follows:**

Update text inserted on SFRA Page 5, Source 1, Para. 1 and Figure 1 to indicate that Indicative fluvial flood maps were developed through the PFRA.



**Zoning Map**

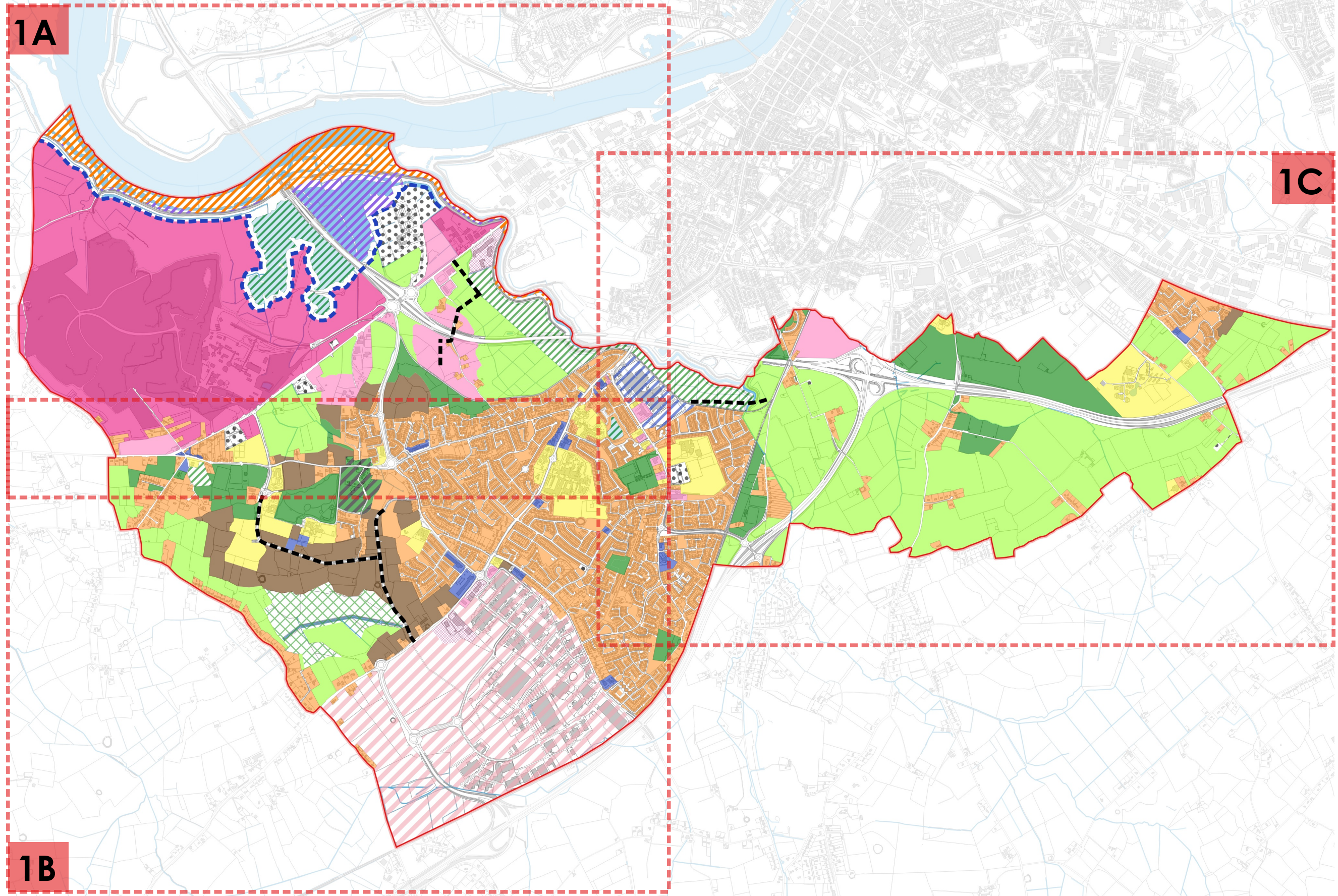
**LEGEND**

-  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

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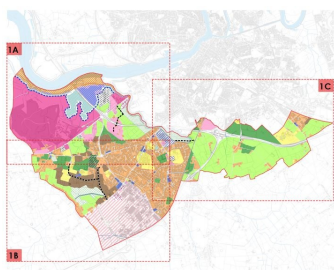
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**Draft Southern Environs  
Local Area Plan  
2021 -2027  
Material Alterations**

