

DRAFT LIMERICK DEVELOPMENT PLAN 2022-2028

Volume 4

Strategic Environment Assessment

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1.0 Non-Technical Summary

1.1 Introduction

Strategic Environmental Assessment (SEA) is a formal process carried out as part of the review of the existing Limerick County Development Plan 2010 – 2016 (as extended) and the City Development Plan 2010 – 2016 (as extended). A new Draft Limerick Development Plan 2022 – 2028 has been prepared to replace both the current Development Plans. This is the first Development Plan prepared by Limerick City and County Council which was formed in 2014. This the first public display period for the draft plan which will take place from the 26th of June 2021 to the 6th of September 2021. An earlier pre-draft display had taken place between the 15th of August and the 12th October 2020. As part of this process information papers called first issues documents were published to inform the responses of statutory agencies and the public. These papers had information on the proposed content of the plan such as Environment and Heritage. The responses received during this informed the preparation of this draft plan.

The preparation of the new Development Plan will include an update of policy in accordance with the introduction of new international, national and regional level policy documents and guidance. Amongst the changes during the review will be:

- 1) **Changes to policies to reflect the National Planning Framework and the Regional Spatial and Economic strategy for the Southern Region;**
- 2) **Changes to the plan to reflect the importance of climate action** including the incorporation of the contents of the EPA guidance note 'Integrating Climatic Factors into the Strategic Environmental Assessment Process in Ireland' (June 2019);
- 3) **Changes to both policy content in the plan and the zoning matrix** to reflect the new policy content following additions to Section 28 and other guidance and the changed planning requirements that have come about since the adoption of the last plans;
- 4) **Re-zoning of lands** where it is considered necessary to accommodate changes required since the preparation of the last plans;
- 5) **Rationalisation of residential and other zoning** to maintain consistency with the population and housing and other targets as specified in the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) for the Southern Region and the Core Strategy prepared in accordance with these higher tier plans.

The SEA process informs decision making during the preparation of the plan, by improving the environmental compliance of the plan and raising awareness of the potential environmental consequences of its implementation, so that these consequences may be mitigated or avoided altogether. It also gives the public and other interested parties an opportunity to comment on, and to be kept informed of, decisions that may affect the local environment and how the review to the plan is carried out.

In accordance with the legislation, an SEA 'scoping' exercise was carried out to determine the range of environmental issues and level of detail to be contained in the Environmental Report. This took place in mid-2020 and involved consultation with the following Environmental Authorities:

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

The main part of the SEA process is the Environmental Report, which outlines the findings of the assessment process. This Environmental Report has been prepared in accordance with the Planning and Development (SEA) Regulations 2004 and SEA (Review) Regulations 2011 (SI 200 of 2011). This report should be read in tandem with the Draft Plan and the Natura Impact Report.



Figure 1: Limerick's Metropolitan Districts

1.2 Contents and Main Objectives of the Draft Limerick Development Plan

The Draft Limerick Development Plan (the Plan/ LDP) is a legal document consisting of a public statement of Limerick City and County Council's planning policies for the City and County of Limerick. This plan will replace both the previous 2010 - 2016 Limerick County Development Plan (as extended) and the 2010 - 2016 Limerick City Development Plan (as extended). The aim of the LDP, is to establish a framework for the planned, coordinated and sustainable development of Limerick and the conservation and enhancement of its natural and built environment for the lifetime of the plan and beyond. The LDP provides guidance as to how this development can be achieved, what new developments are needed, where public and private resource inputs are required and guidance for development proposed in the LDP area. The plan takes into account the provisions of planning policy documents higher in the tier of plans, including the contents of the National Planning Framework and the Regional Spatial and Economic Strategy for the Southern Region, which sets the population and employment growth targets for the plan area.

The chapter headings in the plan are shown in the Table 1 below.

Table 1: Layout of Written Statement

Overall Strategy

Chapter 1 – Introduction - The introductory Chapter sets out an overview of the statutory framework through which the Draft Development Plan is prepared and sets out the overall Development Plan Vision and Strategic Objectives.

Chapter 2 – Core Strategy - This Chapter sets out the Core Strategy or settlement strategy, consistent with both the NPF and RSES that will help guide and shape the growth and development of Limerick.

Chapter 3 – Settlement and Housing Strategy - This Chapter sets out the policy objectives for residential development, both urban and rural, to deliver sustainable residential development and liveable communities and neighbourhoods over the six years of the Plan. The Draft Housing Strategy and Housing Need Demand Assessment helped inform this chapter.

Chapter 4 – A Strong Economy - This Chapter sets out the policy objectives for economic development both urban and rural, to deliver a strong resilient economy, including Enterprise and Employment and Retail Development opportunities. The Draft Retail Strategy and the previously adopted Strategic Integrated Framework Plan for the Shannon Estuary (SIFP) helped inform this chapter.

Chapter 5 – Environment, Heritage, Landscape and Green Infrastructure - This Chapter sets out the policy objectives for the preservation and protection of our natural heritage, adaptation of Green Infrastructure and Biodiversity, Open Space, Parks and Recreation.

Chapter 6 – Sustainable Mobility and Transport - This Chapter sets out detailed policy objectives in relation to Roads and Transport, Mobility and Traffic Safety.

Chapter 7 – Infrastructure - This Chapter sets out detailed policy objectives in relation to services infrastructure including energy networks and environmental services.

Chapter 8 – Climate Action, Flooding and Transition to a Low Carbon Economy - This Chapter sets out detailed policy objectives in relation to climate action and the role of planning in climate change mitigation, climate change adaptation including flooding and the transition towards a more climate resilient economy.

Chapter 9 – Sustainable Communities - This Chapter sets out the policy objectives for community development and place-making, to deliver sustainable and liveable communities and neighbourhoods over the lifetime of the Plan and beyond.

Chapter 10 – Compact Growth and Revitalisation - This Chapter sets out policy objectives for compact growth, development of strategic revitalisation sites and areas, urban design, building height and place-making.

Chapter 11 – Development Management Standards - This Chapter incorporates detailed development management objectives and standards to be applied to future development proposals in Limerick.

Chapter 12 – Land Use Zoning Objectives – This Chapter sets out a series of land use zoning objectives and accompanying definitions, which are given graphic representation through the accompanying zoning maps. The purpose of zoning is to indicate the land use objectives for all lands within Limerick.

Chapter 13 – Implementation and Monitoring - This Chapter outlines the implementation and monitoring mechanisms to be put in place to ensure effective and sustainable delivery of the Plan to allow greater transparency on the progress in its implementation.

The written statement is accompanied by land use zoning maps, this SEA Environmental Report, a Natura Impact Report, a Strategic Flood Risk Assessment and other supporting appendices.

All planning applications for the City and County of Limerick will be considered against the contents of the Limerick Development Plan 2022 – 2028, when it is adopted.

1.3 Current State of the Environment

1.3.1 Biodiversity, Flora and Fauna

The SEA process has considered available information on designated ecological sites and protected species, ecological connectivity (including possible links and corridors) and non-designated habitats. Since Appropriate Assessment concentrates on possible effects on Natura 2000 sites such as Special Areas of Conservation and Special Protection Areas and not on Natural Heritage Areas (NHAs) and other national level ecologically designated sites, the Environmental Report can deal with these sites, thereby filling any gaps in overall assessment. Since the LDP is a policy document, the opportunity has been taken to update policy content in relation to nature conservation. The National Parks and Wildlife submission to the First Issues pre-Draft Plan public consultation, mentioned the need to place nature conservation on a prominent footing in the plan, by referencing the National Biodiversity Action Plan (NBAP). References to the National Biodiversity Action Plan and the All-Ireland Pollinator Plan have been included.

NHAs are designated due to their national conservation value for ecological and/or geological/geomorphological heritage. They can be nationally important semi-natural and natural habitats, landforms or geomorphological features, wildlife plant and animal species or a diversity of these natural attributes. NHAs are designated under the Wildlife (Amendment) Act 2000. There are four NHAs designated in County Limerick:

- Lough Gay Bog (002454)
- Grageen Bog and Fen (002186)

- Moyreen Bog (002361)
- Carrigkerry Bogs (002399).

Proposed Natural Heritage Areas were published on a non-statutory basis in 1995, but have not since been statutorily proposed or designated. These sites are of significance for wildlife and habitats. Their locations and extent can be viewed on the Limerick Plan map system on www.limerick.ie

Ecologically sensitive areas located within Limerick include aquatic and terrestrial ecological areas, which are part of the Limerick's extensive network of watercourses and wetlands comprising:

- Rivers, streams and riparian zones (such as River Shannon, River Maigue, River Feale and River Allaghaun),
- Loughs (such as Lough Gur, Dohyle Lough),
- Bogs and fens (such as Griston Bog and Ellaha fen).

A specific objective has been included in the plan for the protection of wetlands informed by EPOs B1 and W3 in section 1.6 below.

1.3.2 Trees in the plan area

Trees can be as visually prominent as buildings and are an important landscape component. They are able to integrate with building structures providing important landscape features and visual variety. From an ecological viewpoint, whatever the species, it is important to ensure that an adequate tree stock remains within the Development Plan area.

Closely related to trees in the landscape are hedgerows. Within the LDP area there is a presumption against the removal of these landscape features. These are part of the fabric and history of the landscape. Apart from their visual contribution they are also important habitats in their own right. In order to ensure their continued vitality and usefulness as landscape features and habitats, they require continuous management, particularly, if they are to be integrated within new developments.

The link between the quality of the local environment, of which trees are an important component and human well-being, is one that is increasingly recognised. In this regard, the policies that protect trees and groups of trees have been updated in the Draft Plan.

1.3.3 Population and Human Health

Population: The Central Statistics Office's (CSO) most recent Census in 2016 shows that Limerick City and County recorded a combined population of 194,899 persons, an overall increase of 1.5% since the Census 2011. Limerick City and Suburbs, as defined by the CSO has

a population of 94,192 persons recorded in 2016. The average age for Limerick City and County, according to the 2016 Census, is 37.7, up from 36.5 in 2011.

The National Planning Framework Project 2040 sets out that half of the overall national growth in terms of population, employment and housing will be targeted in Ireland's five Cities, Dublin, Cork, Limerick, Galway and Waterford. It is the objective of the National Planning Framework to redistribute growth in a more balanced manner, which would see each of the cities grow by 50% by 2040. The Framework foresees the population of Limerick City reaching approximately 150,000 by 2040.

Labour Force: Census 2016 shows that Limerick City and County's labour force was recorded at 90,120 persons, representing an increase of 0.6% from 2011, which was 89,578 persons. The unemployment rate for the Limerick area has fallen since 2011 Census in line with the national trend. The unemployment rate for Limerick City and County in 2016 is 14.4% down from 21% in 2011. The International Labour Organisation unemployment rate for the Mid-West Region (which would be similar to Limerick's unemployment rate) was 6.1% in Q2 2019 just slightly higher than the national unemployment rate of 5.4%. Economic conditions have changed significantly in Limerick in recent years. With the economic upturn across the state, the wider urban area of Limerick has shown significant improvements in job creation, employment/ unemployment and investment. Across the local authority area, some 20,000 jobs have been created since 2013 with some 7,000 of those jobs in the City. The Covid 19 pandemic has had a serious effects on the Limerick economy, and these will take a number of years to be reversed.

A background paper produced for the Draft Development Plan entitled People and Places makes some important points in relation to employment in Limerick. These are worth noting as they emphasise the modern trends of commuting and the fact that people often travel great distances for work. This is important, not just in trying to establish a sound policy footing for sustainable transport but also important in relation to settlement patterns themselves.

The paper makes the following important point "it is important that a distinction is made between the employment of residents of Limerick and the number of jobs based in Limerick, and also a further distinction between where the jobs are located and where the workers reside for Limerick city". These distinctions are important to gauge the significance of challenges and opportunities for employment generation in the local and regional context and to define commuter zones and travel to work catchments.

The number of jobs in Limerick in 2016 was 67,986, according to Powscar returns. This is a 7.8% increase over the 2011 total, which was 63,054. It should be noted that these figures exclude those who failed to provide information on their workplace and those who indicated that they had no fixed place of work. According to calculations made in the ESRI report 'Prospects for Our Regions' (2018) based on Powscar 2011¹, 76,500 jobs were based in Limerick City and County, and 149,200 in the Mid-West region as a whole (comprising Limerick, Clare and North Tipperary). The jobs figures were total figures and were not confined to jobs in fixed places of work, they also allowed for those responses to the Census.

The commuting pattern also has implications for material assets in that commuting traffic often dominates Limerick road usage particularly at morning and evening peak times. There has been much emphasis on the provision of new road infrastructure, with projects such as the Limerick Northern Distributor Road being an example of road infrastructure that could alleviate traffic congestion in the City itself. This project will be considered in the transport policies section of this report.

1.3.4 Public facilities

Increased population will also lead to increased demands for resources such as potable water, infrastructure and wastewater disposal and transport, while leisure needs will lead to increased demands for parks and leisure facilities, often with associated demands on landscape and habitats. The provision of adequate services, such as waste disposal will have beneficial effects on human health. This has added emphasis during the preparation of the Plan, as both the population of what had been referred to as the City area and suburbs located in the county (Castletroy and Southern Environs), will have to be considered in terms of the capacity of the receiving waste water treatment plants.

The main Waste Water Treatment Plant for the City is the plant at Bunlicky. Capacity is adequate for the City's and Plan area needs with a population capacity of 180,000PE. The plant came into operation in 1999. While the question of it operating close to capacity has been raised, discussions with Irish Water and Water Services Section of Limerick City and County Council have indicated that new working procedures, in addition to the construction of an anaerobic digester and other upgrades, will ensure that the plant will be able to keep pace with development within the agglomeration that it serves. Recent meetings between Irish water and the Planning section of Limerick City and County council, also indicates that a Strategic Infrastructure Development (SID) application is being prepared for further extension of the facilities at Bunlicky.

¹ Edgar Morgenroth 'Prospects for Irish Regions and Counties: Scenarios and Implications' ESRI, January 2018, p31. The 2016 results of powscar were not available at the time of writing of this report.

There are three Seveso sites in the Plan area. One is a 'lower tier' sites and is in the City area. These is Grassland Fertilizers, on the Dock Road. There are two higher tier sites in the County area, Atlantic Fuels Supply Company, Foynes Port, Foynes, and Gouldings Fertiliser, Morgan's South, Askeaton, Co. Limerick. These are included in the Health and Safety Authority referral list, and are also referred to the Emergency Services for comments should any applications be received, either on those sites or close to them.

1.3.5 Air Quality

Air quality in Ireland is generally of a high standard across the country. There are three air quality monitors located in and close to Limerick City, one of which is in Mungret, the other in Castletroy and the other in the Peoples Park. There is another located in Askeaton. The current air quality report from the Askeaton monitor is good (14th June 12:00). On occasion, particularly during holiday periods, through traffic traversing the City and towns in Limerick can create localised issues with traffic fumes, particularly with peak traffic flows along the nearby Dock Road. This road has been selected for improvement works by Limerick City and County Council, which should improve traffic flows in the longer term.

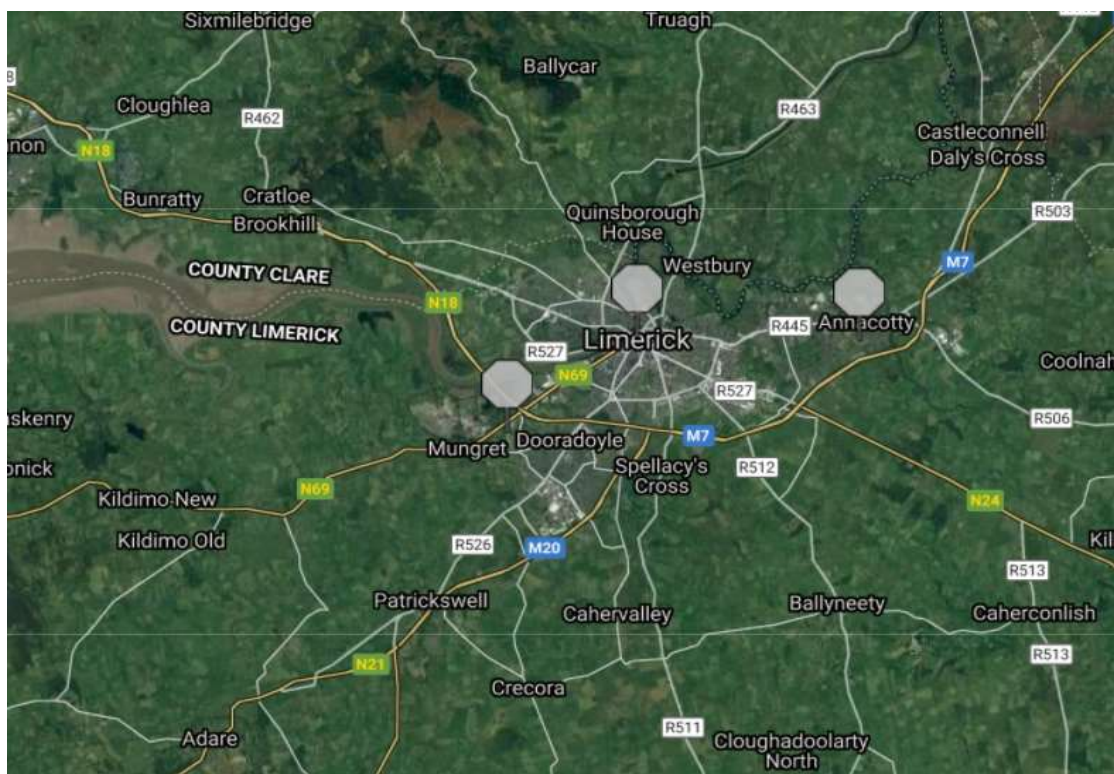


Figure 2: Air Monitoring Sites in Limerick City and Environs

1.3.6 Climate Change

Climate change impacts may present challenges to future land use and the location of development in the Plan area, particularly in urban areas. Predicted impacts from projected temperature rises include more concentrated periods of higher rainfall and more exposure to flood risk. Aside from climate change, “natural variations in climate has resulted in more frequent late summer flooding” (Jacobs CFRAM, 2012, p.7). The issue of flooding in relation to the review and climate change generally will be dealt with in more detail later in this report. However, it should be noted that one of the greatest influences on flooding in the Limerick City, Askeaton and Foynes areas is that of tidal flooding (JBA, August 2020).

An extensive Strategic Flood Risk Assessment (SFRA) has been prepared for the City and Plan area and urban areas in the County to inform the Draft Development Plan preparation process. The SFRA accompanies this SEA Environmental Report.

The issue of climate mitigation and renewable energy has also been addressed in this report. Since the last Plan there has been huge changes in the technology used to harness renewable energy. Numerous solar energy applications have been received since 2010, however only one application has been received for wind energy. The Plan policies require updating to reflect this. Wind energy sites are well established in Limerick and the region as a whole.

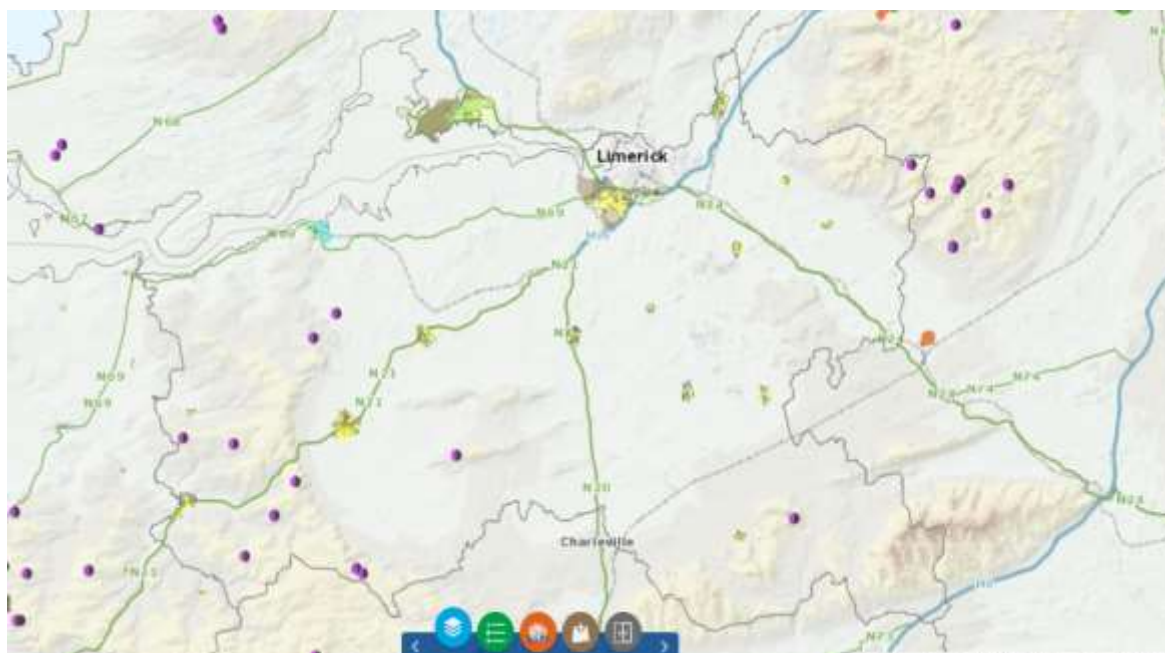


Figure 3: Wind Energy sites in Limerick (Source: ESM/ AIRO)

1.3.7 Geology and Soils

The geology of the urban areas of Limerick has been much modified by generations of building activity, where the original soil cover was removed or covered by the built environment.

At this stage in the Plan process deficiencies in the information available have been identified. A geological survey with the GSI has been planned and funding has been obtained from the Heritage council to facilitate this work. This survey will then be incorporated into the environmental report, following its completion.

An Foras Taluntais, now Teagasc, had by March 1966 completed a county wide survey of soils and published the results in Soil Survey Bulletin No.16, the second county level survey to be produced. Works by other agencies since, such as the Environmental Protection Agency, have added to this body of knowledge. The 1966 survey grouped the soils of Limerick into 11 different groups. These are listed below:

1. Brown Earth Group
2. Brown Podzolic Group
3. Grey Brown Podzolic Group
4. Gley Group
5. Podzol Group
6. Lithosol Group
7. Organic Soils or Peats
8. Lake Alluvial Soils
9. River Alluvial Soils
10. Estuarine Alluvial Soils
11. Other Soils.

Each group has varying characteristics, including drainage. This has implications for agriculture and for the effective functioning of wastewater treatment units for smaller scale developments. The 1966 report does acknowledge the varying qualities of Limerick soils with a description of West Limerick Soils as being “less favoured”.



Figure 4: Soil Associations Northern Limerick (Teagasc)

One of the key questions in examining the issue of soils in Limerick, will be soil conservation. This is promoted through environmental objectives encouraging the re-use of brown field sites, adequate treatment and disposal of waste and re-use of soil following excavations works. Another issue is that of soil contamination as this has arisen in the course of planning applications, particularly on brownfields sites in the City. This has been addressed in Chapter 11 of the plan which contains the Development Management Standards. One issue that is also connected with soil contamination is that of historic landfills, and as part of the Plan process a liaison has been established with the Planning and Environment unit to keep pace with any developments in that area.

Geology is also mentioned in the sections on water in the Environmental Report.

1.3.8 Cultural Heritage

The objectives of the National Landscape Strategy prepared by the DECLG are to implement the European Landscape Convention by integrating landscape into Ireland's approach to sustainable development. To have a sustainable society, environment and economy, it is required to both embrace change and manage our landscape in a considered, integrated and planned way. The implementation of a National Landscape Strategy involves a number of core objectives with associated actions derived from the European Landscape Convention. These will ensure that landscape is integrated in the collective decision making processes and that all landscapes are recognised in this regard.

In general terms the Plan in both urban and rural areas, calls for high quality design and the sustainable reuse of the existing built environment, which would help retain the character of the area. Future developments will be required to be sympathetic to their settings in terms

of design and building height. In this regard, there is a Building Height Strategy which has informed preparation of the Draft Plan. This document is important in informing planning response to higher buildings within the City area and accompanies the Plan. Some of the strategy's recommendations in terms of tentative urban character areas reflect those suggested in the pre-draft Environmental Reports. The suburban areas in the environs of the City all have newer development patterns than the old City areas, with much new housing development being constructed from the 1960s onwards.

1.3.9 Material assets

Material assets are taken to include infrastructure and utilities including rail, road, water supply and wastewater treatment facilities. It also includes economic assets such as buildings, lands and water resources which support tourism and amenities. Material assets are the critical infrastructure essential for the functioning of society, such as electricity generation and distribution, water supply, wastewater treatment, transportation and public facilities such as parks and green space. Policies have been included in the Plan to emphasise the need for climate resilient infrastructure.

Other infrastructure

Investment in City infrastructure has resulted in a total storage capacity of 18 million gallons (75,000m³) of water. A major extension to the water treatment plant at Clareville to the east of the City has started which will double output to nearly 8 billion gallons per annum.

The Development Management section have indicated that recent meetings with Irish water were held to prepare for a Strategic Infrastructure Development application to An Bord Pleanála, to further expand capacity at the Bunlicky Waste Water Treatment plant.

In terms of material assets, one asset that should be considered is that of the broadband network. In Figure 5 below the percentage access to broadband is shown. The darker the colour the greater the access, with the darkest colour showing access of over 83%.

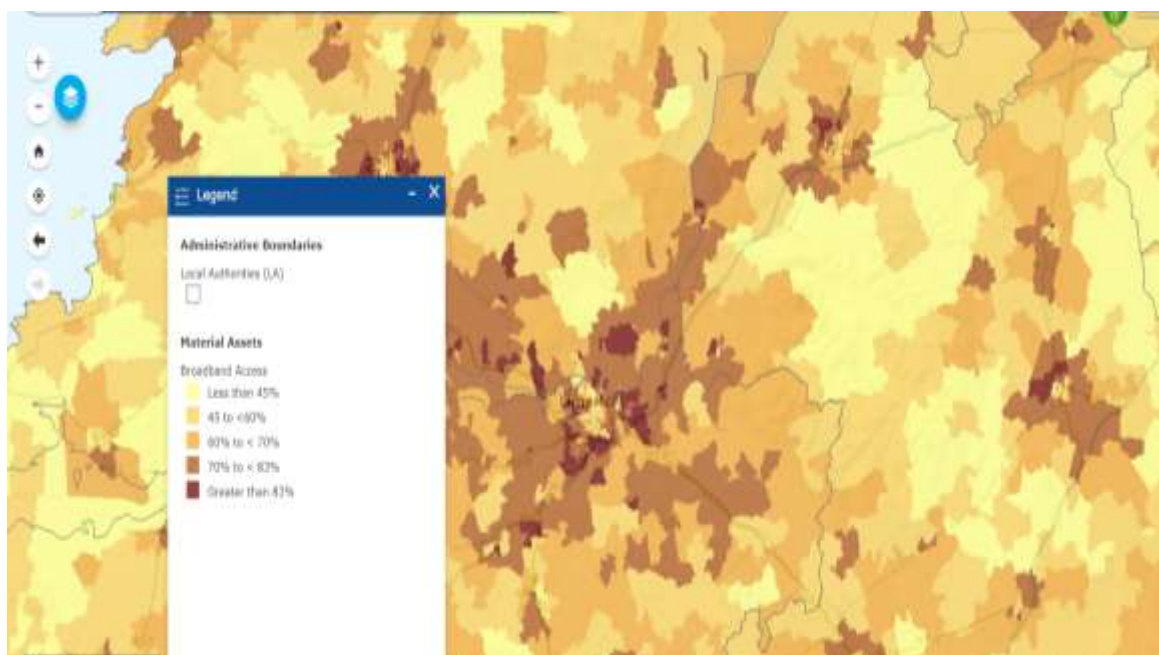


Figure 5: Broadband access (Source ESM/ AIRO)

With the potential for working from home as a means of reducing transport emissions the importance of access to broadband in both urban and rural areas should be a topic to be considered.

1.4 Existing Environmental Issues

Key environmental pressures throughout the City and County include:

- The need to ensure that waste water infrastructure keeps pace with development. As outlined elsewhere in this document, improvement works in Bunlicky Waste Water Treatment Plant has ensured that its work practices and capacity will be sufficient to cater for future developments in the City and wider areas. This is not always the case as many settlements throughout the county are at or have exceeded capacity and urgently require investment, to improve facilities for waste water treatment.

The question of water quality is also closely connected to that of human health and of human usage of the assimilative capacity of water courses for treated discharges from waste water treatment plants. Many of the settlements in Limerick lack adequate treatment facilities as outlined by a report produced by the Water Services section of Limerick City and County Council in 2018 (Assessment of the Waste Water Treatment Plants within County Limerick 2015 – 2018). There are fifty two Waste Water Treatment Plants within Limerick. Limerick City and County Council operate twenty three EPA licence plants (plants over 500 p.e.) and twenty seven EPA Certificate of

Authorisation CoA (plants under 500 p.e.) on behalf of Irish Water. The report examined how the plants performed over the period from 2015 - 2018. The report excluded both Limerick Main Drainage (Limerick City and Plan area) and Kilmallock WWTP's as they are run by private contractors and are under the control of Irish Water. Of these plants 17 required either replacement or major upgrade so they could adequately perform their functions.



Figure 6: Wastewater Treatment Capacity

- Biodiversity including the avoidance of damage to the SAC, SPA, NHA and pNHA sites in the Plan area and establishment and enhancement of ecological corridors, for both amenity and nature conservation purposes. This includes emphasising the All Ireland Pollinator Plan and the National Biodiversity Plans and supporting documents. Policies to this effect have been included in the Draft Plan.
- Cultural Heritage involving the need to maintain the character of the historical areas such as Limerick City and Kilmallock and those of the county towns and villages. Proposals for new developments will need to be carefully balanced with the requirement to maintain access to sites and areas of cultural heritage values, facilitating their continued development and maintaining their cultural heritage value. A key challenge for the architectural heritage of the City and county is sustainable and sympathetic reuse, regeneration and development of the built environment whilst retaining and protecting the distinctive character of the area. This is consistent with the NPF and RSES and policies that have been included in the Draft Plan area.

- Human health benefits through the maintenance and enhancement of the quality of the urban and rural surroundings and of ensuring continuing access to amenities and services is essential. This assumes a new importance with the ongoing Covid 19 pandemic.

1.5 Consideration of Alternative Strategies

Alternative Strategy Option 1 - Continue with the existing City and County Development Plans without the review:

Legally this would not be possible as the Plans have been extended previously and are nearing the end of the statutory life span. As indicated later in this report, the current Plans would not be considered an acceptable alternative.

The growing population of the Draft Plan area also provides its own challenges. One of the greatest needs for the population of the Plan area is the provision of facilities for the local population with young families. This placed a premium on amenity and educational facilities. There has been a number of recent applications within the City area and County for new school facilities. To enable the proper provision of new community facilities, it is necessary to update the Plan to ensure that they are provided in line with the latest guidance and requirements. This includes Section 28 Guidance and requirements of service providers such as the Department of Education. Updated policies are also needed for the county towns and settlements to ensure compliance with the higher tier guidance of the NPF and the RSES. See Environmental Protection Objective HTP 1 in section 1.6 below.

Related to that of retaining the current Plans, is the retention of elements of the old Plans and incorporation into the new one. It is eleven years since the last plan was prepared so all policies that might be included should be assessed in order to establish if they are up to date and take into account the provisions of the NPF and RSES. This includes settlement policies.

While rural settlement policies were subject of the SEA and AA processes in the last County Development Plan, it is now over a decade since the last Plan was adopted and the policy context has changed. During the last Plan, the National Spatial Strategy was the overarching policy document, which has been replaced by the National Planning framework. Similarly at a regional level, the Mid-West Regional Planning Guidelines have been replaced by the Regional Spatial and Economic Plan for the Southern Region. There has been a change of emphasis in both documents from those that preceded them, with a strong emphasis on

compact growth and the concentration of development on infill lands in settlements. This makes the older rural settlement policies outdated.

Limerick is a combined Local Authority since the merger in 2014. The rural settlement strategy in 2010 was prepared in the context of the older County settlement needs. With the City and the County now merged, the new settlement strategy should take into account the situation created by the combined Limerick City and County settlement priorities as defined by both the NPF and RSES.

Alternative Strategy Option 2 - Reliance on the Limerick Economic and Spatial Plan 2030 to help develop the City area:

The outcome of earlier plans such as the Limerick Economic and Spatial Plan 2030 indicated the potential of actions in selected parts of the City. While this has clearly articulated aims, it was considered that its focus on urban areas would not sufficiently contribute to the development of areas in the wider countryside. It should also be remembered that the local authority also takes in the areas of both City and County and individual project led initiatives would not be sufficient to ensure adequate direction of resources to areas outside of the specific locations where they operate. Of equal importance is the Colbert Quarter initiative which seeks to guide development of an area close to the railway station and is a follow on from the development of the Colbert Station area a number of years ago. The Colbert Quarter initiative, will lead to the development of a 50ha site close to Colbert station and hence close to the rail link from Limerick to the rest of the country.

These initiatives are hugely important. These are the vehicles which will secure the development of key areas which are important for economic and social development of the City and County. They complement the Limerick Development Plan, in that while the plan contains overall planning guidance for the planning and development of Limerick as whole, these initiatives offer detailed content to secure the development of specific areas. That is the key difference – the Limerick Development Plan offers statutory guidance on planning and development issues within the entire administrative area of LCCC, while the other initiatives concern themselves with the details of developing specific strategic sites. Because of the core function of the LDP, that of a statutory planning guidance document, it is imperative that this is put in place to act as guidance for such developments.

Alternative Strategy Option 3 - Reliance on non-planning led initiatives to secure the development of the Local Authority area:

While the initiatives of other departments of the Council such as the Roads Section are welcomed, this would address only part of the issue of infrastructure and service provision in the area. It would also mean that any efforts to address such provision would be on a piecemeal basis and would not be plan led.

To ensure balanced provision of services with appropriate policy support, it was considered best to proceed with the review. This ensures that the Plan will be consistent with the contents of the RSES, the NPF and National Development Plan, which is essential for seeking investment from central government. Compliance and support of national policy objectives is a prerequisite for the allocation of resources.

Alternative Strategy Option 4 - The review as outlined in the current Draft Plan:

As noted above, the examination of the policy background indicated that the allocation of resources and zoning would be best served by a review of both City and County Plans and their merging into one document. As has been mentioned elsewhere in the document the older plans are now ten years old and require substantial updating to take into account changed administrative boundaries and new planning requirements such as the Provisions of the NPF and the RSES. The older Plans also need to be updated following adoption of the National Planning Framework and the Regional Spatial and Economic Strategy for the Southern Region and in order to take into account climate change issues. The new settlement hierarchy has been ordered to reflect population growth targets and the availability of employment and services.

1.6 Environmental Protection Objectives (EPOs)

The Environmental Protection Objectives provide a standard against which the goals, policies and objectives of the Limerick Development Plan can be measured, in order to highlight those with the potential for environmental impact. These have been used as a guide for the preparation of the final objectives in the Draft Plan, which are listed in the appendix together. These EPOs are as follows:

Biodiversity, Flora and Fauna/Built and Architectural Heritage

B1: Protect, conserve and enhance habitats, species and areas of regional and local importance, including aquatic habitats and species and promote the sustainable management of ecological networks. See also W3 below.

B2: Ensure the continued conservation of the Natura 2000 sites, Natural Heritage and Proposed Natural Heritage sites. These sites are important, both as an amenity and natural history resource.

B3: Preservation of the character of the historic built fabric.

B4: Preservation of the archaeological heritage.

Population and Human Health

P1: Facilitate a good standard of quality of life for the population of Limerick through ensuring high quality residential, recreational, educational and working environments.

P2: Provide policy support for the provision of suitable employment and facilities for the local population.

Water

W1: Ensure that wastewater infrastructure keeps pace with development proposals.

W2: Ensure that the requirements of the Water Framework Directive are incorporated into the Plan.

W3: Ensure that wetland and peatland sites are preserved.

Air Quality and Climate

AQC1: Increase energy efficiency and the proportion of energy generated from renewable sources and where necessary to ensure the sensitive application of energy saving measures to the historic built fabric of Limerick.

AQC2: Avoid deterioration of air quality in the Plan area.

AQC3: Include climate action concerns into the Plan policies.

Geology and Soils

GS1: Place an emphasis on the development of brownfield sites rather than greenfield sites in Limerick. By reducing the possible development of greenfield sites this makes a positive contribution to soil conservation. This can also be achieved through the sensitive reuse of existing buildings, reducing the need for new build - See C2 below.

GS2: Protect geological sites within the Plan area.

Cultural Heritage

C1: Protect and conserve features of archaeological heritage and their setting.

C2: Protect, conserve and promote the sustainable reuse of architectural heritage.

Landscape

L1: Protect and conserve the quality, character and distinctiveness of the Limerick landscape both urban and rural.

L2: Retain the protected views in the Development Plan.

Material Assets

MA1: Maintain sustainable access to assets such as open spaces, water resources and all other physical and social infrastructure.

MA2: Ensure that there is adequate policy support for infrastructural provision in the Plan area.

Compliance with Higher Tier Plans

HTP 1: Ensure compliance with higher tier plans such as the National Planning Framework and the Regional Spatial and Economic Strategy for the Southern Region and Section 28 guidance that might be issued by the Department.

1.7 Likely Significant Effects on the Environment of Implementing the LDP

Assessment of the policies and development objectives in the reviewed Limerick Development Plan, showed that overall these policies and development objectives will not pose a significant adverse impact on the environment. Many of the policies and objectives

are considered positive, setting out to manage and protect aspects of the environment such as water quality, landscape, heritage resources and management of flood risk. The overwhelming thrust of the review is hugely positive in that it will update the Plan to take into account the policy content of both the National Planning Framework and the Regional Spatial and Economic Strategy for the Southern Region. Continued adherence to both the policies of the RSES and NPF is emphasised.

The findings of the Appropriate Assessment were carried through the Plan preparation process and were addressed through the incorporation of its findings such as updating of policies on Natura 2000 site protection.

1.8 Monitoring Proposals

Measures were proposed as part of the SEA process to monitor the effects on the environment of implementing the new Plan. These are presented in the Environmental Report in terms of the achievement of the environmental protection objectives and the impact on the environmental factors that the SEA legislation requires to be considered. Monitoring for SEA will be carried out as part of the overall monitoring of implementation of the Limerick Development Plan and using existing assessment frameworks such as individual planning assessments and reports for works such as roads and infrastructure repair.

2.0 Introduction to SEA

2.1 Background

This is the first combined Plan for both Limerick City and County and will replace both the City and County Development Plans that have been in place since 2010. Over a decade has passed since the current Plans were prepared. In that time, the functional areas of the Local Authority and the higher tier plans which guide development in Limerick have changed. This places a further onus on the environmental report to ensure that the new policies are both sustainable and have the necessary range and depth to deal with the planning and development of a larger and more complex functional area.

2.2 Strategic Environmental Assessment

Strategic Environmental Assessment (SEA) is defined as ‘the formal, systematic and comprehensive process of evaluating the effects of a proposed policy, plan or programme or its alternatives, including the written report on the findings of that evaluation, and using the findings in publicly accountable decision making’.

