

DRAFT LIMERICK DEVELOPMENT PLAN 2022-2028

Chief Executive's Report on Public Consultation

Volume 3(a)

Environmental Assessments of the Proposed Material
Alterations

Prepared in accordance with Section 12(4) of
the Planning and Development Act 2000 (As Amended)

26th November 2021

Limerick City and County Council.

Draft Limerick Development Plan 2022 - 2028

**SEA and AA Screening for Section 12(4) Chief Executive's Report
to Members on Submissions and Observations received during
the Draft Limerick Development Plan during the first Public
Consultation**



26th November 2021

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1.0 INTRODUCTION

Relevant Background Material

This screening document is for changes to the draft plan which followed the first public display period. This document should be read with the **Section 12 (4) Chief Executive's Report to Members on Submissions and Observations received during the Draft Plan Public Consultation and the Proposed Material Alterations Document that** accompanies it. The Chief Executives report is dated November 2021. That document contains full details of submissions received during the public consultation period and it is that document contains the proposed changes. The Draft Limerick Development Plan had been on public display during the period 26th of June 2021 until September 6th 2021 inclusive.

The SEA guidance (November 2004, p. 49) mentions the fact that screening process should be recorded and can be done "separately from the Environmental Report" The SEA screening in the first section considers all of the proposed changes and responses to them. Environmental Protection Objectives (EPOs) are frequently mentioned in the screening document. They are objectives which are intended to promote environmental protection and when amendments are mentioned as being consistent with them it indicates that those polices, when implemented, will have beneficial effects.

The EPOs used are listed below:

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 in the review of the LDP. 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 all of the population of the 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 the 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.

C3 Conserve and record those aspects of cultural heritage that may be affected by planning related activities.

Landscape

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

L.2: 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 and protection 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 and other guidance that might be issued by the Department.

The second part of the screening document is the appropriate assessment report which deals specifically with those submissions which would have the potential to have significant effects on the Natura 2000 network.

1.1 Proposed Amendments to the Draft Plan:

The proposed amendments are presented below, under the chapter headings of the draft plan. Please note that any changes to the text are presented in a different colour than the original text, while text that is to be removed is shown in green with a strike through- this is further explained below. These have been taken from Section B of the Chief Executives Report. Only the submission number is shown below. A response to each of the proposed amendments follows each one.

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

Chapter 1: Introduction, Vision and Strategic Overview

No	Amendment	Response
1	Change Section 1.3 Point 7 to include the following: <u>This plan will also foster the linkages to transition from linear model to a circular model which keeps resources in use for as long as possible.</u>	Emphasis on the circular economy will help with sustainable resource use and reduces pressures for resource extraction. This has both environmental and ecological benefits

2	Change Section 1.3 Point 3 to include the following Insert the word <u>existing</u> (residential)	For clarity to reflect existing land use- no environmental effects
3	Change Strategic Objective 10 in section 1.3 as follows: Support growth in the tourism sector in Limerick, <u>specifically focusing on sustainable tourism</u> , and capture key opportunities to grow <u>develop</u> the sector based around four <u>five</u> key drivers – <u>Greenways</u> , Waterways, Activities, Heritage, Arts and Culture in an urban and rural environment	Any tourism project needs careful ecological assessment prior to development- emphasis on sustainable tourism noted.

Chapter 2: Core Strategy (new title Core Strategy and Settlement Strategy)

No	Amendment	Response
1	Replace Chapter 2 of the Draft Plan - Core Strategy with a new Chapter 2 - Core Strategy and Settlement Strategy as a response to the submissions received during the public consultation process. Policy and Objective numbering have also been revised to correspond with this revision. New text is included in <u>green</u> while text deletions are outlined in red .	Ensures compliance with higher tier plans in relation to Core Strategy Consistent with EPO HTP1
2	Amend Settlement Hierarchy , Core Strategy Table (Tables 2.4 and 2.5) and Map (Core strategy Map 2.7 altered) , (see response to OPR submission in CE's report). Kilmallock has been moved to being a Tier 3 town. Drombanna and Patrickswell (Lough Gur) have been added to the Level 6 Settlements.	Ensures compliance with higher tier plans as per SEA guidance and the OPR submission. Drombanna and Patrickswell (Lough Gur) will benefit from being added to the settlement hierarchy as they will be subject to planning guidance policies as they relate to level 6 Settlements.
3	<u>2.3.5.3 Settlement Capacity Audit</u> Tiered Approach to Zoning	The audit will ensure that up to date information on Infrastructure will be available in order to inform

	<p>In accordance with the methodology set out in Appendix 3 of the NPF, a <u>Settlement Capacity Audit</u> tiered approach to zoning was applied through the carrying out of an infrastructural assessment for each of the zoned settlements</p>	<p>development decisions. This will have environmental benefits.</p>
<p>4</p>	<p>Insert the following text and associated objective as a new section under Local Area Plans in Chapter 2:</p> <p>Phasing of Lands – Local Area Plans</p> <p><u>A number of existing Local Area Plans have a significant amount of Phase 2 lands zoned. Phase 2 lands cannot proceed for development until 50% of the lands in Phase 1 have been developed. Having regard to the Draft Plan’s Core Strategy figures, it is likely that some of this land will be de-zoned during the Local Area Plan Review. In order to allow a degree of flexibility to applicants who meet the rural housing need, as outlined in Chapter 3 and who wish to build their homes on lands zoned Phase 2 / 3 within a Local Area Plan, individual planning applications will be considered on their merit and on a case-by-case basis having regard to all relevant planning criteria.</u></p> <p><u>Objective XXX Phase 2 Residential Development Lands:</u> It is an objective of the Council to: <u>Consider applications for individual houses on lands currently zoned Phase 2/3 Residential Development, within Local Area Plans subject to the applicant meeting rural housing criteria as outlined in Objective SS O17 or Objective SS O18 of the Rural Settlement Strategy, whichever is applicable. Applications for individual planning applications will be considered on their merit and on a case-by-case basis having regard to all relevant planning criteria.</u></p>	<p>The use of phasing will ensure orderly development patterns and also help to ensure that service infrastructure such as WWTPs are not overloaded. Allowing individual housing applications on some lands will offer an alternative to more dispersed settlements in the countryside with consequent benefits for the rural environment and ecology.</p>

	<p>Policy CSP P5: Road Network – It is a policy of the Council to maintain the strategic function, capacity and safety of the national roads network, including planning for future capacity enhancements and ensure that the existing extensive transport networks, which have been greatly enhanced over the last two decades, are maintained to a high level to ensure quality levels of service, safety, accessibility and connectivity to transport users</p> <p>Policy CSP P6: LSMATS - It is a policy of the Council to ensure that the Core Strategy is in line with the objectives of LSMATS and the integration of land use planning and transport in reducing the need to travel and promote modal shift from the use of the private car</p>	<p>Ensures the future capacity of transport infrastructure. Consistent with both higher tier plans and sustainable transport principles. Consistent with MA2: Ensure that there is adequate policy support for infrastructural provision in the plan area.</p>
5	<p>2.10.1 National and Regional Policy Context</p> <p><u>One of the NPF’s core principles is to ‘ensure a high standard quality of life to future residents as well as environmentally and socially sustainable housing and place-making, through integrated planning and consistently excellent design’. The RSES growth strategy employs a robust evidence-based approach, to derive a settlement hierarchy, which identifies locations for population and employment growth, with matched consistency and alignment with national and regional policy. Limerick’s framework for growth is therefore guided and directed by both the NPF and the RSES infrastructure and service investment, to satisfy and accommodate future growth needs.</u></p> <p><u>The Settlement Strategy for Limerick focuses on the creation of sustainable communities, including increased density and compact growth, in line with national policy, where appropriate and the provision of a wide range of household types and tenures for Limerick.</u></p>	<p>Consistent with Higher Tier Plans (HTP 1) and guidance including s.28 guidance and P1: Facilitate a good standard of quality of life for all of the population of the Limerick through ensuring high quality residential, recreational, educational and working environment.</p>

<p>6</p>	<p>2.10.3 Settlement Hierarchy Insert:</p> <p>Development will be encouraged to locate within the built up footprints of Limerick City Metropolitan Area, towns and villages across Limerick, in accordance with <u>the overall objectives for spatial development set out under Chapter 3 Spatial Strategy, the objectives set out under the</u> Local Area Plans, settlement boundaries and in accordance with zoning objectives and the Settlement Strategy set out below.</p> <p><u>Further to Objective SS O2 Monitoring Growth below, Chapter 13 sets out details in relation to Implementation and Monitoring of development.</u></p> <p>Delete:</p> <p>Objective SS O1 – Compact Growth – It is an objective of the Council to strengthen the core of settlements and encourage compact growth, through the development of infill sites, brownfield lands, under-utilised land/buildings, vacant sites and derelict sites, within the existing built up footprint of the settlements and develop outwards from the centre in a sequential manner.</p> <p>Objective SS O2 – High Quality Design – It is an objective of the Council that residential development proposals shall be prepared, designed and laid out, in accordance with the standards as set out in Chapter 11: Development Management Standards and Section 28 Ministerial Guidelines. This includes promoting higher densities, high quality design, layout and public realm for new residential development appropriate to its location and surrounding context, while recognising the need to protect existing residential communities and the established character of the area, to which the development will be inserted</p> <p>Objective SS O4 – Prevention of Urban Sprawl – It is</p>	<p>Compliant with higher tier guidance and the principles of compact planning. Consistent with 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.</p>
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	<p>an objective of the Council to prevent linear roadside frontage development on roads leading out of towns and villages in order to retain the identity of towns/villages, to prevent sprawl and to ensure a distinction in character between built up areas and the open countryside.</p>	
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New Chapter 3 Spatial Strategy:

No	Amendment	Response
1	<p>Replace Chapter 3 and Chapter 10 of the Draft Plan with a new Chapter 3 Spatial Strategy in response to submissions received during the public consultation process. Policy and Objective numbering have also been revised to correspond with this revision.</p>	<p>Ensures compliance with higher tier plans as per SEA guidance. EPO HTP1.</p>
2	<p>3.1 Introduction</p> <p>This chapter sets out the <u>spatial strategy policies and objectives aimed at providing for the sustainable population growth for of Limerick</u>, in accordance with the Core Strategy, whilst achieving a balance between social, economic and environmental factors. <u>This Chapter comprises the following sections:</u></p> <p><u>-Section 1 Compact Growth which sets out the key concepts and objectives for achieving the spatial strategy, including compact growth, place making and active land management initiatives;</u></p> <p><u>-Section 2 Spatial Strategy which sets out the pattern of envisaged development including:</u></p> <p><u>-Section 2a Limerick Metropolitan Area, which outlines the strategies accompanying this Draft Plan which combine to inform the overall spatial strategy, the key revitalisation</u></p>	<p>Sets out clear planning principles in line with NPF and RSES and national S28 Guidance. Consistent with HTP1</p>