**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

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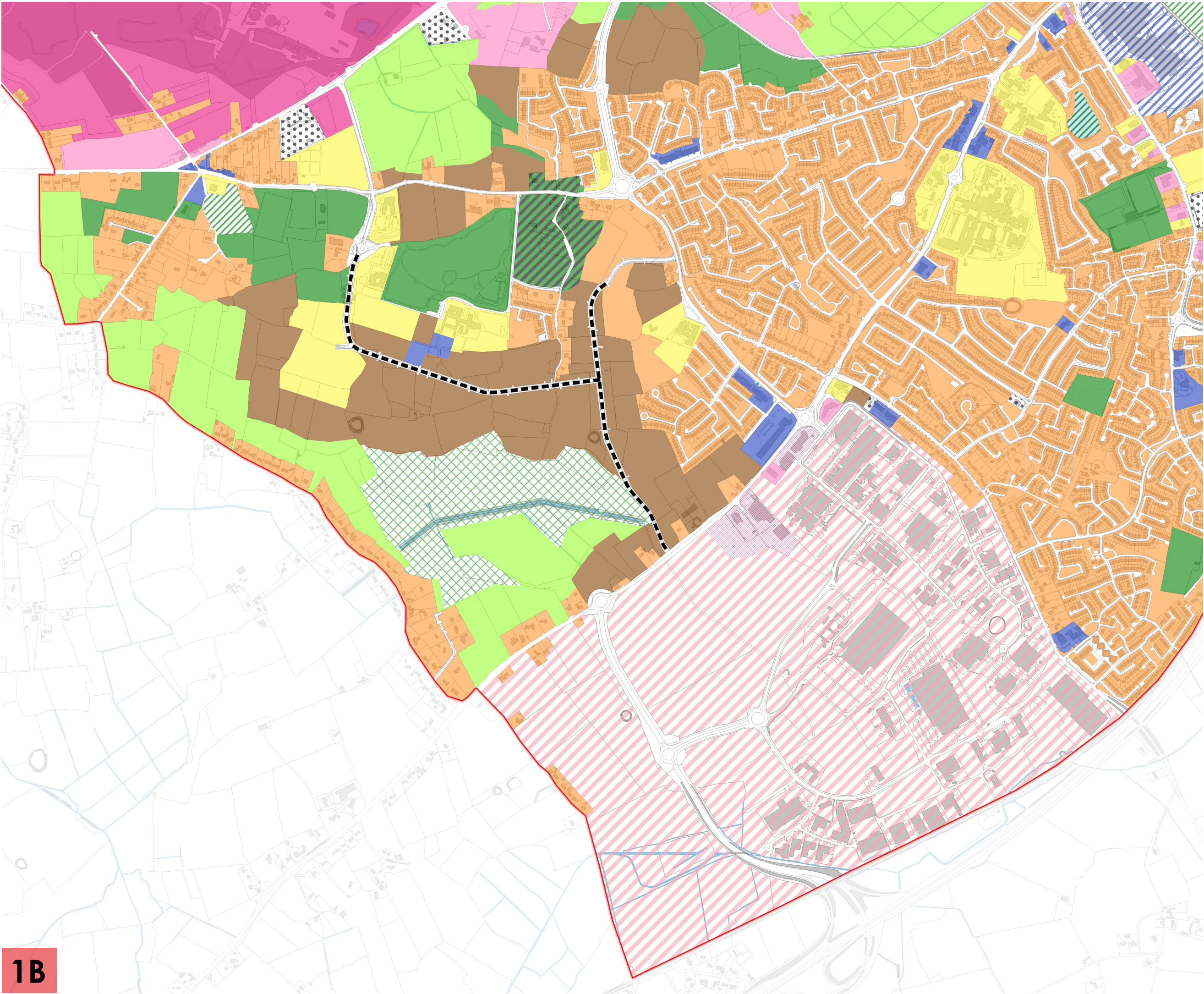
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**1A**