SEA is a process for evaluating at the earliest appropriate stage, the environmental quality, and potential consequences, of policies, plans or programmes and to ensure that any potential consequences are assessed during their preparation and the findings taken into account before they are adopted. Its overall purpose is to contribute to sustainable development. SEA is intended to provide a framework for influencing decision making at an early stage, to improve the environmental sustainability of the Plan and to raise awareness of the potential environmental consequences of its implementation, so that these consequences may be mitigated or avoided altogether. It also gives the public and other interested parties an opportunity to comment and to be kept informed on decisions that may impact on the environment and how those decisions were made.

This SEA process includes the following stages:

- Scoping Report – stating how the scoping responses of the environmental authorities were taken account of in preparing the Environmental Report;
- An Environmental Report updated as the Plan is prepared (a report containing the findings of the SEA) on the likely significant effects of implementing the review;
- An SEA Statement (identifying how environmental considerations and consultation have been integrated into the reviewed LDP).

This is the Environmental Report for the proposed Limerick Development Plan and has been carried out in accordance with Schedule 2B of S.I. 436 of 2004 and SI 201 of 2011, which sets

out the information that is required to be included in SEA and Environmental Reports. This report should be read in tandem with the Draft Plan and the Natura Impact Assessment.

2.3 The Contents and Main Objectives of the Draft Plan

The strategic vision of the Draft Limerick Development Plan reads as follows:

Limerick – A Green City Region on the Waterfront

By 2030, Limerick will become a green city region on the Shannon Estuary connected through people and places. This will be achieved through engagement, innovation, and resilient urban development and self-sustaining rural communities.

The key ambitions supporting this vision are as follows:

1. A Green Region

Limerick will develop as an environmentally sustainable and carbon neutral economy - a pioneer in sustainable growth. This will be underpinned by the promotion of active mobility for all, creating an attractive and distinctive place to live, work and visit.

2. Embracing the River Shannon

Limerick will provide room for people to enjoy the River Shannon/Estuary. The animation of the waterfront will increase public access and create new recreational opportunities for residents and visitors.

3. Resilient, Connected and Inclusive Communities

The future development of Limerick will make it easier to live sustainably and be well prepared for the future, increasing opportunities for movement and connectivity between communities.

4. A Sustainable, Innovative and Competitive Economy

The Limerick region will be an inclusive, self-sustaining economy built on growth and innovation and which maximises its competitive edge. This will enhance local enterprises, attract international investment in a manner which guarantees quality of life.

To deliver on the Draft Development Plan vision and key ambitions over the lifetime of the Plan, there are a number of key cross cutting and interrelated Strategic Outcomes, which underpin the Plan as follows:

1. Grow Limerick's economy and create opportunity through maximising the potential for development through the promotion and enhancement of the **competitive advantages of Limerick**, including its strategic location, connectivity and accessibility to international markets, a skilled workforce and a high quality of life.

2. Transition to an environmentally sustainable **carbon neutral economy**.
3. Ensure new residential development is of the highest quality, enabling life cycle choices and physical, community, recreation and amenity infrastructure are provided in tandem to **create sustainable, healthy, inclusive and resilient communities**.
4. Protect the unique character of Limerick. Support and facilitate **revitalisation** and consolidation of the City, towns and villages through public realm and place making initiatives. Addressing vacancy and dereliction to create compact attractive, vibrant and safe environments in which to live, work, visit and invest. Ensure the highest quality of public realm and urban design principles are applied to all new developments including the construction of landmark buildings in appropriate locations.
5. Create a competitive environment in which to do business. Promote, support and enable **sustainable and economic development**, enterprise and employment generation. Focus in particular on areas which are accessible by public and sustainable modes of transport. Enable settlements and rural areas to become self-sustaining through innovation and diversification of the rural economy.
6. Reduce car dependency and promote and facilitate sustainable modes of transport. Prioritise walking, cycling and public transport. Provide an appropriate level of road infrastructure, road capacity and traffic management to support existing and future development and **enhance connectivity**.
7. Protect, enhance and ensure the sustainable use of Limerick's key **infrastructure** including water supplies and wastewater treatment facilities, energy supply including renewables, broadband and transportation.
8. Protect, enhance and connect areas of **natural heritage, green infrastructure and open space** for the benefits of quality of life, biodiversity, protected species and habitats, while having the potential to facilitate climate change adaptation and flood risk measures.
9. Protect, conserve and enhance the **built and cultural heritage** of Limerick, through promoting awareness, utilising relevant heritage legislation and ensuring good quality urban design principles are applied to all new developments. The principle that well planned and integrated development enhances the sustainability, attractiveness and quality of an area should be at the centre of any proposal.
10. Support growth in the **tourism** sector in Limerick and capture key opportunities to grow the sector based around four key drivers - Waterways, Activities, Heritage, Arts and Culture, in an urban and a rural environment.

The main policy document of the Draft Limerick Development Plan is referred to as the written statement. The structure of the Written Statement is shown in Table 1 above.

2.4 Relationship of the revised plans with other Plans

International Conventions and Agreements

Ireland has ratified a range of international agreements in relation to the environment. Such agreements place legal obligations on the State with respect to the conservation and management of our environment and heritage. Appendix 1.0 includes details on the International Conventions and Agreements ratified by Ireland.

National, Regional and Local Planning Policy Context

The review of the Limerick Development Plan has been prepared in accordance with the requirements of Section 10 (2) of the Planning and Development Act 2000 (as amended), and provides for the proper planning and sustainable development of Limerick City and County for the Plan period and beyond. Through its policy content and zoning objectives, the review provides detailed guidance for development activity in Limerick, with a particular emphasis on updating the Plan content in light of the adoption of both the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy for the Southern Region.

The National Planning Framework and its Implementation Roadmap has played a major part in shaping the Draft Plan. It is from this document that the population figures for the City and Plan area have been drawn. The NPF envisages a population increase of between 50 and 60%, bringing the City population as a whole to 141,000 persons. The residential zoning allocation of the Limerick Plan will therefore be directly influenced by the NPF. The NPF considers that much of this development should take place in a compact manner, on brownfield and infill sites. This will have implications for the Plan policies in relation to concentration and infill of development, the re-use of buildings and the re-development of brownfield sites. This will also have implications for infrastructure provision for the Plan area.

The Regional Spatial and Economic Strategy for the Southern Region is next in the hierarchy of plans and brings a regional emphasis to the national level policies and objectives of the NPF. The new Development Plan will cover both City and County for the first time, which increases Limerick's significance at a regional level. It is important that planning policy is updated to reflect this.

3.0 SEA Methodology

3.1 Steps in the SEA Process

The Environmental Report is an important element of the SEA process. The report is prepared in a series of distinct steps taken in the assessment of the likely potential impacts of the preparation and implementation of the new Plan. The steps taken in preparation of the ER are as follows and are set out in this document.

- 1. Introduction to and familiarisation with the SEA process.**
- 2. Setting out the background to the review of the Limerick Development Plan.**
- 3. Consultation** with the Environmental Authorities, the public and officials with a range of expertise within the Local Authority. Scoping was carried out with the environmental authorities prescribed in the legislation: -The Environmental Protection Agency (EPA), Department of Housing, Planning and Local Government, Department of Culture, Heritage and the Gaeltacht, Department of Agriculture, Food and the Marine and the Department for Communications, Climate Action and the Environment and adjoining Local Authorities. These were all consulted in order to determine the scope and the level of detail to be included in the environmental report.
- 4. Establishment of an Environmental Baseline and Trends for the Limerick Development Plan area:** Baseline data was collected on the basis of the information included in the scoping report, as well as having regard to the requirements of the SEA Directive. The various factors used to describe the current state of the environment include biodiversity, population and human health, water, air quality, landscape, soils and geology, archaeology and built heritage and the inter-relationships between these factors. Much of the data was extracted from existing data sources. There is no requirement for generating new data under the SEA process.
- 5. Identifying significant Existing Environmental Issues in the Draft Plan area:** This was facilitated by the various forms of consultation that took place as part of the SEA process and along with the Plan preparation and ensuing consultation processes. One very useful document in the drafting of Environmental Protection Objectives (EPOs) and report content generally was the 'Integration of Climatic factors into the SEA process in Ireland' (EPA 2019). Content from regional, national and international environmental policy and consideration of the significant environmental issues facing Limerick specifically was also useful. The preparation of the EPOs was an important

step as they serve as a guide for the planning team preparing the review and reflect the contents and the aims of the review.

6. **The outcome of the Chief Executive's Report** on submissions received to the Draft Plan will be shown when this stage in the process is reached.
7. **Reasonable and realistic alternative strategies** were considered regarding options for the review. Zoning patterns are altered from those set out by the older plans. These were altered to reflect the content of new national and regional guidance and to respond to development and housing need. Monitoring measures were identified in order to quantitatively assess the consequences of the identified impacts.
8. **Public Consultation:** The Environmental Report and the draft Limerick Development Plan is made available for public consultation as per the statutory process provided for under the Planning and Development Acts 2000 (as amended). Along with prescribed bodies the documents are made available to neighbouring Local Authorities. See 9 below.
9. **Plan Process to date:** as the SEA process is part of the wider development Plan process it is worth considering the development plan process as a whole and the Steps taken so far.

A pre-draft Public Consultation took place between the **15th Aug to 12th Oct 2020**. The pre-draft consultation was accompanied by the publication of series of First Issues documents, i.e. papers which summarised the planning issues and responses which would be involved in the plan preparation.

A Chief Executives Report on summary of submissions issued on the **20th Nov 2020**. Elected Members considered the Chief Executives report on the pre-draft submissions. The Forward Planning section prepared the Draft Plan – **Feb/ March 2021 which issued to** Elected Members on the **26th April 2021**.

Following this Workshops were held with Elected Members in May and June 2021. The Elected Members made amendments to the draft plan at a Special Council meeting on **the 14th of June 2021**, which was adjourned to the 16th and 17th of June 2021. The adjournments were due to time limits associated with gatherings under Covid Protocols.

The draft plan went on public display for a ten week period between the 26th of June and the 6th of September 2021.

3.2 Difficulties Encountered in Compiling the Required Information

The SEA Guidelines produced by the DoEHLG in November 2004 state that the SEA process “does not require major new research”. As such, the Environmental Report was prepared and informed by available data sources, including planning reports, interviews with key personnel such as local engineers and members of differing agencies. The earlier Development Plans and their variations were available for review. The previous Environmental Reports could therefore be used and proved a valuable information source. Information was also drawn from the preparation of Environmental Reports for the Regeneration Areas of the City in 2013, from the incorporation of the Limerick 2030 Economic and Spatial Plan into the City Development Plan in 2014 and also the environmental reports carried out as part of the Strategic Integrated Framework Plan for the Shannon Estuary (SIFP), 2013 (see link to SIFP SEA):

https://www.limerick.ie/sites/default/files/strategic_integrated_framework_plan_for_the_shannon_estuary_written_statement.pdf.

Difficulties encountered in compiling data include the lack of availability of information relating to geology and also in relation to surface water drainage. It should be noted that studies are currently under way to address these information gaps and when completed the studies will inform both the Environmental Report and the Plan itself. Funding has been obtained from the Heritage Council to support the geological survey. It is still at an early stage in the plan process and both the Plan and report are evolving documents which can incorporate new information when it comes available.

Table 2 below details data sources used in the preparation of to the Environmental Protection Objectives.

Table 2: Environmental Protection Objectives and Data Sources

Biodiversity, Flora and Fauna/Built and Archaeological Heritage	Data Sources
B1: Protect, conserve and enhance habitats, species and areas of regional and local importance, including aquatic habitats and species and promote the	Much information was drawn from NPWS reports and individual planning applications, in addition to site inspections. The County Botanical

sustainable management of ecological networks. See also W3 below.	Recorder has also provided an inventory of sites based on botanical surveys to inform the knowledge base.
B2: Ensure the continued conservation of the Natura 2000 sites, Natural Heritage and Proposed Natural Heritage sites. These sites are important, both as an amenity and natural history resource.	See above.
B3: Preservation of the character of the historic built fabric.	Much has been published on Limerick's built heritage in particular. More detailed site specific material is available in planning files and Protected Structures Records in addition to the NIAH.
B4: Preservation of the archaeological heritage.	Council Archaeologist.
Population and Human Health	Data Sources
P1: Facilitate a good standard quality of life for the population of Limerick through ensuring high quality residential, recreational, educational and working environments.	CSO. Council Monitoring and EPA discharge licence. Regeneration sources.
P2: Provide policy support for the provision of suitable employment and facilities for the local population.	Irish water, Physical Development Section of Limerick City and County Council.
Water Resources	Data Sources
W1: Ensure that wastewater infrastructure keeps pace with development proposals.	Good data available - EPA water quality Data, Inland Fisheries Ireland. Council monitoring.
W2: Ensure that the requirements of the Water Framework Directive are incorporated into the Plan.	See Above.
W3: Ensure that wetland and peatland sites are preserved.	NPWS site synopsis.

Soils and Geology	Data Sources
<p>GS1: Place an emphasis on the development of brownfield sites rather than greenfield sites in Limerick. By reducing the possible development of greenfield sites this makes a positive contribution to soil conservation. This can also be achieved through the sensitive reuse of existing buildings, reducing the need for new build (see C2 below).</p>	<p>Data available - GSI, EPA. Planning Reports and Council Plan Map also used.</p>
<p>GS2: Protect geological sites within the Plan area.</p>	<p>See above. It is planned to carry out a survey in 2021 to address information deficiencies.</p>
Air and Climatic Factors	Data Sources
<p>AQC1: Increase energy efficiency and the proportion of energy generated from renewable sources and where necessary to ensure the sensitive application of energy saving measures to the historic built fabric of Limerick.</p>	<p>Limerick Clare Energy Agency Audit. Published UL sources. Carbon balance paper being prepared which will help with background information.</p>
<p>AQC2: Avoid deterioration of air quality in the Plan area.</p>	<p>See above.</p>
<p>AQC3: Include climate action concerns into the Plan policies.</p>	<p>Data from Limerick Climate Change Adaptation Strategy.</p>
Cultural Heritage	Data Sources
<p>C1: Protect and conserve features of archaeological heritage and their setting.</p>	<p>Good Data available through Record of Monuments and Places, also Council Archaeologist. Text was included in the Plan in order to emphasise the importance of archaeological heritage in the area.</p>

C2: Protect, conserve and promote the sustainable re-use of architectural heritage.	Good Data available through Record of Protected Structures and the local Conservation Officer. NIAH reports.
Landscape	Data Sources
L1: Protect and conserve the quality, character and distinctiveness of the Limerick landscape, both urban and rural.	Planning reports. LDP 2011 Appendix 7. NIAH reports. This will involve detailed consultation with the architectural heritage unit of the DAHG.
L2: Retain listed views in the county area.	County Archaeologist.
Material Assets	Data Sources
MA1: Maintain sustainable access to assets such as open spaces, water resources and all other physical and social infrastructure.	Planning and local engineer reports, particularly in relation to amenity provision. Environmental Section reports for discharge licences.
MA2: Ensure that there is adequate policy support for infrastructural provision in the Plan area.	See above.
Compliance with higher tier plans	Data Sources
HTP 1: Ensure compliance with higher tier plans such as the National Planning Framework and the Regional Spatial and Economic Strategy and other Section 28 guidance that might be issued by the Department.	Reference to RSES and NPF policies and Section 28 guidance.

4.0 Current State of the Environment

4.1 Introduction

Ireland's Environment - An Integrated Assessment 2020, the Environmental Protection Agency's latest state of the environment report, provides an overall assessment of Ireland's environment. The overall conclusion of the report is that the quality of Ireland's environment is not what it should be and there are serious causes for concern. Some of the topics mentioned include:

1. Protection of health and well-being.
2. Need for ecosystem protection.
3. Reducing emissions and the consumption of resources.
4. Climate Change.
5. Air quality in terms of exceeding EU targets for ammonia emissions.
6. Water quality. Of 102 water bodies assessed, two, the Mague estuary and the Deel estuary in Co. Limerick, exceeded the relevant salinity related winter phosphorus thresholds (Environmental Protection Agency | Water Quality in Ireland 2013 - 2018). It should also be noted that groundwater quality is an important resource for potable water in County Limerick and geological conditions in the county mean that much of it is vulnerable to contamination.

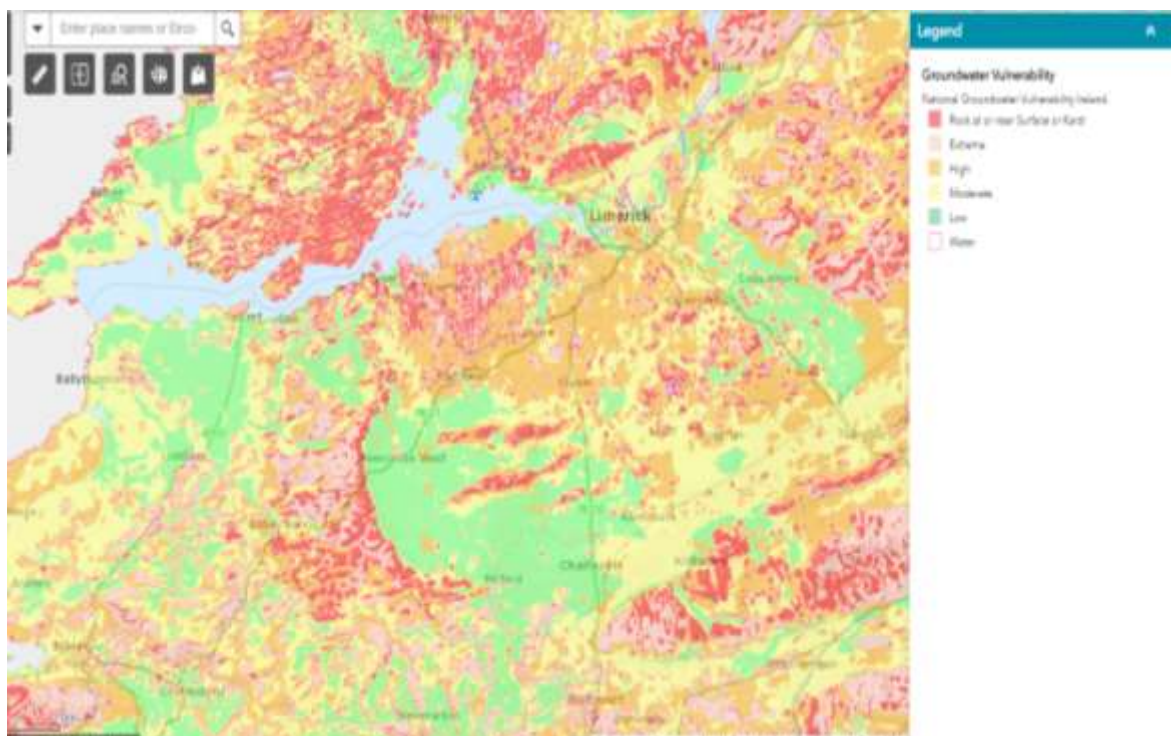


Figure 7: Groundwater vulnerability in Limerick (Source: OSI Ground Water Data Viewer)

Remediation of unsatisfactory quality in groundwater, rivers, lakes and estuaries is one of the main environmental challenges. In the context of this Plan the importance of upgrading treatment systems to ensure adequate treatment of discharges is of huge importance. Despite the cycle of river basin management plans, prepared as a result of the Water Framework Directive, there has been a gradual reduction in water quality.

Biodiversity, Flora and Fauna

The SEA process has considered available information on designated ecological sites and protected species, ecological connectivity (including possible links and corridors) and non-designated habitats. Since Appropriate Assessment concentrates on possible effects on Natura 2000 sites such as Special Areas of Conservation, Special Protection Areas and not on Natural Heritage Areas (NHAs), or proposed Natural Heritage Areas and other national level ecologically designated sites, the Environmental Report will address these sites.

Since the LDP is a policy document the opportunity has been taken to update policy content in relation to nature conservation. The National Parks and Wildlife submission to the First Issues pre-Draft Plan consultation, mentioned the need to place nature conservation on a prominent footing in the Plan, by referencing the National Biodiversity Action Plan (NBAP). References to the National Biodiversity Action Plan and the All-Ireland Pollinator Plan have been incorporated into the Plan.

NHAs are designated due to their national conservation value for ecological and/or geological/geomorphological heritage. They can be nationally important for semi-natural and natural habitats, landforms or geomorphological features, wildlife, plant and animal species or a diversity of these natural attributes. NHAs are designated under the Wildlife (Amendment) Act 2000. There are four NHAs designated in County Limerick:

- Lough Gay Bog (002454)
- Grageen Bog and Fen (002186)
- Moyreen Bog (002361)
- Carrigkerry Bogs (002399).

Proposed Natural Heritage Areas were published on a non-statutory basis in 1995, but have not since been statutorily proposed or designated. These sites are of significance for wildlife and habitats. Their locations and extent can be viewed on the Limerick Plan map system on www.limerick.ie

Ecologically sensitive areas located within the County include aquatic and terrestrial ecological areas, which are part of the County's extensive network of watercourses and wetlands comprising:

- Rivers, streams and riparian zones (such as River Shannon, River Maigue, River Feale and River Allaghaun)
- Loughs (such as Lough Gur, Dohyle Lough)
- Bogs and fens (such as Griston Bog and Ellaha fen).

A specific objective has been included in the Plan for the protection of wetlands informed by EPOs B1 and W3 in section 1.6 above. It is intended to carry out a wetland survey during the lifetime of the Plan. Previously 52 wetlands had been recognised but now a total of 258 wetlands sites have been recorded.



Figure 8: Preliminary wetlands map (Source: Wetlands Surveys Ireland)

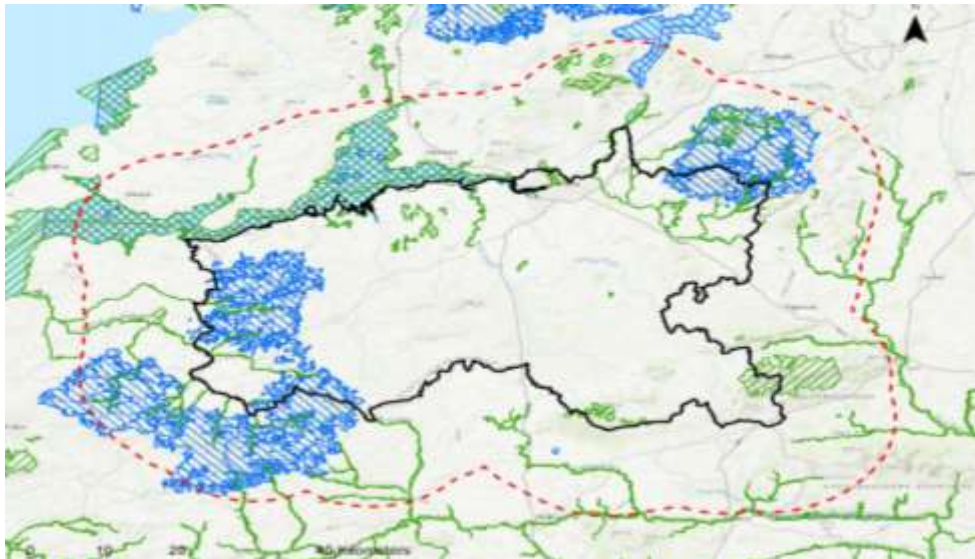


Figure 9: Natura 2000 sites in Limerick and within 15km of the county boundary (Source: Enviroguide 2019)

The sites shown in blue in Figure 9 above are Special Protection areas, those in green are Special Areas of Conservation as listed in Table 3 below. The hatched areas along the Shannon Estuary shows where they overlap.

Table 3: Special Areas of Conservation and Special Protection Areas in Limerick (Source: NPWS)

Special Areas of Conservation
Site Name: Askeaton Fen Complex SAC (002279)
Site Name: Ballyhoura Mountains SAC (002036)
Site Name: Barrigone SAC (000432)
Site Name: Blackwater River (Cork/Waterford) SAC (002170)
Site Name: Carrigeenamronety Hill SAC (002037)
Site Name: Clare Glen SAC (000930)
Site Name: Curraghchase Woods SAC (000174)
Site Name: Galtee Mountains SAC (000646)
Site Name: Glen Bog SAC (001430)
Site Name: Glenstal Wood SAC (001432)
Site Name: Lower River Shannon SAC (002165)
Site Name: Tory Hill SAC (000439)
Special Protection Areas

Site Name: River Shannon and River Fergus Estuaries SPA (004077)
Site Name: Slievefelim to Silvermines Mountains SPA (004165)
Site Name: Stack's to Mullaghareirk Mountains, West Limerick Hills and Mount Eagle SPA (004161)

Trees in the Plan area

Trees can be as visually prominent as buildings and are an important landscape component. They are able to integrate with buildings to provide important landscape features and visual variety. From an ecological viewpoint, whatever the species, it is important to ensure that an adequate tree stock remains within the Development Plan Area.

Closely related to trees in the landscape are hedgerows. Within the LDP area there is a presumption against the removal of these landscape features. These are part of the fabric and history of the landscape. Apart from their visual contribution they are also important habitats in their own right. In order to ensure their continued vitality and usefulness as landscape features and habitats, they require continuous management, particularly, if they are to be integrated within new developments.

The link between the quality of the local environment, of which trees are an important component, and human well-being is one that is increasingly recognised. In this regard, the policies that protect trees and groups of trees have been updated in the existing Plan.

Existing Environmental Pressures for Biodiversity, Flora and Fauna

One of the most pressing issues is prevention of encroachment on sites of ecological interest, both designated and non-designated. There is increasing pressure for public access, often intensified by Covid19 preventative restrictions. This increased disturbance and footfall can cause both physical damage and disturbance to habitats and species.

Closely related to this is fragmentation and isolation of habitats as a result of development. Connectivity of habitats to permit species movement needs to be addressed and will form part of the forthcoming Blue Green Infrastructure Strategy. While agri-environmental schemes are beyond the scope of the Plan, measures through these schemes, allied to planned measures, may help prevent isolation of habitats and species. One other aspect of ecological isolation and fragmentation is that of barrier creation to species movement, either through development, or instream obstacles in the case of watercourses.

Similar to the section on water quality, a decline in water quality, pollution and dumping has adverse effects on habitats.

Population and Human Health

Population: The Central Statistics Office's (CSO) most recent Census in 2016 shows that Limerick City and County recorded a combined population of 194,899 persons, an overall increase of 1.5% since the Census 2011. Limerick City and Suburbs, as defined by the CSO has a population of 94,192 persons recorded in 2016. The average age for the Limerick City and County region, according to the 2016 Census, is 37.7, up from 36.5 in 2011.

The National Planning Framework Project 2040 sets out that half of the overall national growth in terms of population, employment and housing will be targeted in Ireland's five Cities, Dublin, Cork, Limerick, Galway and Waterford. It is the objective of the National Planning Framework to redistribute growth in a more balanced manner, which would see each of the cities grow by 50% by 2040. The Framework foresees the population of Limerick City reaching approximately 150,000 by 2040.

The population growth targets of the NPF has implications for the Development Plan, given the increased emphasis on placing housing and development generally within the boundaries of existing settlement throughout the county, both to avail of and support services and to ensure the growth of stronger settlements. Chapter 3 of the Plan Housing and Settlement Strategy aims to form a balance between compact growth and sustainable communities, while recognising that service capacity in the settlements has to be managed carefully. Chapter 3 itself says..."by placing an increased emphasis on the future development of existing settlements within the county, this Plan seeks to foster sustainable live-work patterns which reinforces existing urban centres whilst safeguarding the agricultural sector and rural areas from urban generated development pressures. The Settlement Strategy addresses a range of settlement scales within urban and rural contexts that provide for a variety of levels of employment, services and housing choice commensurate with their position in the Settlement Hierarchy".

Labour Force: The labour force in 2016, recorded in the Census for Limerick City and County was 90,120 persons, representing an increase of 0.6% from 2011, which was 89,578 persons. The unemployment rate for the Limerick area has fallen since 2011 Census in line with the national trend. The unemployment rate for Limerick City and County in 2016 is 14.4%, representing a substantial decrease from 21% in 2011. The International Labour Organisation unemployment rate for the Mid-West Region (which would be similar to Limerick's unemployment rate) was 6.1% in Q2 2019, just slightly higher than the national

unemployment rate of 5.4%. Economic conditions have changed significantly in Limerick in recent years. With the economic upturn across the state, the wider urban area of Limerick has shown significant improvements in job creation, employment/ unemployment and investment. Across the local authority area, some 20,000 jobs have been created since 2013, with some 7,000 of those jobs in the City. The Covid 19 pandemic has had a serious effects on the Limerick economy and will require a number of years to address.

A background paper produced for the Development Plan entitled People and Places makes some important points in relation to employment in Limerick. These are worth noting as they emphasise the modern trends of commuting and the fact that people often travel great distances for employment. This is important not just in trying to establish a policy footing for sustainable transport, but also in relation to settlement patterns themselves.

The paper makes the following important point “it is important that a distinction is made between the employment of residents of Limerick and the number of jobs based in Limerick, and also a further distinction between where the jobs are located and where the workers reside for Limerick City”. These distinctions are important to gauge the significance of challenges and opportunities for employment generation in the local and regional context and to define commuter zones and travel to work catchments.

The number of jobs in Limerick in 2016 was 67,986, according to Powscar returns. This is a 7.8% increase over the 2011 total, which was 63,054. It should be noted that these figures exclude those who failed to provide information on their workplace and those who indicated that they had no fixed place of work. According to calculations made in the ESRI report ‘Prospects for Our Regions’ (2018) based on Powscar 2011¹, 76,500 jobs were based in Limerick City and County and 149,200 in the Mid-West region as a whole (comprising Limerick, Clare and North Tipperary). The jobs figures were total figures and were not confined to jobs in fixed places of work, they also allowed for those responses to the Census.

Existing Environmental Pressures/ Problems for Population and Human Health

Key environmental pressures in the Plan area relate to:

- The need to integrate the policy content of both the NPF and the RSES with their emphasis on concentration of development and the population figures assigned to Limerick.

- The need to ensure that Waste Water infrastructure keeps pace with development, in rural towns and villages in particular.
- Ensuring adequate zoning for Community and Educational usage, including provision of medical and leisure at a level appropriate to the settlement position in the hierarchy.
- Maintenance and enhancement of the quality of the urban and rural surroundings and ensuring continued access to amenities and services is essential for human health and wellbeing.

Policy responses to the above are discussed in the next Chapter where the assessment of policy takes place.

Water

The hydrology of County Limerick is dominated by the River Shannon and its tributaries. There are a number of rivers, streams and tributaries in the County.

The drainage pattern within Limerick is principally in a south to north direction, flowing towards the Shannon Estuary. There are exceptions to this particularly in the south of the county. The main watercourses in the Plan area include the River Shannon, River Deel and River Maigue. Watercourses and tributaries of these Rivers include the Ballyclogh Stream, Doohyle Stream, Barnakyle River, Greananagh River, Kilbreedy Stream, and Clonshire River. Farther to the west are rivers such as the Feale, the Allaghan and the Galey. In the east, the Mulkear River is important, together with its tributaries such as the Bilboa and Dead rivers. The Plan area is within the new National River Basin District (NRBD), which was formed from the merger of the Eastern, South Eastern, South Western, Western and Shannon River Basin Districts from the previous Water Framework Directive Cycles. There are transitional and riverine surface water features in the form of the River Maigue, the River Deel and the Ahacronane River, all of which flow in a northerly direction and discharge into the Shannon Estuary. In terms of transitional waters the Maigue estuary and the Deel estuary, exceeded the relevant salinity-related winter phosphorus thresholds (Environmental Protection Agency | Water Quality in Ireland 2013 – 2018). This might be a reflection of intensive land usage in their catchments.

According to the EPA, the WFD Transitional Waterbody status (2010-2015) of the River Maigue, River Deel and River Ahacronane and Shannon Estuary is 'moderate' status and 'at

risk' of not achieving good status. The Upper Shannon Estuary just west of Limerick City Docks has a 'poor' status.

Groundwater

While ground water is an important resource as a potable water source in County Limerick in particular, Figure 7 above indicates that it is also a vulnerable resource. Possible pollutants include fertiliser residues, poorly managed farmyard waste. Some of the original 1995 Geological Survey of Ireland Source Protection Reports (see <https://www.gsi.ie/en-ie/publications/Pages/Limerick-Groundwater-Protection-Scheme-Reports.aspx>) indicated that this was a threat to some sources. A later report in 2013 indicates that this is still the case. In other areas the report also indicates that possible contamination from domestic wastewater treatment systems is also an issue.

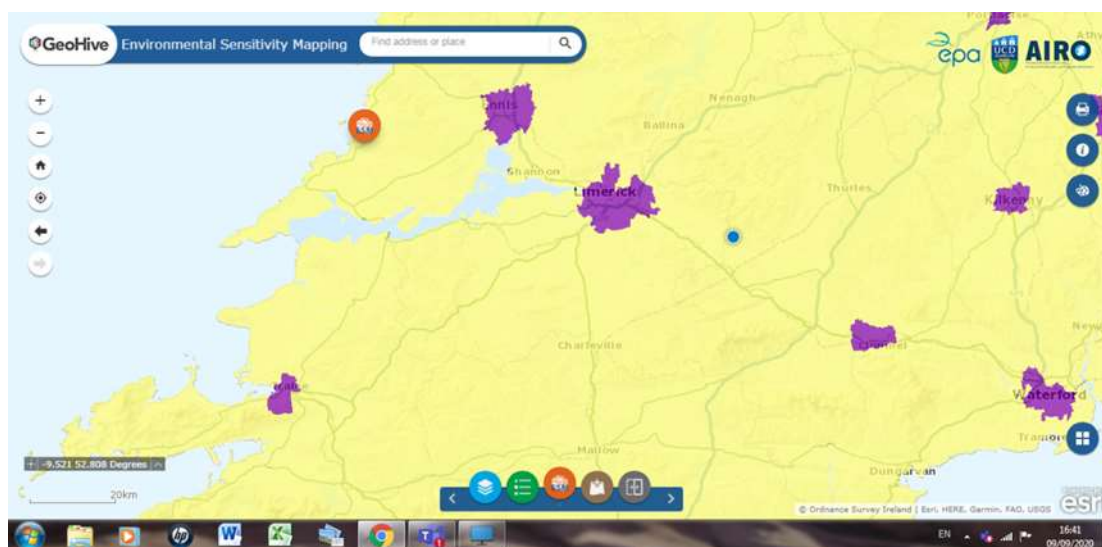
Closely related to ground water flows and hydrology generally are habitats that are dependent on ground water. Examples of these are fens and springs such as the Askeaton Fen complex (SAC 002279) and the Ellaha fen in the west. In mid County Limerick there is an example of a fen within the Tory Hill SAC site, while in the east Grageen bog and fen are another example. Fen habitats are largely groundwater fed, being located in topographic hollows or below springs or seepages of water that has been in contact with mineral soils and like bogs they accumulate peat. As such these fens are considered to be Groundwater Dependent Terrestrial Ecosystems (GWDTEs). Pressure on these can come from excessive ground water abstraction, pollution, infill or drainage.

Water Supply

Water for domestic consumption is extracted from 28 water resource zones (WRZs) to supply Limerick City and County with a potable water supply. As part of the National Water Resource Plan (currently being prepared by Irish Water) it has been determined that the following WRZs may require further investigative studies or interventions to facilitate significant new connections to the network: Glenosheen -Jamestown, Kilmallock, Carrigkerry, Croom, Knocklong-Hospital, Galbally, Ballingarry South West Regional Glin Water Supply, Murroe, Herbertstown, Doon, Castletown-Ballyagran, Abbeyfeale, Fedamore, Rathkeale, Rockhill-Bruree, Ballylanders, Killeely and Oola - Pallasgreen. The NWRP has assessed that it is likely that further investigative studies or interventions will be required in the following WRZs: Cappamore Foileen, Foynes Shannon Estuary and Kilfinnane-Ardpatrick water supplies. These WRZ serve rural hinterlands and other settlements other than the settlements listed above. The full options assessment stage of the NWRP is being prepared both by Irish Water and the Water Services Department of the Council to identify the preferred interim and long-term interventions required to ensure a sustainable water supply in Limerick.

In the earlier non-technical summary, Air Quality in Limerick had been described as being generally good. As can be seen from Figure 11 below, there are different air zones in urban and rural Limerick and as a result different issues of air quality can apply. While traffic can be an issue in urban areas, issues such as the creation of dust from quarrying activity and transport of aggregates can arise, albeit located in rural areas. In these situations, it is through planning conditions applied to planning permissions or registered quarries that control on these issues can be exerted.

Figure 11: Air Zones (Source: Environmental Sensitivity Mapping website)



Development itself can cause issues for air quality and the contaminants that might be released during disturbance of previously developed brownfield sites. While this can give rise to air contamination principally in the form of dust, it can also create problems for local hydrology, through pollution of aquifers and water courses. This is likely to become more of an issue, with both the NPF and the RSES emphasising compact growth and the development of infill and use of brownfield sites. The Development Management section of the Plan (Chapter 11) refers to this issue as follows: “the redevelopment of certain brownfield sites, particularly sites where previous industrial type activities may have left a legacy of contamination could possibly affect human health and/or have adverse impacts on the environment, including on ground and surface waters, soils and air quality. Examples of such sites include those formerly used for manufacturing/industry, landfill, tanneries, petrol filling stations, oil/gas storage, and scrap yards and railway lands”.

The Council will require that sites with the potential to contain contaminants are subject to proper investigation and if necessary remediation, to industry-best practice standards prior to redevelopment. Such site investigation and remediation should be undertaken and managed by appropriately qualified personnel, will require screening for Appropriate

Assessment under the Habitats Directive and may be subject to licensing/permits required under other Acts, including the Waste Management Act.

In rural locations for larger agricultural developments odour can also be an issue. This is referred to in the Development Management standards, where the necessity for an odour management plan in addition to effluent management plans is required.

Traffic is one of the major sources of air borne pollution in parts of Limerick, so the transition to electric vehicles would alleviate this issue. However, to ensure an adequate transition there is a need to ensure that delivery of charging points to facilitate users of such vehicles are provided, both in adequate numbers and in locations where they will be most effective. The provision of an adequate charging network is an essential prerequisite in ensuring large-scale adoption of electric vehicles.

Climate

The direct effects of climate change on Limerick's environment may be immediate or cumulative. Damage from catastrophic weather events such as floods and storms is likely to increase, at the same time as slow onset environmental deterioration from a changing environment. The way these effects manifest will vary, according to the sensitivity of individual locations and its level of exposure. Coastal and estuarine sites would be particularly vulnerable. This is particularly true for the Shannon estuary as there are large areas of tidal mudflats in the estuary which are vulnerable to tidal surges and altered sea levels.

There will also be indirect impacts arising from societal responses to climate change in terms of both adaptation (e.g. changes in land use, such as construction of flood defences or use of land as flood residence areas) and mitigation (e.g. the retrofitting of historic buildings to reduce energy consumption). Of the many potential impacts, those identified as priorities for climate adaptation planning are flooding (inland and coastal, this has been raised by the NPW's submission to the pre-draft First Issues consultation), storm damage, coastal erosion, soil movement (landslip or erosion), pests and mould, wildfires and mal-adaptation. This might include unsuitable adaptations to historic buildings for instance or modifications to wetland habitats which might affect their ecological functions.

The approach in the Plan has been to create a new chapter for climate action but also to include climate issues into each chapter. This means that the specifics of climate action as it relates to issues such as transport infrastructure can be found in that chapter, while a broader response is in the climate action chapter. This will be the first Limerick Development Plan with such an approach.