	<p><u>initiatives to help transform Limerick City Centre, the key opportunity sites and areas which will enable the transformation of the City's urban environment and an outline of the spatial development of the remainder of the Limerick Metropolitan Area.</u></p> <p><u>-Section 2b Limerick County, which outlines the spatial strategies for the Level 2 to 6 settlements and initiatives facilitating the revitalisation of towns and villages.</u></p> <p><u>Key concepts in the setting out of the spatial strategy include revitalisation and compact growth.</u></p>	
3	<p>Insert the Following in 3.1: <u>Further to the concept of compact growth, a number of accompanying strategies have combined to develop and inform the spatial strategy for the Metropolitan Area. In this regard, the spatial strategy is underpinned by the Housing Strategy, Limerick 2030 Plan, the Limerick Shannon Metropolitan Area Transport Strategy (LSMATS), the Building Heights Strategy and Retail Strategy.</u> This chapter <u>briefly introduces these plans, as well as a number of revitalisation projects and opportunity sites and areas, supported by the Limerick Regeneration Framework Implementation Plan (LRFIP),</u> which will contribute to the transformation of Limerick's urban environments.</p>	<p>This helps with the development and use of what are often brown field sites and may already be serviced. This is consistent with higher tier guidance from RSES and the NPF. It also clearly indicates the other strategies at work in the area. Consistent with HTP1 which ensures compliance with higher tier plans.</p>
4	<p><u>The NPF envisages Limerick as the principal focus within the Region with the potential to generate and be the focus of significant employment and housing growth. The NPF supports 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.</u></p>	<p>This is consistent with higher tier guidance from RSES and the NPF and EPO HTP1. It should also help with encouraging compact development and the reuse of brown field sites.</p>

	<p><u>The NPF set out proposals for the preparation of a Metropolitan Area Strategic Plan (MASP) for the Limerick Metropolitan Area, incorporating Shannon. The NPF recognizes the Limerick Shannon Metropolitan Area’s growth potential with existing third level institutes and international airport and port facilities. The NPF aims to build on these strengths, while improving livability with key growth enablers, including proposals to implement and extend Limerick City Centre in accordance with the Limerick 2030 Economic and Spatial Plan, enhance opportunities for education and employment and road connectivity to Shannon Airport and Shannon Foynes Port, Cork and Waterford. The NPF also aims to provide a citywide public transport network with enhanced accessibility from the centre to the National Technology Park, university and airport, develop a strategic cycleway network, encourage inner city development and regeneration and develop and diversify the existing communities in the city</u></p>	
5	<p>Insert: Regional Spatial and Economic Strategy for the Southern Region</p> <p><u>The Regional Spatial and Economic Strategy for the Southern Region (RSES) is a 12 year strategic regional development framework to guide evolution of our society, environment, economy and use of land. The RSES supports the delivery of Project Ireland 2040 comprising the National Planning Framework (NPF) and the National Development Plan 2021-2030. The RSES includes a Metropolitan Area Strategic Plan for Limerick-Shannon (MASP) to secure long term transformational and rejuvenation focused city growth.</u></p> <p><u>In setting out the Spatial Strategy, consideration must be given to the Regional Planning Objectives (RPOs) of the Regional Spatial and Economic Strategy RSES for the Southern Region, including</u></p>	<p>Ensures compliance with higher tier plans, delivery of sustainable transport.</p> <p>Consistent with HTP 1.</p>

	<p><u>those which</u> support the compact growth, revitalisation, brownfield and infill development objectives of the National Planning Framework.</p> <p>To achieve compact growth, the RSES seeks to prioritise housing and employment development in locations within and contiguous to existing urban footprints, where it can be served by public transport, walking and cycling networks <u>such as proposed under the Limerick Shannon Metropolitan Area Transport Strategy</u>. Strategic initiatives, which will achieve the compact growth targets on brownfield and infill sites, are sought, including site assembly for revitalisation and the promotion of brownfield lands over greenfield developments in all urban areas. The RSES also seeks the targeting of measures to reduce vacancy in our building stock and investment in refurbishment, to bring underutilised properties into residential use. <u>These concepts set the basis for the formation of the spatial strategy for settlements across the Limerick Metropolitan Area and County Limerick and are a cross cutting theme of the various chapters of this Development Plan.</u></p>	
6	<p>Insert: <u>3.2.4 A Collaborative Approach</u></p> <p><u>The Southern Region's three Cities (Cork, Limerick and Waterford) and their Metropolitan Areas are primary economic engines for the Region. The RSES promotes a co-ordinated, co-operative, and collaborative intra-regional partnership between the Region's three Cities and their Metropolitan Areas and Galway in the Northern and Western Region. Limerick City and County</u></p>	<p>Ensures a cooperative approach to the issue of urban development and outlines the history of such cooperation. This will ensure a better use of resources.</p>

	<p><u>Council are committed to a collaborative intra-regional partnership approach between the Limerick-Shannon, Cork, Waterford and Galway regions.</u></p> <p><u>Limerick City and County Council recognise that it is a national and regional priority that the Limerick-Shannon Metropolitan Area achieves its full potential and are committed to achieving the objectives set out therein. In this regard, Limerick City and County Council are committed to continuing the collaborative approach undertaken with Clare County Council to ensure the sustainable and co-ordinated development of the Limerick Shannon Metropolitan Area</u></p> <p><u>There is a history of public and private stakeholders working together for the betterment of the area, including the collaborative preparation of the Mid-West Strategic Area Plan, the Strategic Integrated Framework Plan for the Shannon Estuary and the Joint Retail Strategy. In addition, a current example is the Shannon Consortium, comprising a collaborative alliance between the three higher level institutes of UL, Mary Immaculate College and Technological University of the Shannon, aiming to establish the region as an area of excellence in teaching, learning and learner support.</u></p>	
7	<p>Objective SS-04 <u>CGR O1</u>- Prevention of Urban Sprawl - It is an objective of the Council to prevent linear roadside frontage development on roads leading out of towns and villages in order to retain the identity of towns/villages, to prevent sprawl and to ensure a distinction in character between built up areas and the open countryside.</p> <p>Objective SS-03 <u>CGR O2</u> - Capacity of</p>	Renumbering of policies for clarity.

	<p>Town/Village to Absorb Development - It is an objective of the Council that development within towns and villages shall be considered on the basis of its connectivity to the existing town/village core, capacity (infrastructural, social, cultural and economic), good design, community gain and proper planning and sustainable development.</p>	
8	<p>Insertion in CGR03 Ensure that all developments are designed to the highest quality with respect to the principles of place-making, universal design and public realm including the guidance set out under the <i>Urban Design Manual – A Best Practice Guide</i> (2009) and the <i>Design Manual for Urban Roads and Streets</i> (2013) the Whole of Government National Disability Inclusion Strategy (NDIS) 2017-2022 and the 2020 DMURS Interim Advice</p> <p>Note – Covid 19 Pandemic Response</p>	<p>Ensures that adequate facilities will be provided for all sectors of the population and the requirements of the current health measures are being taken into account. Consistent with EPO P1: Facilitate a good standard of quality of life for all of the population of the Limerick through ensuring high quality residential, recreational, educational and working environment</p>
9	<p>O4- Urban Lands and Compact Growth: It is an objective of the Council to:</p> <p>a) Deliver 50% of new homes within the existing built up footprint of Limerick City and Suburbs and 30% of new homes within the existing built up footprint of settlements, in a compact and sustainable manner in accordance with the Core and Housing Strategies of this Draft Plan.</p> <p>b) Encourage and facilitate sustainable revitalisation and intensification of brownfield, infill, underutilised and backland urban sites, subject to compliance with all quantitative and qualitative Development Management Standards set out under Chapter 11 of</p>	<p>Ensures compliance with higher tier plans but also in terms of monitoring will be valuable tool in delivering compact development. It also ties in with the monitoring requirements mentioned in the new draft Development Plan guidelines. Consistent with HTP 1 and GS1 and C2.</p>

	<p>this Draft Plan.</p> <p>c) <u>Continue to work proactively with key state agencies, such as the LDA to bring forward, brownfield urban underutilised state land which can contribute to the delivery of compact growth within an urban context, subject to Development Management Standards set out under Chapter 11 of this Draft Plan.</u></p> <p>d) Encourage residential development in the City Centre zone by requiring at least 20% of new development comprise residential use. Exceptions may be made on a case by case basis, where residential use is not deemed compatible with the primary use of the site e.g. museums/tourist attractions etc.</p> <p>e) Require multiple owners of large scale urban sites to develop a masterplan for the coherent and sustainable development of such lands, addressing issues of the sustainable use of available lands, preservation of existing residential amenity, access, urban design and connectivity. <u>These Masterplans shall set out the framework for the sustainable, phased and managed development of a particular area. The Masterplan should include the written consent of all landowners, where applicable, a conceptual layout, infrastructure proposals including any consultation with service providers and phasing details.</u></p> <p><u>CGR P2 - Monitoring of Brownfield/Infill Sites:</u> <u>It is policy of the Council to monitor the</u></p>	
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	<u>development of brownfield and infill sites and their contribution to delivering on the targets established, over the lifetime of the plan</u>	
10	<p>Section 2: Spatial Strategy</p> <p><u>Further to the Settlement Strategy set out in Chapter 2, Core Strategy and Settlement Strategy, the following sections sets out the role of each settlement in the hierarchy (Section 2a Limerick Metropolitan Area and Section 2b County Limerick) and the Spatial Strategy to achieve the objectives for targeted population growth. Development of each of the settlements are supported by the Compact Growth and Active Land Management objectives set out under Section 1 of this chapter, in conjunction with the Development Management Standards set out under Chapter 11.</u></p> <p>Section 2a: Limerick Metropolitan Area Spatial Strategy</p> <p>3.2 Limerick Metropolitan Area Spatial Definition</p> <p><u>The Limerick Shannon Metropolitan Area Spatial Plan covers the functional areas of both Limerick City and County Council and Clare County Council. The Limerick Metropolitan Area subject of the Spatial Strategy set out in this Chapter include Limerick City Centre, the continuous built up area of Limerick City Suburbs (as defined by the CSO) and the settlements of Mungret, Annacotty, Castleconnell, Patrickswell, Clarina and Montpelier. The spatial strategy for each of these areas is set out below.</u></p>	<p>The new section has resulted in the renumbering of policies within it but all are consistent with the need for coherent urban development. Table 3.4.1 following the Spatial Strategy sets out a SWOT analysis which shows the issues facing the orderly development of all of the settlements including the city. All of this provides a coherent policy framework for the development of Limerick’s settlements. Consistent with HTP 1 MA1, MA 2 and GS1.</p>
11	<p>Insert: 3.4.1</p> <p>3.4.1 Developing a Spatial Strategy</p>	<p>Emphasises the coherent development of the lands</p>