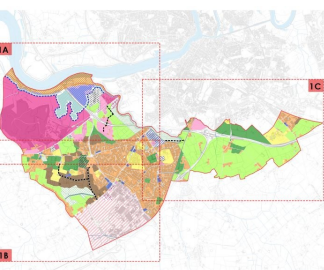




1B

**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

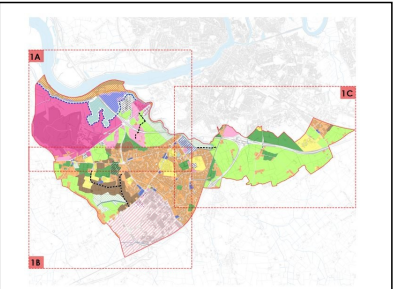
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Zoning Map



**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

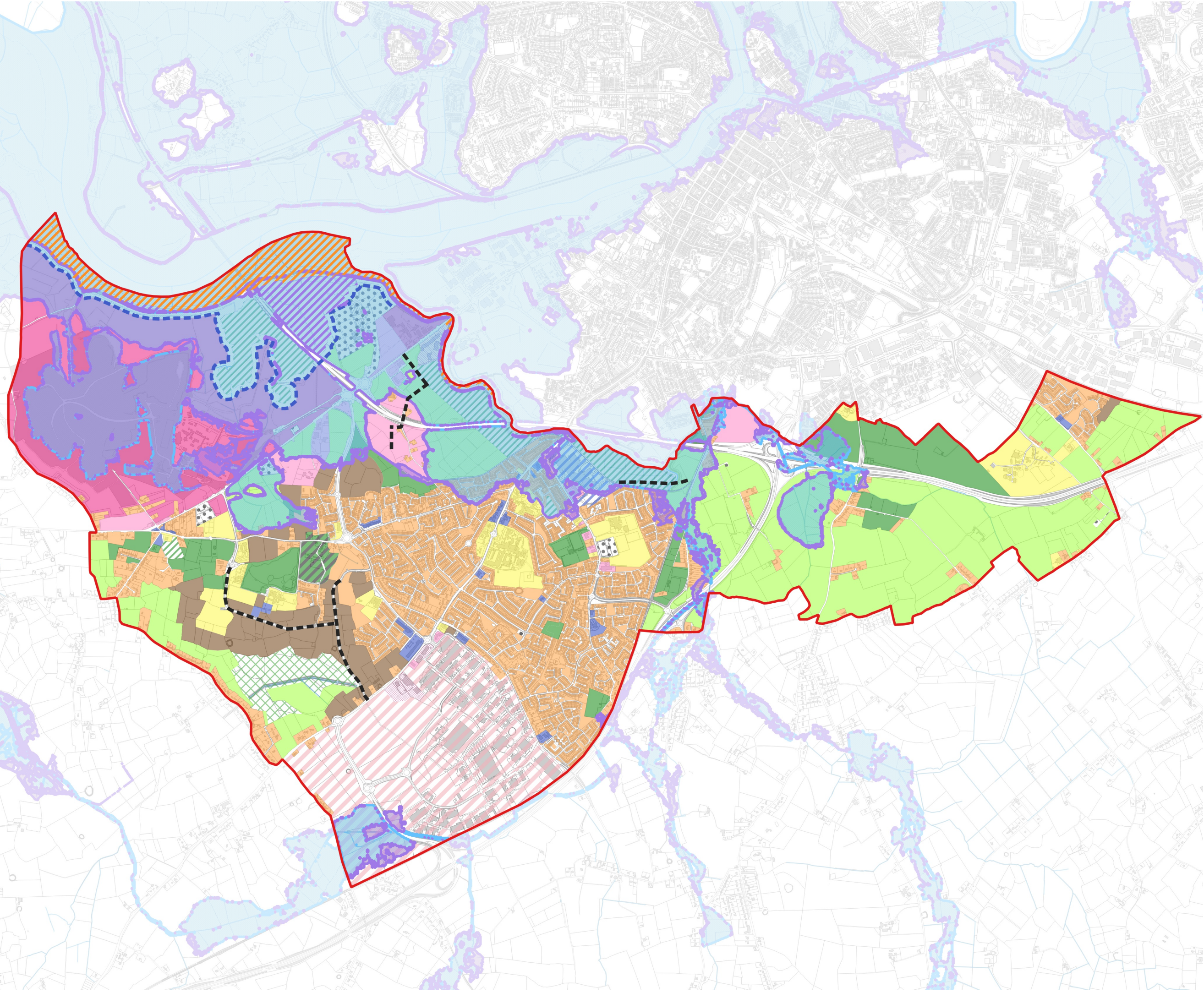
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**Draft Southern Environs  
Local Area Plan  
2021 -2027  
Material Alterations**