Existing Environmental Pressures/ Problems for Air and Climate

Currently there are no significant concerns with regard to air quality in the City as was indicated earlier in this report. It is hoped that the gradual transition to electric vehicles will play a part in reducing traffic emissions and have a positive long-term effect on air quality in the Plan area and the metropolitan area as a whole. Pressures on air quality from transport is addressed in the Plan.

Climate change impacts may present challenges to future land use and location of development in the Plan area. Predicted impacts from projected temperature rises include more concentrated periods of higher rainfall and more exposure to flood risk. As indicated earlier in this report, tidal flooding is a huge part of the flood risk in Limerick. A comprehensive Strategic Flood Risk Assessment has informed the Plan and the zoning pattern has been guided by this.

There is the continued need to comply with current and emerging guidance on climate adaptation and mitigation as it emerges from central government. At present the Limerick Climate Change Adaptation Strategy 2019- 2025 is the most evolved of internal climate response documents in the Council and has informed the climate action sections of the Plan.

Geology and Soils

The geology of Limerick comprises rocks that are between 450 and 300 million years old. The Silurian rocks are the oldest and are mudstones and sandstones that resulted from ocean deposits. These oldest rocks now make up the Slieve Felim Mountains in the east of the county. At the start of the Devonian period (415 Ma) the conditions changed significantly and coarse pebbly sediments and sands were deposited. These were eventually cemented to form conglomerate and sandstones which make up part of the Slieve Felim range. Oceanic deposits from ocean life resulted in the limestone of the centre of the county (shown in light blue). In Ireland Carboniferous volcanic rocks are rare but are encountered close to Linfield in Pallasgrea where some basalt is visible in a local quarry. During the Upper Carboniferous (330-300 Ma) rivers carried a great deal of sediment south-westwards across then land masses and it was dumped at the mouth of these rivers in the form of deltas that grew out into a deepening ocean. These formed the shales that make up the higher ground just west of Newcastle West, shown in brown in the map below.

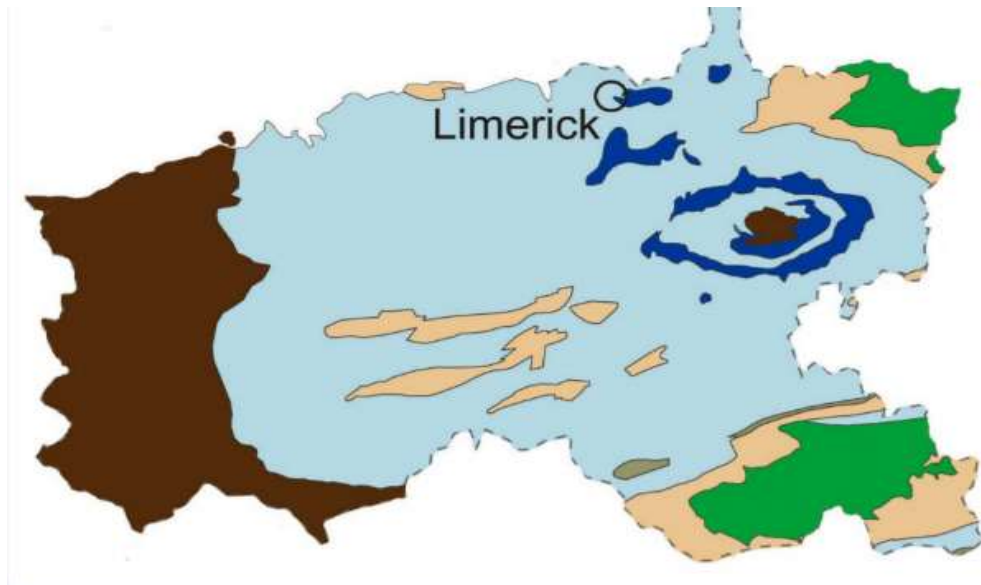


Figure 12: Geological map of Limerick (Source: geoschol.com)

Figure 12 above outlines the geology of County Limerick with green showing Silurian sediments, beige Devonian sandstones and conglomerates, light blue Lower Carboniferous limestone, brown Upper Carboniferous shales and dark blue Carboniferous volcanic rocks.

The geology of the urban areas of Limerick has been much modified by generations of building activity, where the original soil cover was removed or covered by the built environment.

At this stage in the Plan process, deficiencies in the information available have been identified. A geological survey with the GSI has been planned and funding has been obtained from the Heritage council to facilitate this work in 2021. This survey will then be incorporated into the environmental report following completion.

An Foras Taluntais, now Teagasc, completed a county wide survey of soils in 1995 and published the results in Soil Survey Bulletin No.16. This was the second county level survey to be produced. Works by other agencies such as the Environmental Protection Agency have added to this knowledge since. The 1966 survey grouped the soils of Limerick into 11 different groups. These are listed as follows:

1. Brown Earth Group
2. Brown Podzolic Group
3. Grey Brown Podzolic Group
4. Gley Group
5. Podzol Group
6. Lithosol Group
7. Organic Soils or Peats

8. Lake Alluvial Soils
9. River Alluvial Soils
10. Estuarine Alluvial Soils
11. Other Soils.

Each group has varying characteristics including drainage. This has implications for agriculture and for the effective functioning of wastewater treatment units for smaller scale developments. The 1966 report does acknowledge the varying qualities of Limerick soils with a description of West Limerick Soils as being “less favoured”.

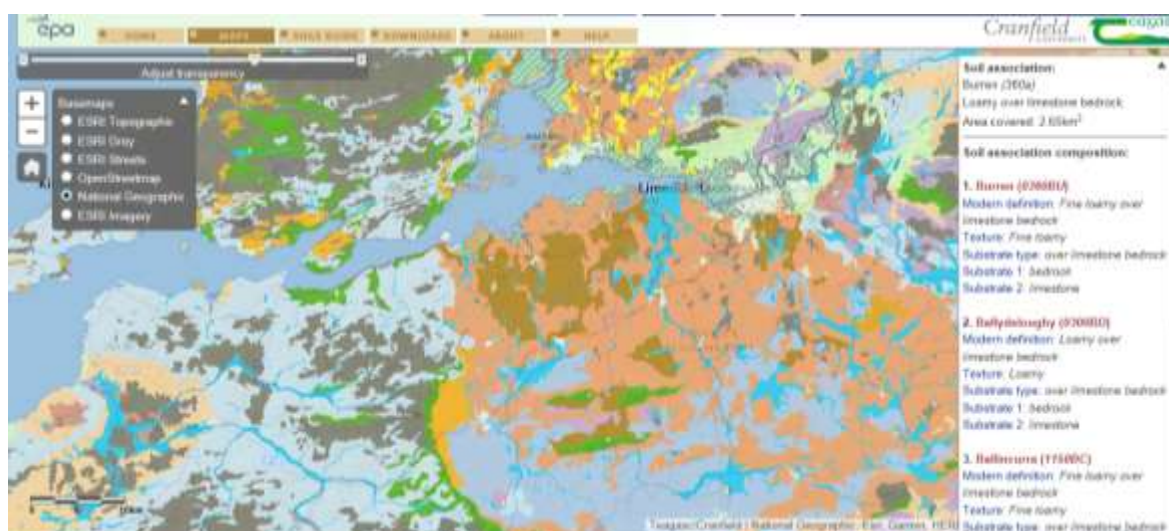


Figure 13: Soil associations in part of Limerick (Source: Teagasc)

The key questions in examining the issue of soils in Limerick, will be soil conservation. This is promoted through environmental objectives encouraging the re-use of brownfield sites, adequate treatment and disposal of waste and re-use of soil following excavations works. Another issue to be examined will be that of soil contamination as this has arisen in the course of planning applications, particularly on brownfields sites in the City. As noted elsewhere in this report, this is dealt with in the Development Management section of the Draft Plan. Historic landfills are also an issue for contamination and developments in these areas are assessed by the Planning and Environment unit.

Geology is also mentioned in the sections on water in the Environmental Report.

Existing Environmental Pressures/ Problems for Soils and Geology

The existing environmental pressures for soils and geology in Limerick are listed below:

1. Soil conservation in its general terms is the biggest issue in that dispersed development patterns lead often to unnecessary use of greenfield sites.
2. The issue of contaminated soils is also a growing issue. One part of the contamination issue that has not been mentioned above is that of the presence of invasive species which have often colonised brownfield sites. The policy content of the plan has been updated to reflect this. Movement of soils with seed stock of invasive species in them can lead to contamination elsewhere.
3. Lack of knowledge of geological heritage sites. This will be addressed through a survey funded by the Heritage Council in 2021.

Archaeological Heritage

For the first time the archaeology of City and County will be combined in a single planning policy document.

The “Archaeology 2025: Strategic Pathways for Archaeology in Ireland” states that the “archaeological sector, as an element of cultural heritage, has the potential through research on Ireland’s past to contribute to policy areas such as tourism, climate change, social inclusion, demographic change, health and well-being”. However, pressures on archaeology through development, human activity and climate change remain.

Cultural Heritage

The number of buildings and structures on the record of protected structures is over 2,000 buildings, structures and features in Limerick. This record will need to be assessed in order to consider those that may need to be delisted or added. The main challenge for the new Plan will be to update the list, as it has been over ten years since the last two Plans were prepared. Substantial redevelopment has been planned for City centre locations such as the Opera site and Cleeves Riverside Campus and as a result the protected structure record will need to be updated to ensure both adequate protection for older building stock and to help with their integration into new surroundings.

The new Building Height Strategy will have particular implications for Limerick in that up until now, with rare exceptions it has been a low rise City. The new Building Heights Strategy will offer valuable guidance on the integration of taller development in carefully selected sites in the City. The Strategy enables a coordinated approach to the development of taller buildings within the cityscape and is a step forward for building design in the City. The Strategy provides ecological opportunities for buildings, as part of the design process, to incorporate nesting

sites for swifts or other urban birds. Taller buildings are often used by raptors such as the peregrine in default of natural features such as cliffs. The Strategy aligns with the urban character assessment of the City and environs suggested in the Draft Plan, referring to the suburbs as a separate entity from the older City developments and the historical City centre (Avison Young 2021, p.64).

The existing landscape character areas will be retained in the County, while urban character areas will be used to describe the urban landscape of the City.

Urban character areas are areas in which different urban areas are distinguished from each other by different characteristics. This may be by reason of street layout, building styles or indeed the remnants of older industries. Some areas may have more modern developments than others which give them an entirely different and more contemporary character. In the new Plan the metropolitan area of Limerick has its own urban character and within that area four separate urban character areas have been identified. These are as follows:

- 1. The City Area** which consists of the functional area of the former City Council. This includes the Georgian quarter and the older parts of the City.
- 2. The Castletroy Environs area** to the east of the City and containing the University of Limerick and the National Technological Park.
- 3. The Southern Environs Area** to the south and west of the City contains the Regional Hospital, Raheen Business Park and many modern housing developments dating from the 1960s. Currently major housing projects are proposed in this area.
- 4. The Caherdavin Area** to the west and north of the City contains many housing developments from the 1960s, the Limerick Institute of Technology and Thomond Park an important sporting focal point in the City.

The Draft Maritime Area Plan Bill included a seascape assessment. The creation of a seascape methodology was examined for its implications for coastal landscape character areas of Limerick. As can be seen from Figure 14 below, there is currently one landscape character area in Limerick with a coastal theme, that of the Shannon Integrated Coastal Management Zone. The importance of this area, not just for Limerick, but on a regional level was emphasised by the publication of the Strategic Integrated Framework Plan in 2012 which accompanies the Draft Development Plan.



Figure 14: Seascape Character Area 8 Shannon Estuary and Tralee Bay (Source: Seascape Character Assessment Report)

It is considered that the seascape character area designation will have no implications for the current landscape character areas shown above. This is because the boundary of seascape character area 8 lies within and not beyond the boundary of the Shannon Integrated Coastal Management zone. The description of the landscape character area in the Plan acknowledges the character of the estuary and similarly the seascape assessment describes the estuary portion of the larger SCA as being sheltered, with a long history of human occupation and usage.

Existing Environmental Pressures/ Problems for Cultural Heritage

The existing environmental pressures for cultural heritage in Limerick are listed below:

- 1. Landscapes:** There are two major challenges for the current Plan, the first being the incorporation of City and County landscapes in an overall assessment and the second being the consideration of the county landscape areas in the context of the new seascape assessment, being carried out for the maritime area planning Bill process.
- 2. Archaeological Heritage:** The need for development to take into account, not just individual archaeological sites but also their setting.
- 3. Archeological Heritage:** Climate change will prove an issue for more exposed sites and monuments and may also prove a threat to more common and widely known monuments such older graveyards still in use.

4. Architectural Heritage: The combination of the two lists of protected structures from the City and County given the changes that have taken place in the time period since the preparation of the last two Plans. This is a difficult task and an up to date list is essential as a basis for their future management.

5. Architectural Heritage: The management and integration of protected structures into modern developments. In this regard, the Living City Initiative in Limerick may well prove to be a valuable incentive.

Material Assets

Material assets are taken to include infrastructure and utilities including rail, road, water supply and wastewater treatment facilities. It also includes economic assets such as buildings, lands and water resources which support tourism and amenities. It also includes the road network of the area and its ability to deal with the traffic loads that will arise in the lifetime of the Plan.

There is further potential to boost rail infrastructure in re-opening the Limerick to Foynes rail line. A planning application was been lodged in 2018 to carry out repairs to bridge structures along part of the route. It is likely that this will occur in the future as the transport needs of Foynes Port grow, which will make it financially worthwhile to modify and re-open the line. While this is part of the transport infrastructure of the Plan area, this will not have any bearing on the review. However, it is important to ensure that the rail line is protected from encroachment.

Existing Environmental Pressures/ Problems Material Assets

The existing environmental pressures for material assets in Limerick are listed below:

- 1.** Protection of the carrying capacity and the strategic transport function of the transport network is an objective of the Draft Limerick Development Plan and requires continuous assessment.
- 2.** It will be important to ensure that the provision of WWTP capacity keeps pace with development.
- 3.** All new infrastructure is required to be designed and built in a fashion so as to ensure it can function in a climate altered future. This issue has been included in policy content in Chapter 8 – Climate Action, Flooding and Transition to a Low Carbon Economy.

4.2 Interrelationships between the environmental factors

The interrelationships between the range of environmental topics is an important consideration in the environmental assessment. Table 4 below indicates the interrelationships identified between the environmental topics in this assessment.

The relationship between adequate wastewater treatment and water quality and Ireland's obligations under the Water Framework is evident.

Open space, blue space and green infrastructure is now recognised as an important concept in land-use planning and environmental protection. It relates to the network of open spaces, parks, gardens, green corridors, woodlands, waterways and urban tree lines. Green space and biodiversity provide environmental, social, economic and physical benefits and give added value for quality of life, with consequent benefits for human health. It can also influence the layout of the urban landscape, with its emphasis on adequate open space, amenity provision and landscaping. However what is termed green infrastructure and its associated human access needs to be managed to ensure that such access does not cause damage or disturbance to wildlife and habitats that are present.

There are many issues at play in the relationship between different factors. Issues of climate change and cultural heritage are now linked, with the recent publication of 'The Built and Archaeological Heritage Climate Change Sectoral Adaptation Plan' in 2019. It highlights that climate change can be expected to give rise to structural damage to monuments and historic properties, the undermining of structures, loss of ground adjacent to structures, exposure and erosion of archaeological sites and collapse of unstable masonry elements.

Table 4: Inter-Relationships between Environmental Topics

Biodiversity Flora, Fauna	√			
Population/ Human Health	√	√		
Soil/ Geology	√	√	√	
Water	√	√	√	√

Air	√	√	√	X	√				
Climate	√	√	√	√	√	√			
Material Assets	√	√	√	√	X	√	√		
Cultural Heritage	X	√	√	√	X	√	√	√	
Landscape	√	√	√	√	X	√	√	√	√
	Biodiversity, Flora, Fauna	Population/ Human	Soil	Water	Air	Climate	Material Assets	Cultural Heritage	Landscape

The 'Built and Archaeological Heritage Climate Change Sectoral Adaptation Plan' also identifies slow onset risks, such as the loss of historic landscape features, decay of building fabric caused by increased saturation, microbiological growth to interiors and contents and increased corrosion of metal elements. Another threat is maladaptation – the inadvertent loss or damage to heritage structures and sites during adaptation works by others, or the carrying out of poorly informed or reactive works. This is an issue that applies to all sectors undertaking climate adaptation works and not just the heritage sector.

There are more immediate environmental threats to the environment than climate change. Many of the activities regulated by planning legislation have the potential to cause environmental and ecological damage if carried out inappropriately, or at the wrong scale or location. The Development Management Chapter is perhaps one of the most important parts of the Draft Plan in dealing with these issues.

4.3 Evolution of the Environment in the absence of the preparation of the Limerick Development Plan

Not proceeding with the Plan preparation would mean that the opportunity to update the policy to reflect the changed national and regional planning context would have been lost. In addition, the adoption of the Limerick Climate Change Adaptation Strategy (CCAS) 2019-2024 places a new emphasis on climate action in Limerick. The Limerick Development Plan is the first of Limerick's Development Plans to be prepared following the merger of City and county in 2014 and following the CCAS adoption. The Draft Plan therefore has been prepared in accordance with guidance, local, regional and national objectives in relation to climate change.

The Climate Action and Low Carbon Development (Amendment) Bill approved by the Dáil on June 16th, and now proceeding to the Seanad sets ambitious targets to reach carbon neutrality by 2050 with a reduction of 51 per cent in carbon emissions overall by 2030 compared to 2018 figures. The new plan allows the incorporation of relevant elements of this bill into planning policy. Without the adoption of the plan the opportunity to incorporate this, the latest and perhaps most ambitious of climate legislation, would be lost.

The latest State of Environment report, 'Ireland's Environment-An Integrated Assessment' (EPA,2020) describes further deterioration in Ireland's environment and submissions from agencies such as the NPW outlines policy measures that could help with ecological decline. The Draft Plan is an opportunity to put these in place to inform planning and development activities. Not doing so would be a lost opportunity.

4.4 Conclusion – Significant Environmental Issues

In summary, key environmental pressures in the review of the development Plan are:

Population and related facilities: Ensuring that the provisions of the NPF and RSES are included in the Plan and that the provision of waste water, water and community facilities keeps pace with development and population growth. It will also be necessary to update the Plan to include the population figures and policies of the new Core Strategy.

Biodiversity: Including maintenance of the Natura 2000 site network, conservation of sites of local and national and international biodiversity interest, enhancement of ecological corridors and retention of urban open space. The role of ecological corridors and Green Blue Infrastructure also needs to be emphasised, subject safeguards for existing habitats. Individual species of conservation interest such as Barn Owls and the lesser Horseshoe bat also have specific policy mention to emphasise their vulnerability.

Direct reference to both National Bio-diversity Action Plan and the National Pollinator Plan has been incorporated.

Cultural Heritage: Involving the need to maintain the diverse range of protected structures and to update the list of protected structures in the new Plan.

A key challenge for the management of the architectural heritage of Limerick is sustainable and sympathetic reuse, regeneration and development of the built environment, whilst retaining and protecting the distinctive character of Protected Structures and their settings.

Policies in relation to archaeology also have been updated, with a particular emphasis required for the setting of archaeological monuments.

Human Health: Provision of suitably zoned land for educational, medical and community facilities. Continued protection of open space, access to recreation and amenity areas are all continuing issues.

Climate Action: The Limerick Climate Change Adaptation Strategy 2019-2024 has been used to update the policies in the Plan as they relate to climate adaptation. The opportunity has been taken to broaden the scope of references to climate change in the Plan across all of the chapters.

4.5 Consideration of Alternative Strategies

Alternative Strategy Option 1 - Continue with the existing City and County Development Plans without the review:

Legally this would not be possible as the Plans have been extended previously and are nearing the end of the statutory life span. As indicated later in this report, the current Plans would not be considered an acceptable alternative.

The growing population of the Plan area also provides its own challenges. One of the greatest needs for the population of the Plan area is the provision of facilities for the local population with young families. This placed a premium on amenity and educational facilities. There has been a number of recent applications within the City area and County for new school facilities. To enable the proper provision of new community facilities, it is necessary to update the Plan to ensure that they are provided in line with the latest guidance and requirements. This includes Section 28 Guidance and requirements of service providers such as the Department of Education. Updated policies are also needed for the county towns and settlements to ensure compliance with the higher tier guidance of the NPF and the RSES. See Environmental Protection Objective HTP 1 in section 1.6 below.

Related to that of retaining the current Plans, is the retention of elements of the old Plans and incorporation into the new one. It is ten years since the last plan was prepared so all policies that might be included should be assessed in order to establish if they are up to date and take into account the provisions of the NPF and RSES. This includes settlement policies.

While rural settlement policies were subject of the SEA and AA processes in the last County Development Plan, it is now over a decade since the last Plan was adopted and the policy

context has changed. During the last Plan, the National Spatial Strategy was the overarching policy document, which has been replaced by the National Planning framework. Similarly at a regional level, the Mid-west Regional Planning Guidelines have been replaced by the Regional Spatial and Economic Plan for the Southern Region. There has been a change of emphasis in both documents from those that preceded them, with a strong emphasis on compact growth and the concentration of development on infill lands in settlements. This makes the older rural settlement policies outdated.

Limerick is a combined Local Authority since the merger in 2014. The rural settlement strategy in 2010 was prepared in the context of the older County settlement needs. With the city and the county now merged, the new settlement strategy should take into account the situation created by the combined Limerick City and County settlement priorities as defined by both the NPF and RSES.

Alternative Strategy Option 2 - Reliance on the Limerick Economic and Spatial Plan 2030 to help develop the City area:

The outcome of earlier plans such as the Limerick Economic and Spatial Plan 2030 indicated the potential of actions in selected parts of the City. While this has clearly articulated aims, it was considered that it's focus on urban areas would not sufficiently contribute to the development of areas in the wider countryside. It should also be remembered that the local authority also takes in the areas of both City and County and individual project led initiatives would not be sufficient to ensure adequate direction of resources to areas outside of the specific locations where they operate. Of equal importance is the Colbert Quarter initiative which seeks to development an area close to the railway station and is a follow on from the development of the Colbert Station area a number of years ago. The Colbert Quarter initiative, will lead to the development of a 50ha site close to Colbert station and hence close to the rail link from Limerick to the rest of the country.

These initiatives are hugely important. These are the vehicles which will secure the development of key areas which are important for economic and social development of the City and County. They complement the Limerick Development Plan, in that while the plan contains overall planning guidance for the planning and development of Limerick as whole, these initiatives offer detailed content to secure the development of specific areas. That is the key difference – the Limerick Development Plan offers statutory guidance on planning and development issues within the entire administrative area of LCCC, while the other initiatives concern themselves with the details of developing specific strategic sites. Because

of the core function of the LDP, that of a statutory planning guidance document, it is imperative that this is put in place to act as guidance for such developments.

Alternative Strategy Option 3 - Reliance on non-planning led initiatives to secure the development of the Local Authority area:

While the initiatives of parts of the Council such as the Roads Section are welcomed, this would address only part of the issue of infrastructure and service provision in the area. It would also mean that any efforts to address such provision would be on a piecemeal basis and would not be plan led.

To ensure balanced provision of services with appropriate policy support, it was considered best to proceed with the review. This ensures that the Plan will be consistent with the contents of the RSES, the NPF and National Development Plan, which is essential for seeking investment from central government. Compliance and support of national policy objectives is a prerequisite for the allocation of resources.

Alternative Strategy Option 4 - The review as outlined in the current Draft Plan:

As noted above, the examination of the policy background indicated that the allocation of resources and zoning would be best served by a review of both City and County Plans and their merging into one document. As has been mentioned elsewhere in the document the older plan are now ten years old and require substantial updating to take into account changed administrative boundaries and new planning requirements such as the provisions of the NPF and the RSES. The older Plans also need to be updated following adoption of the National Planning Framework and the Regional Spatial and Economic Strategy for the Southern Region and in order to take into account climate change issues. The new settlement hierarchy has been ordered to reflect population growth targets and the availability of employment and services.

5.0 Environmental Protection Objectives Relevant to the preparation of the Draft Limerick Development Plan 2022-2028

5.1 Introduction

The use of environmental protection objectives fulfils obligations set out in Section F, Schedule 2B of the Planning and Development (Strategic Environmental Assessment) Regulations 2004. The environmental protection objectives are distinct from the Draft Limerick Development Plan objectives and provide a standard against which the policies of the Plan can be measured in order to highlight those with the potential for environmental impact. They are used as a tool to cross-check the policies of the Plan in order to maximise the environmental sustainability of the Plan as it is reviewed. This will help identify policies that will be likely to result in significant adverse impacts, so that alternatives may be considered or mitigation measures put in place.

The environmental protection objectives for the review were generated from European, National and Regional Policy and Guidance. Sample objectives are set out in Table 4B of the SEA Guidelines produced by the DoELG in 2004. These objectives were reviewed to reflect the specific issues that were considered relevant to the review and the range of issues significant within Limerick. The scoping process also informed the generation of appropriate environmental protection objectives. The objectives are set out below, under a range of headings, which were taken from the SEA Regulations and the DoELG guidelines.

5.2 Environmental Protection Objectives

The Environmental Protection Objectives provide a standard against which the goals, policies and objectives of the Plan can be measured in order to highlight those with the potential for environmental impact. These have been used as a guide for the preparation of the final objectives in the Draft Plan and are listed below, with comments where relevant:

Biodiversity, Flora and Fauna/Built and Architectural Heritage

B1: Protect, conserve and enhance habitats, species and areas of regional and local importance, including aquatic habitats and species and promote the sustainable management of ecological networks. See also W3 below.

B2: Ensure the continued conservation of the Natura 2000 sites, Natural Heritage and Proposed Natural Heritage sites. These sites are important, both as an amenity and natural history resource.

B3: Preservation of the character of the historic built fabric.

B4: Preservation of the archaeological heritage.

Population and Human Health

P1: Facilitate a good standard quality of life for the population of Limerick through ensuring high quality residential, recreational, educational and working environments.

P2: Provide policy support for the provision of suitable employment and facilities for the local population.

Water

W1: Ensure that wastewater infrastructure keeps pace with development proposals.

W2: Ensure that the requirements of the Water Framework Directive are incorporated into the Plan.

W3: Ensure that wetland and peatland sites are preserved.

Air Quality and Climate

AQC1: To increase energy efficiency and the proportion of energy generated from renewable sources and where necessary to ensure the sensitive application of energy saving measures to the historic built fabric of Limerick.

AQC2: To avoid deterioration of air quality in the Plan area.

AQC3: To include climate action concerns into the Plan policies.

Geology and Soils

GS1: Place an emphasis on the development of brownfield sites rather than greenfield sites in Limerick. By reducing the possible development of greenfield sites, this makes a positive

contribution to soil conservation. This can also be achieved through the sensitive reuse of existing buildings, reducing the need for new build - See C2 below.

GS2: Protect geological sites within the Plan area.

Cultural Heritage

C1: Protect and conserve features of archaeological heritage and their setting.

C2: Protect, conserve and promote the sustainable reuse of architectural heritage.

Landscape

L1: Protect and conserve the quality, character and distinctiveness of the Limerick landscape both urban and rural.

L2: Retain the protected views in the Development Plan.

Material Assets

MA1: Maintain sustainable access to assets such as open spaces, water resources and all other physical and social infrastructure.

MA2: Ensure that there is adequate policy support for infrastructural provision in the Plan area.

Compliance with Higher Tier Plans

HTP1: Ensure compliance with higher tier plans such as the National Planning Framework and the Regional Spatial and Economic Strategy and other Section 28 guidance that might be issued by the Department.

5.3 Use of Environmental Protection Objectives

The Environmental Protection Objectives set out in the previous section have been used to carry out the SEA in accordance with relevant legislation. They provide a standard against which the policies of the Plan were measured for their environmental sustainability. A cross-checking process was used whereby the reviewed Plan policies and development objectives

were proofed against the Environmental Protection Objectives, so that any policies/development objectives with the potential for significant adverse environmental impacts were highlighted in addition to significant positive impacts. Alternative options, outlined previously, were considered and measured against the EPOs. Any adverse environmental effects identified, thereby maximising the environmental sustainability of the reviewed Plan.

6.0 SEA of Proposed Draft Limerick Development Plan 2022 - 2028

6.1 Content of the proposed Draft Limerick Development Plan

A Chief Executive's draft plan was circulated to the Elected Members in May 2021. This was considered and amended by the Members at a series of meetings. At the final meeting on the 17th June 2021 it was deemed to be the Draft Plan.

The first part of this section sets out the amendment made by the elected members at a special council meeting on the 14th of June and adjourned to the 16th and 17th of June which was held to specifically discuss the Draft Limerick Development Plan.

The section following that sets out the strategic objectives outlined in Chapter 1 and Chapter 2 in full. From Chapter 3 onwards policies and objectives are presented in an abbreviated tabulated form, showing the objective's codes, environmental commentary, the relevant environmental protection objectives and recommendations.

Each strategic policy and objective proposed for the review of the Limerick Development Plan was assessed against the EPOs. The Draft Plan contains both policies which reflect strategic goals and also objectives which often relate to specific issues. These are listed below with a commentary based on the contents of the Environmental Protection Objectives presented in the previous chapters. The policy content in the Plan is presented in term of an overarching strategic policy, followed by the objectives which relate to more specific areas.

6.1.1 Amendments to the Draft Limerick Development Plan and supporting documents made by the Elected Members at the Special Council Meeting of the 14th of June 2021 and adjourned to the 16th and 17th of June 2021

1. Amendments the Draft Retail Strategy

Amend Section 6 in relation to 'future pipeline supply' as follows:

- (a) In Section 6.14, remove the floor area associated with planning reference 20311, which refers to a convenience unit in Shannon with a floor area of 1,837 sqm. This is to be removed as planning permission was recently refused for this development and it is therefore not appropriate that its included in pipeline figures. Tables 6.20, 6.21 and 6.22 to be amended to reflect the above, with 1837sqm distributed across the metro area.

- (b) Amendments to the following objectives in order to ensure clarity in terms of future interpretation and to avoid duplication.

Objective LCC15: The Council shall require that applications for new supermarkets on Local Centre sites shall be accompanied by a Retail Impact Assessment. ~~Only new food stores that provide for sustainable upgrade of neighbourhood centres, that are not reliant on car-based customers and integrate with mixed use development will be permitted.~~

Objective MASP01: Convenience Retail Floor Space

It is an objective of the council to ensure emphasis remains to attract high quality convenience retail to the city centre. However, there is a demand for new convenience floor space within established residential areas and within ~~to~~ neighbourhood areas with growing residential communities and regeneration sites. This shall include:

City Centre

Moyross

Ballysimon

Southern Environs

Reason: In the interest of clarity.

Environmental comment: no significant effects result as it clarifies policy content within already zoned areas many of which are previously modified.

2. Amend the Zoning Matrix as follows:

- Under Enterprise and Employment zoning change Public House to ‘generally not permitted’ rather than ‘open for consideration’.
- Under Agricultural zoning change the Boarding Kennels Footnote to “No.1 Ancillary to Primary Use” rather than “No. 2 Except for Local/Neighbourhood Centers in Tier 4 Settlements”
- Under Open Space zoning remove the Conference Centre Footnote “No. 5 Except Thomond Park”
- Under Agricultural zoning change the Garden Centre Footnote to “No.1 Ancillary to Primary Use” rather than “No. 2 Except for Local/Neighbourhood Centers in Tier 4 Settlements”

- Under Local/Neighbourhood Centre zoning change Vehicles Sales Outlet Footnote to “No. 10 Except in Settlements” rather than “No. 1111 Except in Settlements”.

Reason: These were typographical errors.

Environmental Comments: No effects text changes only for the purposes of clarity.

3. Include additional objectives as follows in Section (Broadband)

Insertion of additional text into Chapter 7 Infrastructure under Section 7.4.2

Telecommunications Support Structures, Antennae and Domestic Satellite Dishes:

Objective IN O4 : Insertion of a) and b) highlighted below.

Objective IN O4 - Telecommunication Support - It is an objective of the Council to:

- a) Promote shared telecommunications infrastructure in all new developments to facilitate multiple network providers. Shared infrastructure should be made available to all broadband service providers on a non-exclusive basis to both suppliers and users of the new infrastructure.
- b) Work closely with the telecommunications industry during the development and deployment phase of telecommunications infrastructure to carefully manage Limerick’s road networks and minimise future road infrastructure works.

Reason: To provide for the most up to date policy.

Environmental comments: Expected to be beneficial as shared infrastructure makes maximum use of existing resources and minimises visual disruption. Reducing the amount of work required also has beneficial effects in reducing the amounts of run off and habitats disturbance that might result from potential works.

4. Change of zoning at Bruree.

Relocation of zoning, to take account of a permission granted with no increase in overall zoning.

Reason: To take into account existing grant of permission at The Paddocks, Bruree

Environmental Comments: see map below which indicates no expansion of plan boundaries. The alteration is to reflect the situation as it exists on site and will not lead to additional

overloading of treatment systems or other infrastructure. As such it will not have any additional effects.

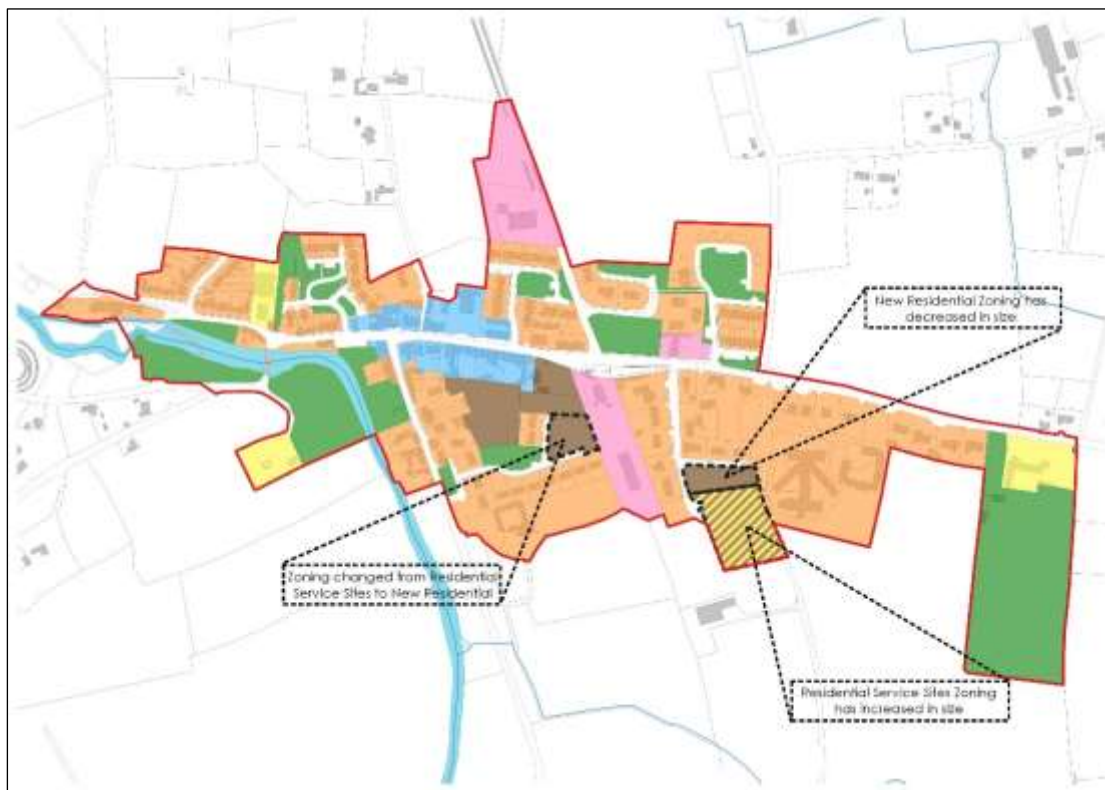


Figure 15: showing the situation in Bruree with no expansion to the development boundary.

5. Limerick 2030 Plan

A review and update of the Limerick 2030 plan is currently underway and is expected to be completed within the next week. This draft plan should be placed on public display with the draft Development Plan in order to allow the public an opportunity to input into it.

Reason: To facilitate public consultation on the review of the Limerick 2030 Plan

Environmental comments; as mentioned elsewhere in this document initiatives such as the Limerick 2030 plan and the Colbert Quarter Initiative have a huge role to play in the development of strategic areas in Limerick. The role of the Limerick Development Plan is to provide planning guidance and direction for these, while they concentrate on the detail of developing specific sites. Based on discussion with Development Management Planners, it is anticipated that the capacity of the Bunlickey WWTP will be increased in time to keep pace with these developments. This is based on preplanning meetings from March 2021.

The updated plan focuses on revitalisation of the City centre in particular and encourages the development of brownfield sites which will result in maximising the use of the existing built environment. Proposals are based on and are consistent with the zoning pattern set out in the Draft Development Plan.

As most of the areas, particularly the City centre areas are brown field sites the effects of development are expected to be limited, involving re-development of an existing heavily modified environment.

6. **Rural housing policy** - Replace text on page 3-2 with the following:

Limerick can be divided into two broad categories, in terms of defining the Rural Settlement Strategy as follows:

- Rural Housing Category 1 - Areas under Strong Urban Influence
- Rural Housing Category 2 – Rural Areas Elsewhere

Objective SS O17 – Areas under Strong urban influence

It is an objective of the Council to consider a single dwelling for the permanent occupation of an applicant, in the area under Strong Urban Influence, subject to demonstrating compliance with ONE of the criteria below:

1. Persons with a demonstrable economic need to live in the particular local rural area;

Persons who have never owned a house in the rural area and are employed in rural-based activity such as farming/bloodstock, horticulture or other rural-based activity, in the area in which they wish to build or whose employment is intrinsically linked to the rural area in which they wish to build, or other persons who by the nature of their work have a functional need to reside permanently in the rural area close to their place of work (within 10km). (Minimum farm size shall be 12 hectares for farming or bloodstock).

The applicant must demonstrate that they have been actively engaged in farming/bloodstock/horticulture or other rural activity, at the proposed location for a continuous period of not less than 5 years, prior to making the application. In the event of newly acquired land demonstrate that the proposed activity would be of a viable commercial scale, and a detailed 5 year business plan will be required to demonstrate this.

2. Persons with a demonstrable social need to live a particular local rural area;

Persons who have never owned a house in the rural area and who wish to build their first home on a site that is within 10km of where they have lived for a substantial period of their lives in the local rural area (Minimum 10 years). The local rural area is defined as the area outside all settlements identified in Level's 1 – 4 of the Settlement Hierarchy.

3. Persons with a demonstrable local exceptional need to live in a particular local rural area, examples include:
 - a. Returning emigrants who have never owned a house in the rural area, in which they lived for a substantial period of their lives (Minimum 10 years), then moved away or abroad and who now wish to return to reside in the local rural area (within 10km of where they lived for a substantial period of their lives). The local rural area is defined as the area outside all settlements identified in Level's 1 – 4 of the Settlement Hierarchy.
 - b. A person who has lived a substantial period of their lives in the local rural area, (at least 10 years), that previously owned a home and is no longer in possession of that home due to the home having been disposed of following legal separation/divorce/repossession and can demonstrate a social or economic need for a new home in the rural area.

Objective SS O18 – Rural Areas Elsewhere

It is an objective of the Council that to help stem the decline and strengthen Rural Areas Elsewhere, in general demand for permanent residential development should be accommodated, subject to meeting normal planning and environmental criteria.