<p>The policies and objectives of this Development Plan will support and enable the delivery of the key growth enablers and transformational change envisaged for the Limerick Shannon Metropolitan Area in the NPF, RSES and MASP. The Local Authority will continue to seek investment through various funding mechanisms including the National Development Plan and Regeneration Development Funds.</p> <p>In order to achieve the growth envisaged, the Core Strategy identifies a population growth target of 34,660 in Limerick City and Environs, including Annacotty and Mungret (population growth of 1,121 proposed) to 2028. This growth must be supported by the Housing Strategy and opportunities for employment. Community and educational facilities and amenities must be provided in tandem with this envisaged growth. To achieve projected population growth in a compact and sustainable manner, this Development Plan has identified 346.31ha. of land available over 153 no. of sites in the City and Environs, with zoning for residential, or residential and a mixture of uses. Infill and brownfield lands comprise 61.84% of the lands identified across the City and Environs. A further 10.03ha. of land across 5 no. of sites have been identified in the adjoining settlements of Mungret in the Southern Environs and Annacotty to the east of Castletroy.</p> <p>To support employment growth this Development Plan, in addition to the City Centre, District Centre and Local Centre zonings, has identified 402ha. of undeveloped/ underutilised land available for Enterprise and Employment, Industry and High Tech/ Manufacturing in the Environs, Mungret and Annacotty.</p> <p>In setting out the Land Use Zoning strategy, the Strategic Flood Risk Assessment has played a key role in informing the appropriateness of the zoning of lands with respect to the vulnerability of uses in the different flood zones, in accordance with the Flood Risk Management Guidelines for Planning</p>	<p>within the development boundary taking into account the targets set by the Core Strategy and the NPF and the RSES. The mention of the SFRA is noted. All measures and maps indicated are consistent with higher tier plans.</p>
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	<p>Authorities. Subsequently, a Settlement Capacity Audit (SCA) was carried out for residential and undeveloped employment land. The SCA and accompanying maps as set out in Volume 2, examined the suitability of each of the sites in the land bank, with respect to the availability of infrastructure under Tier 1 (serviced) and Tier 2 (serviceable). In the case of the residential SCA, the tables also indicate the density standards applicable to each site and the indicative potential yield achievable (subject to consideration with respect to compliance with all relevant planning criteria, development management standards etc.). In this regard, as set out in the Core Strategy, the SCA identifies the potential for 12,400 no. of units across the City and Environs, Mungret and Annacotty.</p> <p>The Land Development Agency (LDA) and Limerick 2030 plans to facilitate high density and mixed use developments on underutilised and brownfield sites in the city and suburbs, will create opportunities to achieve a critical mass of residential and employment population at an international level, to enhance the viability and vitality of the City Centre, while addressing instances of urban blight and decay. Some of the key transformational city consolidation sites identified for development, including the Colbert Quarter are set out further below. The development of such sites will be informed by the guidance set out under the Building Height Strategy.</p> <p>LSMATS will enhance active and public modes of transport and provide opportunities to improve health and wellbeing, while reducing carbon emissions and traffic congestion. The proposals set out under LSMATs with respect to the public transport corridors have facilitated determination of the density zones, with higher densities proposed in areas within walking distances of transport services. The Joint Retail Strategy will aim</p>	
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	<p>to re-establish the City Centre at the top of the Mid-West Region’s retail hierarchy, maximising opportunities arising from Local Authority initiatives to enhance the customer experience of the City Centre.</p> <p>The opportunities presented by the Regeneration Areas through the Limerick Regeneration Integration Framework Plan (LRIFP) will address services, facilitate education and training and provide additional housing stock and employment opportunities, which is supported through the objectives of this Draft Plan. The objectives for the Regeneration Areas are set out further below in this chapter.</p> <p>The aforementioned strategies combine to develop a strategy for the spatial development of the Limerick Metropolitan Area, which will facilitate the achievement of NPF objectives for Limerick to become a city of scale over the lifetime of the Development Plan and demonstrate how the vision for the Limerick Shannon MASP will be implemented</p>	
12	<p>3.4.4.1 Limerick Shannon Metropolitan Area Transport Strategy (LSMATS)</p> <p><u>The Draft Limerick Shannon Metropolitan Area Transport Strategy is being prepared by the National Transport Authority in conjunction with Limerick City and County Council and Clare County Council. The RSES objectives, underpinned by the NPF, provide a strong framework for LSMATS to shape the distribution of growth targets integrating land use and transport planning. It is an objective of the MASP to achieve the National Strategic Outcomes of the NPF, through the sustainable and infrastructure led regeneration, consolidation and growth of strategic residential, employment and nodal locations along strategic bus network corridors. LSMATS will provide the</u></p>	<p>Emphasises the coherent development of the lands within the development boundary taking into account the targets set by the NPF and the RSES and the LSMATS. This is consistent with MA1: Maintain sustainable access to assets such as open spaces, water resources and all other physical and social infrastructure and MA2: Ensure that there is</p>

	<p><u>opportunity to integrate new mixed-use development at appropriate densities with high capacity public transport infrastructure, in conjunction with more attractive walking and cycling networks and public realm improvements.</u></p> <p><u>The NPF identifies the provision of a citywide public transport network as a key enabler for Limerick. The BusConnects Limerick programme will provide a reliable, high-frequency public transport service to improve connectivity of Limerick City and suburbs. The strategy sets out a long term framework for the delivery of an integrated transport system to achieve more sustainable travel patterns, reduce car dependency and increase permeability.</u></p> <p><u>Limerick City and County Council will continue to provide for all components of the transportation system, which are within its remit and will encourage and facilitate the development of those other elements provided by external agencies, such as the National Transport Authority and Transport Infrastructure Ireland.</u></p>	<p>adequate policy support for infrastructural provision in the plan area.</p>
<p>13</p>	<p>Insert 3.4.4.2 Retail Strategy for Limerick Shannon Metropolitan Area and County Limerick</p> <p><u>The MASP envisages the City Centre as the primary commercial area, supporting a range of retail, tourism, social and cultural activities. The MASP required the preparation of a Joint Retail Strategy for the Metropolitan Area by Limerick City and County Council and Clare County Council. The Joint Retail Strategy is set out in Volume 6 of this Development Plan, while Chapter 5 Section 1 sets out the policies and objectives in relation to retail development.</u></p> <p><u>The Local Authority will support initiatives and improvements to the customer experience of the City Centre, including a number of projects which will be undertaken over the lifetime of this Plan. Such initiatives and projects include the</u></p>	<p>Supports centre out development as set out by NPF and RSES.</p> <p>Emphasises the centre out development of the city taking into account the targets set by the Core Strategy and the NPF and the RSES. Consistent with HTP1 and MA 1 and Ma2- see above also.</p>

	<p><u>preparation of a City Centre Public Realm Strategy, the revitalisation of O’Connell Street, the Limerick Laneways Project, the Wayfinding and Orientation Strategy, the Living Limerick City Centre Initiative and the World Class Waterfront. The Retail Strategy identifies the development potential of key consolidation sites that are essential for the creation of critical mass and the revitalisation of a competitive retail sector. Redevelopment of Arthur’s Quay will secure the City’s role as a premier retail destination, increasing visitors, footfall and spin off benefits for restaurants, hotels, tourism and culture destinations. In addition, the Colbert Station development has the capacity for a new neighbourhood supported by employment, education, retail, health, transport and leisure facilities.</u></p>	
	<p>3.4.4.2 Building Height Strategy</p> <p>Implementation of the National Planning Framework requires increased density (Refer to <u>Chapter 2: Core Strategy and Settlement Strategy</u>), scale and height of developments, including an appropriate mix of living, working, social and recreational spaces in urban areas. While achieving higher density does not automatically imply taller buildings alone, increased building height is an essential component in the optimisation of the capacity of urban sites to facilitate compact growth <u>and achieve the transformational objectives of the MASP.</u></p> <p>In accordance with the requirements of the <i>Urban Development and Building Height Guidelines for Planning Authorities</i> (2018), a Building Height Strategy for Limerick City has been prepared to accompany this Plan as set</p>	<p>The inclusion of the Buildings Heights Strategy (BHS) will help achieve more efficient land use in the city area and hence achieve compact growth, properly managed they can also help create a sense of urban identity. The BHS and its measures (Objective CGR10, Map 3.5 and S3.4.2 Urban Character Area objectives, provide a framework for the orderly development of higher buildings in the city.</p> <p>This is consistent with EPO P1: Facilitate a good</p>

	<p>out in Volume 6 and should be read in tandem with this chapter. The strategy aims to ensure the preservation of Limerick’s character and provide guidance and criteria on the development of new buildings with an appropriate scale and mass in areas across the City and Environs. <u>The Strategy defines a series of gateways between the city and wider area and from this proposes a series of urban character areas. The character areas and gateway locations are intended to allow for the identification and plotting of the key characteristics and sensitivities of the City as they pertain to a greater understanding of building height and their implication on development management. The Building Heights Strategy for Limerick City provides guidance for building height at the Character Area level for the City Centre as set out in the Development Management</u></p>	<p>standard of quality of life for all of the population of the Limerick through ensuring high quality residential, recreational, educational and working environment and HTP!</p>
<p>14</p>	<p>Insert in 3.4.3 Strategic Revitalisation <u>The following sections set out examples of some of the key initiatives and strategic sites proposed to facilitate the revitalisation of Limerick City Centre in a consolidated and compact manner</u></p> <p>3.4.1.1 Limerick 2030</p> <p>The development of centrally located and strategic brownfield and underutilised lands present Limerick City with an opportunity to achieve the economic and social objectives associated with the targeted population growth for Limerick City in a sustainable manner. The key tool for the revitalisation of Limerick is the <i>Limerick 2030 – An Economic and Spatial Plan</i>. <u>KPMG have recently prepared an Interim Review and Update of the Limerick 2030 Plan as set out in Volume 6. The Update builds on the original Limerick 2030 Plan’s ambitions based around the economic and spatial objectives. The key objectives of the Update are set out on the map below.</u></p>	<p>In this section the role of the 2030 Limerick Plan is set out and the updates to the plan are noted. It is part of a series of initiatives which is designed to promote the development of Limerick. Also mentioned are specific sites, within these plans such as the Opera site. This is mentioned also in Objective MK01. This has been subjected to a series of assessments including EIA and AA.</p> <p>There are a number of areas, such as the Caherdavin Shopping Centre and the Colbert</p>