**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

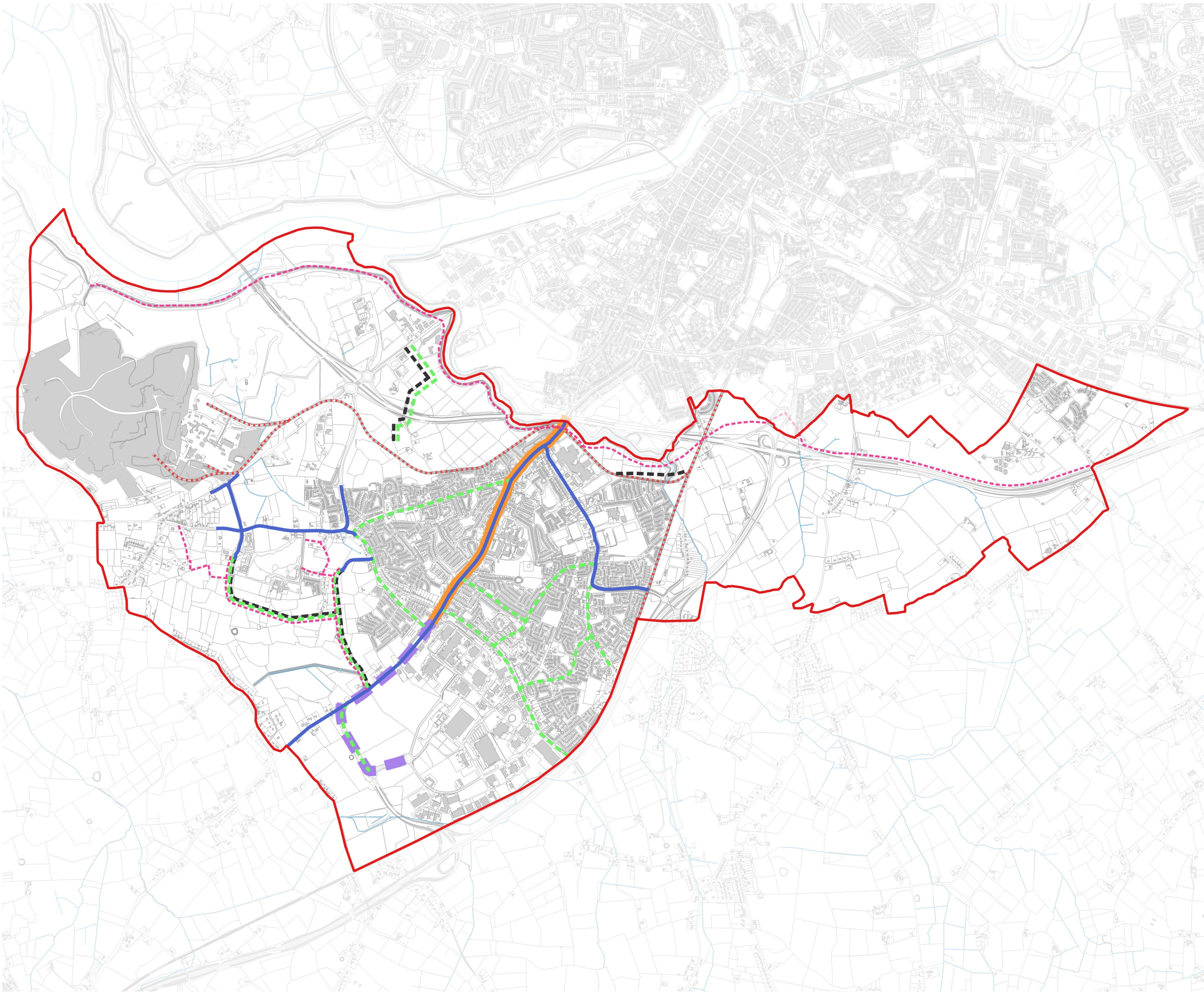
NOTE:  
Flood Zone C covers all areas outside Flood Zone A and B