In all cases the consideration of individual sites, for rural housing will be subject to normal siting and design considerations, which will include, but not necessarily be limited to the following:

- Any proposed vehicular access would not endanger public safety by giving rise to a traffic hazard,
- That any proposed on-site waste water disposal system is designed, located and maintained in a way which protects water quality,
- That the siting and design of new dwellings takes account of and integrates appropriately with its physical surroundings and other aspects of the natural and cultural heritage and,
- That the proposed site otherwise accords with the objectives of the Draft Development Plan in general.

- The Planning Authority shall have regard to the viability of smaller towns and rural settlements in the implementation of the rural housing policy.
- Climate action measures shall be submitted as part of any proposed application, to support a transition to a low carbon economy.

Reason: The change proposed is in compliance with the NPF, RSES for the southern region and the 2005 Sustainable Rural Housing Guidelines.

Economic Comment: there are sufficient environmental safeguards built into the policy changes to ensure that no significant environmental effect would occur. Landscaping guidance mentioned in Chapter 11 of the Plan also emphasis the issues of native species use which affords an opportunity for increased native planting. The New plan has also included reference to the new EPA guidance document from 2021 in relation to waste water systems for single houses.

7. Change to Volume 2 - Hospital

An amendment to change zoning of lands identified as New Residential in Hospital, to Existing Residential and to zone additional lands in lieu of these lands to New Residential, as identified in the attached Map.

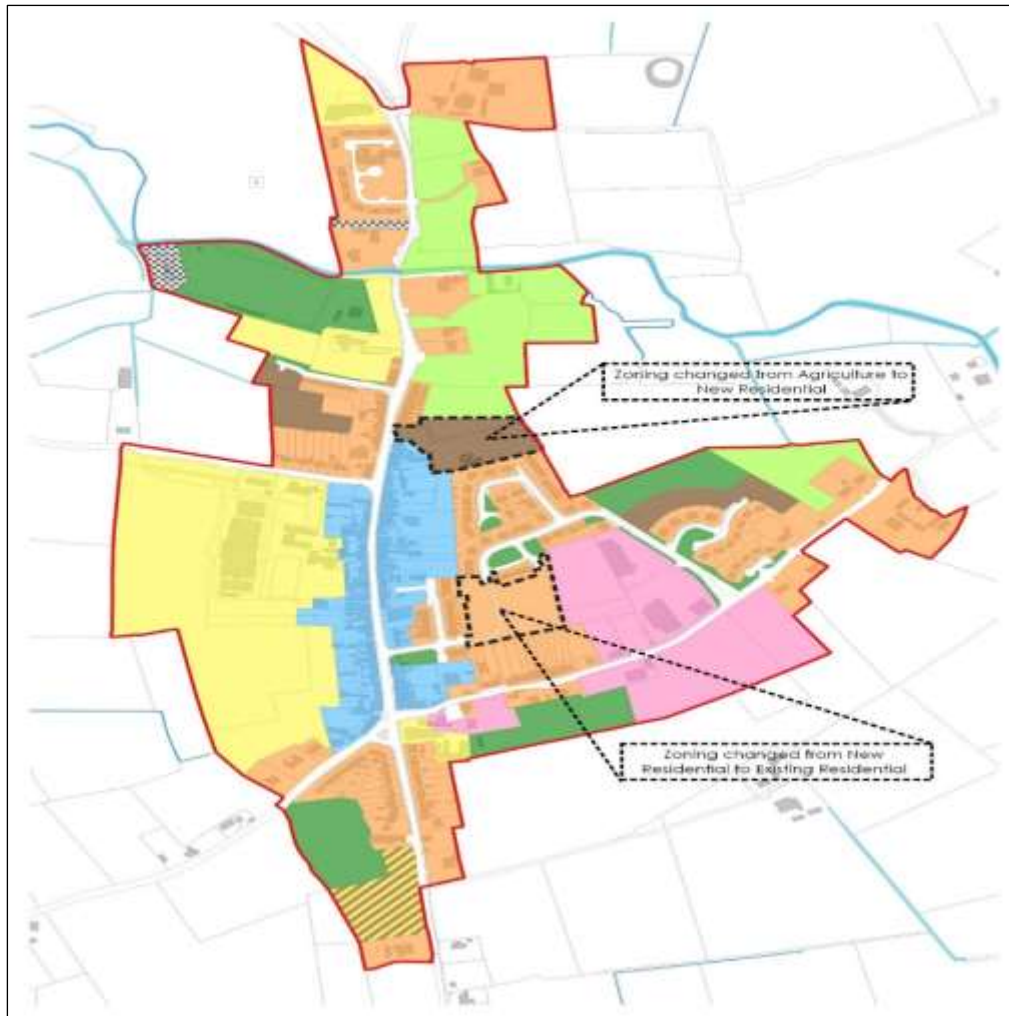


Figure 16: showing zoning changes in Hospital.

Reason:

Works have commenced and are advancing at pace on the lands, which are identified as New Residential and these lands shall now be considered Existing Residential. The zoning of additional lands is to ensure that there is sufficient lands to cater for the growth of Hospital, in line with the Core Strategy, projected growth over the life time of the Draft Development Plan, subject to the much needed upgrade of infrastructure in the village.

Environmental Comment: the change reflects the situation as it stands in Hospital following the grant of planning permission and by changing the designation to existing residential indicates that the area is in the process of being developed. The rezoning is also towards the centre of the settlement reflecting the importance of the development of the settlement core. The idea of compact settlement and centre out development is still being promoted by the changes.

8. Change to Chapter 2 -

Elected Members proposed the re - designation of Kilmallock as a Key Town on Level 2 of the Settlement Hierarchy for Limerick, set out in the Draft Limerick Development Plan 2022 – 2028 and directed that the settlement hierarchy be revised to reflect this change.

Reason:

Kilmallock is currently a Tier 2 settlement as determined by the Limerick County Development Plan 2010 – 2016 (as extended). It is the largest town in south-east of Limerick and is a key market and service provider for a large catchment extending into the rural hinterland, providing a large number of services for the inhabitants.

The town is also an important tourism hub for south and east Limerick, the town itself was an important monastic centre in medieval times, and has retained much of its historical features, which contributes to the tourist potential of the town.

The town has consistently grown from 1,231 in 1996 to 1,668 in 2016 – growth of 35%. There has been extensive development of the town in the last ten years. Development includes: the development of a new wastewater treatment plant with design capacity for 4,000 persons equivalent, a new public realm plan, and redevelopment of a new Municipal District Office and Library building completed in 2009. The town's post primary school benefitted from a recent major expansion and a new primary school was constructed in recently.

Kilmallock has benefitted from its current location in the settlement hierarchy, in terms of seeking and securing funding for the town and the wider area. The retention of Kilmallock as a key town is critical for securing investment and delivery of growth for the town and the wider region.

The level of public infrastructure development and investment in Kilmallock over the past decade has been made on the basis of a national, regional and local policy that identified Kilmallock as a key growth centre for Limerick. Having already made the public investment in public realm, sewage capacity, schools, a library, a fire station, administration headquarters etc to accommodate local population growth to 4,000 people, it makes no sense, from a public policy perspective or a value for money perspective, to now reduce the importance of Kilmallock and limit the growth of the town to well within its immediate development capacity, particularly at a time when Ireland needs housing and development to provide for a rising population. It is bad policy to plan for town infrastructure priorities and investment decisions across short term periods of time and very poor policy implementation to change such priorities on an ongoing basis

Environmental Comment: the town of Kilmallock is the largest town within the largest municipal area of Co. Limerick and by altering the designation to that of a Tier 2 town it reflects the importance of the town in Limerick context. This is crucial for it to maintain it's position and compete against towns just outside the boundary such as nearby Charleville in Co Cork. As indicated above the Town is of considerable heritage significance and is a member of the Irish walled towns Network and has benefitted from funding received from this source which further adds to its attraction for sensitive tourism development. The change does not result in any increase in population allocation to the town over the plan period, in the core strategy.

9. Change to Chapter 4 – Shopfront Design Guides

Propose the inclusion of a new objective in Chapter 4 - Section 4.6.12, as follows:

It is an objective of the Council to prepare Shopfront Design Guidelines, within the lifetime of the Development Plan and ensure implementation of these guidelines on completion.

Reason: The inclusion of this objective is to ensure a high quality design and coherence in the development of shopfronts throughout Limerick.

Environmental Comments: this is entirely consistent with the aim of improving surroundings in the City and towns and villages of Limerick and ensuring the preservation of the rich heritage of shopfront design within the City and County. From both a heritage and urban design perspective it is considered that the effects can only be beneficial.

10. Change to Chapter 4 – Night Time Economy

Propose the inclusion of a new Section be included in Chapter 4 after Section 4.6, called Night time economy. :

The Council recognise the importance of the night time economy throughout Limerick, which is an important form of economic activity that occurs after 5pm and includes dining, nightlife, arts, music, theatre, entertainment, festivals, events, activities and tourist attractions that are open at night.

It is an objective to support the development of night time economy throughout Limerick and to prepare a night time strategy and ensure the implementation of this strategy on completion.

Reason: The inclusion of this objective is to support and enhance the night time economy throughout Limerick

Environmental Comments: the idea of a strategy to guide the night-time economy is welcomed, not just as its potential to guide economic development in this field but also to ensure higher quality development of both events and buildings and structures to minimise nuisance to existing residents and to ensure the integration of the night time economy into daily life.

11. Change to Chapter 4 –

Propose an amendment to Objective ECON O23 Data Centres to include the following:

Promote co-location of data centres with renewable energy sources at appropriate locations subject to proper planning and sustainable development considerations.

Reason: To ensure that Data Centres, as significant consumers of energy are located close to renewable energy sources

Environmental comments: the establishment of data centres requires careful consideration of the origins and amount of energy that they consume and the effects that their operation might have on energy supply to other enterprises. The amendment of ECON023 draws attention to this important factor.

12. Change to Volume 2 -

Propose an amendment to the settlement boundary for the village of Tournafulla, Level 5 Settlement, as identified in the attached Map

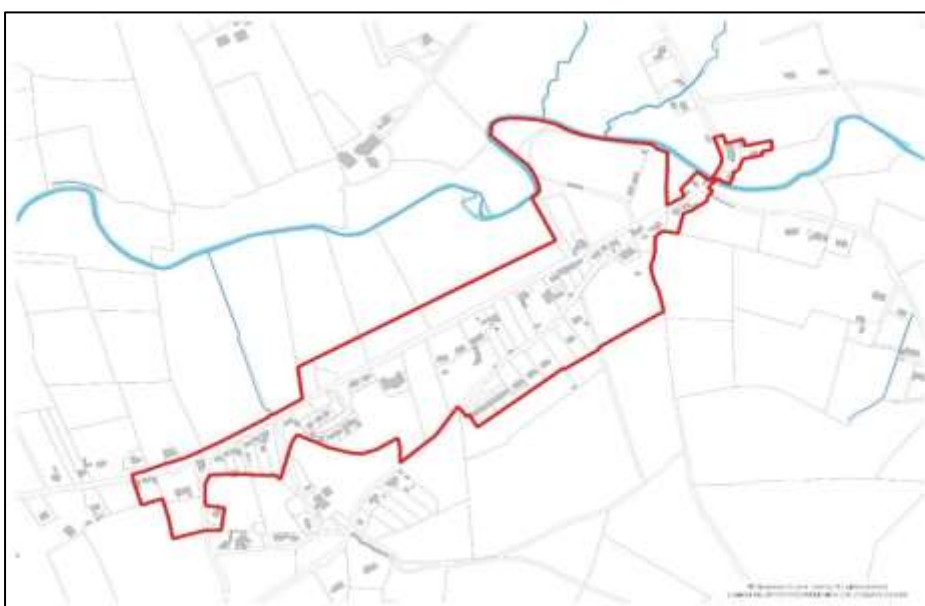


Figure 17: Showing zoning changes in Tournafulla.

Reason: To reflect the actual village core, that exists on the ground and to concentrate development within the village core.

Environmental Comment: this is a reflection of the idea of compact development as the revised boundary has been altered to incorporate lands in the village core, while lands at the outset have been removed. This is consistent with good planning practice.

13. Change to Volume 2, Chapter 2 and 3

Propose the inclusion of Ballybrown as a Level 6 settlement, in the Settlement Hierarchy and in Volume 2 of the Draft Limerick Development Plan 2022 – 2028, including the text and Map below.

Ballybrown is situated eight kilometres west of Limerick City off the N69. Ballybrown has approximately 11 dwellings. The settlement is served by a public water supply however, there is no sewerage scheme in the settlement. The village provides a range of services including: a community resource centre, a primary school, a local food store. Sports facilities including a soccer club and a GAA Club, are shared with the adjoining village of Clarina.



Figure 18: Showing centre point of Ballybrown.

Reason: Ballybrown has a number of existing community facilities, which provides essential infrastructure and services to the settlement

Environmental Comment: this is consistent with the approach taken towards Tier 6 settlements elsewhere in the plan, with such settlements having a number of facilities around which development could be concentrated. They will, as per Development Management guidance, have to rely in the interim at least on individual treatment systems.

14. Changes to Volume 2 - City and Environs Zoning Map and Chapter 3

Propose to re zone lands shown on map from Enterprise and Employment to New Residential, local centre and open Space / recreation and show indicative link to access Enterprise and Employment land.

Also proposed to add to Objective SS O5 in Section 3.3.3, Chapter 3 to ensure that the proposed change in zoning does not contravene the Core Strategy:

The additional households permitted within each settlement shall not exceed the growth identified in the Core Strategy Table in Chapter 3.

Reason: The population of Limerick is expected to grow significantly in accordance with the NPF. To facilitate this growth it is essential that there are adequate lands available for residential development within the City and Environs. These lands are serviceable within the life time of the plan, adjacent to the Technical University of the Shannon and will benefit the university by offering residential lands within walking and cycling distance



Figure 19: Showing the lands in question.

Environmental Comment: by ensuring that Objective SS05 is altered to ensure compliance with the Core Strategy this ensures that the amendment is in line with higher tier plans and guidance, through not exceeding core strategy figures.

15. Change City and Environs Zoning map and Tiered Approach to Zoning

Propose a change to zoning of site on Dock Road from Agricultural to Enterprise and Employment



Figure 20: showing the site in question with land use change from agricultural to Enterprise and Employment.

Reason: "(Roches Feeds) currently operate on the Dock Road. They purchased 4.6 hectares of industrial zoned land in 2017 to facilitate the extension of their business and the construction of new warehousing and grain drying facilities in Limerick City. The new facility is being developed to advance the company's Green Agenda and will use GM free raw materials to deliver a niche product to the farming community. The provision of such a niche product requires a separate production facility.

The development will be accessed off the existing service road providing access to the Wastewater Treatment Facility. Traffic volumes will be low (circa 20 HGV movements onto

and from the site per day during a 12 hour period) and the safety, capacity and efficiency of the N69 Dock Road and N18 /N69 Interchange will be maintained and protected in accordance with the Spatial Planning & National Road Guidelines.

Additional employment will be created for 15 – 20 people when operational. A development proposal is well advanced for the site and pre planning meetings were held with the planning authority. However, to date Brexit and Covid 19 challenges have hindered progress on the site.

There is no other alternative site available in Limerick City. Although planning permission for the facility was previously secured on land adjoining the existing Roches Feeds operation on the Dock Road in 2013 (P13/770158), ultimately that land could not be acquired. There is no land for expansion within the current operational site as Roches Feeds over the years has lost land to the construction of the Racecourse Road and roundabout and provision of land (wayleave) to accommodate Limerick Main Drainage. Relocating the development to a potential alternative site outside of Limerick City will result in greater traffic movements, commuting and dispersed urban growth.

Development on the site will facilitate compact growth in line with the requirements of the National Planning Framework (NPF) and the Regional & Economic Spatial Strategy for the Southern Region (RSES)."

The Elected Members submitted the following Development Plan justification test with the proposed amendment:

Justification Test to support zoning of lands to Enterprise and Employment in the Dock Road	
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. The NPF envisages Limerick as the principal focus within the Mid-West Region, with the potential to generate and be the focus of significant employment and housing growth. The RSES includes a Metropolitan Area Strategic Plan (MASP) for the Limerick Shannon area. The MASP supports the NPF's

	ambitious growth targets to enable Limerick City to grow by at least 50% to 2040 and to enhance its significant potential to become a City of scale.
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	Limerick's Dock Road has been identified as a key employment and enterprise location under the MASP, which acknowledges the significant potential of this area of the City for economic development. The lands at the Dock Road subject of Flood Zone A & B were identified as essential to support the expansion of industries, associated with Limerick Port and Docks. Having regard to their location next to the Docks, these lands are also considered essential for the provision of lands for employment uses which cannot be accommodated in the City centre (warehousing, logistics etc.). Within the Metropolitan Area, the area zoned as Limerick's "City Centre" would correspond with the centre of the settlement. The undeveloped area of the Dock Road consolidates the existing built up area contiguous to the City Centre. These greenfield and brownfield lands are therefore essential to facilitate expansion and compact growth of Limerick City.
(ii) Comprises significant previously developed and/or under-utilised lands	The Dock Road area has had a long history of development and as such has particular importance in both employment and service provision. These are undeveloped greenfield lands which would consolidate the existing built up area contiguous to the City centre.

(iii) Is within or adjoining the core of an established or designated urban settlement	The Dock Road is a designated key employment location adjoining the core of the Limerick Shannon Metropolitan Area, as identified in the RSES.
(iv) Will be essential in achieving compact or sustainable urban growth	The delivery of development on these lands is essential to allow consolidation of the existing built up area of the Dock Road, achieve compact growth and enable Limerick to fulfil its economic development role in the Mid-West Region.
(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	Suitable alternative lands are not available for development within and adjoining the core of the City, on which enterprise and employment uses which cannot be accommodated in the City Centre can be facilitated.
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.	<p>The flood zones show the site within Flood Zone A and B extents. Any future development should be subject to a Site Specific Flood Risk Assessment, which should address the following and an objective included in this regard:</p> <ul style="list-style-type: none"> - Apply sequential approach should be applied through site planning and should avoid encroachment onto, or loss of, the flood plain, - Highly Vulnerable Development shall not be permitted in Flood Zone A or B, - Should address climate change scenarios in relation to FFLs and potential mitigation measures, - Finished floor levels should be above the 0.1% or 1% AEP level where appropriate,

	<ul style="list-style-type: none"> - Proposals should not impede existing flow paths or cause flood risk impacts to the surrounding areas, and - Emergency evacuation plan and defined access / egress routes should be developed for extreme flood events. Any Site Specific Flood Risk Assessment should be cognisant of the identified proposed flood defences adjacent to the site. Any development shall also be required to be built in accordance with SuDS principles and in compliance with the surface water and drainage policies as set out in the Draft Development Plan.
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Environmental comment:

Limerick's Dock Road has been identified as a key employment and enterprise location under the MASP, which acknowledges the significant potential of this area of the City for economic development. The Chief Executives Draft Plan, that issued to the Elected Members in April 2021 identified lands at the Dock Road which are subject of Flood Zone A & B as essential to support the expansion of industries, associated with Limerick Port and Docks. The Flood justification submitted by the Elected Member on this site considered the location next to the Docks and the lands that were previously justified, and stated that they are essential for the provision of lands for employment uses which cannot be accommodated in the City centre (warehousing, logistics etc.).

There are no suitable alternative lands within the City centre to accommodate this type of development. The draft plan also includes an objective requiring a site specific flood risk assessment for any future development on this site.

A justification test for this site appears in the Strategic Flood Risk Assessment which is part of the plan documentation.

16. Change Record of Protected Structures – Newcastle West Municipal Area

Propose to update the Record of Protected Structures for the Newcastle West Municipal District, as these structures have already been removed at Municipal District level and draft plan was not updated accordingly.

RPS No. 52 Quilty's – Ballinruane, Kilmeedy



RPS No. 153 Flynn's – Balliniska, Feohanagh



Remove the following structures as they are no longer in place:

RPS No. 51 Fitzgibbon's – Ballinruane, Kilmeedy

RPS No. 271 Lane's – Cloncrippa, Feenagh

Remove RPS No. 409 – Glengort School, Knockinadiha

Reason: No longer of architectural merit



Remove RPS No. 445 – Sexton's – Gortskagh, Castlemahon

Reason: No longer of architectural merit



Remove RPS No. 1162 – Woodfield House – Woodfield, Dromcolliher

Reason: No longer of architectural merit and the building is structurally unsound



Remove RPS No. 1174 Gayers – Feenagh

Reason: No longer of architectural merit



Remove RPS No. 702 Elm Hill

Reason: structure is in a dangerous condition and discussion were held with Limerick City and County Council Conservation officer, who agreed that its removal was warranted.

Environmental Comment: in many cases these buildings have already been demolished or deteriorated to such a degree that they are no longer of architectural merit. Their removal reflects the current situation of each building and emphasises the need to regularly update the RPS, both for additions and deletions of buildings. It has been over ten years since the last plan was prepared which has been double the length of time that would normally occur.

It has been even longer since the NIAH listing has been completed. This emphasises the need for regular updating of the RPS.

17. Change to Chapter 4

Propose an amendment to Objective ECON O36 as follows:

g) To work with Waterways Ireland and Fáilte Ireland to develop the water activity sector in Limerick by exploring the potential for increased accessibility to Limerick's waterways ~~and the potential of the former Fisheries building at Browne's Quay~~ for water based tourism activity (refer also to Chapter 9 and Chapter 11).

Reason: Insufficient public engagement

Environmental comments: the non-use of a building is not likely to have any environmental implications.

18. Change to Chapter 11

Propose an amendment to 11.3.9 Trees as follows:

After 4th sentence include the following text, **Any proposals to remove mature trees shall be done as part of the Planning application process, in order to prevent mature trees being removed on lands zoned for development in advance of a planning application being submitted, where there is an intention to develop the lands.**

Reason: To safeguard trees

Environmental comment: while well intentioned and would have undisputed Ecological benefits, this would be difficult to enforce and may fall under Forest Service Guidance and legislation as it relates to tree felling and felling licence application.

19. Change to Chapter 5.

Proposed the inclusion of text and objective from the existing City Development Plan to be inserted in Chapter 5 as follows

Historic Gardens & Designed Landscapes

The DEHLG have undertaken a 'Survey of Historic Gardens & Designed Landscapes' where this inventory includes over 6000 records of historic gardens and designed landscapes throughout Ireland. Phase One and Two (Historic Ordinance Surveys and Aerial Photography) desktop surveys are complete for Limerick City with Phase three (field surveys) yet to be complete.

Within Limerick City, some of these historic gardens include: o Castlepark House (Moyross) Reference: LI-65-R-561597, Grid Reference : 561597 o Corbally House (Corbally) forming grounds of St Munchin's College, Reference: LI-65-R584590; o Clonmacken House: LI-65-R-548568. Grid Reference : 548568

It is the policy of the Council to protect and maintain surviving remnants of Historic Gardens, Designed Landscapes and surrounding Parklands including form and patterns of hard and soft landscaping and all mature trees and vegetation as highlighted in the DEHLG 'Survey Of Historic Gardens & Designed Landscapes' Inventory.

Reason: Many of the gardens/landscapes identified still possess a level of natural heritage importance, which needs to be recognised and protected, where possible.

Propose the inclusion of a new text and objective in Chapter 5 as follows:

Environmental comment: this objective recognises the natural history present in such gardens and parklands and their particular importance in an urban context. They also contain many older trees which, with more complex structures and potential for bats and bird roosts, have an ecological value, sometimes greater than younger tree species which cannot be used for these purposes as they often lack the cracks and fissures which these older tree possess. Many of the tree species are ornamental trees and species other than Ash will assume greater importance in the future as Ash die back, which will take it's toll on the country's tree stock. Remnants of walls and other buildings and structures offer similar opportunities for roosts. These remnants of gardens and parks are also historic features in the landscape and objectives for their preservation is useful from both an historic and natural history perspective.

20. Change to Chapter 5 -

Propose to include an objective in Chapter 5 as follows:

The parkland characteristics and mature trees in the area surrounding Castle Park House which is zoned for enterprise and employment use shall be retained as part of any new development.

Reason: To safeguard the mature trees, high nature value and in order to retain the old Parkland layout.

Environmental Comment: this is expected to be beneficial in that it seeks to retain trees and parkland layout. See also comment on previous amendment, as this amendment also recognises the historical aspect of these parkland remnants,

21. Change to Chapter 4:

Propose the inclusion of the following text in the Section below:

“To successfully build resilience and revitalise a sustainable City centre, the key themes in this plan aiming to improve Limerick City’s offer and attractiveness include:

1. Ensuring a critical density of residential and workforce population in the city centre;
2. Ease of mobility, particularly walkability and perceptions of safety;
3. Perception of the attractiveness of retail, commercial and leisure activities in the city centre;
4. The strength of the City centre as a destination for work and doing business;
5. The use and quality of public spaces in the City centre, **including the provision of public facilities such as public toilets, drinking water fountains and seating.**”

Reason: For the purpose of increasing footfall, dwell time and spend

Environmental comments: as human health is part of the concern of SEA, the inclusion of an objective supporting the provision of such facilities is welcomed.

22. Change to Chapter 9:

Proposed the inclusion of the following locations in the following sentence. The Public Rights of Ways in Limerick are identified on Map 9.1 and 9.2 below and include:

- Westfields;
- North Circular Road;
- Park Canal;
- Lucas Lough/Shannon Fields (Athlunkard);
- Monabraher/Longpavement;
- Kings Island (St Mary’s Park);
- Corbally;
- Ballinacurra Creek -Vance Lands;
- Ballinacurra Creek - Baggot Estate;
- Clare Glens;
- **Coonagh;**
- **Condell Road;**
- **Barringtons pier.**

Reason: In the Interests of clarity.

Environmental Comments: the inclusion of rights of way in the plan may encourage more pedestrian use which would have benefits for human health. These can also provide a network of routes which may contribute to a green infrastructure strategy.

23. Change to Chapter 11

Proposed the following change to Section 11.4.1.4:

In addition to the minimum apartment storage requirements, apartment schemes should provide external storage for bulky items outside individual units (i.e. at ground or basement level). These storage units should provide for accessible and secure storage, allocated to each individual apartment unit. **Each storage room shall provide appropriate electric points for the purpose of charging electric bikes/scooters.**

Reason: To enable modal shift

Environmental comments: This amendment to the Development Management Guidelines is intended to promote more sustainable transport practices so it is anticipated that there would be environmental benefits.

24. Change to Chapter 4:

Propose the inclusion of the following objective in Chapter 4 in Section 3, relation to harnessing the potential of Limerick's heritage within the Towns and Villages.

It is objective of the Council to recognise the heritage value of Limerick's towns and villages such as Adare, Kilmallock and Askeaton and seek opportunities to enhance their tourism potential.

Reason: To strengthen the tourism opportunities within County Limerick.

Environmental Comments: sensitively carried out this has the potential to ensure that heritage assets and built structures of these towns are conserved sensitively while contributing to tourism development.

25. Changes to Chapter 8

Propose that the area to the south of the proposed Foynes to Limerick Road Scheme, indicated in green hatching in the attached map, be designated as open for consideration for wind energy in the Draft Limerick Development Plan 2022 – 2028.

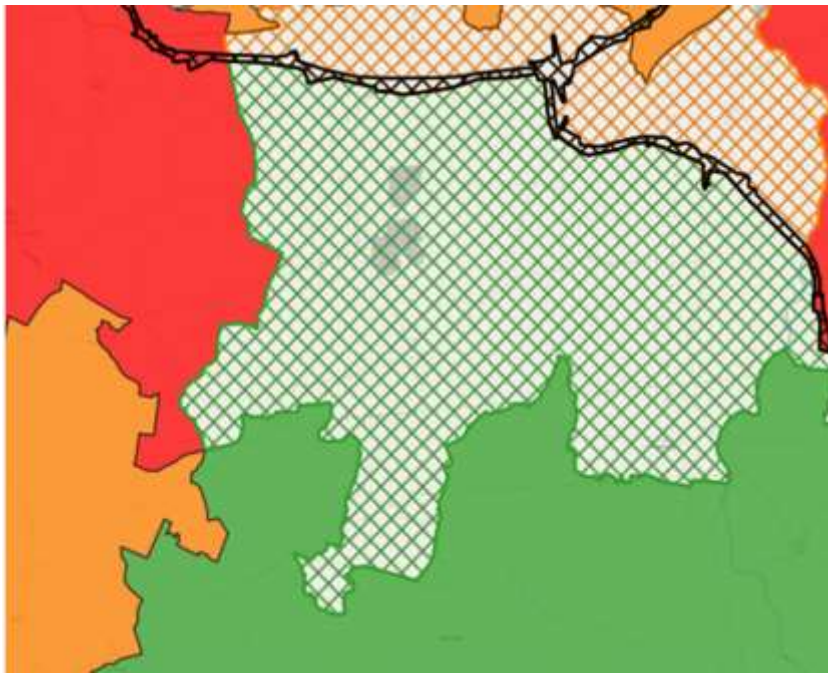


Figure 21: Hatched area in green south of proposed Limerick to Foynes roadway to be designated as open for consideration for wind energy.

Reason: The proposal will assist in addressing climate mitigation and the delivery of additional renewable energy supply to meet the targets at national level. Any proposals for wind energy in the area, will be guided by appropriate ecological assessments which will inform the siting, design and layout of wind energy developments.

Environmental Comment: the areas north of the roadway is to be designated as not open for consideration due to the reliance of wintering wild flow. Discussion with those who have carried out recent studies (Winter 2020 to date) have indicated that this area is widely used by wildfowl many of whom are part of the Qualifying interests of the River Shannon and Fergus Special Protection Areas. Collision Risk Modelling has indicated that, even with one species, the Lesser Black Backed Gull that mortality would increase by 10% which would be unacceptable. The areas to the south of the roadway is not used to anything like the same extent by wildfowl. Part of the reason for this might be the number of quarry developments in the area, which have a deterrent effect on wild fowl usage. Much of this area is also further from the estuary which would reduce the incidence of bird usage.

This area would not have the same issues associated with it that arose in the case of a 2013 planning application for wind energy in the area to the north of the roadway where issues such as encroachment on the SAC and SPA arose, while wild fowl flight routes and usage of the site were also an issue. See also the Natura impact Statement which is part of the plan documentation.

From the point of view of residential amenity the area north of the proposed route way would have very little areas suitable for wind energy development if the requirement of the buffer distances from wind energy development are taken into account.

26. Change to Chapter 9

Propose an amendment to Chapter 9, under section 9.6, Childcare facilities add the following text after 4th bullet point

- *“In or within close proximity of schools and educational facilities including catchment area of rural schools”*

Reason: In the interests of clarity.

Environmental Comment: no effects anticipated. The provision of child care is regarded as being part of human health which is concern of the SEA process. Adherence to normal development management standards would ensure that any environmental effects would be minor in nature should they occur.

27. Change to Chapter 9

Propose the inclusion of an objective in Chapter 9, as follows:

It is an objective of the Council to prepare a Leisure Strategy for Limerick City Centre, within the lifetime of the Development Plan and seek to deliver the strategy on completion, subject to resources.

Reason: To strengthen and promote the City Centre as a destination for leisure.

Environmental Comment: this is consistent with the principle of centre out development and will assist in delivering vibrant City centres. This is consistent with the provisions of the RSES for the southern region.

28. Changes to Chapter 10

Propose an amendment to Chapter 10 in **Objective M 01- Moyross**

To amend M 01 (e)(iv) to read: Provide a new **road** connection between Moyross Avenue and Cratloe Road;

Reason: In the interest of clarity and a road connection has been agreed with residents

To amend M 01 (e)(v) to read : Create a new **road** connection between LIT and the District Centre at Watch House Cross;

Reason - A road connection has been agreed with residents.

Environmental Comment: subject to adequate environmental assessment and within the urban area it is not likely that such a roadway would have major environmental effects.

29. Changes to Chapter 10

Propose an amendment to insert a new section (g) under objective M 01 - Moyross:

(g) To ensure sufficient land zoning around the Coonagh /Knockalisheen Road capable of delivering a Northside Business campus as referred to in the RSES, to attract and enhance job creation and economic investment in the area.

Reason: A Northside Business campus is outlined in RSES and zoning of sufficient and suitable lands with direct access to the Coonagh Knockalisheen Road is essential. The aim of the Coonagh/Knockalisheen Road was to improve connectivity and attract employment to Moyross as set out in the Regeneration framework.

Environmental Comment: the provision of an adequate amount of zoned lands within the urban boundary for business use is entirely consistent with good planning practice and the provisions of the RSES.

30. Changes to Chapter 6

Amend Objective TR 017 - Enhanced Public Transport as follows: It is an objective of the Council to support and encourage public transport providers to enhance the provision of public transportation **and frequency of** services throughout Limerick, including the provision of enhanced accessibility from the City Centre to Shannon Airport.

Reason: To enhance the frequency of public transport services, which continues to be a barrier and contributes to isolation, particularly for people living in rural areas and the outer City suburbs.

Environmental Comments: improving the efficiency of public transport would serve to present it as an increasingly effective alternative to private transport. This would help reduce the amount of vehicle movement and use of vehicles which would have environmental benefits.

31. Amendment to Chapter 9 as follows

Policy SCS1 025 Playgrounds. Which states - Support play policies to address the play and recreation needs of children and you people with specific consideration given to the needs of children and young adults with Disabilities.

Reason: in support of inclusivity.

Environmental Comments: as outlined elsewhere one of the concerns of SEA is Human health. Provision of play and recreation facilities for all reflects the needs of many with disabilities and is an important consideration.

32. Changes to Chapter 11

Proposed an amendment to include the following text in 11.5 Community facilities:

That this Council recognise and provide the need for an all-purpose facility to support the various Suicide Prevention and Search and Rescue Groups in the City and County.

Reason: To support this important service

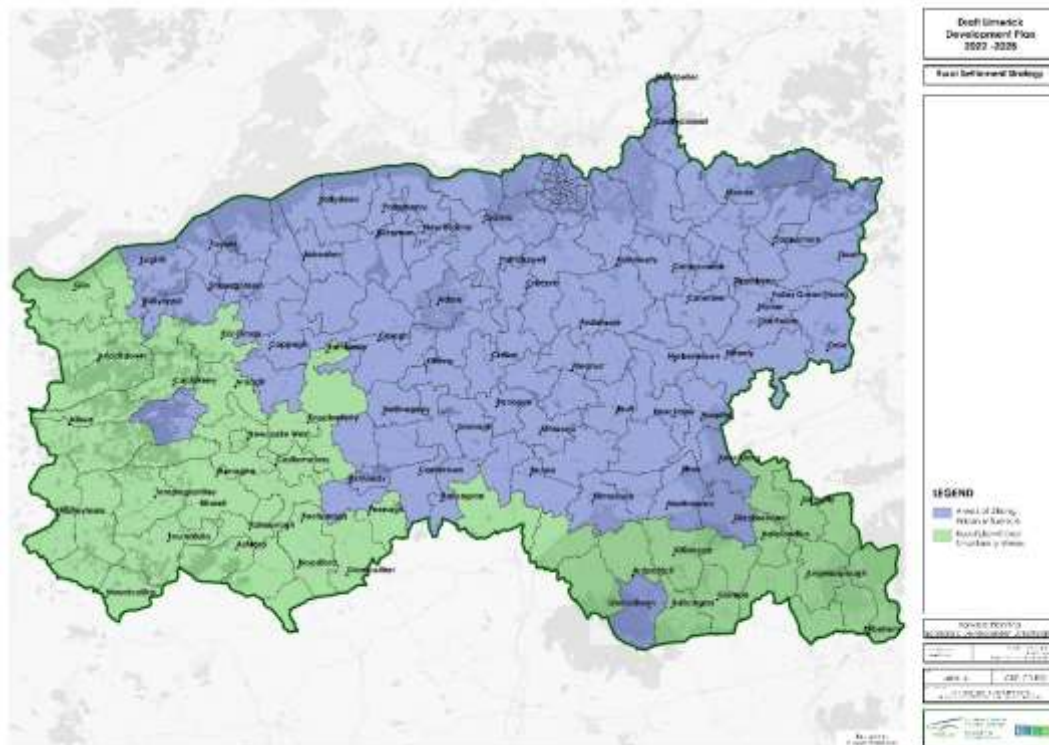
Environmental Comments: one of the concerns of SEA is Human health. Provision of facilities for such a facility reflects the needs of many and is an important consideration.

33. Change to Chapter 3 Amend first paragraph on page 3-12 :

“The NPF and RSES make a distinction between areas under urban influence i.e. those within the commuter catchment of cities and large towns and centres of employment, (which includes Electoral Divisions where at least 15% of their workforce commute to a City ~~or Key~~

town) and rural areas outside these catchments, where a more flexible approach to rural housing will apply”.

34. Replace the Rural Settlement Strategy Map with the following map:



Reason for amendment:

Section 5.3 in the National Planning Framework states that it is *“important to differentiate, on the one hand, between rural areas located within the commuter catchment of the five cities and our largest towns and centres of employment and on the other hand rural areas located outside these catchments”*.

The Draft Plan that issued to the Elected Members in April 2021 considered the commuting catchment to Limerick City and also Newcastle West.

‘Largest towns and centres of employment’ are defined in appendix 4 of the National Planning Framework, under References, as towns with a population of more than 10,000 people or more than 2,500 jobs. In Appendix 2 of the NPF the population for Newcastle West in 2016 is stated as 6,619 and the total jobs is 2,413.

As both population and jobs in Newcastle West is below the threshold set out in the NPF and the Regional Spatial and Economic Strategy for the Southern Region the rural settlement

strategy map should be based on the criteria of 15% of the workforce employed in Limerick City only and should exclude Newcastle West.

Environmental comment: the proposed amendment is in line with the contents of both RSES and the NPF and the threshold figures for “largest towns and Centres of employment” as set out therein. It reflects policy as put forward in those documents and as such is entirely consistent with higher tier plans and consistent with EPO HTP1.

6.1.2 Assessment of policies and objectives of the Draft Limerick Development Plan.

Introduction: in this section the planning policy content of Volume 1 of the draft Development Plan is assessed against the Environmental Protection Objectives (EPOs) which were mentioned previously in this report.

Chapter 1 Introduction

Chapter 1 Introduction outlines the Strategic objectives of the Development Plan in S1.2:

1. Grow Limericks economic and create opportunity through maximising the potential for development through the promotion and enhancement of the **competitive advantages of Limerick**, including its strategic location, connectivity and accessibility to international markets, a skilled workforce and a high quality of life.
2. Transition to an environmentally sustainable **carbon neutral economy**.
3. Ensure new residential development is of the highest quality, enabling life cycle choices and physical, community, recreation and amenity infrastructure are provided in tandem to **create sustainable, healthy, inclusive and resilient communities**.
4. Protect the unique character of Limerick. Support and facilitate **revitalisation** and consolidation of the City, towns and villages through public realm and place making initiatives. Addressing vacancy and dereliction to create compact attractive, vibrant and safe environments in which to live, work, visit and invest. Ensure the highest quality of public realm and urban design principles are applied to all new developments including the construction of landmark buildings in appropriate locations.
5. Create a competitive environment in which to do business. Promote, support and enable **sustainable and economic development**, enterprise and employment generation. Focus in particular on areas which are accessible by public and sustainable modes of transport. Enable settlements and rural areas to become self-sustaining through innovation and diversification of the rural economy.