<p>The MASP supports initiatives including the development of the Opera <u>Square site</u>, Cleeves Riverside Quarter, Mungret College lands and the proposed World Class Waterfront project, which will link strategic brownfield sites and enhance the amenity and attractiveness of Limerick’s waterfront.</p> <p>The revitalisation of brownfield sites and the tackling of dereliction and vacancy will secure the long term transformational and rejuvenation of the City Centre, resulting in focused compact City growth. Unlocking centrally located sites represents a unique opportunity to develop high quality mixed-use developments in a more sustainable manner than developing a greenfield site on the outskirts of the City.</p> <p>3.4.3.1 Opera <u>Square Site</u></p> <p>The Opera <u>Square development site</u> represents Limerick 2030’s principle response to transform the social and economic profile of Limerick City Centre and stimulate growth that will benefit not just its immediate environs but also the entire Mid-West Region.</p> <p>Project Opera <u>Square under construction</u> on a 1.62ha. site zoned City Centre, will be a landmark commercial development reflecting Limerick’s status as a leading destination for inward investment. Works have commenced on the development which will be a LEED Gold and nZEB standard Campus, consisting primarily of commercial offices supported by a range of retail and non-retail services, an Apart Hotel and new City Library in the historic Georgian Town Hall. The development will extend to over 555,000 sq. ft. of accommodation with over 5,800m² of public realm and high-quality streetscapes. The campus will provide a day-time employment hub,</p>	<p>Quarter which will be important for the future development of the city. Mungret (Map 3.8 Mungret Framework Plan) indicates that this part of the city environs is the subject of a framework plan. The use of such plans will allow best use of zoned land, is consistent with the RSES and promotes orderly development. Consistent with HTP1 and P1: Facilitate a good standard of quality of life for all of the population of the Limerick through ensuring high quality residential, recreational, educational and working environment.</p>
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transforming into a bustling night-time destination complete with restaurants, bars and open entertainment spaces. The design will also be entirely complementary to and protect important Georgian architecture on the site.

~~Project~~ Opera Square will be a key driver for increased economic activity in the City Centre, delivering significant employment opportunities on brownfield lands while acting as a catalyst for other major City Centre investments.

3.4.3.2 Opera Square Site

The Opera Square development site represents Limerick 2030's principle response to transform the social and economic profile of Limerick City Centre and stimulate growth that will benefit not just its immediate environs but also the entire Mid-West Region.

~~Project~~ Opera Square under construction on a 1.62ha. site zoned City Centre, will be a landmark commercial development reflecting Limerick's status as a leading destination for inward investment. Works have commenced on the development which will be a LEED Gold and nZEB standard Campus, consisting primarily of commercial offices supported by a range of retail and non-retail services, an Apart Hotel and new City Library in the historic Georgian Town Hall. The development will extend to over 555,000 sq. ft. of accommodation with over 5,800m² of public realm and high-quality streetscapes. The campus will provide a day-time employment hub, transforming into a bustling night-time destination complete with restaurants, bars and open entertainment spaces. The design will also be entirely complementary to and protect important Georgian architecture on the site.

~~Project~~ Opera Square will be a key driver for increased economic activity in the City Centre, delivering significant employment opportunities

	<p>on brownfield lands while acting as a catalyst for other major City Centre investments.</p> <p>Mungret Framework Masterplan</p> <p>The Limerick Shannon MASP recognises the potential for sustainable residential development in Mungret. Limerick 2030 DAC commissioned the preparation of a framework masterplan for residential zoned land comprising 59.6ha, including 27.1ha of lands owned by Limerick City and County Council. Funding has been secured through the Local Infrastructure Housing Activation Fund (LIHAF) to deliver a link street, which will unlock substantial lands within public and private ownership and allow construction of residential development supported by community and employment uses. This opportunity area has the potential to deliver approximately 1,950 dwelling units. <u>A number of housing developments have recently been granted planning permission in this area.</u> The first phase will deliver approximately 250 dwelling units. All dwellings will be located within 100m of a pocket park and 400m of a small park.</p> <p>Two new primary school campuses (Educate Together and Gaelscoil An Raithin) have been constructed on the lands, while a third campus has been reserved for a new secondary school. In addition, a Neighbourhood Park of 11ha. including a fully equipped inclusive playground and walking track has already been completed. The pedestrian connection between these facilities and Mungret Village has undergone public realm improvements along the R859 and in Mungret Village. Additional cycle facilities have also been introduced on the R859. The <u>framework masterplan</u> will accommodate bus services on the link streets, which will link into existing bus routes in the wider area. These measures, in addition to delivering a more connected network of walking routes that can enable people to walk to and from destinations</p>	
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within the neighbourhood and wider area are essential to create a shift away from use of the car and facilitate a more sustainable form of development.

Objective MF O1 below sets out the framework for development in Mungret. ~~masterplan will deliver much needed housing for Limerick.~~ The framework plan will facilitate the creation of aims to create a vibrant neighbourhood that accommodates and encourages facilitates a variety of uses ~~and~~ that nurtures a strong sense of community. The framework masterplan seeks to ensure that the new neighbourhood at Mungret is a place that is safe, with people friendly streets and spaces that relates well to its surroundings, including Mungret Village and the adjacent neighbourhoods of Dooradoyle and Raheen. The framework is set out in the map below.

3.4.1.2 Caherdavin Shopping Centre

These Local Centre lands comprise the Caherdavin Shopping Centre and will facilitate the upgrade and redevelopment of the existing Centre. The adjoining 0.2ha. of lands located within the flood zones will be utilised for ancillary car-parking and open space only. The principle use of the overall zone shall be for local level shops and services, commensurate with a local centre and residential development. The site has potential to provide professionally managed student accommodation given the proximity to the TUS Campuses at Coonagh and Moylish. Any development of these lands shall comprise the highest quality design and layout, including a landmark/ gateway building with dual frontage onto the roadways and open space onto which it faces. Any development shall include proposals for improved connectivity and enhancement of

	<p><u>the public realm.</u></p> <p><u>Objective CSC O1 – Caherdavin Shopping Centre: It is an objective of the Council to:</u></p> <ul style="list-style-type: none"> a) <u>Require the highest quality of landmark design and layout with dual frontage onto the adjoining roadways and open space.</u> b) <u>Facilitate local level shops and services commensurate with a Local Centre.</u> c) <u>Facilitate purpose built and managed student accommodation where deemed appropriate.</u> d) <u>Require water compatible uses including car parking and open space within the flood zone, such car parking shall be adequately screened and sympathetically integrated.</u> e) <u>Require connectivity for pedestrians and cyclists to the nearby bus stops and walking/cycling networks.</u> <p><u>Require comprehensive proposals for the improvement of the public realm of the entire Local Centre development at this location. No occupation of any new development shall occur until upgrade of the public realm has taken place</u></p>	
15	<p>3.4.1.1 Southill</p> <p><u>Insert: The Limerick Enterprise Development Partnership (LEDP) campus at Roxboro comprises 3.87ha. of Enterprise and Employment and 2.49ha. of Local Centre zoned lands. The campus provides for a broad range of employment opportunities, community and education and training facilities of significant benefit to the disadvantaged area in which the campus is located. The vision for development of the campus will be focused on job creation. The redevelopment of a vacant unit (Innovation Hub) of 33,000 sq. ft. to provide a new multi-functional Creative and Innovation Industries Centre, comprising Ireland’s first virtual production studio and space will</u></p>	<p>This text and objective are consistent with EPOs P1: Facilitate a good standard of quality of life for all of the population of the Limerick through ensuring a high quality residential, recreational, educational and working environment. It also provides facilities for training and employment to serve the local population and fulfil local social needs.</p>

	<p><u>facilitate and encourage indigenous SME sub suppliers to the Film Industry to locate in a regeneration area.</u></p> <p><u>Objective LEDP O1 - Limerick Enterprise Development Partnership:</u> It is an objective of the Council to:</p> <p>a) <u>Support and facilitate expansion of the existing employment uses and training facilities, enhancing the broad range of employment opportunities for the local community;</u></p> <p>b) <u>Facilitate the reuse of the vacant Innovation Hub for employment uses such as a multi-functional Creative and Innovative Industries Centre;</u></p> <p><u>Facilitate and encourage employment creation by SMEs</u></p>	
16	<p>3.4.2 Metropolitan Settlements outside the City and Environs</p> <p><u>The settlements of Mungret, Annacotty, Castleconnell, Patrickswell and Clarina, as well as a large rural area are located in the Limerick Metropolitan Area.</u></p> <p><u>The settlements of Mungret in the Southern Environs and Annacotty to the east of Castletroy adjoin the suburban areas of Limerick City and Environs. In Mungret village, under the Settlement Capacity Audit 2 no. sites have been identified with a potential yield of 1,272 no. units over the lifetime of this plan. This includes a site with an area of 31.95ha. located within the Framework Plan area. In Annacotty, the Settlement Capacity Audit identifies 4 no. sites with a potential yield of 280 no. units. Development of these sites will enable the consolidation and compact growth of these settlements while achieving projected growth in a sustainable manner.</u></p>	<p>As indicated above Mungret is one of the areas that has a framework plan. The other settlements below either have local area plans or are on the settlement hierarchy with policies appropriate for their scale. Some also have been subject to the settlement capacity audit which identifies potential development sites. Within the text is an emphasis on compact development. This addition is consistent with compact development and EPO GS1: Place an emphasis on the development of brownfield sites rather than greenfield</p>