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LEGEND

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

NOTE:  
Indicative Link roads to be designed in accordance with the requirements of the Design Manual for Urban Roads and Streets 2019







## **Part C - Strategic Environmental Assessment Screening and Appropriate Assessment Screening**

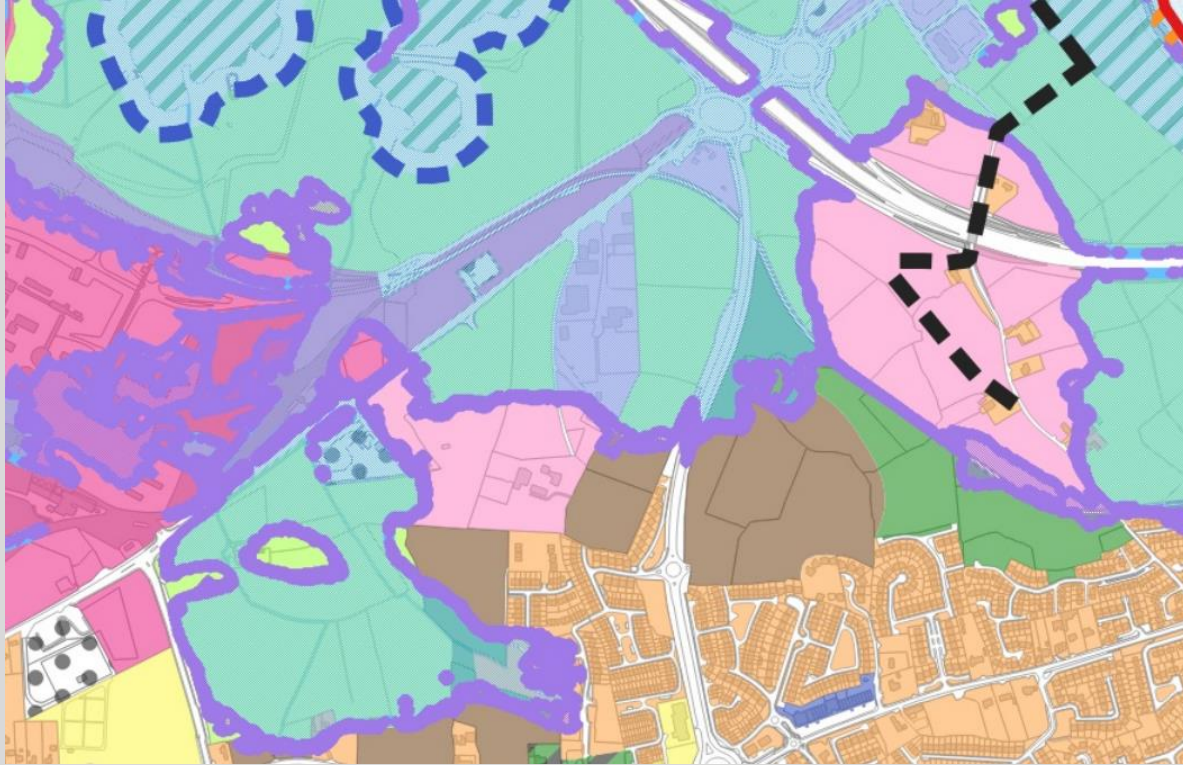
All changes have been screened to assess their significance from an SEA and AA perspective. The results show that these are not significant and as such do not require further AA or SEA assessment.