6. Reduce car dependency and promote and facilitate sustainable modes of transport. Prioritise walking, cycling and public transport. Provide an appropriate level of road infrastructure, road capacity and traffic management to support existing and future development and **enhance connectivity**.
7. Protect, enhance and ensure the sustainable use of Limerick's key **infrastructure** including water supplies and wastewater treatment facilities, energy supply including renewables, broadband and transportation.
8. Protect, enhance and connect areas of **natural heritage, green infrastructure and open space** for the benefits of quality of life, biodiversity, protected species and habitats, while having the potential to facilitate climate change adaptation and flood risk measures.
9. Protect, conserve and enhance the **built and cultural heritage** of Limerick, through promoting awareness, utilising relevant heritage legislation and ensuring good quality urban design principles are applied to all new developments. The principle that well planned and integrated development enhances the sustainability, attractiveness and quality of an area should be at the centre of any proposal.
10. Support growth in the **tourism** sector in Limerick and capture key opportunities to grow the sector based around four key drivers - Waterways, Activities, Heritage, Arts and Culture, in an urban and a rural environment.

Comment: The contents of strategic objectives 2, 8 and 9 are welcomed as is objective 2 to promote an environmentally sustainable carbon neutral economy. This is consistent with the higher tier plans and from the outset provides for compliance with the content of both the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy for the Southern Region (RSES). This is important because these new higher-level plans have updated environmental and planning policy content and will through allocation of population figures directly affect the population targets of the Plan. It should be noted that both the NPF and the RSES place a very strong emphasis on development of existing brownfield areas and have a strong climate action content.

Environmental Effects: one of the most important additions to the new draft plan is S1.4.2 Ministerial guidelines, which acknowledges the role that that planning guidance, produced under S.28 of the Planning Act, plays in plan preparation. These outline current best practice in areas as diverse as wind energy and plan preparation and are an important part in ensuring plan content that is adequately informed by current good planning practice. A statement of consistency with these guidance documents is included In Volume 1 of the plan. This indicates compliance with higher tier plan and guidance which is consistent with EPO HTP 1. Of equal importance is the inclusion of the UN Special Development Goals, which in turn

inform the plan policy and are broadly consistent with the NPFs National Strategic Outcomes in areas such as climate action, renewable energy and sustainable urban development. The UN Special Development Goals and their relationship with the planning policy and objective content are shown in Appendix 2 of this document.

Overall these objectives are positive given the updated environmental content of the higher tier plans and their emphasis on concentrated development and climate action. These objectives are consistent with EPO HTP1 compliance with higher tier plans.

Relevant Environmental Protection Objectives: AQC3, B1, W3, C2, P1, P2, HTP1, B1.

Chapter 2 Core Strategy

This chapter presents population targets taken from both the National Planning Framework (NPF) and the Regional Economic and Spatial Plan. This defines zoning and residential patterns in Limerick and is consistent with higher tier plans.

The most important Core Strategy Policy from an SEA perspective is:

Policy CSP 02: Compact Growth - It is Council policy to support the compact growth of Limerick City Metropolitan area, towns and villages by prioritising housing and employment development in locations within and contiguous to existing City and town footprints where it can be served by public transport, walking and cycling to ensure that development proceeds sustainably and at an appropriate scale, density and sequence and in line with the Core Strategy Table.

Closely related to the Core Strategy is the settlement strategy which outlines the settlement hierarchy for Limerick. This is presented in Table 2.4 of the plan. One of the major changes that has taken place is the movement of Kilmallock to Level 2 in the settlement hierarchy. This has been presented earlier in the first section of this chapter. This reflects the importance of Kilmallock in the context of Limerick. It is the key town in the largest metropolitan area, has recorded continuous population growth over the last number of census periods and has benefited from investment in infrastructure and facilities. It has also benefitted from investment in archaeological and architectural heritage and has considerable potential for heritage based tourism. It also functions as tourist hub in the south east of Limerick. Its re-designation as a Tier 2 town also helps emphasises the importance of allowing it to compete with nearby towns in other counties such as Charleville and Tipperary.

One other change to the settlement strategy has been the inclusion of Ballybrown within the level 6 rural clusters. This has been done in such a fashion as to not interfere with Core strategy figures, but emphasises the range of facilities available, which include a school, community centre, church and shop.

Comments: The basis for the Core Strategy arises from the NPF and RSES population targets. When applied to Limerick it is considered that this will enable revitalisation of urban areas and the further development of Limerick, which would complement initiatives such as Limerick 2030 and Colbert Quarter proposals, which is promoting development in the City through the development of key sites.

In general as concentrated development would be more easily served and less dispersed, this would be beneficial from an environmental perspective which reduces pressure on the wider countryside and environmental resources. It also reflects the content of the NPF and the RSES, the higher tier plans from which the Plan has formed its policies. The changes to the settlements strategy outlined above do not affect core strategy figures but reflect local knowledge and priorities in establishing a more informed settlement strategy based on the resources available in both Kilmallock on the one hand and in the level 6 settlement of Ballybrown on the other.

Relevant Environmental Protection Objectives: AQC3, B1, W3, C2 P1, P2, HTP1, B1.

Chapter 3 Settlement Strategy

The Settlement Strategy presents the policy of the council in relation to settlement in the Plan area. The Draft Limerick City and County Housing Strategy and HNDA 2022-2028 informs the policies and objectives of the Draft Limerick Development Plan, playing a key role in translating national and regional housing policies to the local level. It sets out policy principles and objectives to support Limerick City and County Council to plan for and deliver new housing through the Draft Development Plan.

The policy content is in two forms, higher tier policies which reflect national and regional guidance, with emphasis on Limerick and the objectives that follow them. The objectives are more detailed as they seek to offer planning guidance suited for development control purposes. As noted above, the policies and objectives are presented in abbreviated form in the tables that follow. To view them in their non-abbreviated form please consult chapter 3 of the Plan. An overall commentary follows each table. See above re comments on changes to the settlement strategy as presented in Table 2.4 of the plan.

A brief summary of the anticipated environmental effects of the policy or objective is included in the column. These are as follows:

- + Positive
- = Neutral
- Negative
- Highly negative

Table 5: Settlement Strategy Policies and Objectives

Settlement Strategy Policy/Objectives	Relevant EPOs	Comments	Ecological Effects	Recommendations
Settlement Strategy Policy SS P1	P1 P2 MA2 HTP1 GS1 C2 AQC3.	Stresses the importance of the NPF and RSES in the core strategy and revised settlement hierarchy	+	Clearly reflects the requirement of higher tier NPF and RSES policy. No additional recommendation necessary.
Settlement Strategy Policy SS P2	P1 P2 MA2 HTP1 GS1 C2 AQC3	Reflects the importance of Core Strategy and Settlement hierarchy in informing development decisions.	+	Reflects the important of coherent development patterns.
Settlement Strategy Objectives SS 01 to SS 05	P1 P2 MA2 HTP1 GS1 C2 AQC3	Adheres to RSES and NPF and clearly outlines a tiered settlement strategy, informed by Core Strategy and its population figures.	+	Clearly reflects the requirement of higher tier NPF and RSES policy. No additional recommendation necessary. The emphasis on compact growth and infill of development may reduce development of green field sites,

				<p>which will reduce pressure on undeveloped sites. Objective SS 01 Compact growth is particularly strong in this regard.</p> <p>SS04 refers to the need to avoid urban sprawl, which would reduce development pressure on the wider countryside and its habitats. It would also mean that it would be easier to service more concentrated development patterns.</p> <p>No additional recommendation.</p>
Settlement Strategy Policy SS P3	HTP1	Adheres to RSES in emphasizing the importance of Limerick.	+	Promotes sustainable urban development. No additional recommendation necessary.
Settlement Strategy Objectives SSO6 to SS20	P1 P2 HTP1	Broad range of objectives which take into account the settlement needs of settlements in Limerick. This includes Newcastle West and Kilmallock as key towns and	+	SS07 includes Kilmallock within Level 2 which reflects its importance as the largest town in Limerick's largest metropolitan area. SSO20 mentions refurbishment of rural structures of merit- generally

		<p>the preparation of LAPS for identified towns. It also sets out the scale of development appropriate for different settlements in the hierarchy.</p> <p>SSO18 and 19 have been modified to take into account Limerick rural housing strategy while at the same being compliance with the NPF/RSES and Core strategy.</p>		<p>redevelopment of older structures should take into account the need for adequate wildlife surveys.</p> <p>The designation of Kilmallock as key town helps to achieve balanced development and growth in the county, as it acts as an essential counter weight in the south east to Limerick and Newcastle West to the north and east.</p>
Housing Strategy and Housing Need Demand Assessment Policy HO P1	P1, P2 MA2, HTP1, GS1 C2 AQC3	<p>Supports implementation and delivery of the Draft Housing Strategy and Draft Housing Need Demand Assessment (HNDA) 2022 – 2028 to meet the increasing projected population, changing household size and housing needs.</p> <p>Ensures suitable housing mix and</p>	+	<p>None. Would ensure a coherent response to housing need, in line with NPF/RSES and Core Strategy which favours compact development with its environmental benefits.</p> <p>Section 3.7.4 mentions higher density development which would be preferable to more dispersed forms of development. See</p>

		densities in appropriate locations. Caters for differing housing needs for all sections of the population.		comments on SS04 above.
Urban Housing Objectives HO1-HO16	P1	Provides further detail on types and design of housing and accommodation for urban areas.	+ H004 encourage the reuse of existing housing stock. H005 promotes apartments which encourage higher density land use in urban areas consistent with NPF and RSES. In terms of human health objectives 9 and 10 makes provision for specialist accommodation for dependents.	Should stress the need for suitable assessment for larger development sites.

Overall comments: This section presents a range of policies and objectives on housing, which covers allocations from the core strategy, housing, tenure and location. Of particular note is the emphasis on housing quality, both in terms of design and layout, open space provision and the need to take climate change into account. The objective emphasising the reuse of

existing stock is welcomed as it encourages increased use of existing resources, which are often located in already serviced areas.

Rural Settlement Strategy

There is a strong focus from the outset on the need to comply with policies and population figures from both the NPF and RSES. This is indicated in Figures 15 and 16 below, which show the current and proposed rural area classifications. The proposed area classifications take into account both NPF and RSES, which have informed the preparation of the Core Strategy of the Plan through population allocations and commuting patterns. The emphasis on brownfield development and compact growth will help with sustainability issues such as servicing concentrated populations rather than dispersed. In practical terms it will also help with climate actions by building sustainable settlements with sufficient facilities and resources to meet local needs while minimising the need to travel. There will be habitat losses pending the development of zoned land, but this will have to be weighed against the importance of sustainable urban development and compact growth.

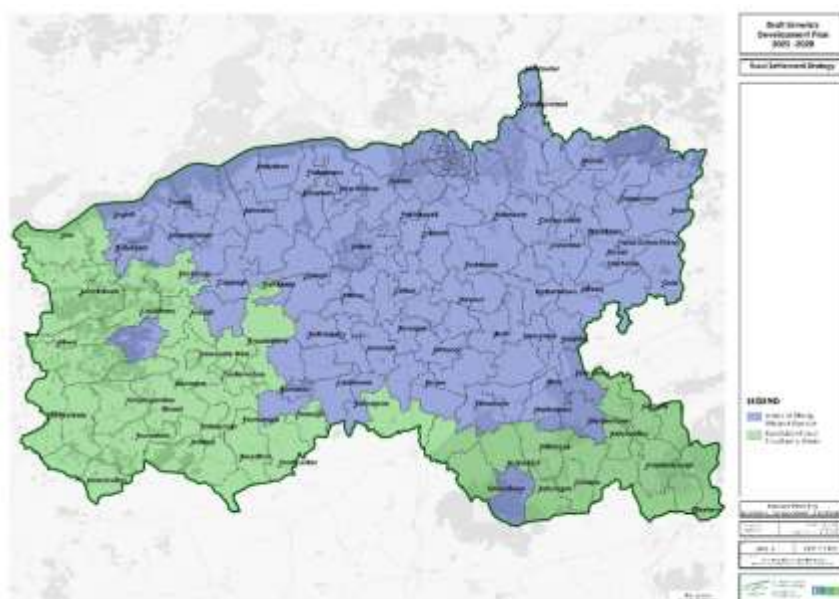
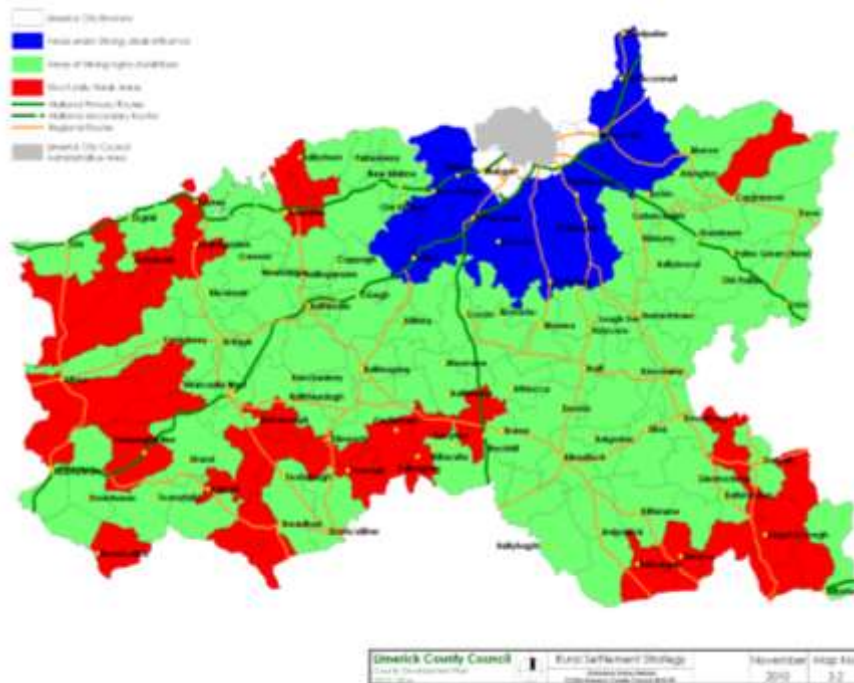


Figure 15: Areas of Strong Urban Influence**Figure 16: Previous settlement areas under the Limerick County Development Plan 2010**

Chapter 4 A Strong Economy

Given the emphasis on the new Limerick Shannon metropolitan area as a whole, the inclusion of this section in the Plan is of huge importance. It identifies the role that Limerick can play with emphasis on high quality employment in the City on lands that are available to the Council. It also makes reference to the Draft Retail Strategy for the Limerick Shannon Metropolitan Area and County Limerick. This is important in that it will ensure a coordinated approach to retail activity in both local authority areas covering the Metropolitan area. The Draft Retail Strategy's suite of recommended policy objectives are focussed on supporting urban regeneration, investment in city and town cores and addressing vacancy or renewal in existing properties. Where new floor space is provided for, it is qualified by assessment criteria to ensure retail is delivered to support a suitable and convenient location and quantum with the needs of the population. The policy objectives in the Draft Retail Strategy will be delivered in accordance with the zoning framework set out in the Draft Limerick Development Plan 2022-2028.

The Chapter begins with the following quote “the aim of this chapter is to support the growth of employment and enterprise, retail, tourism and the marine economy in Limerick, *in a manner, which ensures that economic development does not impact adversely on the environment*”. This is welcomed.

Table 6: A Strong Economy Policies and Objectives

A Strong Economy Policy/Objective	Relevant EPOs	Comment	Effects	Recommendations
Economic Development Policy ECON P1-7	HTP1 P1 P2	Promotes Limerick City economic activity including retail and marine related industry. The Limerick 2030 plan is also mentioned, which is an important component of coherent development in Limerick.	=	None
City Centre Objective ECON O1	GS2	Maintain Limerick City Centre as the primary retail centre and to support its evolving multifunctional role.	+	None, it is an important policy in that it reflects the importance of the City centres historic development role, reinforcing the idea of centre out development.
Limerick Environs retail ECON O2	HTP1 P1 P2	Regulates retail in the environs so that it does not undermine	+	None, See comment above.

		City centre retail.		
District and Local Centres Objectives and Retail Warehousing. ECON O3-6	P1 P2 HTP1	Protect and enhance the mix of services and facilities in existing Centres. Defines their limits and functions, outlines policies for retail warehousing and local shops.	=	None, By supporting mixes of services in local centres it reduces the need for travel and supports the idea of vibrant local areas, where not needs can be fulfilled nearby.
Newcastle West Objective ECON O7	P1 P2 HTP1	Promotes the role of the town as an economic centre and its role as a Level 2 Town.	=	None
County Towns and Villages Objectives ECON O8	P1 P2 HTP1	Promotes their role as economic centres	=	None
Local Shops and Rural Retail Objectives ECON O9		Promotes local and rural shops and retail at adequate levels to support local populations	=	None
Casual trading ECON 10 Casual Trading	P1 P2	Designates areas for casual trading.	=	None
Active Street Frontages ECON 11	L1 C2.	Promotes ground floor retail and upgrade of original shopfronts	+ provides alternatives to retail parks, ensures vibrant streets which are important in	None by promoting such development it can play a role in revitalising urban areas.

			urban development.	
Strategic Employment Objectives ECON O12-14	HTP 1 P1 P2 MA1	Supports the night time economy strategic employment locations in the City and Environs, the development of zoned lands and existing business parks, including the knowledge based economy and education, home marketing and incubator units.	+ ECON O14 supports development on brown field sites and infill development.	None
Location of industry on brown field sites ECON 015	P1 P2	Promotes location on already serviced sites or those with existing structures.	+	None, consistent with RSES.
Knowledge economy ECON 016	P1 P2	Promotes knowledge economy.	+	Could help support working from home and reduce travel.
Education and skills ECON 16	P1 P2	Promotes education and skills for work force and educational opportunities.	=	None
Work with Higher Education. /Education and Skills ECON017 ECON18	P1 P2	See above.	=	None

Clustering and Innovation ECON019	P1 P2 HTP1.	Promotes clustering	+	None- promotes concentrated development.
Tackling Unemployment ECON020	P1 P2 HTP1	Support ETB and establishment of facilities.	=	None
Smart City ECON021	P1 P2	Support smart City.	+ Could promote sustainable solutions to urban problem such as smart energy use.	None
Office Development ECON 022	P1 P2	Promotes appropriately zoned office development in urban areas.	+	None.
Light Industry ECON023	P1 P2	Encourages development on appropriately zoned lands.	+	None
Data Centres ECON024	P1 P2	Encourages development on appropriately zoned land	-	High energy consumption, also might affect supply to other enterprises. While 23(b) supports location close to renewable energy sources, this does not reduce their energy demand and might not be feasible in many cases.
Cultural and Creative ECON025	P1 P2	Promotes cultural enterprises	+	Benefits human health.
Incubator units ECON 026	P1 P2	Encourages their	=	None

		development in suitable lands.		
Rural Hubs ECON027	P1 P2	Encourages the development of rural hubs to facilitate remote working	+ could play a part in reducing travel	None
Rural Economy Objectives ECON O28 – O33	HTP 1 P1 P2 MA1	Rural economic activity in settlements and in sectors such as agriculture, forestry equine industry	=	Would require careful assessment of intensive practices.
Home working Objective ECON O34	HTP 1 P1 P2 MA1	Supports activity from home	+	None
Food Strategy Objective ECON O35	HTP 1 P1 P2 MA1	Supports Limerick Food Strategy	+	Could serve to promote local resilient industries reducing demands for imported foods.
Tourism Objectives ECON O36 - O40	HTP 1 P1 P2 MA1	Supports development of tourism, including water based and niche tourism in Limerick both in rural and urban centres. ECON O38 directs tourism away from sensitive areas.	= ECON O38 states that facilities will not be located where they can cause significant effects. ECON O40 requires that new tourism development is located within existing settlements.	That the provisions of Tourism O38 and O40 are used to inform the development of tourism to ensure a sustainable base for Limerick tourism.
Marine Economy Objectives ECON O41-44	P1 P2 MA1	Encourages Shannon Estuary	-	Requires careful assessment and management and

		Economic Development, including Foynes Port and mariculture.		mitigation. Mentions SIFP which has an excellent track record of such assessment.
Offshore Renewable Energy Objective ECON O45	AQC3	Encourages the development of offshore renewables.	-	Requires careful assessment and management and mitigation.

Comments: Larger infrastructural projects to facilitate economic development will require careful assessment of their environmental effects. Tourism can damage natural environments and care is required to ensure that this will not take place. Objectives ECON O38 and O40 are welcomed. Objective ECON O38 ensures development will not be located in sensitive areas where they are likely to have significant effects, while objective ECON O40 requires that new tourism developments to locate within existing settlements.

Chapter 5 Environment and Heritage

The content of this chapter has been significantly modified since the previous Development Plans to reflect changing circumstances. One of the main changes has been to reflect the importance of climate change. There has also been the integration of the record of protected structures from both City and County. In addition, the policy content has been modified to take into account climate action concerns and the effects it might have on Limerick's environment. In addition, reference has been made to specific species of conservation concern in Limerick such as the Lesser Horseshoe Bat.

Table 7: Environment and Heritage Policies and Objectives

Natural Heritage Policies and Objectives	Relevant EPOs	Comments	Effects	Recommendations
Natural Heritage Policies EH P1-7	B1 B2	Calls for sustainable management of natural habitats, biodiversity and linkages between them, including	+	None

		designated sites. Calls for climate action and compliance with Limerick's Heritage Plan, water and air quality and environmental noise.		
Natural Heritage Objectives EH01 - EH029	AQC3 MA1 B1 B2	<p>Contains references to climate action, species and sites of conservation concern, blue green infrastructure, and provision of habitats.</p> <p>EHO5 stresses the need for infrastructure to be permeable for wildlife.</p> <p>EHO6 mentions the Barn owl and EHO2 mentions the Lesser Horseshoe bat.</p> <p>EHO 15 mentions peatlands in response to NPWS/DAU submission.</p>	+	That during the lifetime of the Plan surveys to support these policies be carried out such as the Swift Survey planned for 2022 and the geological heritage survey for 2021. Funding has been obtained from the Heritage Council for this. Objective EH05 is important for wildlife permeability in new infrastructure.

		EH023 mentions wildlife friendly lighting.		
Landscape Policy EH P8	L1 L2	Promotes distinctiveness of landscape through the Landscape Character assessment process.	+	None
Landscape Objectives UCA01-UCA04 LCA O1- O10	L1 L2	Introduction of Urban Landscape character areas and policies Rural Landscape character areas policies	+	None. These will help integrate development.
Views and Prospects Objective EH O30	L1 L2	Seeks to conserve views and prospects	+	Will help integrate development.
Historical Landscapes Objective EH O31	L1 L2 C1 C2	Seeks to carry out a survey in the lifetime of the plan.	+	None
Special Control Areas Objectives EH O32-O34	C1 C2 L1 L2	EH32 calls for retention of trees and landscape features in Castle park while 33 and 34 outline Special Control areas to regulate development in Mungret and other areas of archaeological significance.	+	Will help regulate development in sensitive areas.

Archaeology Objectives EH O35 - O47	C1	Covers underwater archaeology, preservation by record or in situ, correct procedures, access to monuments, town defences, surveys for archaeological landscapes and support to protect Lough Gur.	+	None. The archaeological landscape survey would complement the historical one.
Architectural Heritage Objectives EH O48 - O52	C2	These objectives relate to protection and development of protected structures, shop fronts in Architectural Conservation Areas, Architectural Conservation Areas and the National Inventory of Architectural Heritage.	+	Modification of older buildings would require wildlife surveys.

Comments: In the natural history section specific mention has been made of species of conservation concern such as the Barn Owl, Lesser Horseshoe bat, at the request of the NPWS who consider that these species are of particular concern in a Limerick context. They also raised the issue of mainstreaming bio-diversity in planning and mention has been made of both the National Bio-diversity Action Plan and the All Ireland Pollinator Plan. The Pollinator Plan has been included in the measures in the Development Management chapter to ensure

that its recommendations are included in landscaping plans, submitted as part of planning applications. The effects of climate change on the natural environment has also been reflected in policy content. The importance of Ecological Impact Assessment (EclA) has also been acknowledged. This is an important tool as ecology also lies outside designated sites and this is an appropriate tool for assessing such areas.

The importance of ensuring that infrastructure allows wildlife movement has also been included in EH-05 which calls for permeability in infrastructure for wildlife movement. Adherence to this objective would prevent infrastructure acting as barriers for species movement in the wider landscape.

There is also a recognition of the possibilities that development can afford to create new habitats, such as by way of the provision of nesting sites for swifts in new buildings for example. This complements elements of Chapter 10 Development Management Standards, where it is suggested that the open space component of development might be located adjacent to ecological areas to allow for expansion of habitat and to ensure the siting of sympathetic land uses.

The introduction of new Urban Character Areas in the Plan reflects the merging of both City and County in the landscape characterisation process and creates an integrated approach.

Chapter 6 Sustainable Mobility and Transport

The Sustainable Mobility and Transport chapter intends to promote the use of more sustainable transport patterns as an alternative to the private car. However, it also recognises the need to ensure that existing infrastructure is safeguarded and where necessary further developed. It should be noted that when the transition to electric or sustainably powered vehicles takes place, (i.e. with sustainably powered recharging facilities) a reduction in transport based carbon emissions will result.

Table 8: Sustainable Mobility and Transport Policies and Objectives

Sustainable Mobility and Transport Policies and Objectives	Relevant EPOs	Comments	Effects	Recommends
Integration of transport and Land use policies, Sustainable	MA2 P2 AQC3	Delivery of sustainable transport linkages,	+ integration of land use and transport	None. Chapter refers to Limerick Climate Change Adaptation Strategy 2019-25.

Mobility and Transport Policies TR P1 - P4		integration of land use and transport policies. Promotes national transport policy. Emphasises sustainable transport links in line with NPF/RSES.	policies should result in increased transport efficiencies and less emissions.	
Sustainable Mobility and Transport Objectives TR 01 - 08	MA2	Supports delivery of specific projects such as the M20 to Cork, the Shannon to Foynes N69 upgrade and link roads such as the LNDR.	=	None, these policies do stress the need for adequate planning and environmental assessment.
Sustainable Travel and Transport Policy TRP5	AQC3 MA2	Work with relevant agencies to promote climate friendly solutions in transport infrastructure	+	None- delivering on climate issues does require a multi-agency response.
Sustainable Mobility and Transport Objectives TR 09 – 024	MA2 AQC3	Deals with sustainable mobility, in particular issues within City and County. Also deals with climate proofed infrastructure. Objectives deal with modal split	=	TR 09 refers to the need to climate proof transport.

		and promote walking and cycling and associated infrastructure. Promotes public transport, bus rail and their infrastructure and Park and Ride Facilities. TR022 protects the Limerick Foynes rail link for future use which is important from point of view of linkages with the port.		
Car Clubs, Electric Vehicles and Micro-Mobility Objectives TR O25 – O27	AQC3 MA2	Promotes e vehicles, car sharing and micro mobility.	+	Could reduce traffic levels and carbon emissions, while reducing wildlife mortality caused by traffic movements.
Mobility Management and Active Travel Objectives TR O28 - O30		Encourages mobility planning and behavioural change towards active travel modes.	+	See above.
Strategic Connections Objectives TR O31 TR032	MA2	Supports and Shannon Airports and Foynes Port.	-	Requires careful assessment and mitigation.
Road Safety and Carrying capacity of the road network. TRP7	MA2 AQC3	Tries to “ future proof” the network By maintaining	+	None Maintaining capacity and efficiency will help reduce grid lock and

TRP 8 Refers specifically to National Roads.		capacity and standards and also seeks improvement to benefit road safety.		reduce need for new infrastructure.
Strategic Regional Roads TRP9	MA2	Protect capacity in regional road network.	+	None- these are important links within the county and maintaining their efficiency would reduce the need for new infrastructure.
Road Infrastructure Objectives TR O33 - O36	MA2	Safeguards capacity of regional and national roads and promotes improvement works.	-	Requires careful assessment and mitigation.
Road Infrastructure Objectives TR O37- O41	MA2	Supports link road provision upgrade of roads and streets and safeguard regional road capacity. Improved access to zoned lands on Dock Road (TRO41).	-	Requires careful assessment and mitigation.
Sustainable Transport In Rural Areas TRP10 TRP11	MA2 AQC3	Support sustainable transport provision in rural areas TRP11 supports Rural Link Network.	+	None- supporting public transport initiatives reduces number of individual car journeys.

Traffic Management Objectives TR 042- 048	MA1	Deals with City traffic management, road and directional signage, car and cycle parking.	=	None. Provision of cycle facilities may encourage cycling.
Noise Objectives TR 049 - 050	AQC3 MA2	Deals with traffic noise and mitigation for noise sensitive developments.	+	None

Comments: The need for adequate environmental, appropriate and ecological assessment for all transport infrastructure, including greenways and large scale transport infrastructure projects should be emphasised.

The encouragement of more sustainable forms of transport such as public transport, electric vehicles and walking and cycling should serve to reduce individual journeys by private transport which would help reduce carbon emission. The eventual publication of the Limerick Shannon Metropolitan Area Transport Strategy would be a step forward in this regard.

Chapter 7 Infrastructure

This chapter sets out the Development Plan policies in relation to infrastructure in Limerick. There has been substantial updates to these policies since the last Development Plans given that a single Plan covers both the City and County areas.

Table 9: Infrastructure Policies and Objectives

Infrastructure Policy/Objectives	Relevant EPOs	Comments	Effects	Recommendations
Infrastructure Policy IN P1	MA2	Secure investment in necessary infrastructure.	=	This should be accompanied by adequate assessment from the earliest stages.
Climate Action in Infrastructure Planning Objective	MA2 AQC3	Requires infrastructure to avoid areas that	+	None, objectives ensure infrastructure projects avoid

IN 01		might flood or be subject to erosion, or locations where climate risk might arise.		sensitive habitats where possible.
Digital Connectivity Objective IN 02	MA2 AQC3	Promotes digitalisation of Limerick's communities which could help working from home.	+ Could help reduce travel and hence wildlife mortality as traffic is often cited as being an important cause of wildlife mortality, particularly for smaller mammals, birds and otters.	None
Broadband Objective IN 03	MA2	Promotes efficient broadband network for Limerick.	+	None
Telecommunications Objective IN 04	MA2	Supports the roll out of efficient tele-communications, but also supports shared infrastructure.	+	None
Water Services Objective IN 05	MA2 W1	Emphasis support for Irish water to ensure adequate service provision	=	None

		throughout Limerick.		
Public Water Supply Objective IN O6	MA2 W1	IO6(b) Restricts development within zones of contribution.	+	None
Private Water Schemes Objective IN O7	MA2 W1	Includes protection of ground water supply and requires connection to the public supply where connections are available.	+	None
Public Waste Water Treatment Objective IN O8	MA2 W1	IO8(c) stresses the need to separate foul and storm water to avoid hydraulic overloading.	+	None
Private Waste Water Treatment Objective IN O9	MA2 W1	Refers to latest EPA Code of Practice for Domestic Waste Water Systems issued in March 2021.	+	None
Surface Water and SuDS Objective IN O10	MA2 W1 W2	Refers to National River Basin Management Plan for Ireland 2018-2021 (DHPLG) and achieving targets through SuDs and water management measures.	+	None

Energy Networks Objective IN O11	MA2 L1	Requires best practice in siting in terms of landscape protection. Supports gas networks in achieving carbon neutrality. Reserves corridors for energy and promotes shared services.	=	None
Energy Interconnector Objective IN O12	MA2	Includes reference to international energy connections.	=	None. In the future it may allow transfer of renewable energy internationally or allow Ireland to avail of such energy from abroad.
Electricity Grid Development Objective IN O 13	HTP1	Supports Eirgrid's Development Strategy and injection of renewables into a developed grid.	=	None
Gas Development Objective IN O14	MA2	Supports GNI's Network Development Plan 2018	=	None
Waste Management and the Circular Economy Objective IN O15	AQC3	Promotes the circular economy and re-use of material and waste minimisation.	+	None
Waste Infrastructure Objective IN O16	HTP1 MA2	Ensures waste infrastructure is appropriately located,	+	None. Promotes access to these facilities and hence

		adequate provision of waste management facilities, recycling centres etc.		encourages recycling.
Sludge Management Objective IN O17	W2	Encourages sustainable use of sludge.	+	None
Agricultural Waste Objective IN O18	W2	Encourages sustainable use of agricultural waste. References GAP regulations.	+	None. More related to good Agricultural Practice regulations than planning.
Construction and Demolition Waste Objective IN O19	AQC3	Encourages re-use of material in the circular economy. Requires a refurbishment/ demolition asbestos survey with details of disposal.	+	None
Landfills Objective IN O20	W2	Addresses restoration of historical landfills and re-development of older landfills as public amenities.	+	None
Hazardous Waste Objective IN O21	W2 AQC2	Implements EPA's National Hazardous Waste Management Plan.	+	None
Seveso Sites Objective IN O22	W2 AQC2	Inform HSA on any applications close to identified	=	None

		sites and have regard to potential impacts on public health and safety.		
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Comments: This chapter cross references Chapter 8 Climate Action. This is important as climate action has been identified as a cross cutting theme in the Draft Limerick Development Plan. A clear reference to the need for adequate ecological and appropriate assessment of infrastructure projects would be desirable, though this has been covered in Chapter 5 under Policy EH P1 (Protection of Natural Heritage and Bio-diversity) and Objective EH O1 (Designated Sites and Habitats Directive) and Objective EH O3 (Ecological Impact Assessment).

Chapter 8 Climate Action, Flooding and Transition to a Low Carbon Economy

Chapter 8 Climate Action, Flooding and Transition to a Low Carbon Economy is a new chapter in terms of land use planning. This chapter seeks to bring together policies on topics as diverse as flooding, climate adaptation and mitigation including for example renewable energy production and the transition to a low carbon economy. Table 8.1 in Volume 1 of the plan gives an idea of how the chapters of the plan incorporate climate action concerns. This chapter also gives importance to the concept of a just transition to a climate altered future.

Table 10: Climate Action, Flooding and Transition to a Low Carbon Economy Policies and Objectives

Climate Action, Flooding and Low Carbon Economy Policies and Objectives	EPO	Comments	Effects	Recommendations
Climate Action Policy CAF P1	AQC3	CA P1 places climate action at the centre of plan policies.	+ See Chapter 5, where biodiversity climate plan is acknowledged.	None
Climate Action Objectives CAF 01 - O12	AQC3	CA01 from the outset emphasises national guidance	+ It is acknowledged in CAF 02 that cooperation with	None. Preservation of bogs was highlighted by NPWS/DAU

		on climate change. Climate proofing and energy efficiency is emphasised in new developments (CA 04 and CA 05). Promotes achieving nature based solution and climate resilience (CA09 and CA10). CA O10 promotes woodland creation, forestry and preservation of bogs.	service providers and entities will be required. CAF 12 mentions urban greening.	submission to the pre-draft first issues paper public consultation.
City XChange project CAF013	AGC3	Promotes climate resilience through promotion of lighthouse City initiative and technical solutions to climate change.	+	None
Energy Generation CAF014	AGC3	Supports renewable energy and connection to gas network.	+	None
Localised energy Production CAF015	AGC 3	Supports localised and carbon friendly energy production.	+	None
Circular economy CAF016	AGC3	Encourages reuse reduce and recycling of resources.	+	None

Low energy building materials CAF017	AGC3	Encourages use of low energy building materials.	+	None
Energy and Emissions Balance CAF018	AGC 3	Supports energy and Emissions report.	+	None
Decarbonising Zones CAF 019	AGC HTP1	Supports areas devoted to climate mitigation	+	None
Flood Risk Management Strategic Policy CAF P5	AQC3	Ensures compliance with Section 28 guidance – The Planning System and Flood Risk Management Guidelines for Planning Authorities, 2009. Protects Flood Zones A and B from inappropriate development and directs land uses to appropriate lands.	+	Link with nature based solutions.
Flood Risk Assessments CAF020	AQC3	Requires site specific FRA.	+	None
Identified Flood Risk CAF021	AQC3	Ensures that no development takes place on lands mentioned as being prone to flood risk.	+	None
Cooperation with other	AQC3	Recognises necessity of working with	+	None

Agencies CAF022		OPW and other agencies.		
Flood relief Schemes. CAF 023	AQC3	Supports delivery of flood relief schemes.	-	Potential for ecological damage requires careful assessment.
Minor Flood works and Coastal schemes. CAF 024	AQC3	Supports the OPW in delivering these schemes.	-	Potential for ecological damage requires careful assessment
Strategic Flood Risk assessment CAF025	AQC3	Will adopt the findings of the SFRA commissioned by the council to inform the plan.	+	None- would result in dezoning.
Renewable Energy Policies CAFP6	AQC3 MA2	Supports renewable energy, both on shore and offshore, community based energy and renewable energy technologies.	+ Requires adequate Ecological assessment.	None
Green Digital Basin CAFP7	AQC3	Supports the development of Digital green basin, technological hub which would be located in Limerick.	-	Requires assessment. As to effects and energy usage.
Renewable Energy Objectives CAF P8-P9	AQC3 MA2	Encourages development of new renewable technologies, community energy projects, and carbon	+ Requires adequate ecological assessment and the need to avoid	None

		capture. The need for adequate assessment is emphasised.	damage is set out in P8.	
Bio-energy CAF 026	AQC3 MA2	Supports bio-energy at suitable locations.	+ Requires adequate ecological assessment and the need to avoid damage is set out in P8	None
Renewable Energy Production. CAF027	AQC3 MA2	Supports different technologies, hydro, Tidal geothermal and wind.	+ Requires adequate ecological assessment and the need to avoid damage is set out in P8	None
Assessment of Renewable Energy Production CAF028, 29 , 30 , 31	AQC 3 MA2	Wind energy to be assessed in accordance with latest guidance, its location to be determined by wind energy map 8.1 and on shore facilities for off shore wind to be developed. (CAF031)	+ Requires adequate ecological assessment and the need to avoid damage	None
Off shore wind CAF032	AQC3 MA2	Supports the development of offshore wind.	+ Requires adequate ecological assessment and the need to avoid damage	

Foynes Port CAF033	MA2	Supports development of Foynes as off shore wind logistics/support base.	- Requires adequate ecological assessment and the need to avoid damage	None
Wind Energy Development on sloping sites CAF034	MA2 AQC3	Requires assessment of slippage.	+ Requires adequate ecological assessment and the need to avoid damage	None- this could avoid future peat slippage
Community based energy initiatives CAF035	MA2 AQC3	Supports Community based energy production initiatives.	+	None
Geothermal CAF 036	MA2 AQC3	Facilitates geothermal energy.	+	None
Emerging Technologies CAF 037	MA2 AQC3	Facilities emerging technologies such as Hydrogen electrolysis.	+	None
Carbon Capture CAF038	MA2 AQC3	Supports investment in such technologies.	+	None
Energy Storage CAF039	MA2 AQC3	Promotes the use of storage systems such as battery systems.	+ Requires adequate ecological assessment and the need to avoid damage	None
Community and Renewable energy CAF040	MA2 AQC 3	Promotes and supports community renewables.	+ Requires adequate ecological assessment and the need to avoid damage	None

Comment: Chapter 8 is a wide ranging chapter dealing with aspects of climate adaptation such as flood management and mitigation including renewable energy production and carbon storage. The chapter also recognises the need for adequate ecological assessment of development proposals for renewable energy. The text cross references climate action topics in other chapters of the Plan.