<p><u>Castleconnell is a Level 3 Town in the settlement hierarchy. In accordance with National Policy Objective 3c, a growth target of 28% has been incorporated into the Core Strategy. Development in Castleconnell shall accord with the objectives for the Level 3 Town settlements as set out under Section 2b below, with the exception of projected growth.</u></p> <p><u>Patrickswell is a Level 4 Large Village in the settlement hierarchy. Following a survey of services and infrastructure and having regard to the unique situation in the village, the limited growth over a prolonged period and the location of the village in the Metropolitan Area, a growth target of 40% has been incorporated into the Core Strategy. Development in Patrickswell shall accord with the objectives for the Level 4 Large Village settlements as set out under Section 2b below, with the exception of projected growth.</u></p> <p><u>Clarina is a Level 5 Village in the settlement hierarchy. Having regard to National Policy Objective 3c, a growth target of 28% has been incorporated into the Core Strategy. Development in Clarina shall accord with the objectives for the Level 5 settlements as set out under Section b below.</u></p> <p><u>Further details in relation to development in these settlements are set out under Section 2b below. Development in these settlements shall take place in accordance with the core strategy, compact growth and active land management objectives and all development management standards as set out under this Development Plan.</u></p> <p><u>Development in the rural areas of the Metropolitan Area shall comply with the rural housing policy and all relevant planning criteria and Section 28 guidelines.</u></p>	<p>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.</p> <p>It also emphasises the role of S28 Guidelines in informing development decisions which is consistent with HTP1 Compliance with Higher Tier Plans.</p>
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<p>17</p>	<p>Section 2b: Limerick County Spatial Strategy</p> <p>3.5 Level 2: Key Towns</p> <p><u>Newcastle West has been identified as a Key Towns in the Southern Region. The Council acknowledge the importance of this designation. A Key Town is a are settlements with a strong employment base and a broad range of services that serves a wide catchment area. They each The Key Town plays a critical role in underpinning the RSES objectives to ensure a consolidated spread of growth beyond the cities to the sub-regional level. It is envisaged that the Key Towns will be a focus for significant growth.</u></p> <p>The Southern Regional Spatial and Economic Strategy describes the location of Newcastle West as presenting opportunities for future economic development and employment growth. Identified by the RSES as a key town, Newcastle West will play a critical role in ensuring a consolidated spread of growth beyond Limerick City and Suburbs to the sub-regional level. <u>In this regard, the Core Strategy identifies 30% growth from a population of 6,619 in 2016 to 8,607 to 2028, equating to an additional 706 dwelling units.</u></p> <p>Kilmallock is also a Key Town serving the East of County Limerick.</p> <p><u>A Local Area Plan is in place for Newcastle West, which will be reviewed on completion of this Development Plan. The Local Area Plan (LAP) will deal with the more detailed approach to the development of Newcastle West in line with its ambition as a Key Town. The LAP will consider in detail employment and economic development opportunities, placemaking initiatives, upskilling, lifelong learning, social infrastructure. In addition to the LAP, the Council is committed to the</u></p>	<p>This indicates that Newcastle West had been designated as being a key town in line with the RSES and NPF, which ensures consistency. Similarly Kilmallock is no longer a key town in line with these strategies.</p> <p>Objectives CGR 12 and 13 also indicate that Newcastle West is a Level 2 town and Kilmallock is no longer a Level 2 town. With its importance as a key town Newcastle West has its own LAP. All of this is consistent with Higher Tier plans.</p> <p>There has also been a renumbering of policy objectives as they relate to development and revitalisation within settlements from level 3 to 6, but renumbering is not regarded as a material amendment.</p>
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	<p><u>preparation of a Local Transport Plan for Newcastle West, which will consider sustainable mobility and placemaking, as a key element of the growth of NewcastleWest</u></p> <p>Objective SS-O7 <u>CGR O12</u>- Level 2 – Key Towns Newcastle West and Kilmallock – It is an objective of the Council to promote Newcastle West and Kilmallock as <u>a</u> key service centres and to promote the sustainable growth of the towns to become <u>a</u> self-sufficient settlements and act as <u>a</u> service centres for their <u>its</u> inhabitants and rural hinterland. At least 30% of all new homes shall be located within the existing built-up footprint of the settlements, in order to deliver compact growth and reduce unsustainable urban sprawl.</p>	
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Chapter 4: Housing.

No	Amendment	Response
1	<p>4.1 Introduction</p> <p><u>The delivery of housing must comply with the Core Strategy and Settlement Strategy set out in Chapter 2 and must align with the principles established in the Spatial Strategy as outlined in Chapter 3. This chapter sets out the policies and objectives for the provision of housing in Limerick. Limerick, like the rest of the country is affected by the current housing crisis including supply shortages, increased demand for social and affordable housing, a pressurised rental sector, rising building costs and vacant homes. The Council has a key role to play in enabling the delivery of new housing, ensuring that best use is made of existing stock and delivering strong, sustainable communities. The Council as a Housing Authority has multiple roles in the facilitation of housing in Limerick, including formulating policies in the provision and management of social housing in partnership with the Department of Housing, Local Government and Heritage and Approved Housing Bodies.</u></p>	<p>Ensures Compliance with Higher Tier Plans which place an emphasis on compact development.</p>

2	<p>4.2.1 National Policy</p> <p><u>Housing for All: A New Housing Plan for Ireland was published in 2021. It represents the Governments housing plan to 2030, replacing Rebuilding Ireland. It reiterates the national target of building an average of 33,000 new homes every year from 2021 to 2030, including approximately 10,000 social homes and 6,000 affordable homes for purchase or rent, it provides a comprehensive strategy and action plan across all tenure and elements of the Irish Housing system, guided by four main pathways to improving the housing system:</u></p> <ul style="list-style-type: none"> • <u>Supporting home ownership and increasing affordability;</u> <p><u>Eradicating homelessness, increasing social housing delivery and supporting social inclusion</u></p> <ul style="list-style-type: none"> • <u>Increasing new housing supply;</u> • <u>Addressing vacancy and efficient use of existing stock;</u> <p><u>Local Authorities will play a key role (in partnership with Approved Housing Bodies) in delivering new social and affordable homes under Housing for All. Each Local Authority will produce a Housing Delivery Action Plan by December 2021 to translate national targets into clear local targets and actions, underpinned by an evidence –based assessment of local housing need. Limerick City and County Council have published the Draft Housing Delivery Action Plan which can be found at https://www.limerick.ie/sites/default/files/media/documents/2021-11/06-draft-housing- action-plan-2022-2026.pdf. The strategy also supports the role of the Land Development Agency (LDA) in delivering new social and affordable homes on major publicly – owned sites, with State land planned to be transferred to the LDA.</u></p> <p>In order to align with the provisions of the NPF <u>and</u> RSES and delivery of the four pathways above, the Council will continue to utilise all policy options available to it, to ensure the optimum delivery of residential units over the duration of the Draft Plan, from both the public and private sectors in the delivery of a mix of tenures</p>	

3	<p>4.2.3 Housing Mix</p> <p><u>All new residential schemes shall ensure that a minimum of 15% of dwellings are designed to the national Disability Authority’s UD ++ standard. The principle of Universal design, adaptable housing designs and Lifetime Homes in new housing development will also be promoted.</u></p> <p>HO O1 - Social Inclusion – It is an objective of the Council to ensure that new developments are socially inclusive and provide for a wide variety of housing types, sizes and tenure, <u>in suitable locations</u>, throughout Limerick, to cater for the demands established in the Draft Housing Strategy and the Housing Need Demand Assessment</p>	<p>Ensures housing suitable for a variety of needs.</p> <p>Consistent with EPO P1: Facilitate a good standard of quality of life for all of the population of Limerick through ensuring high quality residential, recreational, educational and working environment</p>
	<p>4.2.1 Protecting Existing Residential Amenity</p> <p>Objective HO O3 - Protection of Existing Residential Amenity - It is an objective of the Council to ensure a balance between the protection of existing residential amenities, the established character of the area and the need to provide for sustainable <u>new residential</u> development is achieved in all new developments</p>	<p>See above.</p>
	<p>4.2.6 Reuse of Buildings The existing housing stock of Limerick provides a valuable resource in terms of meeting the needs of a growing population and its retention and management is of considerable importance. Retaining and adapting <u>including measures to promote downsizing</u>, as appropriate, <u>and</u> encouraging energy retrofitting of the existing housing stock, is important to stem population loss in these areas by promoting and encouraging additional dwelling units within existing communities, particularly those suited to the emerging demographics of an area. <u>The Council are currently working on a programme for the retrofitting of social housing units across Limerick. In addition, the Department of Environment, Climate and Communications are in the process of developing a new Local Authority Energy Efficiency Retrofit Loan proposal for</u></p>	<p>Consistent with EPO GS1: Place an emphasis on the development of brownfield sites rather than greenfield sites in Limerick. By reducing the possible</p>

	<p><u>homeowners as supported in Objective HPO 21.8 of the Housing for All, a New Housing Plan for Ireland. The forthcoming initiative will enable Local Authorities to provide low cost retrofit loans to individual homeowners. Housing design that contributes to climate resilience and climate mitigation, including innovative low-carbon construction methods and reduction of embodied energy will be promoted.</u></p>	<p>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.</p>
	<p>4 HO O8 Student Accommodation: It is an objective of the Council to:</p> <p>a) Support the provision of <u>high quality, professionally managed purpose-built student accommodation either on campus, or</u> in appropriate and accessible locations <u>on public transport or cycle networks. All forms of student accommodation shall respect and protect the existing residential amenities of the area in which it is proposed. Student accommodation shall be</u> and of appropriate design, in accordance with the <u>Department of Education and Science ‘Guidelines on Residential Development for Third Level Students’ (1999),</u> and (2005) National Student Accommodation Strategy (2017) and any subsequent updates. Applications for change of use from student housing to any other form of housing use shall be <u>strongly</u> resisted, without adequate demonstration that <u>there is no longer a need for such use in the area and</u> an over-provision of student housing exists’.</p> <p>) <u>Ensure that all applications for new off campus purpose built student accommodation, the change of use to student accommodation in existing residential areas, or extensions to existing dwellings to facilitate student accommodation, must include details outlining the presence and distribution of any permanent residential occupiers, the extent of students</u></p>	<p>Caters for the accommodation needs for this segment of the population. Consistent with EPO P1: Facilitate a good standard of quality of life for all of the population of Limerick through ensuring high quality residential, recreational, educational and working environment</p>

	<p><u>renting in the private housing market and the presence of any other housing catering primarily for students and short term lets in the area/estate. The application should address any potential impacts of the proposal on residential amenity and any permanent residents in the area.</u></p> <p><u>c) Require all applications for off campus purpose built student accommodation to be accompanied by a Student Management Plan outlining how the scheme will be professionally managed. The Plan shall demonstrate how the development will be managed so as to avoid negative impacts from occupants on surrounding properties and neighbourhoods and ensure the maintenance of safe, secure and clean environments for the community, occupants and nearby residents.</u></p> <p><u>d) Ensure permissions for student accommodation will be subject to a condition requiring planning permission for a change of use to any other type of use, including short term holiday letting. Future applications for this type of change of use will be resisted. Where it is demonstrated that such form of housing is no longer required a planning application will require details of a proper management plan for the non-student use of the units to prevent adverse impacts on traditional residential</u></p>	
	<p>4.2.8 The Living Limerick City Centre Initiative</p> <p>Objective HO O12 – The Living Limerick City Centre Initiative – It is an objective of the Council to support the Living Limerick City Centre Initiative for the delivery of community housing across the City and rural towns and villages <u>and the extension of a similar initiatives to rural towns and villages</u></p>	<p>Supports community led housing initiatives. Consistent with EPO P1.</p>
	<p><u>Housing for All, A New Housing Plan for Ireland – Rebuilding Ireland, an Action Plan for Housing and Homelessness (2016) set ambitious targets for the delivery of social and affordable housing and put in place the mechanisms to support an increase in the supply of housing.</u></p> <p><u>The Affordable Housing Act has introduced several important changes for housing. It establishes a legislative basis for new forms of affordable housing for households who cannot afford private market housing but are above eligibility thresholds for social housing. The Act amends ‘Part V’ housing requirements to</u></p>	<p>Seeks to provide housing supplies for social and affordable housing needs. Consistent with EPO P1. Operates</p>