## **Part D – Updated Flood information to inform land use zoning**

### Justification Test in determining the land use zoning

Three sites have been assessed using the Justification Test mechanism, as set out in the Flood Guidelines for Planning Authorities. These sites are located at the Dock Road, the Raheen Business Park and Enterprise and Employment zoned lands to the northwest of the M20/M7/N18 Junction. The assessments are set out below.

#### (a) Lands at the Dock Road

Justification Test	
	
Lands at the Dock Road	
<p><b>The urban settlement is targeted for growth under the National Planning Framework regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act 2000, as amended.</b></p>	<p>The Limerick Shannon Metropolitan Area is targeted for growth under the National Planning Framework and Regional Spatial and Economic Strategy for the Southern Region. Within the Limerick Metropolitan Area, the area zoned as “City Centre” would correspond with the core area, “which acts as centre...” as defined in the Flood Guidelines (p.56).</p>
<p><b>The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the town and in particular:</b></p>	
<p><b>(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement</b></p>	<p>These greenfield lands are not essential to facilitate regeneration or compact growth.</p>

<b>(ii) Comprises significant previously developed and/or under-utilised lands</b>	These are undeveloped greenfield lands at an out of centre location, at risk of flooding, behind flood defences designed to defend agricultural lands only. The defences themselves are earth embankments of variable quality which are not constructed to the standards required for protecting development uses. The Planning and Flood Risk Guidance documents of 2009 advises that flood defences should be disregarded. There is both a residual risk of overtopping or failure or they might not be maintained into the future.
<b>(iii) Is within or adjoining the core of an established or designated urban settlement</b>	The lands are not within the core of Limerick city, nor are the lands located adjacent to the city centre zoning.
<b>(iv) Will be essential in achieving compact or sustainable urban growth</b>	The delivery of development on these lands is not essential to achieve compact urban growth.
<b>(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement</b>	Suitable alternative lands are available for development within and adjoining the core of the city, including a range of infill and brownfield lands. Additional lands are available within the City and Environs, which are not at risk of flooding.
<b>A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere.</b>	<p>Based on the location and the fact that suitable lands are available in locations at less risk of flooding it is decided not to zone these lands for development purposes.</p> <p>By leaving the area undeveloped it can contribute to attenuation by simply remaining as agricultural land which is a less vulnerable use and offers large areas of permeable soil which in themselves offer some element of storage capacity and delay run off.</p>
<b>Conclusion</b>	
The OPW submission outlines that the flood defences are in the ownership of various parties, of varying standards of protection and were built to protect agricultural lands and hence may be prone to failure in flood conditions. The OPW state that the benefitting areas cannot be considered as defended and cannot be relied as providing protection to the benefitting areas. This is compounded in the guidelines which state “the presence of flood defence structures should be ignored in determining flood zones” as defended areas still carry a residual risk of flooding from overtopping, failure of the defences and deterioration due to lack of maintenance.	

Loss of flood storage or blockage of flow paths within existing defended areas on the floodplain can exacerbate flooding to other properties within the defences in the event that such defences are overtopped.

The subject lands would not pass the Development Plan Justification Test in accordance with the Section 28 Flood Risk Management Guidelines (2009). The lands are defended by embankments for agricultural lands and not for development lands. Development of these lands would not be “essential to facilitate regeneration and or expansion of the centre of the urban settlement”, or “essential in achieving compact or sustainable urban growth” and “suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement” are available (2009 Guidelines).