Chapter 9 Sustainable Communities and Social Infrastructure

Chapter 9 Sustainable Communities and Social Infrastructure emphasises the need for adequate community facilities to cater for all members of society, at all stages in the lifecycle and for all abilities. It recognises the contribution of culture, sports and arts and recommends their inclusion in new developments. It also mentions the significance of existing initiatives such as regeneration and acknowledges the benefits that it has brought to Limerick.

Table 11: Sustainable Communities and Social Infrastructure Policies and Objectives

Sustainable Communities and Social Infrastructure Policies and Objectives	Relevant EPOs	Comments	Effects	Recommendations
Sustainable Communities and Social Infrastructure Policies SCSI P1 – P3	MA2 P1 P2	These policies aim to improve provision and location of community facilities and provide for adequate social infrastructure to enable sustainable communities. Policies ensure facilities are adaptable and include social elements, arts and sports. Supports	+ Ensures delivery of accessible facilities at local level close to where they are needed.	None

		development of rural communities and facilities.		
Sustainable Communities and Social Infrastructure Objectives SCSi 01 -06	MA2 P1 P2	Promote safe, accessible open space, new developments will incorporate sufficient facilities that can provide shared services. Seeks development of a strategy on community facilities identifying where new/improved infrastructure should be provided. SCS104 provides the for the 10 minute neighbourhood which aims to provide for local need within this radius.	+ Caters for broad range of social and cultural needs within communities.	None
Rural Community Development SCSP4.	MA2 P1 P2.	Supports national rural Development policies.	+	None
Smart Towns and Villages SCSi07	MA2P1P2	Promotes innovation to solve problems in rural towns.	+	None

Place Making Objectives SCSI 08	MA2 P1 P2	Objective for place making and to establish a hierarchy of well designed open space, with natural settings and quiet areas	+	None
Education Facilities Objectives SCSI 09 – 012	MA2 P1 P2	To reserve lands to facilitate educational facilities, ensure sufficient school places, support the provision of schools in tandem with new residential development, the multi-use of school facilities and support for the higher education institutes.	=	None
Childcare Facilities Objectives SCSI 013	MA1 P1 P2	Encourage facilities as an integral part of residential development, in a timely manner which would help local economic activity.	+ Increases access to these facilities.	None
Heath and respite Care Objectives SCSI 014 - 015	P1 MA 2	Encourage development and expansion of health care facilities in	=	None

		suitable locations, within communities. Facilitate the ambulance and emergency services.		
Age Friendly Strategy Objective SCSi O16	P1 P2	Support and facilitate the implementation of Age Friendly Limerick Strategy 2016-2020 or any update thereto.	=	None
Active City Initiative Objective SCSi O17	P1 P2	Part of a wider global initiative on physical activity	=	None
Sports and Recreation Objectives SCSi O18 - O23	P1 P2	Protect lands zoned for open space, sports grounds/ facilities. Improve open space and City amenity areas including play facilities. Provide new facilities (O21) Support the Limerick Recreation Strategy.	+ Provision of open space has environmental as well as social benefits.	None
Night Time Strategy SCSi024	P1 P2	Prepare strategy for the	+ could lead to an integrated approach to the	None

		nighttime economy.	night time economy which also minimise nuisance for local residents.	
Sports Plan SCSI025	P1 P2 MA2	Supports Limerick Sports Plan	+	None
Play Areas Policy SCSI P5, Objective SCSI 026	MA 2 P1 P2	Support the Play Policy. Address play and recreation needs of children and young people, support local communities in establishing play facilities and encourage nature based play. SCSIO26 also includes those with disability.	+ Reduces the need to travel for such facilities. Supports nature based play which increases natural features such as trees in play areas.	None
Trails and Green Routes and water sports Objectives SCSI O27 - O29	AQC3 MA2 P1 P2	Supports amenity walkways but draws attention to the need for adequate ecological assessment. SCSI O28 encourages the development of water based sports.	-- Increased public access and facilities can effect local ecology.	Adequate assessment and mitigation is required for such amenities.
Arts and Culture Objectives SCSI O30 - O34	P1 P2	Support the objectives of Limerick	=	None

		Cultural Strategy 2016-2030 and arts and cultural events, hubs/ clusters and venues. Aims to develop an Art Strategy. Supports Limerick Museum		
Library Service Objective SCSi O35-	P1 P2	Supports expansion of library services	=	None
Burial Grounds and Crematoria Objective SCSi O36	P1 P2	To provide and facilitate the provision and management of burial grounds or extensions to existing burial grounds, in cooperation with local communities, at appropriate locations.	=	None
Community Gardens and Allotments Objective SCSi O37	AQC3	Facilitate development of community gardens and allotments.	=	Link with Chapter 8 Climate action in relation to local food production.
Public Rights of Way Objective SCSi O38	MA1	Encourage preservation of rights of way	Increased public access can have adverse effects on local ecology.	None

Comments: Chapter 9 places a strong emphasis on the provision of appropriate social and community infrastructure throughout Limerick, which should help with place making. This could be better linked with Chapter 3 Settlement Strategy. The provision of appropriate community facilities, open space and cultural amenities close to and within the communities they serve, would have undoubted benefits for human health and well-being and also reduce the need to travel.

The provision of walkways, trails and promotion of water sports will have adverse ecological consequences and require careful assessment, management and mitigation. In many situations it would be best not to develop these facilities in sensitive areas. For those routes that lie outside or at a distance from Natura 2000 sites, they should be carefully assessed for their ecological effects using Ecological Impact Assessment techniques. For those close to or within Natura 2000 site networks the provision of Article 6 of the Habitats Directive shall apply.

Chapter 10 Compact Growth and Revitalisation

Chapter 10 Compact Growth and Revitalisation emphasises the need to strengthen the urban areas of the Plan, through the principles of compact growth, infill development and the use of brownfields sites. All of these are basic planning principles in accordance with the policy approach of the National Planning Framework and the Regional Spatial and Economic Strategy. Opportunity sites and areas within the City are identified and objectives included for their development. The Buildings Heights Strategy will offer guidance to potential developers regarding higher rise buildings within the City. As noted in the Environmental Report this can offer opportunities for wildlife should provision be made for nesting and roosting sites at the design stages. From the point of view of the Appropriate Assessment of the Plan, the Building Heights Strategy applies only to zoned areas within the metropolitan area and as such is on previously modified environments. There has been no reports of bird collisions with existing higher rise buildings along the River Shannon in Limerick. Higher rise buildings generally contribute to higher density development which would reduce demands for more dispersed forms of development and in this regard such buildings would be a very useful alternative to more dispersed less dense development types. Other documents that will influence development within zoned areas in particular are the Retail Strategy and Housing Strategy, both of which relate to zoned land.

Table 12: Compact Growth and Revitalisation Policies and Objectives

Compact Growth and Revitalisation	EPOs	Comments	Effects	Recommendations
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Policies and Objectives				
Compact Growth and Revitalisation Policy CGR P1	AQC3 P1 P2 HTP1 MA2	Encourages compact growth through revitalisation, the integration of land use and transport, higher densities, mixed use and consolidation of development through the use of infill and brownfield sites.	+ In the longer term, by encouraging the better use of existing zoned and brownfield sites, it would prevent urban sprawl. It also refers to rural settlements which would help prevent sprawl in rural areas.	None
Place-making, Universal Design & Public Realm Objective CGR O1	P1 P2	Ensures highest quality design and public realm with access for all.	+	None. Applies to urban areas but has the potential to include natural features, trees, grassed areas, in public areas.
Building Heights Objective CGR O2	MA2 P1 P2	Ensures tall buildings comply with the Building Height Strategy accompanying the Plan.	=	None CGR05 mentioned the need for adequate assessment effects.
Urban Lands and Compact Growth Objective CGR O3	HTP1 P1 P2	Clearly reflects NPF and RSES settlement targets with 50% of new homes in the City, and 30% within existing settlements. Promotes	+ See above	None

		compact growth and high quality design.		
Active Land Management Objective CGR O4	HTP1	Supports use of derelict, vacant and underutilised sites. Aims to establish a data base of brown field sites to facilitate compact growth.	+ Reduces chances of urban sprawl.	None
Vacant site Levy Objective CGR 04 Derelict sites Objective CGR 05 Unfinished estates Objective CGR O6	HTP1	The vacant site register and derelict site register are active land measures to encourage development of sites and address dereliction and decay.	+ Reduces urban sprawl and improves the urban environment.	None
Unfinished estates CGR07	HTP MA2.	Seeks to work with others to complete these developments.	+ Would make maximum use of existing resources.	None
Revitalisation Objective CGR O8	HTP1 P1 P2 MA2	Seeks to revitalise Limerick's urban areas both within and outside the City, using investment from sources such as URDF, Rural Regeneration and Towns and Villages Renewal scheme.	=	None

Limerick Laneways Objective LL01	C2	Encourages reuse of vacant buildings and improved linkages and public realm in the City.	=	Would require adequate urban wildlife assessments.
Cleeves Riverside Campus Objectives CRC 01	C2 P1	Encourages development of the former Cleeves factory brownfield site.	=	Would require adequate urban wildlife assessments and AA screening.
UL City Campus Objectives ULCC 01	C2 P1	Seeks to redevelop the former Dunnes store site at Honan's Quay/ Sarsfield Bridge as a UL City Campus	=	Would require adequate urban wildlife assessments.
Arthur's Quay Objectives AQ 01	P1 P2	Facilitates the redevelopment of the Arthur's Quay area in the City centre for a mix of uses and public realm works.	=	Would require adequate urban wildlife assessments.
Land Development Agency Objective LDA 01	HTP1	Work with the Land Development Agency to develop larger land banks.	+	None Would require adequate urban ecological assessments, but would ensure efficient development of centralised urban lands.
Colbert Station Quarter Objectives CSQ 01	HTP1	Seeks to redevelop the Colbert station area of the City	=	Would require adequate urban ecological assessments.

		as a new mixed use urban quarter.		
Ellen Street carpark Objectives ES 01	P1 P2 C2	Seeks to create a mixed use City centre development on an underutilised site	=	Would require adequate urban ecological assessments.
Thomond Park Objectives TP 01	P1 P2	Seeks to develop mixed use employment, tourist and leisure facilities.	=	Would require adequate urban ecological assessments.
The Bays, Moyross Objectives BM 01	P1 P2	Seeks to develop mixed employment in the Regeneration area of Moyross.	=	Would require adequate urban ecological assessments.
Mungret Masterplan Objectives MM 01	C2 B3 B4	Develop a new neighbourhood with high quality residential and community facilities.	=	Would require adequate urban ecological assessments. Would need to consider Loughmore Commons PNHA and potential hydrological intakes to the Shannon SAC site.
Parkway Valley Objectives PV 01	P1 P2	Requires master plan for this brownfield site, which will govern building height, layout and individual design features.	= Contributes to coherent development patterns which make maximum use of brownfield and infill sites.	Would require adequate urban ecological assessments and would need to take into account and potential hydrological intakes to the Shannon SAC site.

Groody Valley Objectives GV 01	B1 W3 B2	Facilitates higher quality development on the northern part of the valley green wedge with pedestrian and cyclist connectivity.	+	Would require adequate urban ecological assessments and would need to take into account and potential hydrological intakes to the Shannon SAC site.
Towlerton Objectives TN 01	P1 P2	Seeks to develop a masterplan for a mixed use development adjoining the Groody Valley green wedge.	-	Would require adequate urban ecological assessments and would need to take into account and potential hydrological intakes to the Shannon SAC site.
Regeneration Strategic Policy RA P1	HTP 1 P1 P2	Supports the Limerick Regeneration Framework Implementation Plan.	=	None
Regeneration Areas Opportunity Areas Objective RA 01	HTP 1 P1 P2	Seeks to integrate regeneration communities into mainstream social, economic and community life of the City through regeneration.	+ Benefits to human health though increased opportunities.	Would require adequate urban ecological assessments.
Social Framework Strategy Objectives SF 01	P1 P2	The social framework is part of the regeneration process and	+ See above.	None

		seeks to ensure that people can access social and employment opportunities.		
Economic Framework Strategy Objectives EF 01	P1 P2	Promotes training and access to jobs and employment.	=	None
Physical Framework Strategy Objectives PF 01	MA 2	Promotes good design, sustainable movement and conservation of the Natural environment.	+	None
Moyross Objectives M 01	P1 P2	Promotes environmental improvements and linkages in the area. Includes protection for landscape and Natura 2000 sites. Promotes opportunities for education, employment, recreation and leisure.	+	None Includes requirements for protection of the Natura 2000 sites of the area.
St. Mary's Park & King's Island Objectives MK 01	P1 P2	Promotes environmental improvements and linkages in the area, supports CFRAM objectives. Promotes opportunities for education,	+	None. Includes requirements for adequate ecological assessment.

		employment, recreation and leisure.		
Ballinacurra Weston Objectives BW O1	P1 P2	Seeks to improve the permeability of the area. Promotes opportunities for education, employment, recreation and leisure.	+ Enables improved pedestrian and cycling access.	None
Southill Objectives OK O1	P1 P2	Promotes permeability and employment in the area and new pedestrian routes. Promotes opportunities for education, employment, recreation and leisure.	+ See above	None
Kincora and Carew Parks Objectives KC O1	P1 P2	Promotes permeability, employment and training opportunities. Protection of the landscape and provision of a community garden.	+	None
Revitalisation of Towns and Villages Objectives CGR P2	P1 P2	Promotes the revitalisation of Limerick and its towns and villages.	+ A core principle of the NPF and RSES, which would help sustain Limerick's	None Consistent with NPF and RSES.

			towns and villages.	
Town and Village Revitalisation Objectives CGR O9	P1 P2	Promotes and supports renewal and revitalisation to enhance vitality including the reuse of vacant premises.	+	None

Comments: While consolidation of urban settlements would in the long term prevent dispersed development and urban sprawl and associated pressures on the natural environment, there is a need to ensure that adequate ecological assessment is carried out for such development.

The policies of the NPF and the RSES have been carried through to the Plan with adequate recognition for other initiatives in Limerick such as the Regeneration Implementation Frameworks, which predated the plan.

For development with potential hydrological links to the Shannon such as the Parkway Valley, Towlerton and the Groody an assessment of such links should form part of any planning application. For the Cleeves site located in close proximity to the Lower River Shannon SAC site, any assessment should examine the Qualifying Interests of both the SAC and the SPA.

Chapter 11 Development Management Standards

In considering the content of the Development Management Standards (DMS), it is important to note that this chapter does not contain policies and objectives. However, the chapter includes standards required for developments which should be addressed in all planning applications in Limerick. The chapter offers guidance at a project level rather than at the strategic level of the current Strategic Environmental Assessment/ Appropriate Assessment process. This does not mean that Appropriate Assessment will not be necessary at planning application stage and Ecological Impact Assessment (EclA) as set out in policy EH03 in Chapter 5 may also be required. Environmental Impact Assessment may also be required. A useful step in establishing whether or not EIA is required is looking at the Planning Regulations where the thresholds for individual projects are laid down. The chapter presents the best way to integrate environmental concerns into individual planning applications and includes a section on the importance of Appropriate Assessment (Article 6 Assessments) in Section

11.12.1. Section 11.12.1.2 addresses Ecological Impact Assessment which was raised by the NPWS/DAU submission in the pre-draft stage of the Plan.

One of the major issues to emerge in Limerick in relation to Natura 2000 sites over the last five years, for water based sites in particular, was that of hydrological connectivity to such sites. One of the most recent examples relates to a Strategic Housing Development (SHD) in the City. An Bord Pleanála is the competent body in relation to SHD applications. The Bord determined the possibility of a hydrological link through groundwater to the Lower River Shannon SAC site, approximately two kilometres away. This has led to a new emphasis on ground water within the development management section of planning and the possibility of effects of various kinds of development on its quality. This brings into focus the efficiency of treatment systems and the need for enforcement and monitoring of these and ground water quality, a point which was raised in pre-draft submissions. It should also be noted that the new EPA guidance on treatment systems for single houses 2021 Code of Practice for Domestic Waste Water Treatment Systems has been included in the plan. This replaces the previous EPA 2009 guidance.

Another important ecological issue that is dealt with in Chapter 11 is the value of trees and hedgerows, particularly as ecological corridors as set out in Section 11.3.9. In addition, Section 11.3.6 addresses the need for ecological corridors linking areas of open space. Table DM 1 Open Space Hierarchy within Residential Estates requires bio-diversity areas within local parks.

Section 11.3.8 entitled Landscaping notes the contribution to bio-diversity that suitable landscaping can make and also links the importance of landscaping to pollinator friendly actions. It is worth quoting in full:

“The landscape design rationale should also address the following:

- *Biodiversity (including pollinator friendly approach): Biodiversity Open spaces, especially large ones, can provide for a range of natural habitats and can facilitate the preservation and enhancement of flora and fauna. All proposals should be pollinator friendly, providing sufficient year-round diverse flowering plants to address the decline of pollinators. They should generally accord with the planting and maintenance approach set out in the Pollinator Friendly Planting Code of the All-Ireland Pollinator Plan, which is inclusive of best practise in the use of pesticides, herbicides, fungicides, and growth regulators.”*

As mentioned earlier in the environmental approach, a coherent response towards bio-diversity outside designated sites can help with species movement and contribute to fulfilling

the requirements of Article 10 of the Habitats Directive, facilitating species movement between areas of habitat value and the Natura 2000 site network itself.

On a more strategic level, it is anticipated that the new policies, put forward in previous chapters, favouring compact settlement and development patterns, will themselves contribute to bio-diversity conservation as they will encourage development of brownfield and infill sites rather than greenfield development on the edges of settlements.

Table 13: Environmental Protection Objectives and Development Management Standards

Themes and Objectives	Content
Biodiversity, Flora and Fauna/Built and Archaeological Heritage	Content
B1: Protect, conserve and enhance habitats, species and areas of regional and local importance, including aquatic habitats and species and promote the sustainable management of ecological networks. See also W3 below.	Section 11.3.6 requires adequate open space provision and linkages with wildlife habitats.
B2: Ensure the continued conservation of the Natura 2000 sites, Natural Heritage and Proposed Natural Heritage sites. These sites are important, both as an amenity and natural history resource.	The importance of open space and green areas both to serve as a buffer and to allow expansion of bio-diversity is emphasised. The importance of pollinator friendly planting and the All Ireland Pollinator Plan is also included.
B3: Preservation of the character of the historic built fabric.	The chapter places an emphasis on good quality design which respect to protected structures and their settings.
B4: Preservation of the archaeological heritage.	This is addressed throughout the chapter in relation to both individual housing developments in the wider countryside and larger development

	such as those associated with the extractive industry.
Population and Human Health	Content
P1: Facilitate a good standard of quality of life for the population of Limerick through ensuring high quality residential, recreational, educational and working environments.	The chapter places an emphasis on high quality development and sets out in detail aspects such as landscaping, design of individual units and the need for adequate amenities.
P2: Provide policy support for the provision of suitable employment and facilities for the local population.	The chapter places an emphasis on high quality environments to attract enterprise and employment opportunities.
Water Resources	Content
W1: Ensure that wastewater infrastructure keeps pace with development proposals.	In particular the need to ensure that the waste water systems correspond to the particular development requirements e.g. seasonal development is emphasised.
W2: Ensure that the requirements of the Water Framework Directive are incorporated into the Plan.	The WFD and new EPA guidance for single houses (March 2021) are referenced.
W3: Ensure that wetland and peatland sites are preserved.	The chapter outlines that constraints will be exercised in areas of ecological interest, including wetlands.
Soils and Geology	Content
GS1: Place an emphasis on the development of brownfield sites rather than greenfield sites in Limerick. By reducing the possible development of greenfield sites this makes a positive contribution to soil conservation. This	The emphasis throughout the chapter is on the development of brownfield and infill sites and compact growth.

can also be achieved through the sensitive reuse of existing buildings, reducing the need for new build.	
GS2: Protect geological sites within the Plan area.	Sites of “geological or geomorphological importance” are acknowledged.
Air and Climatic Factors	Content
AQC1: To increase energy efficiency and the proportion of energy generated from renewable sources and where necessary to ensure the sensitive application of energy saving measures to the historic built fabric of Limerick.	Section 11.7.2 addresses renewable energy.
AQC2: To avoid deterioration of air quality in the Plan area.	Section 11.2.1 addresses air quality.
AQC3: To include climate action concerns into the Plan policies.	New developments and changes of use applications are required to include “an assessment of the impacts of climate change on their development and make provision for these impacts - particularly relating to drainage design, waste management, and energy use”.
Cultural Heritage	Content
C1: Protect and conserve features of archaeological heritage and their setting.	Addressed throughout the chapter in relation to both small developments and larger infrastructure projects, such as solar farms, where both archaeological heritage impacts assessments are required. See Section 11.12.2.1

C2: Protect, conserve and promote the sustainable re-use of architectural heritage.	Addressed in Section 11.12.3
Landscape	Content
L1: Protect and conserve the quality, character and distinctiveness of the Limerick landscape both urban and rural.	All development proposals, including tourism related projects must take cognisance of the existing landscape character and quality.
L2: Retain listed views in the county area.	Protected views are addressed in relation to different types of development including electricity, wind, extractive industry etc.
Material Assets	Content
MA1: Maintain sustainable access to assets such as open spaces, water resources and all other physical and social infrastructure.	Open space has been addressed in terms of amenity, both public and private in new residential developments in Table DM6
MA2: Ensure that there is adequate policy support for infrastructural provision in the Plan area.	Section 11.5 addresses the requirements for community facilities.
Compliance with higher tier plans	Content
HTP 1: Ensure compliance with higher tier plans such as the National Planning Framework, the Regional Spatial and Economic Strategy and other guidance that might be issued by the Department.	There is an emphasis on compact growth throughout the chapter with requirements to develop infill and brownfield sites, which are strategic objectives of both the NPF and the RSES.

Comments: The Development Management Standards Chapter is the part of the Plan that offers guidance to those making planning applications within the functional area of the Council. It translates the environmental policies content of the Plan into practical advice for those applicants. In this regard, the overall content of the Plan accurately reflects the content

of those polices and the higher tier requirements of the National Planning Framework and the Regional Spatial and Economic Strategy. It places an emphasis on compact growth and offers advice on how to integrate environmental considerations into different scales and types of development. The chapter places a greater emphasis on green infrastructure, open space provision and the integration of climate change considerations.

Chapter 12 Land Use Zoning Strategy

Chapter 12 sets out the land use zoning strategy for Limerick, which along with the Core Strategy in chapter 2 has informed the settlement zoning maps in Volume 2. Given the importance of land use zoning in the Plan, the table of land use zoning objectives has been reproduced in a modified form with comments below. This is to enable readers to be aware of the policies that apply to land use zones presented in the Draft Plan.

Table 14: Land Use Zoning Objectives

Land Use Zoning	Objective & Purpose
City Centre	<p>Objective: <i>To protect, consolidate and facilitate the development of the City centre commercial, retail, educational, leisure, residential, social and community uses and facilities.</i></p> <p>Purpose: To consolidate Limerick City Centre through densification of appropriate commercial and residential developments ensuring a mix of commercial, recreational, civic, cultural, leisure, residential uses and urban streets, while delivering a high quality urban environment which will enhance the quality of life of residents, visitors and workers alike. The zone will strengthen retail provision in accordance with the Limerick Shannon Metropolitan Retail Strategy, emphasise urban conservation, ensure priority for public transport, pedestrians and cyclists while minimising the impact of private car based traffic and enhancing the existing urban fabric.</p>
Comments	Clear emphasis on the “centre out” approach to development and consistent with EPO HTP1 compliance with higher tier plans.

Town/ Village Core	<p>Objective: <i>To provide for the development and enhancement of town/village centre core uses including a mix of retail, residential, commercial, civic and other uses.</i></p> <p>Purpose: To consolidate the existing fabric of the core/ central areas of settlements by densification of appropriate commercial and residential developments ensuring a mix of commercial, recreational, civic, cultural, leisure, residential uses and urban streets, while delivering a quality urban environment. The zoning emphasises compact growth objectives and priority for public transport, pedestrians and cyclists while minimising the impact of private car based traffic.</p>
Comments	<p>Clear emphasis on the “centre out” approach with mention of village centre/core uses, to development and consistent with EPO HTP1 compliance with higher tier plans.</p>
District Centre	<p>Objective: <i>To provide for a mixture of retail, residential, commercial, civic and other uses.</i></p> <p>Purpose: To facilitate a district level centre consisting of a compatible mix of uses complimentary to the City Centre, having regard to the principles of compact growth, consolidation and densification. A diversity of uses for both day and evening may be considered. These areas require high levels of accessibility, including pedestrian, cyclists and public transport (where feasible).</p> <p>Retail proposals which would undermine the vitality and viability of Limerick City Centre will not be permitted. The sequential approach to retail development set out in the “Retail Planning Guidelines for Planning Authorities, 2012” will be strictly enforced. Any development shall comply with the Limerick Shannon Metropolitan Retail Strategy.</p>
Comments	<p>This is essential in providing a range of services to suit local needs. Consistent with EPOs MA1 P2.</p>
	<p>Objective: <i>To protect and provide local centre facilities to serve the needs of new/existing neighbourhoods and residential areas.</i></p>

Local/ Neighbourhood Centre	<p>Purpose: To provide a mix of community and commercial neighbourhood facilities to primarily serve the immediate needs of the local working and residential population and complement, rather than compete with the City centre. A mix of appropriate convenience retail, commercial, community, childcare and medical facilities, residential and recreational development of a local scale will be considered. Larger scale office and residential development will be considered in new developments where public transport is available.</p> <p>The retail scale and type will be controlled to prevent negative impacts on the retail function of Limerick City Centre at the top of the hierarchy. A materially broader range of comparison goods than currently exists shall not be allowed in order to avoid further competition with the City centre. Any proposal for retail development shall comply with the Retail Strategy for the Limerick Shannon Metropolitan Area and County Limerick.</p>
Comments	<p>This is essential in providing a range of services to suit local needs. Consistent with EPOs MA1 P2. It also ties in with the idea of the “10 minute Neighbourhood” mentioned In Chapter 9.</p>
Existing Residential	<p>Objective: <i>To provide for residential development, protect and improve existing residential amenity.</i></p> <p>Purpose: This zone is intended primarily for established housing areas. Existing residential amenity will be protected while allowing appropriate infill development. The quality of the zone will be enhanced with associated open space, community uses and where an acceptable standard of amenity can be maintained, a limited range of other uses that support the overall residential function of the area, such as schools, crèches, doctor’s surgeries, playing fields etc.</p>
Comments	<p>Provides for a range of complementary uses and encourages infill development. Consistent with HTP1 and MA1 P2.</p>
New	

Residential	<p>Objective: <i>To provide for new residential development in tandem with the provision of social and physical infrastructure.</i></p> <p>Purpose: This zone is intended primarily for new high quality housing development, including the provision of high quality, professionally managed and purpose built third level student accommodation. The quality and mix of residential areas and the servicing of lands will be a priority to support balanced communities. New housing and infill developments should include a mix of housing types, sizes and tenures to cater for all members of society. Design should be complementary to the surroundings and should not adversely impact on the amenity of adjoining residents. These areas require high levels of accessibility, including pedestrian, cyclists and public transport (where feasible).</p> <p>This zone may include a range of other uses particularly those that have the potential to facilitate the development of new residential communities such as open space, schools, childcare facilities, doctor’s surgeries and playing fields etc.</p>
Comments	Similar to the existing residential objectives, this allows a range of uses which contribute to what has been referred to in the plan as “place making”. Consistent with MA1 and P2.
Education & Community Infrastructure	<p>Objective: <i>To protect and provide for educational, training and adult learning, community, healthcare, childcare, civic, religious and social infrastructure.</i></p> <p>Purpose: To protect existing and allow for expansion of a wide range of educational facilities, services and related development. To facilitate sustainable development of community infrastructure and create an inclusive high quality of life. This land use will provide for community facilities, healthcare services, childcare, religious, social and civic infrastructure, ancillary purpose built accommodation and other facilities.</p>
Comments	The emphasis on social infrastructure and educational and training facilities is important in addressing community needs, while reducing the need to travel. Consistent with MA1 MA2 and P2.

University	<p>Objective: <i>To support the growth of the University of Limerick campus.</i></p> <p>Purpose: To support and facilitate expansion of the University and provide for purpose built student and ancillary residential accommodation and research and development buildings which facilitate the sustainable development of community, cultural, educational and ancillary needs, for the benefit of the University population and wider area.</p>
Comments	Emphasis on the university is of national and regional importance. Consistent with MA1 MA2 and P2.
Regeneration Area	<p>Objective: <i>To support the social, economic and physical regeneration of Moyross, St. Mary's Park/ King's Island, Ballinacurra Weston and Southill.</i></p> <p>Purpose: To support and facilitate the physical, economic and social framework strategies for the Regeneration Areas in accordance with the Limerick Regeneration Framework Implementation Plan. All developments in the Regeneration Areas will be assessed in accordance with the principles and objectives for each area as set out under the Compact Growth and Revitalisation Chapter of this Development Plan. All proposed developments within these areas will be assessed in the context of the impact on the local area and on the City as a whole.</p>
Comments	Consistent with the aims of both the Regeneration Plan and the RSES which acknowledges the needs of regeneration areas in Limerick.
Mixed Use	<p>Objective: <i>To provide for a mixture of residential and compatible commercial uses.</i></p> <p>Purpose: To facilitate the use of land for a mix of uses, making provisions, where appropriate for "primary" uses i.e. residential and combined with other compatible uses e.g. offices as "secondary". These secondary uses will be considered by the Local Authority, having regard to the particular character of the area. A diversity of uses for both day</p>

	<p>and evening is encouraged. These areas require high levels of accessibility, including pedestrian, cyclists and public transport (where feasible).</p> <p>Compatible uses include residential, retail, community, civic, hotel, leisure and recreation, offices, professional services, etc.</p>
Comments	<p>This is essential in providing a range of services to suit local needs. Consistent with EPOs MA1 P2. It also facilitates location of employment close to residential areas which contributes to sustainability.</p>
High Tech / Manufacturing	<p>Objective: <i>To provide for office, research and development, high technology, manufacturing and processing type employment in a high quality built and landscaped campus style environment.</i></p> <p>Purpose: To facilitate opportunities for high technology, advanced manufacturing including pharmaceutical and food production, major office and research and development based employment within high quality, highly accessible, campus style settings. The zoning is for high value added businesses and corporate facilities that have extensive/specific land requirements such as those located at Raheen Business Park and the National Technology Park. These businesses are generally not accessible to members of the public. Retail warehousing will not be acceptable in this zone.</p> <p>The uses in this zone are likely to generate a considerable amount of traffic by both employees and service vehicles. Sites should be highly accessible, well designed and permeable with good pedestrian, cyclist and public transport links. The implementation of mobility management plans will be required to provide important means of managing accessibility to these sites.</p>
Comments	<p>This compliments the policies in relation to the University and Enterprise and Employment zones below. Consistent with MA1 MA2 and P2.</p>
Enterprise & Employment	<p>Objective: <i>To provide for and improve general enterprise, employment, business and commercial activities.</i></p>

	<p>Purpose: To provide for enterprise, employment and general business activities and acknowledge existing/permitted retailing uses. To accommodate compatible industry and employment activities that are incapable of being situated in the City centre, in a high quality physical environment. Marine related industry shall be allowed on Enterprise and Employment zoned lands on the Dock Road.</p> <p>New enterprise and employment developments shall be provided in high quality landscaped park style environments, incorporating a range of amenities. These zones may accommodate light industry, low input and emission manufacturing, logistics and warehousing, campus style offices and commercial services with high space and parking requirements. The form and scale of development on these sites shall be appropriate to their location having regard to surrounding uses and scale. A proliferation of retail uses will not be permitted.</p> <p>The uses in this zone are likely to generate a considerable amount of traffic by both employees and service vehicles. Sites should be highly accessible, well designed and permeable with good pedestrian, cyclist and public transport links. The implementation of mobility management plans will be required to provide important means of managing accessibility to these sites.</p>
Comments	Provides for a range of complementary uses and encourages enterprises that cannot be accommodated within the City centre, but are within the built environment. Consistent with HTP1 and MA1 P2.
Industry	<p>Objective: <i>To provide for specialised and heavy industrial development and associated employment creation.</i></p> <p>Purpose: To provide employment locations specifically for heavy and specialised industry associated with environmental emissions including noise, dust and odour (e.g. waste processing, aggregate processing etc.) and with intensive or hazardous processing (e.g. Seveso) which may give rise to land use conflict if located within other land use zones. Marine related industry shall be allowed on Industry zoned lands on the Dock Road.</p>

Comments	In the interests of proper planning this objective provides for siting for industries that might be good neighbours for other land uses. It provides policy support which, when considered with objectives for other employment uses, creates a policy backdrop for more opportunities for employment and economic growth. Consistent with EPO P2 MA2.
Retail Warehousing	<p>Objective: <i>To provide for retail warehouse development.</i></p> <p>Purpose: To facilitate the sale of bulky household goods such as carpets, furniture, electrical goods and bulky DIY items catering mainly for car based customers, in high quality and accessible locations subject to the requirements of the Retail Planning Guidelines, and the Retail Strategy for Limerick Shannon Metropolitan Area and County Limerick.</p>
Comments	Ensures compliance with higher tier plans and guidance. Consistent with EPO HTP1.
Open Space & Recreation	<p>Objective: <i>To protect, provide for and improve open space, active and passive recreational amenities.</i></p> <p>Purpose: To provide for active and passive recreational resources including parks, sports and leisure facilities and amenities including greenways and blueways. The Council will not normally permit development that would result in a loss of open space.</p>
Comments	Consistent with EPO P1.
Sports Arena	<p>Objective: <i>To protect, provide for and improve sports arenas and stadiums and associated ancillary facilities.</i></p> <p>Purpose: To provide for recreation, leisure and tourism facilities and associated ancillary amenities at a regional and national scale.</p>
Comments	Consistent with EPO P1.
Semi Natural Open Space	Objective: <i>To protect Natura 2000 designated sites, candidate/proposed sites and flood plains in a semi natural open state.</i>

	<p>Purpose: This zoning recognises the importance and need for protection of these areas for wildlife, habitat, flora and fauna and floodwater storage. Within these areas development will be prohibited in order to maintain the integrity of the sites.</p>
Comments	Consistent with B1 B2, W3 of the EPOs.
Groody Valley Wedge	<p>Objective: <i>To preserve and protect the Groody Valley from development.</i></p> <p>Purpose: To maintain the area's importance in preventing the encroachment of the built up area of Limerick City and to retain its important role as a wildlife corridor and a flood management zone.</p>
Comments	Consistent with B1 B2, W3 of the EPOs. Within the City area this area is a particularly important flood plain.
Special Control Area	<p>Objective: <i>To protect the heritage significance of the specified sites.</i></p> <p>Purpose: This zoning recognises the heritage importance of the area. The Special Control Area designation will facilitate the preservation in situ of the identified archaeological, including any subterranean, remains. Within this area, new development will be prohibited in order to maintain the archaeological heritage of the area.</p>
Comments	Consistent with C1 and L1 and also ensure that such sites and their settings are preserved.
Utilities	<p>Objective: <i>To provide for the infrastructural needs of transport and other utility providers.</i></p> <p>Purpose: Park and Ride facilities and commercial development associated with the provision of public transport services are considered appropriate in this zone. This zoning also provides for and preserves land for the provision of services such as electricity and gas networks, telecommunications, the treatment of water and wastewater etc.</p>

Comments	Preserves corridors for the provision of such infrastructure. This is consistent with higher guidance and EPOs HTP 1 and MA2.
Agriculture	<p>Objective: <i>To protect and improve rural amenity and provide for the development of agricultural uses.</i></p> <p>Purpose: Protect rural amenity and agricultural lands from urban sprawl and ribbon development and provide a clear demarcation to the adjoining built up areas. Uses which are directly associated with agriculture or rural related business activities which have a demonstrated need for a rural based location, and which would not interfere with rural amenity are open for consideration.</p> <p>One off dwellings will only be considered on agriculturally zoned land outside of Flood Zones A, B and C for the permanent habitation of farmers and the sons and/or daughters of farmers only and subject to the terms and conditions of the rural housing policy as set out in this Draft Development Plan. Dwellings are categorised as “highly vulnerable development” in the Section 28 Planning System and Flood Risk Management Guidelines for Planning Authorities (2010) and will not be permitted in flood zones.</p>
Comments	Consistent with RSES and EPO HTP1.

Comments: The objectives as they relate to land use zoning closely reflects those in the higher tier documents such as the NPF and RSES. They also try to provide a broad range of policy support for varied land uses, carried out in a manner that is sustainable and favours coherent development patterns, such as infill and centre out patterns of compact development.

The objectives as they relate to the Groody Valley Green wedge and semi-natural open space are of particular importance from a nature conservation and flood management perspective as they explicitly state that zoning will respect and where possible enhance these natural features within zoned areas.

6.2 Methodology for Assessment and Determination of Significance of Effects

The policies in the Draft Limerick Development Plan were examined in the previous section together with comments from an environmental perspective, in particular comments relating to the Environmental Protection Objectives.

Evaluation of significant effects requires consideration of the following questions, which will establish the overall “significance” of the effects of implementing the Plan:

1. Will the policies and objectives in the Draft Limerick Development Plan lead to a risk of environmental standards being breached?
2. Could it lead to a failure to achieve environmental policies or targets?
3. Will it affect environmental resources, which are protected by laws or policies, e.g. Natura 2000 habitats, species, landscapes, water resources, agricultural resources and cultural heritage sites etc.?
4. Could it lead to impacts on environmental resources, which although not legally protected, are important or valuable?
5. Are policies and objectives consistent with planning legislation?
6. Does the Plan adequately incorporate climate action concerns?
7. Do they adequately incorporate biodiversity concerns?

Following on from the preparation and evaluation of the previous sections of the report, the above questions were considered in determining the significance of the environmental effects identified. Suggested alternatives, mitigation and offsetting of any potential adverse significant effects were identified and a review of policies recommended to the LDP in the conclusions section of the last section.

1. Will the policies and objectives in the Draft Limerick Development Plan lead to a risk of environmental standards being breached?

This is not considered likely as sufficient protection has been incorporated into the Plan to ensure that this does not take place. However, in real terms this depends on compliance with the Plan contents and in the case of breaches of planning conditions would require enforcement of the relevant planning legislation. It is also necessary for the Council, in its own works, to have cognisance of the policies of the Plan and relevant environmental legislation.

The policies in relation to nature conservation have been substantially updated since the last Plan and reference has been made to specific species as requested by the NPWs in their

submission. New biodiversity guidance documents such as the All Ireland Pollinator Plan 2021-2025 and supporting documents have been referenced in the Plan and are included in planning recommendations by the Heritage Officer to the Development Management planners. This also applies to species mentioned in submissions such as the Barn Owl and Lesser Horseshoe Bats, which are also the subject of recommendations at project level.

2. Could it lead to a failure to achieve environmental policies or targets?

Given that it will be almost twelve years since the last Plans were adopted, the opportunity has been taken to substantially update the environmental policy content of the Plan itself. This should ensure that with up to date policy there is a lesser chance of missing environmental targets or new directions in environmental policies. However, it should be noted that adherence to the Plan policies is of huge importance in ensuring compliance with environmental policies and achieving environmental targets.