	<p><u>include a requirement for up to 20% social and affordable housing in developments in excess of four units (intended by Government to comprise 10% social and 10% cost rental and/or affordable purchase where justified</u></p> <p>Objective HO O13 - Provision of Social <u>and Affordable</u> Housing - It is an objective of the Council to promote the provision of social <u>and affordable</u> housing, in accordance with the Council’s Draft Housing Strategy, Housing Need Demand Assessment and Government policyas outlined in the DoHPLG <u>Housing for All - a New Housing Plan for Ireland 2021</u> Social Housing Strategy 2020 and to ensure that 10% of lands zoned for residential use, or for a mixture of residential and other use, <u>20%</u> of lands in <u>residential or mixed-use schemes greater than 4 units where permission for the development of houses is granted</u> be reserved for social <u>and affordable</u> housing in accordance with the Urban Regeneration and Housing Act 2015 <u>the Affordable Housing Act 2021</u> and Part V of the Planning and Development Act 2000 (as amended) and any subsequent amendments to the legal requirement to deliver this housingduring the lifetime of the Draft Plan.</p> <p><u>This requirement shall comprise 10% social housing and 10% affordable housing (including affordable purchase and/or Cost Rental), subject to local factors, including demand for and viability of affordable housing on individual sites. The Council reserves the right to determinethe appropriateness of ‘Part V’ Cost Rental and/or affordable purchase delivery on individual sites on a case-by-case basis.</u></p> <p><u>All new social and affordable housing schemes shall promote a social and tenure mix. Support the provision of affordable housing through affordable purchase, cost rental andnew build incremental schemes.</u></p>	<p>within Zoned lands.</p>
	<p><u>4.2.8 Housing Delivery Action Plan</u> <u>Limerick City and County Council’s Housing Development Directorate are currentlydeveloping a Housing Delivery Action Plan for Limerick covering the next five years. The Planwill set out details on how and when the Council will delivery housing targets, including the delivery of affordable homes. Objective HO O14: Limerick Housing Delivery Action Plan: It is an</u></p>	<p>For clarity no environmental effect.</p>

	<p><u>objective of the Council to support the implementation of the forthcoming Limerick Housing Delivery Action Plan.</u></p>	
	<p>4.2.17 Homeless Accommodation</p> <p><u>The Council will continue to support means of preventing homelessness and providing pathways out of homelessness in line with the Housing First National Implementation Plan and any subsequent updates, working in co-operation with public and voluntary bodies and central government. The Council acknowledge that supporting younger people at risk of becoming homeless can help avoid a cycle of longer-term homelessness and will support the implementation of the forthcoming Youth Homelessness Strategy.</u></p> <p>Objective HO O16 – Youth Homelessness Strategy: <u>It is an objective of the Council to support and implement the forthcoming Youth Homelessness Strategy currently under preparation by the Department of Housing, Local Government and Heritage and Department of Children, Equality, Disability integration and Youth.</u></p>	<p>Provides for homeless needs in a cooperative fashion with other organisations. Consistent with EPOP1 P2 and HTP1.</p>
	<p>4.2.18 Traveller Accommodation</p> <p>HO O17 - Traveller Accommodation - It is an objective of the Council to support the provision of housing suited to the need of the travelling community <u>the quantity and quality of delivery of traveller-specific accommodation with the relevant agencies</u> and <u>to</u> implement the Traveller Accommodation Programme 2019-2024 and any subsequent updates.</p>	<p>Provides for homeless needs in a cooperative fashion with other organisations. Consistent with EPOP1 P2 and HTP1</p>
	<p>4.2.19 Accommodation for Refugees and Asylum seekers.</p> <p>HO O18 - Accommodation for Refugees and Asylum Seekers – It is an objective of the Council to:</p>	<p>Consistent with EPOP1 P2 and HTP1.</p>

	<p>(a) Implement government policy in relation to the provision of accommodation for refugees and asylum seekers.</p> <p><u>Work with Central Government, relevant State Agencies, AHBs and other bodies to support the provision of appropriate housing for asylum seekers and refugees in Limerick in accordance with identified requirements, and to support the phasing out and replacement of the Direct Provision system in accordance with national policy and requirements</u></p>	<p>Provides for refugee accommodation needs in a cooperative fashion with other organisations</p>
	<p>4.3 Serviced sites in towns and Villages</p> <p>Serviced sites refer to a number of individual residential plots <u>typically of the order of 0.1ha</u> of not less than 0.1ha. with access to services such as utility connections, footpaths, lighting and within walking distance of the town or village core. The density shall generally be 10 housing units per hectare. Larger sites may be required for a dwelling unit in excess of 250m² floor area, to allow sufficient space for private amenity, parking and landscaping. Whilst individual house design on serviced sites is encouraged, the overall design of the scheme must be consistent in terms of boundary treatments and landscaping.</p> <p><u>Sites must comply with the requirements of “Code of Practice: Wastewater Treatment Systems for Single Houses” (EPA 2009). Where necessary, cumulative effects must be considered in accordance with “Guidance on the Authorisation of Discharges to Groundwater” (EPA 2011). Minimum site size will be determined by house size, number of bedrooms, type of treatment proposed and soil conditions, but will be typically of the order of 0.1ha for a four bedroomed house.</u></p> <p><u>It is important to note that not all lands will demonstrate suitable drainage characteristics to allow this type of development. It will be a requirement that the houses in question connect to the public sewerage system once the relevant wastewater treatment plant is upgraded and has sufficient capacity. Provision for this must be made at the time of construction. Once connected to the sewerage system, on site wastewater systems should be decommissioned</u></p> <p>Policy in relation to serviced sites has been renumbered, but this</p>	<p>These provide an alternative to more scattered forms of development in the countryside and as a result are more sustainable. The fact that sites must comply with EPA standards and eventually connect to a public system adds further environmental safeguards. Consistent with W2: Ensure that the requirements of the Water Framework Directive are incorporated into the plan.</p>

	is not a material amendment.	
	<p>4.4 Rural Housing</p> <p>Insert: <u>Consideration of planning applications for development in Rural Housing Category 1: Areas under Strong Urban Influence and Category 2: Rural Housing Category 2: Rural Housing Elsewhere will have regard to Objective TR O35 TR O38 – National Roads.</u></p>	<p>Seeks to maintain the efficiency of the national transport network, and maintaining their efficiency with consequent environmental benefits. Consistent with MA2: Ensure that there is adequate policy support for infrastructural provision in the plan area.</p>

Chapter 5: A Strong Economy

No	Amendment	Response
1	<p>Amend Objective ECON O13 to remove part C and D as follows:</p> <p>Ensure development on the ‘High Tech/Manufacturing’ zoned lands to the west of Raheen Business Park shall be subject to the following:</p> <ul style="list-style-type: none"> • Cognisance to the residential amenities of the properties to the north and western side of the site and the adjacent agricultural land; • Access to the ‘High Tech/Manufacturing’ zoned land to the west of the R510 will be limited to the existing roundabout to the east of the site; • Applications for development in the low-lying area in the southern section of this zone shall have regard to the attenuation infrastructure and shall include a Site-Specific Flood Risk Assessment, including proposals to mitigate and control the level of run-off and attenuation. <p>B) Ensure the provision of a minimum 20m landscaped buffer zone between proposed development and adjoining development/lands in Annacotty Business Park, Northside Business Park and the ‘High Tech/Manufacturing’ zoned lands to the west of Raheen Business Park.</p> <p>and include in a new Objective ECON OXX with additional text as follows:</p> <p><u>Objective ECON OXX Specific Site Requirements: It is an objective of the Council to:</u></p> <p><u>A) Ensure development on the ‘High Tech/Manufacturing’ zoned lands to the west of Raheen Business Park shall be subject to the following:</u></p>	<p>Ensures the orderly development of manufacturing sites, with due regard being paid to constraints such as the need for SuDS infrastructure and the need for site specific FRA reports. This is consistent with good planning practice. Consistent with HTP 1</p>

	<ul style="list-style-type: none"> • <u>Cognisance to the residential amenities of the properties to the north and western side of the site and the adjacent agricultural land; Access to the ‘High Tech/Manufacturing’ zoned land to the west of the R510 will be limited to the existing roundabout to the east of the site. Limited access maybe be provided off the Patrickswell Road;</u> • <u>Applications for development in the low-lying area in the southern section of this zone shall have regard to the attenuation infrastructure and shall include a Site-Specific Flood Risk Assessment, including proposals to mitigate and control the level of run off and attenuation.</u> <p><u>B) Ensure the provision of a minimum 20m landscaped buffer zone between proposed development and adjoining development/lands in Annacotty Business Park, Northside Business Park and the ‘High Tech/Manufacturing’ zoned lands to the west of Raheen Business Park.</u></p> <p><u>C) Require the preparation of a Masterplan for the Enterprise and Employment zoning at the former racecourse lands at Greenpark. The Masterplan shall include a conceptual layout, infrastructure and phasing details.</u></p>	
2	<p>Include addition policy support and text for the development of social enterprise as follows: <u>A social enterprise is an enterprise whose main objective is to achieve a social impact. Social enterprises can have a positive social impact on the people working and living in their communities through fostering inclusive growth, shared prosperity, social inclusion, training and job creation.</u> <u>It is an objective to promote the development of social enterprise in Limerick.</u></p>	<p>This supports the delivery of enterprises that strengthen localities and local bonds. This is consistent with EPO P2: Provide policy support for the provision of suitable employment and facilities for the local population. It has also been mentioned in the previous chapter.</p>
3	<p>Include an objective in Chapter 4 Section 1 as follows: <u>It is an Objective of the Council to support</u></p>	<p>This has to be viewed in the context of the current</p>