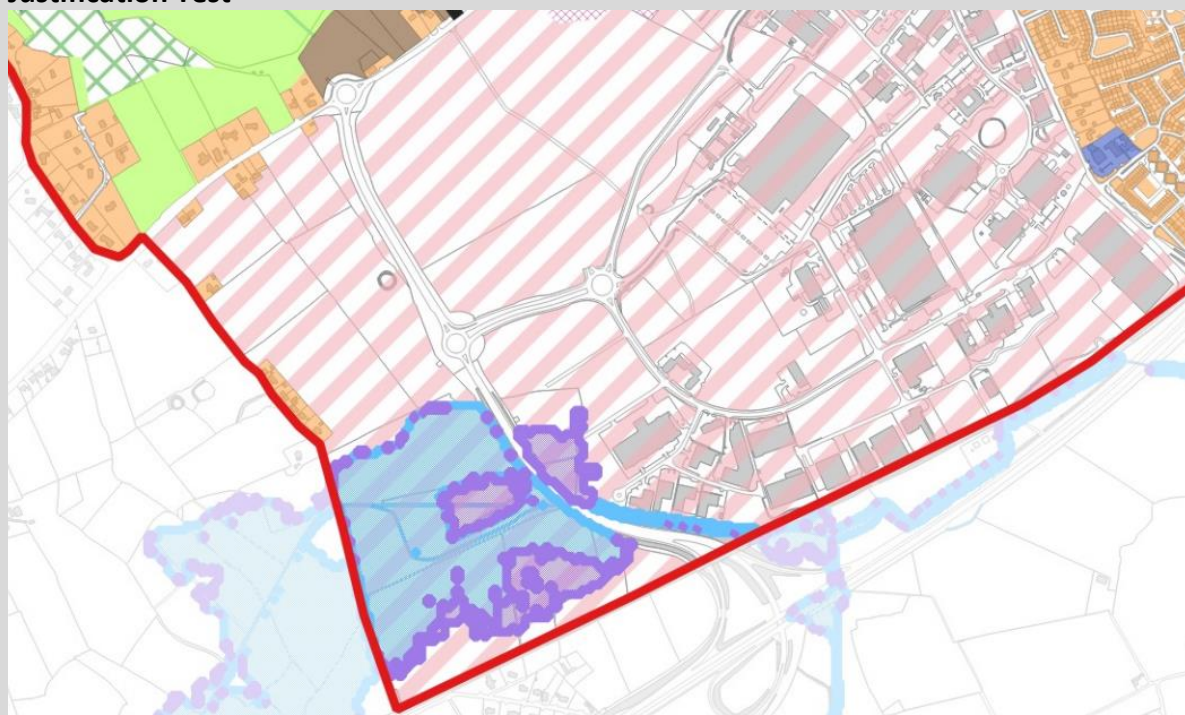
The zoning of these greenfield lands located within Flood Zone A and B does not pass the Justification Test.

#### **Recommendation**

The zoning of these greenfield lands located within Flood Zone A and B is not acceptable. The zoning of these lands does not pass the Justification Test. The proposed zoning should be rezoned to Agricultural use.

#### **(b) Lands at Raheen Business Park**

##### **Justification Test**



##### **High Tech/ Manufacturing zoned lands within Raheen Business Park**

**The urban settlement is targeted for growth under the National Planning Framework regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives**

The Limerick Shannon Metropolitan Area is targeted for growth under the National Planning Framework and Regional Spatial and Economic Strategy for the Southern Region. Within the Limerick Metropolitan