It should also be noted that the Plan includes a Statement of Compliance with Section 28 Guidance. This is the series of guidance documents issued under Section 28 of the Planning Act 2000 (as amended) which sets out requirements for issues such as EIA, SEA, residential development and much more <https://www.gov.ie/en/collection/85b83-planning-guidelines-standards/>

The Plan content has been informed by the Section 28 guidance documents. The Development Management Chapter (Chapter 11) mentions these and other non-planning guidance frequently. This helps ensure that the Plan content would meet the standards required by the guidance and as a result achieve the standards and targets, both planning and environmental that they set out.

Also present in an Appendix to this report is a list of the UN sustainable development goals and the plan policies that are relevant to them. This also helps to ensure that the plan policies are compatible with sustainability goals.

3. Will it affect environmental resources, which are protected by laws or policies, e.g. Natura 2000 habitats, species, landscapes, water resources, agricultural resources and cultural heritage sites etc.?

As noted elsewhere, there has been major updating of the policies in the Plan to ensure that this does not happen. The reader's attention is drawn to the semi-natural open space objective in Table 14 above, which states that is an objective "To protect Natura 2000 designated sites, candidate/proposed sites and flood plains in a semi natural open state".

When aligned to other policies in chapter 5, protecting both designated and un-designated areas of ecological interest is considered to receive sufficient protection. Chapter 5 also refers to Article 6 and the need for appropriate assessment of any development in or close to the Natura 2000 site network.

It should be noted that a specific policy in relation to ecological impact assessment has been included. A policy in relation to Flora Protection Order (FPO) plants has also been included. This means that additional emphasis is placed on nature conservation assessment outside of designated sites, ensuring species and habitats of nature conservation will be considered in the course of assessment of development applications.

Cultural heritage sites and their protection through the mechanism of Special Control areas are also included in Chapter 5 of the Plan. The updating of the list of protected structures and the associated Architectural Conservation Areas (ACAs) in the Plan also places this aspect of Limerick's Cultural Heritage on an improved footing.

The new policy emphasis on compact growth, infill and brownfield development, reduces the demand for non-agricultural uses in rural areas.

4. Could it lead to impacts on environmental resources, which, although not legally protected, are important or valuable?

This is considered unlikely. It is more likely that as a result of the policies, emphasised by the NPF, the RSES and reflected in the Core Strategy of the Plan, that more compact forms of development will take place within previously zoned land or within brownfield sites in existing urban areas. Directing development activity from the wider countryside into settlements, with a previously modified environment, is likely to result in development that is more easily serviced and generally closer to amenities than more scattered forms of development. Indirectly, this concentration of development is expected to result in less environmental pressures in the wider landscape.

Within the development management standards chapter guidance is also set out on issues such as siting and layout of developments and in some cases design features that would protect local amenity.

It is the intention of the council, to carry out wetland surveys of the county, to ensure that an adequate record of these are present so that they can be protected.

5. Are policies and objectives consistent with planning legislation?

Yes. From the outset the intention was for the Draft Plan to update policy content to reflect that of the NPF and RSES. In addition, the opportunity has been taken to incorporate updated environmental and ecological policies that have come about since the adoption of the last Plans. It should also be noted that the Plan contains a statement which emphasises its compliance with the section 28 guidance which have been published under the Planning Act 2000 (as amended).

6. Does the Plan adequately incorporate climate action concerns?

It is considered that the Plan adequately incorporates climate action concerns. While it might be necessary to improve cross referencing between different chapters in the Plan on the subject of climate action, the Plan does reflect the content of the Limerick Climate Adaptation Strategy 2019-2024. This was the first strategy specifically drawn up to address climate adaptation and has been referenced throughout the Plan. In addition, a specific chapter on climate action and flooding has been included. One of the important aspects of this chapter is that it stresses the importance of a just transition so that no section of the economy or population would be unduly affected by the transition to a low carbon society.

7. Does the Plan adequately incorporate biodiversity concerns?

It is considered that biodiversity concerns have been adequately dealt with in the Plan. There are a number of reasons for this, the first is that the contents of the NPWS pre-draft submission on issues such as ecological assessment have been included in the policy content. There has been updated references to specific species that have been indicated as being of particular conservation concern, such as the Barn Owl and Lesser Horseshoe Bat. In addition, as outlined above references to Flora Protection order plants have also been included in the Plan.

In relation to climate adaptation the issue of nature friendly solutions for issues such as water management and flooding has been emphasised in the Plan, together with the need for adequate ecological assessment of climate adaptation works such as flood defences. The need to take into account the measure contained in the Biodiversity Sectoral Adaptation Plan has also been included in the Plan policy.

Due to the importance of land use zoning objectives, the important sections for ecology and Natura 2000 sites is reproduced below to ensure that readers will be aware of the policies

that apply to land use zonings presented in the Plan. It should be noted that the Retail Strategy and Building Heights Strategy will relate to zoned lands and subject to the land use zoning objectives of Section 12.3 of the Plan. The objective to protect Natura 2000 sites in the zoning objectives is valuable to aid both nature conservation and flood management.

Table 15: Nature related Land Use Zonings

<p>Semi Natural Open Space</p>	<p>Objective: <i>To protect Natura 2000 designated sites, candidate/proposed sites and flood plains in a semi natural open state.</i></p> <p>Purpose: This zoning recognises the importance and need for protection of these areas for wildlife, habitat, flora and fauna and floodwater storage. Within these areas development will be prohibited in order to maintain the integrity of the sites.</p>
<p>Groody Valley Wedge</p>	<p>Objective: <i>To preserve and protect the Groody Valley from development.</i></p> <p>Purpose: To maintain the area's importance in preventing the encroachment of the built up area of Limerick City and to retain its important role as a wildlife corridor and a flood management zone.</p>
<p>Special Control Area</p>	<p>Objective: <i>To protect the heritage significance of the specified sites.</i></p> <p>Purpose: This zoning recognises the heritage importance of the area. The Special Control Area designation will facilitate the preservation in situ of the identified archaeological, including any subterranean, remains. Within this area, new development will be prohibited in order to maintain the archaeological heritage of the area.</p>

6.3 Summary of Likely Significant Effects of Implementing the proposed Draft Plan on the Environment and Measures Proposed to Prevent, Reduce or Offset such effects

6.3.1 Introduction

In accordance with the SEA legislation, the likely significant effects on the environment of implementing the Draft Plan are summarised below.

6.3.1.1 Biodiversity, Flora and Fauna

In tandem with the SEA process and to comply with Article 6 (3) of the Habitats Directive, an Appropriate Assessment was carried out to examine the impacts of the review of the Plan on Natura 2000 habitats. Natura 2000 sites are located within the Plan area and it was important to carry out the process in order to establish if any of the Plan contents might have effects on the Natura 2000 sites, such as the Lower River Shannon SAC site or the River Shannon and Fergus SPA. The assessment indicates that there would not be any significant effects on these areas with the implementation of the Plan as presented. The implementation chapter of the Plan draws attention to the increasing emphasis of Article 6 of the Habitats Directive and also the role that Environmental Impact Assessment and Ecological Impact assessment can play in examination of the ecological effects of potential development. With the new Plan the opportunity has been taken to update the policy content. Up to date planning regulations and new Section 28 guidance as it relates to environmental impact assessment have been referenced in the new Plan.

6.3.1.2 Population and Human Health

Generally, potential impacts on population and human health arising from the Development Plan review are considered positive as the contents of the review provides for additional community and educational facilities. A new chapter Sustainable Communities and Social Infrastructure places a particular emphasis on creating sustainable communities with a range of activities suitable for their needs. This emphasis is not just for the larger settlements as the chapter content is intended to inform development decisions at all levels and in settlements of all sizes. The Plan takes a coherent approach towards communities across Limerick as whole.

6.3.1.3 Water/Wastewater

While there are no constraints on development in the City and environs with respect to waste water capacity and water provision, this is not the case for many settlements within the county. The bulk of the population allocation is for the City and Environs under the Core Strategy. However, there are many settlements in the county where further development is not possible due to waste water or water provision constraints. It is a matter of urgency to ensure that service provision in these areas is delivered, in order to avoid pollution and to ensure the coherent development of the City and county as a whole.

Limerick City and County council has commissioned a Strategic Flood Risk Assessment (SFRA) to inform this Plan. This covers the metropolitan area and the most important settlements in the revised settlement hierarchy. The SFRA ensures that zoning and subsequent planning decisions can be taken on the basis of the most up to date information available at the time of preparation. In addition to the SFRA, a surface water management plan for the metropolitan area is under preparation, which will inform decisions on how to deal with surface water run-off and sustainable urban drainage issues within the Metropolitan Area.

6.3.1.4 Air Quality & Climate

Air quality in Limerick is considered to be of a very high standard and there are no issues arising from the Plan that would adversely impact air quality. While there are negative localised impacts from traffic in the centre of the City during busy periods, such as summer traffic heading westwards, this is not regarded as significant in overall terms.

In Chapter 11 (Development Management Standards) content has been included in order to deal with dust emissions and odour. Dust emissions in particular can be an issue with development in the extractive industry, but can also be an issue on brownfield sites where demolition and alterations to buildings can create issues. This is important given the new emphasis on infill and brownfield development in both the Plan and higher tier plans.

Perhaps the biggest change in relation to dealing with climate issues has been the inclusion of a chapter on Climate and Flood Management, which deals with these issues. The preparation of the Limerick Climate Change Adaptation Plan (2019-2024) means that there was a range of policies that could serve as the basis for updated policies in the Draft Limerick Development Plan. The climate issue is also cross referenced throughout the Plan and within the Development Management Standards, which offers advice at planning permission level. It is considered that this will have positive effects during the lifetime of the Plan as climate considerations have been mainstreamed for the first time.

6.3.1.5 Geology and Soil

The Draft Plan is expected to have beneficial effects for soil conservation, given that the policies in both the NPF and the RSES in relation to brownfield development can be reflected at county level. New development is more likely in the City than elsewhere in the county, resulting in the loss of green fields and redevelopment of brownfield sites. The emphasis on brownfield development is firmly based in the policies of both the NPF and the RSES.

Information has been lacking in relation to geological sites in Limerick. To address this deficiency funding has been obtained from the Heritage Council to carry out a survey which will be carried out in 2021.

6.3.1.6 Cultural Heritage

The Draft Plan is expected to have beneficial effects for the protection of architectural and archaeological heritage across Limerick. This is achieved by a detailed set of principles for development as expressed in Chapter 11 in particular.

6.3.1.7 Landscape

There has been a substantial updating of landscape policies in the Plan to take into account the merging of the City and County areas. Four new Urban Character Areas have been added to reflect the inclusion of the City and the Metropolitan Areas.

6.3.1.8 Material Assets

Material assets are taken to include infrastructure and utilities including rail, road, water supply, wastewater treatment facilities, electricity supply and distribution. It also includes economic assets such as buildings, lands and water resources which support tourism and amenities.

Amongst the most important elements of infrastructure are wastewater and the transport network. The presence of the Limerick to Foynes rail line which is currently disused should be noted. This has the potential to serve as a transport link to Foynes Port and some suggestions have been made for a walkway along its length. While this might be feasible, no development proposals should compromise its use as a transport link to the port and to West Limerick as a whole and this is recognised in the Plan. The retention of the rail link as a potential route to the west is hugely important for the port as part of the European TEN-T initiative and for future sustainable transport links generally.

6.3.1.9 Flooding

Flooding and Responses to flooding have been guided by the The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) for over a decade now. While the previous Development Plans, both City and County, had been prepared following their issue, there has been a growing body of experience in their implementation since 2009. This has resulted in a more comprehensive approach toward flood risk management in this plan which reflects the needs of the local authority.

As part of the plan preparation process Limerick City and County Council commissioned a Strategic Flood Risk Assessment study to inform the location and type of zoning and land use proposals. This is part of the plan documentation and is a separate volume. An important part of this was the production of Flood Zone Mapping. In addition to flood assessment of Limerick City and Environs, settlements in the county were also assessed and flood maps produced. The settlements in the county were screened to establish an appropriate level of assessment. The intention is to provide flood risk guidance for all zoned lands within the City and County.

The settlements that are included in the Limerick Development Plan that have had flood risk maps prepared are as follows:

Ballingarry	Doon	Hospital
Bruff,	Dromcolliher	Kilfinane
Bruree	Foynes	Pallasgrea
Cappamore	Glin	Pallaskenry.

Towns such as Newcastle West and Kilmallock which have their own Local Area Plans will be assessed during the Local Area Plan process for each individual settlement.

Flooding can be a complex issue and for some settlements can arise from a number of sources. Foynes, for instance is subject to fluvial and coastal flooding. Two rivers flow through the town and it lies on banks for the Shannon Estuary. A flood relief scheme has been completed but this aims to deal with tidal risk and is concentrated around the port and adjacent properties. This example has been chosen to indicate the complexity of flooding issues in Limerick and the need for a well informed planning response.



Figure 22: Flooding in Foynes (Source: Limerick Post).

The Strategic Flood Risk Assessment points out that while at individual site level it might be possible to manage flood risk, strategically it might not be a sustainable approach as cumulatively it might not be possible to protect larger areas without excessive cost either financially or environmentally.

An important part of climate adaptation is incorporation of climate risk into flood management. The OPW recommend two scenarios, a mid Range future scenario and high end future scenario. In practical terms this means an allowance of 20% for the mid range scenario and 30% allowance for the high end for fluvial flood risk. This emphasises the importance of designing these into flood protection works from the outset or insisting that any works constructed can be readily altered to meet these requirements.

6.4 In-combination Effects

As the Draft Plan is a policy document, it is important to consider cumulative effects of plans and policy documents that are in operation at the same time.

Consideration of legacy plans such as the Limerick City Development Plan 2010 – 2016 (as extended) and the Limerick County Development Plan 2010 – 2016 (as extended), is the first step in assessing cumulative effects in that prior to this Plan there would have been a rather more disjointed approach to the development of Limerick City and County. They can now be considered as one Plan area, ensuring consistency of ecological policies. In this regard, Natura

2000 sites do not follow administrative boundaries and policy consistency is important in their conservation.

The Limerick Development Plan review has to be considered with changes to the City, of which the Castletroy and Southern Environs areas will now form part. Due to Limerick's status as the major City in the Mid West, it is necessary to consider the Plan review and its effects at a larger scale. Table 16 below shows the main plans and projects ongoing in the City and County areas and it is these that provide the most immediate back drop to the review. These are the plans and projects that are assessed with respect to in-combination effects.

Table 16: In-Combination Effects

Projects and Plans	Comments
Limerick 2030 Economic and Spatial Plan	<p>This plan identifies seven key locations in Limerick for re-development, which will complement the SIFP given that the aims of both as they relate to Limerick are similar. Both offer detailed area based suggestions of redevelopment of selected areas. The Marine Energy park proposal in the 2041 SFPC Vision is reflected in this document (p. xiii) where it refers to the need for an urban science park.</p> <p>The draft 'Review and update of the Limerick 2030 Plan' forms part of the consultations documents. The draft update aligns with the policies and objectives set out in the overall Draft Development Plan.</p>
Colbert Quarter	<p>This development of the 50ha land bank through the aegis of the Land Development Agency involves a number of state agencies. It is located close to rail and bus station strategic transport infrastructure and is located in the centre of the City, which further emphasises its importance. The development of this important site would revitalise not just the City centre but the surrounding areas and with the proximity of the rail link would ensure access to all parts of the country served by the rail. This ambitious project</p>

	complements the aims of the Limerick 2030 plan and in its own right will play a central role in redeveloping Limerick.
Regeneration areas	The Limerick Regeneration Framework Implementation Plan envisages one of the largest capital and regeneration programmes in the State. The Plan includes investment on physical, social and economic programmes. From the point of view of population and human health the effects are meant to be beneficial.
Iarnrod Eireann: Redevelopment of Colbert Station and improvements to Limerick and Cork Line (2020)	The upgrading of rail infrastructure will have beneficial effects on the connectivity of the City as a whole and for movement of goods to and from the City. The line to Foynes which runs through part of the Plan area may be upgraded in the long term, but its effects are not anticipated to be significant given that this initial upgrade will be for freight rather than passenger traffic. However, it has the potential to be part of a more sustainable transport network for the County as a whole. The improvement of the Limerick to Cork line with removal of level crossings reducing journey times will improve connectivity between Cork and Limerick. Rail improvements are also associated with the M20 road scheme.
Strategic Integrated Framework Plan (SIFP)	The SIFP operates throughout the estuary, which means that docklands in the City area as well as locations in Foynes and Askeaton are included. The SIFP has been viewed as being a model of good practice in the RSES and much valuable ecological survey work has resulted from it.
City Development Plan 2010- 2016 (as extended) and County Development Plan 2010 – 2016 (as extended)	Since the amalgamation of the City and County Councils, the implementation of the both Plans have proceeded in tandem. The draft Limerick Development Plan will function across the city and

	county Plan areas, which should ensure greater planning policy consistency throughout Limerick.
Smarter Travel and successor programmes (which was a demonstration project until 2018)	Designed to promote sustainable travel patterns which will promote cycling and pedestrian access throughout the City and Plan area.
Limerick Shannon Metropolitan Area Transport Strategy	Outlines a coherent transport strategy for the region. This will mean an emphasis on more efficient transport and an expansion of cycle routes.
Limerick Northern Distributor Road (LNDR) and other large road infrastructure schemes such as the M20 and Foynes to Limerick scheme.	<p>The LNDR project running to the north and the east, would reduce the volumes of City traffic with consequent improvements in both traffic flows and the City environment. This would also assist in dealing with traffic flows on a Citywide basis and complement the southern ring road.</p> <p>The M20 scheme would improve connectivity between Limerick and Cork which is an objective not just of the LDP but also of the RSES. A programme of rail improvement works has also been put forward for consideration.</p>
Upgrade of Bunlicky Wastewater Treatment Plant	Communications from Water Services and Irish Water indicate that a programme of works will be ongoing to ensure that capacity keeps pace with demand. This is essential for the future development of the City and Plan area. A pre-planning meeting was held with the Development Management planners in March 2021 to discuss a Strategic Infrastructure Development application to the Bord, which will ensure that capacity will expand to take into account the development needs for the foreseeable future. Given Limerick's regional importance, the City has the largest treatment plant in the region which should keep pace with development demands.

7.0 Conclusion

SEA assessment of the draft Limerick Development Plan has determined that no significant adverse impacts are predicted from the proposed Plan while negative impacts will be minimised through policies and objectives for climate action, biodiversity, population, water and cultural heritage.

For certain activities that will complement the Plan e.g. improvements to WWTP and transport projects, impacts will be determined by way of environmental assessment largely through EIA and AA at the project level. These assessments will involve application of Appropriate Assessment, landscape appraisal, archaeological and architectural heritage appraisal and flood risk assessment, to accurately determine the impacts under the range of environmental headings detailed above.

Compilation of the background information, including through discussions with Council staff such as area engineers and the public consultation process have all informed the Environmental Report to address key environmental issues in the Limerick Development Plan.

Table 17: Key Environmental Issues

Key Environmental Issue		Relevant draft LDP content and policies
Water Quality	<ul style="list-style-type: none"> -Protection of Water Quality -Water Framework Directive, incorporation of relevant objectives and measures -Surface and ground water protection -Drinking water -Wastewater treatment -Water conservation 	Addressed in Chapter 11 Development Management Standards, Chapter 7 Infrastructure and Chapter 5 Environment and Heritage

	<p>-Integration of flood risk assessment into the Plan to ensure appropriateness of land use and inclusion of SUDS technology</p> <p>-Increased risk of flooding due to Climate Change</p>	<p>Addressed in Chapter 8 Climate Action, Flood Risk and Transition to Low Carbon Economy</p> <p>A SFRA has been incorporated into the Plan</p>
Biodiversity	<p>Protection of Biodiversity - Natura 2000 sites, pNHAs, non-designated habitats, riparian buffer zones, green infrastructure</p>	<p>Addressed in Chapter 5 Environment and Heritage,</p> <p>Chapter 8 Climate Action, Flood Risk and Transition to Low Carbon Economy</p> <p>Chapter 11 Development Management Standards,</p> <p>The Natura Impact Statement</p>
	<p>Conservation of the open spaces and Parklands in the LDP area</p>	<p>Addressed in Chapter 9 Sustainable Communities and Social Infrastructure</p>
	<p>Consideration of potential impacts of climate change</p>	<p>Addressed in Chapter 8 Climate Action, Flood Risk and Transition to Low Carbon Economy and throughout the Plan</p>
Air and Climate	<p>Lighting</p>	<p>Addressed in Chapter 5 Environment and Heritage,</p> <p>Chapter 11 Development Management Standards</p>
	<p>Sustainable modes of transport</p>	<p>Addressed in Chapter 6 Sustainable Mobility and Transport</p>
	<p>Protection of air quality</p>	<p>Addressed in Chapter 5 Environment and Heritage</p>
	<p>Consideration of potential impacts of climate change</p>	<p>Addressed in Chapter 8 Climate Action, Flood Risk and Transition to Low Carbon Economy, Chapter 7 Infrastructure</p>
	<p>Promotion of use of energy conservation</p>	<p>Addressed in Chapter 8 Climate Action, Flood Risk and Transition to Low Carbon Economy</p>
Cultural Heritage	<p>Architectural Heritage Protection</p>	<p>Addressed in Chapter 5 Environment and Heritage</p>

	Protection of archaeological heritage of the area	Addressed in Chapter 5 Environment and Heritage
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7.1 Summary of how environmental considerations were factored into the proposed review to date

Environmental considerations were integrated into the Plan's policy and zoning objectives using information from a variety of sources. Zoning has been applied in a way that emphasises the NPF and RSES objectives for compact growth. Policy in the Plan has been prepared to reflect this principally through the adoption of a new Core strategy.

The Plan preparation process undertaken by the Planning Department was informed by specialist input through the SFRA process carried out by consultants. This determined the zoning of land to avoid inappropriate development being permitted in areas at high risk of flooding. Various provisions have been inserted into the Plan which provide for flood risk management at project level as emphasised in Chapters 8 and 11.

Environmental sensitivities relating to ecology, cultural heritage, landscape and the introduction of new Urban Character Areas in the City were also taken into account.

7.2 Summary of how the Environmental Report and submissions received from Statutory Authorities following scoping were taken into account

The scoping responses were important in informing the Draft Plan. From the outset they stressed the topics that would shape the Plan content. Most importantly were the issues of climate change, the need to update policy to take into account the new NPF and the RSES and also the need to ensure that the new Plan had adequate policy content to suit the new combined areas of City and County.

Some changes have taken place in areas such as the revised settlements strategy, where some settlements have moved in the hierarchy to take into account the changed administrative environment of City and County and the new investment needs and priorities that have emerged with respect to infrastructure.

A climate change chapter has been included, while climate change is a cross cutting issue that now appears in every chapter.

New polices in relation to wildlife conservation involving specific species at the request of the NPW has been included.

New infrastructural priorities have been set out, such as delivering the Limerick to Foynes road scheme and Cork to Limerick Scheme.

Table 18: Possible Environmental Effects of the Draft Plan

Alterations	Environmental effects	Comments
Compact growth and consolidation of the built environment	Beneficial in that it will place additional protection to water courses	IFI publication “Planning for water courses in Urban areas” has also been included in policy.
Specific climate action chapter and cross references to climate issues between chapters	None	Commitment to monitoring of Plan policies by Limerick City and County Council.
Alteration of zoning objectives informed by an SFRA	Ensures that additional open space will be provided and that sufficient area is zoned for service provision outside of flood risk	Allows zoning with community and environmental benefits.

Adequate monitoring is important to keep track of possible environmental changes. It is a policy of the council to support monitoring initiatives associated with the implementation of the Limerick Development Plan.

7.3 Reasons for choosing the proposed review in the light of other reasonable alternatives considered

The option that was selected is presented below:

Alternative Strategy Option 4 - The review as outlined in the current Draft Plan:

The examination of the policy background indicated that the allocation of resources and zoning would be best served by a review of both City and County Plans and their merging into

one document. The older Plans also need to be updated following adoption of the National Planning Framework and the Regional Spatial and Economic Strategy for the Southern Region and in order to take into account climate change issues. The new settlement hierarchy has been ordered to reflect population growth targets and the availability of employment and services.

The other alternatives that had been presented earlier in the Plan did not adhere sufficiently to the content of higher tier plans or to updated guidance that had emerge since the last Plans were adopted in 2010.

8.0 Monitoring

8.1 Introduction

As part of the SEA process, measures envisaged for monitoring the likely significant effects of implementing the review of the Plan must be included in the Environmental Report. Monitoring is often based on indicators, which measure changes in the environment, especially changes which are critical in terms of environmental quality. The Department of Environment, Heritage and Local Government's SEA Guidelines state that indicators easily and realistically measured should be used. *“Environmental indicators are key statistics, which describe an environmental issue. Their purpose is to communicate information on environmental issues in a simplified manner and over time to create a benchmark against which future progress towards sustainable development can be measured. To be effective they should be representative of the issue and be based on scientifically valid information. In this manner they can support policy development and reflect the interrelationship between society, the economy and the environment.”*

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

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

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

Where new or improved monitoring measures come to light during the course of the updating or addition of Section 28 guidelines, they will inform monitoring for SEA, to ensure that monitoring of effects during the course of implementing the guidelines can be meaningful and effective.

As the current Development Plans, both City and County, were subject to SEA there is a previous Environmental Report to inform the current SEA process.

The following measures are proposed as part of this SEA process to monitor the effects on the environment of implementing the Plan, presented in terms of the achievement of the environmental protection objectives and the impact on the environmental factors that the SEA legislation requires to be considered. Measures include targets and thresholds that determine where remedial action may be required, in order to achieve that target and fulfil the environmental protection objective. It is important to note that the Natura Impact Report contains a monitoring programme and mitigation measures. Although the NIR relates specifically to Natura 2000 sites and bio-diversity issues, it should be read in tandem with this Environmental Report.

Biodiversity, Flora, Fauna

Environmental Objectives and Objectives in the Plan	Indicators	Responsible Authority	Frequency of Monitoring	Targets	Remedial Action
B1 B2 (EPOs) Plan: EH P1-P4 EH01-014	Conservation status of habitats and species as assessed under Article 17 of the Habitats Directive.	NPWS Limerick City and County Council through planning applications and LAPs IFI	Development Plan Two Year Review	Maintenance of favourable conservation status for all habitats and species protected under national and international legislation. Identification of sites of local biodiversity and ecological corridors.	Loss of favourable conservation status of protected habitats and species. Altered zoning objectives in place for the Natura 2000 sites has taken place in this new Plan. Enforcement action may also be required.

Environmental Objectives and Objectives in the Plan	Indicators	Responsible Authority	Frequency of Monitoring	Targets	Remedial Action
P1 P2 Plan Section 9.5 Objectives SCS1 09-012	Increase in educational opportunities, services within the area. Increase in the population.	LCCC	Review of Plan	Increase in employment opportunities, services and public services in the Plan area.	Consultation with Department of Education and interested parties in order to progress suitable development opportunities for the area.
Water					
Environmental Objectives and Objectives in the Plan	Indicators	Responsible Authority	Frequency of Monitoring	Targets	Remedial Action
W1-3 Section 5.3.9	Water quality monitoring results by the EPA and by LCCC	LCCC	Annual	Protect and restore areas identified in the River Basin District Management Plan	Upgrade of WWTPs

<p>Objective EHO 15-18</p>	<p>EPA data under <i>Urban Waste Water Discharges in Ireland Population Equivalents Greater than 500 persons - Reports for the Years 2008 and 2009 and 2010-2011.</i></p> <p>Performance of WWTP in relation to conditions of licence of discharge licence.</p>			<p>required to achieve “good” status, i.e. 4+ for water quality by 2021 in line with the Water Framework Directive objectives.</p> <p>No deterioration in levels of compliance with drinking water quality standards and maintenance of national average compliance rate.</p>	<p>Ongoing monitoring of discharge licences by staff from the Environment sections.</p>
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Soils					
Environmental Objectives and Objectives in the Plan	Indicators	Responsible Authority	Frequency	Targets	Remedial Action
HTP1: Compliance with higher tier plans and guidance. Chapter 10 Compact Growth and Revitalisation	Amount of greenfield development. Promote reuse of structures, which is the most basic tenet of soil conservation in urban areas.	LCCC	Annual	Concentrate development in the selected zoned areas and encourage re-use of existing sites.	Enforcement, where necessary.

Air and Climate					
Environmental Objectives and Objectives in the Plan	Indicators	Responsible Authority	Frequency	Targets	Remedial Action
EPO C2 AQC 3 Chapter 8 Climate Action, Flooding and Transition to a Low Carbon Economy EH 01	Numbers of buildings being upgraded and insulated. Adoption of renewable technologies.	LCCC	Ongoing	Increase in upgraded sources of energy production from renewable sources.	Non-attainment of targets set out in LCEA energy audit.

Cultural Heritage

Environmental Objectives and Objectives in the Plan	Indicators	Responsible Authority	Frequency	Targets	Remedial Action
<p>C1: Protect and conserve features of archaeological heritage and their settings.</p> <p>EH032-46</p>	<p>Number of Monuments in the RMP and areas of archaeological potential which have been recorded or subject to exploration as a result of development.</p> <p>Number of archaeological monuments and their settings damaged due to development.</p>	<p>LCCC</p> <p>National Monuments Service</p>	<p>Ongoing</p>	<p>To maintain and increase the number of archaeological features recorded and protected.</p> <p>No damage occurring to structures or monuments and their settings due to development.</p>	<p>Damage to or loss of area of recorded monuments or their setting would result in enforcement actions being taken.</p>

<p>C2: Protect, conserve and promote the sustainable reuse of architectural heritage.</p> <p>EHO 47-51</p>	<p>Number and conservation status of structures in RPS</p> <p>Number of buildings conserved and re-used for new development</p> <p>Number of protected structures damaged due to development.</p>	<p>LCCC</p> <p>DAHG</p> <p>NIAH</p>	<p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p>	<p>To increase the number and maintain the conservation status of Protected Structures</p>	<p>Damage to or loss of Protected Structures, to be dealt with by enforcement.</p>
Landscape					
Environmental Objectives and Objectives in the Plan	Indicators	Responsible Authority	Frequency	Targets	Remedial Action
<p>C2</p> <p>UCA 01-04</p>	<p>Quality of urban environment and halt in dereliction.</p>	<p>LCCC</p>	<p>Ongoing</p>	<p>Increase in quality of individual applications.</p>	<p>Enforcement through planning legislation and Derelict Sites Act.</p>

Building height strategy	Building height and design.				
Material Assets					
Environmental Objectives and Objectives in the Plan	Indicators	Responsible Authority	Frequency	Targets	Remedial Action
<p>MA1: Maintain sustainable access to assets such as open spaces, water resources and all other physical and social infrastructure.</p> <p>Chapter 5 Environment and Heritage</p> <p>Chapter 9 Sustainable</p>	Access to public amenities and facilities.	LCCC area office	Ongoing	<p>Increase in area of amenity space within the Plan area.</p> <p>Increased usage of open space as a public amenity.</p> <p>Increased visitor numbers to cultural heritage sites.</p>	Enforcement where necessary and modification of objectives if they are not judged strong enough.

Communities and Social Infrastructure					
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Appendix 1: International Conventions & Agreements

Topic	Policy, Plan or Programme	Objectives
Biodiversity	UN Convention of Biological Diversity (1992).	Maintain and enhance biodiversity.
	The Ramsar Convention The Convention on Wetlands of International Importance (1971 and reviews).	Objectives include protection and conservation of wetlands, particularly those of importance to waterfowl as Waterfowl Habitat.
	European Union Directive (92/432/EEC) on the conservation of natural habitats and of wild flora and fauna.	Lists certain habitats and species that must be given protection.
	European Communities (Natural Habitats) Regulations, SI 94/1997, as reviewed SI 233/1998 and SI 378/2005 SI 584/2011.	These Regulations give effect to Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (Habitats Directive) and the Minister to designate special areas of conservation (endangered species and habitats of endangered species) as a contribution to an EU Community network to be known as NATURA 2000.
	EU Directive (EU/79/409) on the Conservation of Wild Birds.	Designation of Special Protection Areas for birds.
	Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities (2009).	Guidance on carrying out AA on plans and Projects as required under Article 6 of the Habitats Directive.

	National Biodiversity Plan 2011.	To secure the conservation, including where possible the enhancement and sustainable use, of biological diversity in Ireland.
	European Communities Environmental Objectives (Freshwater Pearl Mussel) 2009.	Measures to protect the conservation status of Freshwater Pearl Mussel.
	Irish National Forest Standards (2000).	Aims to ensure sustainable forest management.
	Ospar Convention (1992) The Convention for the Protection of the Marine Environment of the North East Atlantic.	Protection of the Marine Environment.
	EU Marine Strategy Framework Regulations 2011.	Aims to achieve good environmental status of the EU's marine waters by 2021 and to protect the resource base upon which marine-related economic and social activities depend.
	EU Freshwater Fish Directive (78/659/EEC).	Objectives seek to protect those freshwater bodies identified by Member States as waters suitable for sustaining fish populations. For those waters it sets physical and chemical water quality objectives for salmonid waters and cyprinid waters.
Water	EU Water Framework Directive (2000/60/EC) 2000.	Establishes a framework for community action in the field of water policy. Aims to prevent any deterioration in the status of any waters and to achieve at least "good status" in all waters by 2015.
	The Groundwater Directive (1980/68/EC) 1980	Seeks to maintain and enhance the quality of all ground waters in the EU.

	EU Urban Waste Water treatment directive (91/271/EEC) 1991.	Sets target dates for the provision of specified waste water treatment infrastructure and services.
	EU Floods Directive (2007/60/EC).	The Floods Directive applies to river basins and coastal areas at risk of flooding and provides for the prevention and management of flood risk and preparation of Flood Risk Management Plans.
	DoEHLG Guidelines on Flood Risk Management and the Planning System (2009).	Seeks to prevent development that is sensitive to the effects of flooding in flood prone or marginal areas. Must not reduce the flood plain or restrict flow across floodplains.
	The Nitrates Directive (91/676/EEC).	This Directive has the objective of reducing water pollution caused or induced by nitrates from agricultural sources and preventing further such pollution.
	Drinking Water Directive (80/778/EEC) as reviewed by Directive 98/83/EC.	The primary objective is to protect the health of consumers in the European Union and to make sure drinking water is wholesome and clean.
	The Local Government (Water Pollution) Act, 1977 (Water Quality Standards for Phosphorous) Regulations, 1998.	Rivers of good quality to be retained as such, rivers of poor quality to be improved.
	European Communities Environmental Objectives (Surface Waters) Regulations, 2009.	Transposes into Irish law the measures needed to give effect to Article 4 of the Water Framework Directive relating to the protection of surface waters including the requirements of Directive 2008/105/EC on environmental quality standards.

	Managing Ireland's Rivers and Lakes: Catchment based Strategy Against Pollution (1997).	This document details a strategy to protect water quality against pollution by phosphorus from all sources.
	River Basin Management Plans for River Basin Districts (RBDs).	Seeks to establish an integrated monitoring and management system for all waters within an RBD, to develop a dynamic programme of management measures and to produce a River Basin Management Plan, which will be continually updated.
	Bathing Water Directive EC Directive 2006/7 EC Repeals existing Directive (71/160/EEC) with effect from 31 December 2014.	Sets out standards for bathing water quality to protect health and the environment.
Human Health	WHO Air Quality Guidelines (1999) and Guidelines for Europe (1987) Non Statutory.	Seeks to eliminate or minimise certain airborne pollutants for the protection of human health.
	The Stockholm Convention (2001).	Objectives seek to protect human health and the environment from Persistent organic pollutants (POPs).
	The EU CAFÉ Programme Commission communication of 4 May 2001 "The Clean Air for Europe (CAFE) Programme: Towards a Thematic Strategy for Air Quality".	Seeks to prevent and reduce air pollution and impacts on human health from air pollution.
	EU Shellfish Directive (79/923/EEC).	Objectives seek to maintain those coastal and brackish waters, which need protection or improvement, in order to allow shellfish to develop and to contribute to the high quality of

		shellfish products intended for human consumption.
	The EU Environment and Health Strategy 2004 - 2010.	Seeks to prevent and reduce the impacts pollution on human health.
	Environmental Noise Directive (2002/49/EC) Environmental Noise Regulations 2006.	Establishes a framework for environmental noise planning including environmental noise maps for designated areas and appropriate noise action plans.
Climate / Air	Kyoto Protocol (1997)	Aim of the UN Protocol is to combat climate change. Industrialized countries will have to reduce their combined greenhouse gas emissions by a minimum of 8% by 2012.
	Second European Climate Change Programme (ECCP II) 2005	Seeks to develop the necessary elements of a strategy to implement the Kyoto protocol.
	White Paper on 'European transport policy for 2010', COM (2001) 370	Seeks to develop a modern sustainable transport system.
	"The IPPC Directive" Directive 96/61/EC concerning integrated pollution, prevention and control.	Seeks to minimise pollution and maximize resource efficiency in industry through licensing and guidance.
	Ozone in Ambient Air Regulations 2004 (S.I. No. 53 of 2004).	Objectives include the reduction of certain airborne pollutants for the protection of human health and the environment.
	"Air Framework Directive" Directive on Air Quality Assessment and Management (Framework Directive) (1996/62/EC).	Seeks the prevention and/or reduction of airborne pollutants for the protection of human health and the environment.
	Directive on national	Seeks to limit the national emissions of certain airborne pollutants for the

	emission ceilings for certain atmospheric pollutants (2001/81/EC).	protection of human health and the environment.
	EC Directive 2008/50/EC on ambient air quality and cleaner air for Europe.	Replaces the air framework directive and the first three daughter directives. Sets standards and target dates for reducing concentrations of fine particles, which are among the most dangerous pollutants for human health.
	Adopting to climate change in Europe – options to EU action {SEC(2007) 849}.	Seeks to initiate a Europe-wide public debate and consultation on developing responses to climate change at EU level.
	National Climate Change Strategy 2007-2012.	Established measures by which Ireland can meet its 2008-2012 targets in respect to greenhouse gas emissions.
	Delivering A Sustainable Energy Future for Ireland	Government Energy Policy Framework 2007-2020 to deliver a sustainable energy future for Ireland.
Cultural Heritage (Landscape Architecture Archaeology)	European Landscape Convention 2000	Encourages public authorities to adopt policies at local, national and international level to protect and manage landscapes.
	Policy Paper on Ireland's Landscape and the National Heritage, The Heritage Council, (2002).	Policy paper sets out a vision for the Irish landscape to allow people to harness the landscape for economic benefit whilst acknowledging that in the long run such benefits can only be sustained through an appreciation and awareness of the contribution of that landscape to our quality of life.
	Landscape and landscape and Assessment, Guidelines for Planning Authorities - 2000	Sets out how a landscape character assessment should be conducted.








	Granada Convention for protection of the Architectural Heritage of Europe 1985	Established common principles and strategy, informed Part IV of the 2000 Planning and Development Act 2000-2004.
	European Convention on protection of the Archaeological Heritage 1992	Requires that appropriate consideration be given to archaeological issues at all stages of the planning and development process.
	Architectural Heritage Protection- Guidelines for Planning Authorities 2004	The protection of structures, or parts of structures, which are of special architectural, historical, archaeological, artistic, cultural, scientific, social, or technical interest, and the preservation of the character of architectural conservation areas.
	National Heritage Plan 2002	Plan forms the basis of a strategic approach to the protection and management of heritage up to 2007.
	National Inventory of Architectural Heritage	To establish inventory of buildings of value.
	Framework and Principles for the Protection of the Archaeological Heritage (1999)	This document sets out the archaeological policies and principles which should be applied by all public bodies when undertaking or authorising development.
Soil	2006 Proposal for an EC Directive establishing a framework for the protection of soil	This has been abandoned.
	Sewage Sludge Directive (86/278/EEC)	To encourage the use of sewage sludge in agriculture and to regulate its use in such a way as to prevent harmful effects on soil, vegetation, animals and man.