	and accommodate the growth of 'Click and Collect' retail services and grocery home shopping as appropriate.	pandemic and could be a useful means of dealing with this and any future population level health issues that may arise.
4	Amend section 4.6.4 to accurately reflect district centres as follows: "There are also a number of other Tier 2, Level 2 District Centres throughout the Environs, including the Jetland Shopping Centre, Castletroy Shopping Centre, <u>Watch House Cross</u> Coonagh Shopping Centre , the Parkway Shopping Centre, the Childers Road complex and Roxboro Shopping Centre";	Ensures clarity- no environmental implications
5	<p>Update Section 4.7.12 of the Plan as follows: <u>The Council recognises and distinguishes between aggregate and mineral extraction and mining. The Council also recognises the importance of Scheduled Minerals as defined in the Minerals Development Act 1940-1999. Minerals are important to the economy and in particular to renewable energy and battery technology. Both these areas of technology are hugely important in terms of achieving local and national climate mitigation targets.</u></p> <p>'It is recognised <u>that the exploration and extraction of minerals</u>, aggregates (stone, sand and gravel) and concrete products industry contribute to economic development, and are essential building materials <u>and are required for industrial processes</u>. However, they can give rise to land use and environmental issues which are required to be mitigated and controlled through the planning process';</p> <p>Update Objective ECON O32 as follows: <u>a) The Council recognises the potential of the extractive, mineral and mining industries to contribute to Limerick's economy and will endeavor to protect access to these resources, where known.</u></p> <p>Section 4.7.17 include Mineral Deposits Map/Aggregates Map</p>	<p>Takes into account mining and mineral extraction which was lacking in the older development plan. However it also recognises the fact that there are environmental issues that can arise, which is dealt with Chapter 11 of the plan Development Management Standards.</p> <p>This is also accompanied by a geological resource map which adds clarity to the plan in this regard showing where major deposits of minerals exist in the County</p>

6	<p>Insert the following Section in Chapter 4: Marine Spatial Planning</p> <p><u>The 2020 Programme for Government, Our Shared Future, committed to reaching Ireland’s target of 10% under the Marine Strategy Framework Directive (MSFD) as soon as is practical and aim for 30% of MPAs by 2030. This is in line with the EU Biodiversity Strategy.</u></p> <p><u>Marine Spatial Planning (MSP) is a new way of looking at how we use the marine area and planning how best to use it into the future. MSP will try to balance the different demands for using the sea including the need to protect the marine environment. It is about planning when and where human activities take place at sea. It is about ensuring these activities are as efficient and sustainable as possible.</u></p> <p><u>National Marine Planning Framework</u></p> <p><u>Ireland’s Marine Spatial Plan is known as the National Marine Planning Framework was published in June 2021. The National Marine Planning Framework (NMPF) brings together all marine-based human activities for the first time, outlining the Government’s vision, objectives and marine planning policies for each marine activity. Ireland’s National Marine Planning Framework will be a key decision-making tool for regulatory authorities and policy makers into the future in a number of ways, including decisions on individual consent applications which will have to have regard to the provisions of the plan in the same way that terrestrial plans form part of the decision making tool-kit in the on-land planning process.</u></p> <p><u>Maritime Planning Bill 2021</u></p> <p><u>The Maritime Area Planning Bill (MAP) is the State’s leading response to the much-needed reform of marine governance. This legislation intends to put in place a comprehensive and coherent planning system for the entire Maritime Area. The constituent elements of this system are:</u></p> <ul style="list-style-type: none"> <u>• A forward planning regime for the maritime area;</u> 	<p>Consistent with higher tier plans (EPO HTP1) but also allows for a planning framework for managing sensitive development of the marine environment. It is anticipated that this would be beneficial.</p>
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- A new streamlined development management system for the maritime area incorporating consenting for the occupation of the maritime area (Maritime Area Consents and licencing) and a new planning consenting regime (to be implemented by coastal local authorities and An Bord Pleanála);
- The establishment of a new agency, the Maritime Area Regulatory Authority (MARA) to manage the occupation of the maritime area and to enforce the provisions of the new regime.

The Bill provides the legal underpinning to an entirely new marine planning system, which will balance harnessing our huge offshore wind potential with protecting our rich and unique marine environment. The Bill is a key enabler of Ireland’s decarbonisation goals. The Bill will provide for a completely new regime for the entire maritime Area underpinned by the NMPF. Foreshore Consents will be replaced by a more focused and streamlined Maritime Area Consent regime. The planning permission system will be extended into the entire maritime area with development subject to a single comprehensive environmental assessment. Compliance and enforcement activities are supported through robust provisions.

Insert new objective as follows:

Objective ECON O43 National and Regional Marine Planning

It is an objective of the Council to

- Support and facilitate the implementation of the National Marine Planning Framework (NMPF) and the Maritime Area Planning Bill 2021 upon its adoption.
- Continue to work with the relevant Government Departments and other relevant stakeholders in the promotion of integrated marine management and following the adoption of the NMPF to identify those areas that may have

	<p><u>particular management requirements and, where appropriate set out any requirement that may exist for Maritime Spatial Plans (MSPs) and Designated Maritime Area Plans (DMAPs)</u></p> <p>c) <u>Support the potential of the marine environment by nurturing opportunities for innovation in the Maritime economy while ensuring that its ecosystems are managed sustainably.</u></p>	
7	<p>Amend Section 4.7.20 Limerick’s Food Sectors to include the following text:</p> <p><u>The Agri-Food sector is one of Limerick’s most important indigenous industries, playing a vital role in the local economy. Limerick also supports the rich heritage of market towns with the potential to revive farmer markets to support local SMEs and food tourism. The Council supports the Department of Rural and Community Development’s Action Plan for Rural Development (APRD), which focuses on the continued development of the agri-food sector through implementation of Food Wise 2025. The Food Vision 2030 Strategy is a new ten-year Strategy for the Irish agri-food sector (taken to include primary agriculture, food and drink processing and manufacturing, fisheries, aquaculture and fish processing, forestry and forestry processing and the equine sector). Its Vision is that Ireland will become a world leader in Sustainable Food Systems (SFS) over the next decade. This will deliver significant benefits for the Irish agri-food sector itself, for Irish society and the environment. In demonstrating the Irish agri-food sector meets the highest standards of sustainability – economic, environmental, and social – this will also provide the basis for the future competitive advantage of the sector. By adopting an integrated food systems approach, Ireland will seek to become a global leader of innovation for sustainable food and agriculture systems, producing safe, nutritious, and high-value food that tastes great, while</u></p>	<p>The establishment of a locally based food industry can lead to the development of an industry with low food miles and result in the production of a wider variety of foodstuffs than might otherwise be the case with the product of new niche foods and products adding greater variety to Limerick’s economic and tourism base. Consistent with AQC3: To include climate action concerns into the plan policies.</p>

	<p><u>protecting and enhancing our natural and cultural resources and contributing to vibrant rural and coastal communities and the national economy. The Fáilte Ireland ‘Food Tourism Development Strategy 2018-2023 aims to increase the availability of great Irish food and drink experiences across the country, to increase the number of tourism businesses engaged with development initiatives and, overseas, to increase and enhance the awareness and perception of Ireland’s food and drink offering. In order to develop and improve the food and drinks experiences in pubs the product must be authentic and the service must be of high quality.</u></p> <p><u>The Food Strategy for Limerick 2016–2018 is a plan to develop and enhance Limerick’s reputation for outstanding food and drink by supporting Limerick’s food and drink producers.</u></p> <p><u>The Food Strategy aims to encourage, support and develop Limerick’s rural and urban food scene through information, education and marketing.</u></p>	
8	<p>Replace Objective ECON O35 as follows:</p> <p>Limerick Food Strategy It is an objective of the Council to support Limerick’s food and drink producers in accordance with the aims/goals established under the Food Strategy for Limerick 2016–2018 and any update thereto a) <u>Support The Food Vision 2030 Strategy and the Food Strategy for Limerick 2016–2018 and any update thereto, the aim of which is to develop and enhance Limerick’s reputation for outstanding food and drink, by supporting Limerick’s food and drink producers and to ensure the development of Limerick as leader of innovation for sustainable food and agriculture systems, producing safe, nutritious, and high-value food that tastes great, while protecting and enhancing our natural and cultural resources and contributing to vibrant communities and the economy.</u> b) <u>Support Failte Ireland’s ‘Food Tourism Development Strategy 2018-2023 and any update thereto</u></p>	See previous response.

9	<p>Include a new objective as follows: <u>Promote Limerick as a food destination and to implement the Fáilte Ireland ‘Food Tourism Development Strategy 2018-2023’ and the Limerick City and County Council Food Strategy 2016-2018, regarding the development of food tourism in conjunction with relevant stakeholders</u></p>	See response above.
10	<p>Include a new objective in Chapter 4, Section 3 as follows: <u>Objective ECON 0XX Digital Innovations to support the Tourism Industry</u> <u>It is an Objective of the Council to support digital innovations to support the tourism industry throughout Limerick</u></p>	This would be much less resource intensive than other forms of tourism support and as a result would have environmental benefits.
11	<p>Amend Objective ECON O40 to as follows: a) Ensure that holiday home developments should be concentrated within existing towns, villages and settlements <u>holiday accommodation including campsite (i.e., static and touring caravans, campervans, glamping and tents) developments should be concentrated within or adjoining existing towns, villages and settlements</u>, where they can best support the provision of services and minimise the impact on the open landscape. Such developments should respect the existing fabric of the settlement, both in scale and design.</p>	While the development of local tourism facilities and activities could prove an advantage for local tourism and local economic activity, they need to be carried out and located with care to avoid environmental damage. Consistent with AQC3: To include climate action concerns into the plan policies.
12	<p>Amend ECON P6 as follows: b) to include reference to <u>Limerick Wild Atlantic Way Gateway City Strategy</u>;</p>	Could promote tourism in urban areas where it would be easily serviced.
13	<p>Include a new Objective in Chapter 4 Section 3 as follows: <u>Objective ECON 0XX Shannon Tourism Masterplan Promote, encourage and facilitate the implementation of the Shannon Tourism Masterplan and its objectives in co-operation with Waterways Ireland, Fáilte Ireland and adjoining local authorities. This includes</u></p>	Tourism activities need to be planned and carried out carefully to avoid environmental damage. It is noted that the Tourism Master Plan has been subject to SEA and AA which will help inform any actions.