<b>provisions of the Planning and Development Act 2000, as amended.</b>	Area, the area zoned as “City Centre” would correspond with the core area, “which acts as centre...” as defined in the Flood Guidelines (p.56).
<b>The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the town and in particular:</b>	
<b>(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement</b>	These lands are not essential to facilitate regeneration or compact growth. However, they are essential to the operation of the existing Business Park.
<b>(ii) Comprises significant previously developed and/or under-utilised lands</b>	These lands have been developed for attenuation purposes ancillary to the operation of the Business Park.
<b>(iii) Is within or adjoining the core of an established or designated urban settlement</b>	The lands are not within or adjoining the city centre. However, the lands are located within an existing Business Park. The Business Park is an employer of regional significance with multi-national employers present. It is one of the largest employment hubs in the region.
<b>(iv) Will be essential in achieving compact or sustainable urban growth</b>	The lands are essential to enable the continued sustainable growth of the Business Park.
<b>(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement</b>	There are no suitable alternative lands to provide attenuation for the Business Park. The lands are ideally located to serve this function and to enable future development of the business park.
<b>A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere.</b>	As an attenuation area, this use is water compatible.
<b>Conclusion</b>	
Objective FM O8 requires a site specific flood risk assessment and hydraulic model for the lands to demonstrate that flood risk can be mitigated or that a less vulnerable use can be accommodated. The zoning of these lands located within Flood Zone A and B for water compatible uses ancillary to the Business Park, including the existing attenuation areas and open space passes the Justification Test.	

**Recommendation**

The zoning of these lands located within Flood Zone A for water compatible uses ancillary to the Business Park including existing attenuation areas and open space passes the Justification Test.

**(c) Lands to the northwest of the M20/M7/N18 Junction****Justification Test**

**Enterprise and Employment zoned lands to the northwest of the M20/M7/N18 Junction**

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

The Limerick Shannon Metropolitan Area is targeted for growth under the National Planning Framework and Regional Spatial and Economic Strategy for the Southern Region. Within the Limerick Metropolitan Area, the area zoned “City Centre” would correspond with the core area, “which acts as centre...” as defined in the Flood Guidelines (p.56).

**The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the town and in particular:**

**(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement**

These greenfield lands will facilitate the regeneration of Southill and contribute to expansion of the city centre.



<b>(ii) Comprises significant previously developed and/or under-utilised lands</b>	These are undeveloped greenfield lands.
<b>(iii) Is within or adjoining the core of an established or designated urban settlement</b>	The lands within or adjoining the core of an established or designated urban settlement.
<b>(iv) Will be essential in achieving compact or sustainable urban growth</b>	The delivery of development on these lands will contribute to compact urban growth. However, the area is limited in size and will be ancillary to the development of the larger landholding.
<b>(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement</b>	Suitable alternative lands are available for development in closer proximity to the city centre.
<b>A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere.</b>	Part of these lands are subject to flooding as indicated in the map above. However, this portion of the site will be used for water compatible uses, ancillary to the overall development of the area. As outlined below development on site can be sequential, taking care at all times to ensure sufficient design of non-compatible uses in areas of flood risk.
<b>Conclusion</b>	
A small section of this zoning is located within Flood Zone A. An objective is included requiring no encroachment onto, or loss of the flood plain, or that only water compatible development would be permitted for the lands that are identified as being at risk of flooding. The lands pass the Justification Test.	
<b>Recommendation</b>	
The zoning of these lands located within Flood Zone A passes the Justification Test, as the lands are limited in size and should be considered ancillary in the overall development of the lands. A specific objective should be included in relation to a requirement for a sequential approach to site planning.	

**Conclusion:**

Based on The Planning System and Flood Risk Management Guidelines, fieldwork and the preparation of the Justification test for the above sites, it has been determined to present the zoning decisions identified on the sites above. At this point in the plan making process and based on current information, it was considered to comply with the above guidelines. Flood maps have been updated based on a robust Strategic Flood Risk Assessment, which has informed zoning decisions.

**Chief Executive's Recommendation:**

In accordance with Section 20(3) of the Planning and Development Act 2000 (as amended), it is recommended that the Draft Southern Environs Local Area Plan 2021 – 2027 is made in accordance with the Draft published on the 10th October 2020, the Material Alterations published on the 6<sup>th</sup> February 2021 and the proposed further alterations outlined in the Chief Executives Report above. It is considered that the changes listed above will not have any implications for SEA or Appropriate Assessment.



Vincent Murray

A/Director of Services - Economic Development Directorate