	Directive 2004/35/EC on Environmental Liability with regard to the prevention and remedying environmental damage	Prevention and remediation of environmental damage.
Sustainable Development	Agenda 21 (1992). Action for Sustainable Development	Aims to promote sustainable development at a local and regional level by taking into account environmental protection in the development process.
	“The Gothenburg Strategy” Communication from the Commission on Sustainable Europe for a Better World” 2001	Seeks to make the future development of the EU more sustainable.
	The Sixth Environmental Action Programme (EAP) of the European Community 2002 - 2012 Statutory	Seeks to make the future development of the EU more sustainable.
	The SEA Directive (2001/42/EC)	Objective is to provide for a high level of protection of the environment, and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes, with a view to promoting sustainable development, by ensuring that, in accordance with this Directive, an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment.
	Guidelines for Planning Authorities on Sustainable Rural Housing 2005	To address the issue of sustainable rural housing.


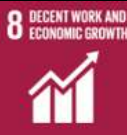



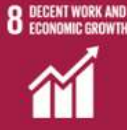


























	Sustainable Residential Development in Urban Areas 2008	Addressing sustainable design and services in urban areas.
	Wind Energy Guidelines 2006	To ensure a consistency of approach in the identification of suitable locations for wind farm development and the treatment of planning applications for wind farm developments.
	Draft Framework for Sustainable Development for Ireland 2012	The Framework will form a central element of Ireland's contribution to the UN Conference on Sustainable Development (Rio+20) which takes place in Rio de Janeiro, Brazil in June 2012.
	Transport 21 (2005)	Seeks to develop an integrated transport system across Ireland.
	Traffic Management Guidelines (2003)	Provides guidance on a number of traffic management issues including public transport.
	Smarter Travel- A Sustainable Transport Future, A New Transport Policy for Ireland 2009-2020	Promotion of sustainable transport. Limerick is a demonstration City in this regard.
	Delivering A Sustainable Energy Future For Ireland The Energy Policy Framework 2007 – 2020	Seeks to reduce energy demand and energy related emissions.
	Directive 2004/35/EC on Environmental Liability with regard to the prevention and remedying environmental damage	Seeks to establish a common framework for the prevention and remediation of environmental damage.









Waste	The Waste Framework Directive” Council Directive 75/442/EEC of 15 July 1975 on waste “the Waste Framework Directive” and amending acts.	Seeks to minimise the quantities of waste production in the EU, reduce the environmental impacts from the management of these wastes and defines what constitutes a waste or hazardous waste.
	“The Landfill Directive” Council Directive 99/31/EC of 26 April 1999 on the landfill of waste Also measures in relation to historic waste including 2007 and 2008 regulations	Seeks to reduce the environmental impact from the landfilling of waste and divert certain quantities and types of waste from European landfills.
	“The WEE Directive” Directive 2002/96/EC of 27 January 2003 on waste electrical and electronic equipment	See more environmentally sensitive management of waste electric and electronic equipment.
	National Waste Prevention Programme	Seeks to decouple waste generation from economic activity in Ireland.
Major Accidents	EU Major Accident (Seveso) Directive (96/82/EC) 1996	Seeks to avoid and minimise the effects of major accidents.




















Appendix 2: Alignment of Policies and Objectives with UN Sustainable Development Goals























Policy/Objective Proposed in the Draft Development Plan	Alignment with Principal UN Sustainability Goals
Chapter 2 – Core Strategy	
Policy CSP 01: Core Strategy Implementation	
CSP 02: Compact Growth	
Policy CSP 03: Availability of land	
Policy CSP 04: Local Area Plans	
Chapter 3– Settlement and Housing Strategies	
Policy SS P1 - Settlement Strategy	
Policy SS P2 - Development of Limerick in accordance with the Settlement Hierarchy	
Objective SS O1 - Compact Growth	

<p>Objective SS O2 - High Quality Design</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>8 DECENT WORK AND ECONOMIC GROWTH</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>13 CLIMATE ACTION</p> 
<p>Objective SS O3 - Capacity of Town/Village to Absorb Development</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>8 DECENT WORK AND ECONOMIC GROWTH</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>13 CLIMATE ACTION</p> 
<p>Objective SS O4 - Prevention of Urban Sprawl</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>8 DECENT WORK AND ECONOMIC GROWTH</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>13 CLIMATE ACTION</p> 
<p>Objective SS O5 - Monitoring Growth</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>8 DECENT WORK AND ECONOMIC GROWTH</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>13 CLIMATE ACTION</p> 
<p>Policy SS P3 - Level 1 – Growing Limerick City Metropolitan Area, including Mungret and Annacotty</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>8 DECENT WORK AND ECONOMIC GROWTH</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>13 CLIMATE ACTION</p> 
<p>Objective SS O6 – Limerick City Metropolitan Area</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>8 DECENT WORK AND ECONOMIC GROWTH</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>13 CLIMATE ACTION</p> 
<p>Objective SS O7 - Level 2 – Key Town Newcastle West</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>8 DECENT WORK AND ECONOMIC GROWTH</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>13 CLIMATE ACTION</p> 
<p>Objective SS O8 – Newcastle West Local Area Plan</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>8 DECENT WORK AND ECONOMIC GROWTH</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>13 CLIMATE ACTION</p> 

<p>Objective SS O9 - Level 3 – Towns</p>				
<p>Objective SS O10 - Scale of Development within Level 3</p>				
<p>Objective SS O11 - Requirements for Developments within Level 4 Settlements</p>				
<p>Objective SS O12 - Local Area Plans in Level 4 Settlements</p>				
<p>Objective SS O13 - Development within Level 5 Settlements</p>				
<p>Objective SS O14– Scale of Growth for Level 5 Settlements</p>				
<p>Objective SS O15- Development in Level 6 Settlements</p>				
<p>Objective SS O16 - Serviced Sites in Towns and Villages, without adequate Water Services Infrastructure</p>				

<p>Objective SS O17 - Rural Housing Category 1 – Rural Areas under Strong Urban Influence</p>	
<p>Objective SS O18 – Rural Housing Category 2 - Rural Areas Elsewhere/Structurally Weak Areas</p>	
<p>Objective SS O19 - Refurbishment/Replacement of Traditional Rural Dwelling</p>	
<p>Objective SS O20 - Occupancy Condition</p>	
<p>Policy HO P1 - Implementation of the Housing Strategy, including the Housing Need Demands Assessment</p>	
<p>Objective HO O1 - Social Inclusion</p>	
<p>Objective HO O2 - Density of Residential Developments</p>	
<p>Objective HO O3 - Protection of Existing Residential Amenity</p>	
























<p>Objective HO O4 - Re-use of Existing Buildings</p>			
<p>Objective HO O5 – Apartments</p>			
<p>Objective HO O6 - Build-To-Rent and Shared Accommodation</p>			
<p>Objective HO O7 – Shared Accommodation/Co-Living</p>			
<p>Objective HO O8 – Provision of Student Accommodation</p>			
<p>Objective HO O9 - Support Housing Options for Older People</p>			
<p>Objective HO O10 - Location Criteria for Nursing Homes/Care Home Accommodation</p>			
<p>Objective HO O11 - Subdivision of Dwellings to Accommodate Dependent Relative</p>			






















<p>Objective HO O12 – The Living Limerick City Centre Initiative</p>			
<p>Objective HO O13 - Provision of Social Housing</p>			
<p>Objective HO O14 - Homeless Accommodation</p>			
<p>Objective HO O15 - Traveller Accommodation</p>			
<p>Objective HO O16 - Accommodation for Refugees and Asylum Seekers</p>			
<p>Chapter 4 – Economic Development</p>			
<p>Policy ECON P1 - Strong Economy</p>			 
<p>Policy ECON P2 - Economic Development and Enterprise</p>			 



























<p>Policy ECON P3 - Urban Economy</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>8 DECENT WORK AND ECONOMIC GROWTH</p> 	<p>9 INDUSTRY, INNOVATION AND INFRASTRUCTURE</p> 	<p>13 CLIMATE ACTION</p> 	
<p>Policy ECON P4 – Retail</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>8 DECENT WORK AND ECONOMIC GROWTH</p> 	<p>9 INDUSTRY, INNOVATION AND INFRASTRUCTURE</p> 	<p>13 CLIMATE ACTION</p> 	
<p>Policy ECON P5 - Enterprise and Employment Development Opportunities</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>8 DECENT WORK AND ECONOMIC GROWTH</p> 	<p>9 INDUSTRY, INNOVATION AND INFRASTRUCTURE</p> 	<p>13 CLIMATE ACTION</p> 	
<p>Policy ECON P6 - Tourism</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>8 DECENT WORK AND ECONOMIC GROWTH</p> 	<p>13 CLIMATE ACTION</p> 		
<p>Policy ECON P7 - Marine Economy</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>8 DECENT WORK AND ECONOMIC GROWTH</p> 	<p>14 LIFE BELOW WATER</p> 	<p>13 CLIMATE ACTION</p> 	
<p>Objective ECON O1 - City Centre</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>8 DECENT WORK AND ECONOMIC GROWTH</p> 	<p>13 CLIMATE ACTION</p> 		
<p>Objective ECON O2 - Limerick Environs Retail</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>8 DECENT WORK AND ECONOMIC GROWTH</p> 	<p>13 CLIMATE ACTION</p> 		
<p>Objective ECON O3 - District Centres</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>8 DECENT WORK AND ECONOMIC GROWTH</p> 	<p>13 CLIMATE ACTION</p> 		








<p>Objective ECON O4 - Local/ Neighbourhood Centres</p>				
<p>Objective ECON O5 - Local Shops</p>				
<p>Objective ECON O6 Retail Warehousing</p>				
<p>Objective ECON O7 - Newcastle West</p>				
<p>Objective ECON O8 - County Towns and Villages</p>				
<p>Objective ECON O9 - Rural Retail</p>				
<p>Objective ECON O10 - Casual Trading Areas</p>				
<p>Objective ECON O11 - Active Street Frontages</p>				


<p>Objective ECON O12 - Strategic Employment Locations City and Environs</p>				
<p>Objective ECON O13: Strategic Employment Locations County Limerick</p>				
<p>Objective ECON O14 - Location of Industry or Enterprise in Brownfield Sites</p>				
<p>Objective ECON O15 - Knowledge Economy</p>				
<p>Objective ECON O16 - Education and Skills</p>				
<p>Objective ECON O17 - Further and Higher Education Institutions</p>				
<p>Objective ECON O18 - Clustering and Innovation</p>				
<p>Objective ECON O19 - Tackling Unemployment</p>				 

























<p>Objective ECON O20 - Smart City</p>				
<p>Objective ECON O21 - Office Development</p>				
<p>Objective ECON O22- Light Industrial and Related Uses</p>				
<p>Objective ECON O23 - Data Centres</p>				
<p>Objective ECON O24 - Cultural and Creative Industries</p>				
<p>Objective ECON O25 - Enterprise Incubator Units</p>				
<p>Objective ECON O26 - Rural Hubs</p>				
<p>Objective ECON O27 - Rural Development</p>				


























<p>Objective ECON O28 - Agricultural developments</p>			
<p>Objective ECON O29 - Farm Diversification</p>			
<p>Objective ECON O30 - Support Sustainable Forestry</p>			
<p>Objective ECON O31 - Mineral Extraction and Environmental Impacts</p>			
<p>Objective ECON O32 - Equine Industry</p>			
<p>Objective ECON O33 - Home Working / E-Working</p>			
<p>Objective ECON O34 - Limerick Food Strategy</p>			
<p>Objective ECON O35 - Tourism</p>			


























<p>Objectives ECON O36 - Limerick Greenway</p>				
<p>Objective ECON O37 - Tourism Facilities and Environmentally Sensitive Areas</p>				
<p>Objective ECON O38 - Facilities and Amenities incidental to Tourist and Recreational Attractions and Scenic Views</p>				
<p>Objective ECON O39 - Location of Tourism Facilities</p>				
<p>Objective ECON O40 - Marine Economy</p>				
<p>Objective ECON O41 – Strategic Integrated Framework Plan</p>				
<p>Objective ECON O42 - Safeguard Strategic Development locations along the Estuary</p>				
<p>Objective ECON O43 - Shannon Foynes Port</p>				

<p>Objective ECON O44 - Offshore Renewable Energy</p>	
<p>Chapter 5 – Environment and Heritage</p>	
<p>Policy EH P1 - Protection of Natural Heritage and Biodiversity</p>	
<p>Policy EH P2 - Sustainable Management and Conservation</p>	
<p>Policy EH P3 - Climate Action and the Natural Environment</p>	
<p>Policy EH P4 - Compliance with Limerick’s Heritage Plan</p>	
<p>Policy EH P5 - Protection of the Built Environment</p>	
<p>Policy EH P6 - Water and Air Quality</p>	








<p>Policy EH P7 - Environmental Noise</p>	 	
<p>Objective EH O1 - Designated Sites and Habitats Directive</p>	 	
<p>Objective EH O2 – Lesser Horseshoe Bat</p>	 	
<p>Objective EH O3 - Ecological Impact Assessment</p>	 	  
<p>Objective EH O4 - Creation of New Habitats</p>	 	  
<p>Objective EH O5 - New Infrastructure Projects</p>	 	  
<p>Objective EH O6 - Barn Owl Conservation</p>	 	

<p>Objective EH O7 - All Ireland Pollinator Plan</p>				
<p>Objective EH O8 - Roosting Habitats</p>				
<p>Objective EH O9 - Geological Sites</p>				
<p>Objective EH O10 - Trees and Hedgerows</p>				
<p>Objective EH O11 - Invasive Species</p>				
<p>Objective EH O12 - Blue Green Infrastructure</p>				
<p>Objective EH O13 - Blue Green Infrastructure Strategy</p>				












<p>Objective EH O14 - Nature Based Solutions</p>				
<p>Objective EH O15 - Ground Water, Surface Water Protection and River Basin Management Plans</p>				
<p>Objective EH O16 - Septic Tanks and Proprietary Systems</p>				
<p>Objective EH O17 - Water Quality</p>				
<p>Objective EH O18 - Riparian Buffers</p>				
<p>Objective EH O19 - Quiet Areas</p>				
<p>Objective EH O20 - Noise and Vibration during Construction and at Open Sites</p>				










<p>Objective EH O21- Commercial and Industrial Noise</p>	<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>15 LIFE ON LAND</p> 	
<p>Objective EH O22 - Entertainment Noise</p>	<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>15 LIFE ON LAND</p> 	
<p>Objective EH O23 - Light Pollution</p>	<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>13 CLIMATE ACTION</p> 	<p>15 LIFE ON LAND</p> 
<p>Objective EH O24 - 'Dark Sky' Parks and Reserves</p>	<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>13 CLIMATE ACTION</p> 	
<p>EH O25 Objective - Air Pollution</p>	<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>13 CLIMATE ACTION</p> 	<p>15 LIFE ON LAND</p> 
<p>Objective EH O26 - Improvement of Air Quality</p>	<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>13 CLIMATE ACTION</p> 	<p>15 LIFE ON LAND</p> 
<p>Objective EH O27 - Air Quality Monitoring</p>	<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>13 CLIMATE ACTION</p> 	<p>15 LIFE ON LAND</p> 


















<p>Objective EH O28 - Air Quality during Construction</p>	<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>13 CLIMATE ACTION</p> 	<p>15 LIFE ON LAND</p> 
<p>Objective EH O29 - Odour</p>	<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>15 LIFE ON LAND</p> 	
<p>Policy EH P8- Landscape Character Areas</p>	<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>15 LIFE ON LAND</p> 	
<p>UCA O1 City</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>15 LIFE ON LAND</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	
<p>UCA O2 Castletroy</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>15 LIFE ON LAND</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	
<p>UCA O3 Southern Environs</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>15 LIFE ON LAND</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	
<p>UCA O4 Caherdavin</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>15 LIFE ON LAND</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	




<p>LCA01 Agricultural lowlands</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>15 LIFE ON LAND</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	
<p>LCA02 Ballyhoura /Slieve Reagh</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>15 LIFE ON LAND</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	
<p>LCA O3 Galtee Uplands</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>15 LIFE ON LAND</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	
<p>LCA O4 Knockfierna</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>15 LIFE ON LAND</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	
<p>LCA05 Lough Gur</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>15 LIFE ON LAND</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	
<p>LCA06 Shannon Coastal Zone</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>15 LIFE ON LAND</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>14 LIFE BELOW WATER</p> 
<p>LCA07 Southern Uplands</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>15 LIFE ON LAND</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	




























<p>LCA08 Slieve Felim Uplands</p>			
<p>LCA 09 Tory Hill</p>			
<p>LCA 010 Western Uplands (Western Hills/Barnagh Gap/Sugar Hill)</p>			
<p>Objective EH 030 - Views and Prospects</p>			
<p>Objective EH 031 - Historical Landscapes</p>			
<p>Objective EH 032 - Special Control Areas</p>			
<p>Objective EH 033 - Special Control Areas Mungret</p>			



























<p>Objective EH O34 - Preservation of the Archaeological Heritage</p>	 	
<p>Objective EH O35 - Preservation of unrecorded/newly discovered Archaeological Heritage</p>	 	
<p>Objective EH O36 - Preservation of the Underwater Archaeological Heritage</p>	 	
<p>Objective EH O37 - Protection of the setting of Archaeological Monuments</p>	 	
<p>Objective EH O38 - Proper procedures during the planning process</p>		
<p>Objective EH O39 - Archaeological Monuments in Local Authority ownership/ guardianship</p>		
<p>Objective EH O40 - Town Defences and Layout</p>		

<p>Objective EH O41 - Industrial Archaeology</p>	
<p>Objective EH O42 - Lough Gur</p>	  
<p>Objective EH O43 - Raise public awareness and encourage active participation</p>	 
<p>Objective EH O44 - Heritage Plan 2017-2030</p>	 
<p>Objective EH O45 - Increase access to Archaeological Monuments</p>	 
<p>Objective EH O46 - Assessment and Recognition of Archaeological Landscapes</p>	
<p>Objective EH O47 - Work to Protected Structures</p>	






















<p>Objective EH O48 - Energy Efficiency of Protected Structures</p>			
<p>Objective EH O49 - National Inventory of Architectural Heritage (NIAH)</p>			
<p>Objective EH O50 - Architectural Conservation Areas</p>			
<p>Objective EH O51 - Shopfronts within an ACA</p>			
<p>Chapter 6 – Sustainable Transport and Mobility</p>			
<p>Policy TR P1- Integration of Land Use and Transport Policies</p>			 
<p>Policy TR P2 - Promotion of Sustainable Patterns of Transport Use</p>			 
<p>Policy TR P3 - Sustainable Mobility and Regional Accessibility</p>			 






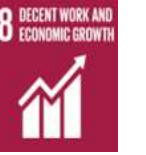














<p>Policy TR P4 - Delivery of Transport Infrastructure in line with National Policy</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>13 CLIMATE ACTION</p> 	<p>9 INDUSTRY, INNOVATION AND INFRASTRUCTURE</p> 	
<p>Objective TR O1- N/M20 Cork to Limerick Project</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>9 INDUSTRY, INNOVATION AND INFRASTRUCTURE</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>13 CLIMATE ACTION</p> 	<p>8 DECENT WORK AND ECONOMIC GROWTH</p> 
<p>Objective TR O2 - Foynes to Limerick (including Adare Bypass) Road</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>9 INDUSTRY, INNOVATION AND INFRASTRUCTURE</p> 	<p>13 CLIMATE ACTION</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>8 DECENT WORK AND ECONOMIC GROWTH</p> 
<p>Objective TR O3 - N21 Newcastle West and N21 Abbeyfeale Road Schemes</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>9 INDUSTRY, INNOVATION AND INFRASTRUCTURE</p> 	<p>13 CLIMATE ACTION</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>8 DECENT WORK AND ECONOMIC GROWTH</p> 
<p>Objective TR O4 - N24 Cahir to Limerick Junction</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>9 INDUSTRY, INNOVATION AND INFRASTRUCTURE</p> 	<p>13 CLIMATE ACTION</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>8 DECENT WORK AND ECONOMIC GROWTH</p> 
<p>Objective TR O5 – Motorway Network Arterial Roads</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>9 INDUSTRY, INNOVATION AND INFRASTRUCTURE</p> 	<p>13 CLIMATE ACTION</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>8 DECENT WORK AND ECONOMIC GROWTH</p> 
<p>Objective TR O6 - Limerick Northern Distributor Road</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>9 INDUSTRY, INNOVATION AND INFRASTRUCTURE</p> 	<p>13 CLIMATE ACTION</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>8 DECENT WORK AND ECONOMIC GROWTH</p> 

<p>Objective TR O7 – O’Connell Street Improvement Works</p>					
<p>Objective TR O8 – Connecting Limerick’s Southside</p>					
<p>Policy TR P5- Sustainable Travel and Transport</p>					
<p>Objective TR O9 - Climate Proofed Transport Infrastructure</p>					
<p>Objective TR O10 - Delivery and Servicing Strategy</p>					
<p>Objective TR O11 - Universal Design</p>					
<p>Objective TR O12 - Limerick – Shannon Metropolitan Area Transport Strategy</p>					




<p>Policy TR P6 - Local Transport Plans</p>				
<p>Objective TR O13 - Delivering Modal Split</p>				
<p>Objective TR O14 - Walking and Cycling Infrastructure</p>				
<p>Objective TR O15 - Limerick Cycle Network</p>				
<p>Objective TR O16 - Limerick Regeneration Areas Sustainable Travel Infrastructure</p>				
<p>Objective TR O17 - Enhanced Public Transport</p>				
<p>Objective TR O18 - Protect Existing Bus Services</p>				











<p>Objective TR O19 -Bus Lanes/Quality Bus Corridors</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>13 CLIMATE ACTION</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>9 INDUSTRY, INNOVATION AND INFRASTRUCTURE</p> 
<p>Objective TR O20 - Transport Interchange</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>13 CLIMATE ACTION</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>9 INDUSTRY, INNOVATION AND INFRASTRUCTURE</p> 
<p>Objective TR O21 - Rail Network</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>13 CLIMATE ACTION</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>9 INDUSTRY, INNOVATION AND INFRASTRUCTURE</p> 
<p>Objective TR O22 – Limerick to Foynes Line</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>13 CLIMATE ACTION</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>9 INDUSTRY, INNOVATION AND INFRASTRUCTURE</p> 
<p>Objective TR O23 - Park and Ride Facilities</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>13 CLIMATE ACTION</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	
<p>Objective TR O24 - Park and Stride Facilities</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>13 CLIMATE ACTION</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	
<p>Objective TR O25 - Car Clubs/Car Sharing</p>		<p>13 CLIMATE ACTION</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 



























<p>Objective TR O26 - Electric Vehicles</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>13 CLIMATE ACTION</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	
<p>Objective TR O27 - Micro-Mobility</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>13 CLIMATE ACTION</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	
<p>Objective TR O28 – Mobility Management</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>13 CLIMATE ACTION</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	
<p>Objective TR O29 - Area Wide Mobility Management Planning/Networks</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>13 CLIMATE ACTION</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	
<p>Objective TR O30 -Behavioural Change Measures</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>13 CLIMATE ACTION</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	
<p>Objective TR O31 - Shannon Airport</p>	<p>9 INDUSTRY, INNOVATION AND INFRASTRUCTURE</p> 	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>8 DECENT WORK AND ECONOMIC GROWTH</p> 	
<p>Objective TR O32 - Docks and Ports</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>9 INDUSTRY, INNOVATION AND INFRASTRUCTURE</p> 	<p>8 DECENT WORK AND ECONOMIC GROWTH</p> 	























<p>Policy TR P7 - Road Safety and Carrying Capacity of the Road Network</p>			
<p>Objective TR O33 - Land Uses and Access Standards on to All Roads</p>			
<p>Objective TR O34 - Improvements to Regional and Local Roads</p>			
<p>Policy TR P8 - Safeguard the Capacity of National Roads</p>			
<p>Objective TR O35 - National Roads</p>			
<p>Objective TR O36 - National Road Network Drainage Regimes</p>			
<p>Policy TR P9 – Strategic Regional Road Network</p>			







<p>Objective TR O37 - Strategic Regional Roads</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>9 INDUSTRY, INNOVATION AND INFRASTRUCTURE</p> 	
<p>Objective TR O38 - Roads and Streets</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>9 INDUSTRY, INNOVATION AND INFRASTRUCTURE</p> 	
<p>Objective TR O39 - Upgrade works/New Road Schemes</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>9 INDUSTRY, INNOVATION AND INFRASTRUCTURE</p> 	<p>13 CLIMATE ACTION</p> 
<p>Objective TR O40 - Link Roads</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>9 INDUSTRY, INNOVATION AND INFRASTRUCTURE</p> 	<p>13 CLIMATE ACTION</p> 
<p>Objective TR O41 - Industrial and Enterprise and Employment lands adjacent to Junction 2, Dock Road</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>13 CLIMATE ACTION</p> 
<p>Policy TR P10 - Sustainable Transport in Rural Areas</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>13 CLIMATE ACTION</p> 
<p>Policy TR P11 - Rural Transport</p>	<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>13 CLIMATE ACTION</p> 

<p>Objective TR O42 - Limerick City Centre Traffic Management Plan</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>13 CLIMATE ACTION</p> 	
<p>Objective: TR O43 - HGV Restrictions</p>	<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>13 CLIMATE ACTION</p> 	
<p>Objective TR O44 - Traffic Management</p>	<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>13 CLIMATE ACTION</p> 	
<p>Objective TR O45 – Car and Cycle Parking</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>13 CLIMATE ACTION</p> 	
<p>Objective TR O46 - Taxi/Hackney Transport</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>13 CLIMATE ACTION</p> 		
<p>Objective TR O47 - Roadside Signage</p>	<p>9 INDUSTRY, INNOVATION AND INFRASTRUCTURE</p> 			
<p>Objective TR O48 - Directional Signage</p>	<p>9 INDUSTRY, INNOVATION AND INFRASTRUCTURE</p> 			






















<p>Objective TR O49 - Noise and Transportation</p>	<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 		
<p>Objective TR O50 - Noise Sensitive Development</p>	<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 		
<p>Chapter 7 – Infrastructure</p>				
<p>Policy IN P1 - Strategic Infrastructure</p>	<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>13 CLIMATE ACTION</p> 	
<p>Objective IN O1 - Climate Action in Infrastructure Planning</p>	<p>13 CLIMATE ACTION</p> 	<p>9 INDUSTRY, INNOVATION AND INFRASTRUCTURE</p> 		
<p>Objective IN O2 – Digital Connectivity</p>	<p>8 DECENT WORK AND ECONOMIC GROWTH</p> 	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>13 CLIMATE ACTION</p> 	
<p>Objective IN O3 – Broadband</p>	<p>8 DECENT WORK AND ECONOMIC GROWTH</p> 	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>13 CLIMATE ACTION</p> 	








<p>Objective IN O4 - Telecommunication Support</p>	 	
<p>Objective IN O5 – Water Services</p>	   	
<p>Objective IN O6 - Public Water Supply</p>	   	
<p>Objective IN O7 - Private Water Supply</p>	   	
<p>Objective IN O8 - Public Waste Water</p>	   	
<p>Objective IN O9 - Private Waste Water Treatment</p>	   	
<p>Objective IN O10 - Surface Water and SuDS</p>	   	



<p>Objective IN O11 - Energy and Gas Network</p>				
<p>Objective IN O12 – Energy Interconnection</p>				
<p>Objective IN O13 - Electricity Grid Development</p>				
<p>Objective IN O14 - Gas Development</p>				
<p>Objective IN O15 - Waste Management and the Circular Economy</p>				
<p>Objective IN O16 - Waste Infrastructure</p>				
<p>Objective IN O17 - Sludge Management</p>				



























<p>Objective IN O18 - Agricultural Waste</p>	
<p>Objective IN O19 - Construction and Demolition</p>	
<p>Objective IN O20 - Closed Landfills or Historical Landfill Sites</p>	
<p>Objective IN O21 - Hazardous Waste and Contaminated Sites</p>	
<p>Objective IN O 22 - SEVESO Sites Objectives</p>	
<p>Chapter 8 – Climate Action, Flood Risk & Transition to Low Carbon Economy</p>	
<p>Policy CA P1 - Climate Action Policy</p>	


























<p>Objective CAF O1 - Compliance with Higher Tier Climate Legislation and Guidance</p>	  
<p>Objective CAF O2 - Partnership with Service Providers</p>	  
<p>Objective CAF O3 - Sustainable Development</p>	  
<p>Objective CAF O4 - Climate Proofing</p>	  
<p>Objective CAF O5 - Energy Efficiency in Existing Development</p>	  
<p>Objective CAF O6 - Energy Efficiency in New Developments</p>	  
<p>Objective CAF O7 - Near Zero Energy Buildings</p>	  























<p>Objective CAF O8 - Renewable Energy Objective</p>	  
<p>Objective CAF O9 - Achieving Climate Resilience</p>	  
<p>Objective CAF O10 - Woodland Creation, Forestry and Preservation of Bogs</p>	  
<p>Objective CAF O11 - Nature Based Solutions</p>	  
<p>Objective CAF O12 - Urban Greening</p>	  
<p>Objective CAF O13 - +CityXChange Project</p>	  
<p>Policy CAF P2 - Transition to a Low Carbon Economy</p>	  

<p>Policy CAF P3 – Promote Awareness and Behavioural Change</p>	
<p>Policy CAF P4 – Co – operation with Relevant Stakeholders</p>	
<p>Objective CAF 014 - Energy Generation</p>	
<p>Objective CAF 015 - Local Energy Production</p>	
<p>Objective CAF 016 - Circular Economy</p>	
<p>Objective CAF 017 - Low Energy Building Materials</p>	
<p>Objective CAF 018 – Energy and Emissions Balance</p>	























<p>Objective CAF 019 - Decarbonising Zones</p>				
<p>Policy CAF P5 - Managing Flood Risk</p>				
<p>Objective CAF 020 – Flood Risk Assessments</p>				
<p>Objective CAF 021 – Identified Flood Risk</p>				
<p>Objective CAF 022 - Cooperation with Other Agencies</p>				
<p>Objective CAF 023 - Flood relief Schemes</p>				
<p>Objective CAF 024 - Minor Flood and Mitigation Works and Coastal Protections Schemes</p>				






















<p>Objective CAF 025 – Strategic Flood Risk Assessment</p>				
<p>Policy CAF P6 - Renewable Energy</p>				
<p>Policy CAF P7 – Atlantic Green Digital Basin (GDB)</p>				
<p>Objective CAF P8 – Community Based Renewable Energy</p>				
<p>Objective CAF P9 – Renewable Energy Technologies</p>				
<p>Objective CAF 026 - Bio Energy</p>				
<p>Objective CAF 027 – Renewable Energy Production</p>				

<p>Objective CAF 028 – Assessment of Renewable Energy Projects</p>	<p>13 CLIMATE ACTION</p> 	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>7 AFFORDABLE AND CLEAN ENERGY</p> 	
<p>Objective CAF 029 – Wind Energy Development and Environmental Considerations</p>	<p>13 CLIMATE ACTION</p> 	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>7 AFFORDABLE AND CLEAN ENERGY</p> 	
<p>Objective CAF 030 – Location of Wind Energy Developments</p>	<p>13 CLIMATE ACTION</p> 	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>8 DECENT WORK AND ECONOMIC GROWTH</p> 	<p>7 AFFORDABLE AND CLEAN ENERGY</p> 
<p>Objective CAF 031 - Wind Energy supporting Infrastructure</p>	<p>13 CLIMATE ACTION</p> 	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>8 DECENT WORK AND ECONOMIC GROWTH</p> 	<p>7 AFFORDABLE AND CLEAN ENERGY</p> 
<p>Objective CAF 032 – Off Shore Wind</p>	<p>13 CLIMATE ACTION</p> 	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>8 DECENT WORK AND ECONOMIC GROWTH</p> 	<p>7 AFFORDABLE AND CLEAN ENERGY</p> 
<p>Objective CAF 033 – Development of Foynes Port</p>	<p>13 CLIMATE ACTION</p> 	<p>8 DECENT WORK AND ECONOMIC GROWTH</p> 	<p>14 LIFE BELOW WATER</p> 	<p>7 AFFORDABLE AND CLEAN ENERGY</p> 
<p>Objective CAF 034 - Wind Energy Development</p>	<p>13 CLIMATE ACTION</p> 	<p>8 DECENT WORK AND ECONOMIC GROWTH</p> 	<p>7 AFFORDABLE AND CLEAN ENERGY</p> 	

<p>Objective CAF 035 - Community Based Energy Initiatives</p>	  
<p>Objective CAF 036 - Geothermal Energy</p>	  
<p>Objective CAF 037- Emerging Technologies</p>	  
<p>Objective CAF 038 - Carbon Capture</p>	  
<p>Objective CAF 039 - Energy Storage</p>	  
<p>Objective CAF 040 - Community Renewable Energy</p>	   
<p>Chapter 9 – Sustainable Communities and Social Infrastructure</p>	
<p>Policy SCS1 P1 - Sustainable Communities</p>	  
















<p>Policy SCS1 P2 - Location of Community Facilities</p>				
<p>Policy SCS1 P3 - Social Infrastructure</p>				
<p>Objective SCS1 O1 - Community Facilities</p>				
<p>Objective SCS1 O2 - Accessibility for All</p>				
<p>Objective SCS1 O3 - Community Hubs</p>				
<p>Objective SCS1 O4 - 10 - Minute Neighbourhood</p>				
<p>Objective SCS1 O5 - Multi-Use of Facilities</p>				












<p>Objective SCS1 O6 - Strategy on Community Facilities</p>				
<p>Policy SCS1 P4 - Rural Community Development</p>				
<p>Objective SCS1 O7 - Smart Towns and Villages</p>				
<p>Objective SCS1 O8 – Place-making for the Community</p>				
<p>Objective SCS1 O9 - Educational Facilities</p>				
<p>Objective SCS1 O10 - Location of Schools</p>				
<p>Objective SCS1 O11 - Multi-Use of School Facilities</p>				

<p>Objective SCS1 O12 - Further and Higher Education Facilities</p>				
<p>Objective SCS1 O13 - Childcare Facilities</p>				
<p>Objective SCS1 O14 - Health Care Facilities</p>				
<p>Objective SCS1 O15 - Emergency Services</p>				
<p>Objective SCS1 O16 - Age Friendly Strategy</p>				
<p>Objective SCS1 O17 - Active City Initiative</p>				
<p>Objective SCS1 O18 - Protection of lands zoned for public open space</p>				

<p>Objective SCS1 O19 - Protection of Sports Grounds/Facilities</p>				
<p>Objective SCS1 O20 - Improve Open Space Provision</p>				
<p>Objective SCS1 O21 - New City Amenity Areas</p>				
<p>Objective SCS1 O22 - Limerick Sports and Recreation Facilities Strategy</p>				
<p>Objective SCS1 O23 - Limerick Sports Partnership Strategic Plan 2018-2021</p>				
<p>Objective SCS1 O24 - Local Sports Plan</p>				
<p>Policy SCS1 P5 - Play</p>				






















<p>Objective SCS1 O25 - Playgrounds</p>				
<p>Objective SCS1 O26 - New amenity walkways</p>				
<p>Objective SCS1 O27 - Trails, Hiking and Walking Routes</p>				
<p>Objective SCS1 O28 - Water-Based Sports</p>				
<p>Objective SCS1 O29 - Art and Culture</p>				
<p>Objective SCS1 O30 - Public Art Strategy</p>				
<p>Objective SCS1 O31 - Limerick City Gallery of Art Strategy</p>				


<p>Objective SCS1 032 - Museum Service</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	
<p>Objective SCS1 033 - Limerick Museum</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	
<p>Objective SCS1 034 - Library Service</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	
<p>Objective SCS1 035 - Burial Grounds/Crematoria</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	
<p>Objective SCS1 036 - Community Gardens and Allotments</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	
<p>Objective SCS1 037 - Public Rights of Way</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	
<p>Chapter 10 – Compact Growth and Revitalisation</p>			
<p>Policy CGR P1- Compact Growth and Revitalisation</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>8 DECENT WORK AND ECONOMIC GROWTH</p> 

<p>Objective CGR01- Place-making, Universal Design and Public Realm</p>			
<p>Objective CGR02 - Building Heights</p>			
<p>Objective CGR03 - Urban Lands and Compact Growth</p>			
<p>Objective CGR04 – Active Land Management</p>			
<p>Objective CGR05 - Vacant Site Levy</p>			
<p>Objective CGR06 - Derelict Sites</p>			
<p>Objective CGR07 - Unfinished Estates</p>			

<p>Objective CGR08 - Revitalisation</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>8 DECENT WORK AND ECONOMIC GROWTH</p> 
<p>Objective LL01- Limerick Laneways</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	
<p>Objective CRC 01 - Cleeves Riverside Quarter</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>8 DECENT WORK AND ECONOMIC GROWTH</p> 
<p>Objective ULCC 01 - UL City Campus</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>8 DECENT WORK AND ECONOMIC GROWTH</p> 
<p>Objective AQ 01 - Arthur's Quay</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>8 DECENT WORK AND ECONOMIC GROWTH</p> 
<p>Objective LDA 01 - Land Development Agency</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>8 DECENT WORK AND ECONOMIC GROWTH</p> 
<p>Objective CSQ 01 - Colbert Quarter</p>	<p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>3 GOOD HEALTH AND WELL-BEING</p> 	<p>8 DECENT WORK AND ECONOMIC GROWTH</p> 

<p>Objective ES 01 - Ellen Street Car Park</p>			
<p>Objective TP 01 - Thomond Park</p>			
<p>Objective BM 01 - The Bays, Moyross</p>			
<p>Objective MM 01 - Mungret Masterplan</p>			
<p>Objective PV 01 - Parkway Valley</p>			
<p>Objective GV 01 - Groody Valley</p>			
<p>Objective TN 01 - Towleron</p>			

<p>Policy RA P1 - Regeneration Strategic Policy</p>			
<p>Objective RA 01 - Regeneration Opportunity Areas</p>			
<p>Objective SF 01 - Social Framework Strategy</p>			
<p>Objective EF 01 - Economic Framework Strategy</p>			 
<p>Objective PF 01- Physical Framework Strategy</p>			
<p>Objective M 01 - Moyross</p>			
<p>Objective MK 01 - St. Mary's Park and King's Island</p>			

<p>Objective BW 01 - Ballinacurra Weston</p>	
<p>Objective OK 01 - O'Malley Park and Keyes Park</p>	
<p>Objective KC 01 - Kincora and Carew Parks</p>	
<p>Policy CGR P2- Revitalisation of Towns and Villages</p>	
<p>Objective CGR 09 - Town and Village Revitalisation</p>	
<p>Chapter 13 – Implementation and Monitoring</p>	
<p>Policy IM P1: Implementation of Draft Plan</p>	
<p>Policy IM P2: Review</p>	<p>All relevant SDG's</p>