	<p><u>proposals for the increased access to and visibility of the Shannon's scenic attributes and its use for land-based activities, such as cycling and walking.</u></p> <p><u>and promote, encourage and facilitate the implementation of the Lower Shannon Priority Projects, as identified in the Shannon Tourism Masterplan, where they relate to Limerick.</u></p>	
14	<p>Include the following text in Section 4.7.14 Rural Enterprise and Employment Opportunities: <u>Having regard to the location and potential nature of developments facilitated by policies promoting rural enterprise and economic development, including rural tourism, proposals for development shall have regard to Policy TR P8 and Objective TR O35 in chapter 6.</u></p>	<p>The policy is designed to safeguard the efficiency of transport routes and ensure their safety. This would lead to improvements in traffic flows which would result in less traffic emissions and reduce the need for additional infrastructure. This would have environmental benefits</p>
15	<p>Include a new objective in Chapter 4 as follows:</p> <p><u>Objective ECON OXX Festivals</u></p> <p><u>Support and develop existing festivals and encourage the establishment of new festivals and events on a yearly basis in conjunction with relevant stakeholders</u></p>	<p>No significant environmental implications. Such events would be subject the events licence system through which they could be regulated.</p>
16	<p>Amend Objective ECON O13(c) as a bullet point in relation to lands at Raheen Business Park: <u>'All development proposals undertake an appropriate level of transport assessment, including an assessment of the cumulative impact of development, to ensure planned development can be accommodated complementary to safeguarding the strategic function of the national road network and associated junctions'</u></p>	<p>Seeks to safeguard capacity of transport infrastructure with consequent environmental benefits. Consistent with MA2: Ensure that there is adequate policy support for infrastructural provision and protection in the plan area</p>
17	<p>Amend Objective ECON O14 (a) to include the following: <u>Access to the Development Location Site at Askeaton should be facilitated from the non-national road network.</u></p>	<p>Not significant.</p>

18	<p>Include the following text in Section 4.7.14 Rural Enterprise and Employment Opportunities: Having regard to the location and potential nature of developments facilitated by policies promoting rural enterprise and economic development, including rural tourism, proposals for development shall have regard to Policy TR P8 and Objective TR O35 in Chapter 6.</p>	Seeks to safeguard transport infrastructure.
19	<p>Amend Objective ECON O27 as follows: ECON O27 Rural Remote Working Hubs It is an objective of the Council to facilitate the development of remote working/rural working hubs at appropriate locations across the County. Limerick.</p>	Reduces the needs for travel. Consistent with AQC3 below.
20	<p>Insert the following text and associated objective in to Chapter 4 <u>The transition to a more circular economy, where the generation of waste is minimised by the principals of designing out waste and pollution and keeping products and materials in use for as long as possible, is essential in developing a competitive, sustainable, low carbon, resource efficient economy. The Council recognises the multiple economic and environmental benefits and opportunities that arise from a more circular economy particular in the creation of job opportunities in recycling and high-quality repairs and new innovative enterprises. More information on the Economic Opportunities around the Circular Economy can be found in Chapter 7 Infrastructure.</u></p> <p>Insert new objective as follows: <u>Objective ECON OX: Circular Economy-</u> It is an objective of the Council to: <u>Support the economic benefits and opportunities that exist in the transition to a more circular economy.</u></p>	Emphasises the circular economy which would reduce the need for resource extraction with consequent environmental benefits. Consistent with AQC3: To include climate action concerns into the plan policies.
21	<p>Insert new objective into Chapter 4: <u>Networks: It is an objective of the Council to actively engage in the development of networks, including economic networks and the Atlantic Economic Corridor Initiative, to share assets,</u></p>	The points about creating networks is taken to mean collaborative networks as well as sharing ideas and resources and this would

	<u>collaborate and drive economic growth and competitiveness.</u>	not have environmental implications
22	Amend Rural Housing Settlement Strategy Map	Not significant-ensures consistency with text.
23	Insert the following Objective into Chapter 4 Section 4.4 Strategy: <u>Promote the Limerick Shannon Metropolitan Area as a key location for economic development supporting the provision of increased employment through the expansion of the existing enterprise ecosystem in the region and the development of smart specialisation</u>	Supports compact development and development of urban areas consistent with EPO HTP1 GS1 and MA1
24	Update ECON O14 to remove the word Strategie from title.	Text Change. Not significant.
25	Insert the following into Objective ECON O44: <u>(c) to promote Limerick to become the primary hub for the development of Ireland's west coast renewable energy potential in research, innovation, logistics, development, maintenance and administration.</u>	Ties in with mention of Foynes Port as such a centre in the plan. Existing infrastructure can be used to support off shore developments.
26	Include new objectives in Chapter 4 as follows: <u>It is an objective of the Council to support the development of inter urban links as identified in the RSES, between Newcastle West, Abbeyfeale and Rathkeale and across the County boundary into Co. Kerry and to develop partnership and synergies to support the development of the wider area.</u>	Reflects the town natural hinterlands- the promotion of local development would be good from an environmental perspective as it would reduce the need for long distance commutes.
27	Insert the following Text in Chapter 4 A Strong Economy as follows: <u>New Section: Economic Principles:</u> <u>The economic vision set out in the RSES for the Southern Region seeks to develop a strong and diverse economic base to enable sustainable, competitive, inclusive and resilient growth. These five principles form the corner stones of the economic strategy for Limerick. The five principles include:</u> <u>Smart Specialisation</u> - <u>bringing together key stakeholders (local communities, national enterprise bodies, higher education institutions and</u>	Ensures consistency with higher tier plans (HTP1) Clustering also promotes compact development which is in line with EPO GS1: Place an emphasis on the development of brownfield sites rather than greenfield sites in the Limerick. By reducing the possible development of greenfield sites this makes a positive contribution to

	<p><u>private enterprises) to identify the competitive advantages of an area with the view of developing economic opportunities.</u></p> <p><u>Clustering - Clusters are a geographic or virtual concentration of interrelated companies, suppliers, and associated institutions. Clusters put in place a favourable and connected regional business ecosystem in which new players emerge and support the development of new industrial value chains and emerging industries.</u></p> <p><u>Placemaking for enterprise development – The Draft Plan places significant emphasis on placemaking, which involves ensuring that geographical locations are attractive places to live, learn and work. The knowledge economy has shifted trends. Effective place-making can create the necessary conditions for sustaining and creating jobs while also creating compact, attractive, vibrant and safe environments in which to live, work, visit and invest.</u></p> <p><u>Knowledge Diffusion: The policy of “knowledge diffusion” is the spreading of knowledge - the process of knowledge transfer to different segments of society to create an environment that attracts inward investment and promotion of a knowledge economy.</u></p> <p><u>Capacity Building: Capacity building is defined by the RSES as building capacity to enable effective implementation and to respond to emerging challenges. Capacity building aims at developing a secure and stable economy that enables economic resilience by adapting to challenges and anticipating changes.</u></p>	<p>soil conservation. This can also be achieved through the sensitive reuse of existing buildings, reducing the need for new build.</p>
28	<p>Include new objective as follows in Chapter 4 A Strong Economy as follows:</p> <p><u>Networks: It is an objective of the Council to work as part of different networks, including economic networks and the Atlantic Economic Corridor</u></p>	<p>The points about creating networks is taken to mean collaborative networks as well as sharing ideas and resources and this would</p>

	<u>Initiative, to share assets, collaborate and drive economic growth and competitiveness.</u>	not have environmental implications.
29	<p>Insert the following text into Objective ECON O17 in Section 4.7.5 Education and Skills:</p> <p>It is an objective of the Council to</p> <p>(a) Sustain the existing high levels of educational attainment and skilled workforce, to encourage employment generation to maintain this resource within Limerick and to promote the availability of education opportunities to all residents in Limerick City and County.</p> <p><u>(b) Support the continued collaborative work undertaken by the Mid-West Regional Enterprise Plan (REP) and the Mid-West Regional Skills Forum in employment generation and fostering of the knowledge-based economy to the Limerick-Shannon Metropolitan Area and Mid-West.</u></p>	<p>Consistent with EPOs P1: Facilitate a good standard of quality of life for all of the population of the Limerick through ensuring high quality residential, recreational, educational and working environments.</p> <p>P2: Provide policy support for the provision of suitable employment and facilities for the local population.</p>
30	<p>Insert the following new objective into Section 4.7.4 Knowledge Economy:</p> <p>New Objective: Learning Region: It is an objective of the Council to support the further development of Limerick, as an inclusive Learning City and County and to work with relevant stakeholders as appropriate.</p>	See response just above
31	<p>Update Objective ECON O32 to include part <u>c) The Council shall seek to ensure that development for aggregates/mineral extraction does not significantly impact on County Geological Sites / Sites of geological interest;</u></p>	Consistent with EPO GS2: Protect geological sites within the plan area.
32	<p>Update Chapter 4 Section 4.6.1 A Strong Economy as follows:</p> <p><u>The Retail Strategy has identified a number of key actions and recommendations to facilitate improvements to sustain the vitality and viability of the City Centre as follows:</u></p> <ol style="list-style-type: none"> <u>1. Consider pedestrianisation and public realm improvements (new attractive hard</u> 	Promotes city centre development. This is sustainable and consistent with the NPF and RSES.

	<p><u>landscaping) to encourage pedestrian activity within the core retail area.</u></p> <ol style="list-style-type: none"> 2. <u>Maintain the vitality and viability of Limerick City Centre by consolidating the core retail area to ensure any future retail development is directed towards this area in the first instance.</u> 3. <u>Encourage and facilitate the reuse of vacant buildings or under-utilised sites throughout the City Centre, with a focus on brownfield sites.</u> 4. <u>Consider improvements to the public realm within the City Centre, waterfront and consider improving pedestrian linkages to create a more pedestrian friendly environment.</u> 5. <u>Promote access to Limerick’s historic core through improved signage/street maps to make visitors aware of the presence and location.</u> 6. <u>Incentivise owners to make improvements to their buildings/shopfronts within the retail core through grant funding via the ‘Business and Retail Incentive Scheme’.</u> 7. <u>Adopt a pilot programme for the extension of opening hours to allow for late night shopping within the retail core, this could be scheduled to take place alongside one of the City’s major festival/events which will support the night-time economy.</u> 8. <u>Undertake an access audit of the built environment to seek to improve accessibility within the City for people with disabilities.</u> 9. <u>Support the retail charter for operators and landlords to sign-up to high quality goals for retail in the City Centre.</u> 10. <u>Support synergy with non-retail uses that attract footfall to the City Centre.</u> 11. <u>Work to define character areas and invest in marketing campaigns to communicate a</u> 	
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	<p><u>broad City Centre experience to attract visitors and consumers.</u></p> <p>12. <u>Develop multi-channel synergy between the retail, service and cultural offer of the City Centre.</u></p>	
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-New Chapter 6: Environment, Heritage, Landscape and Green Infrastructure (Formally Chapter 5

No	Amendment	Response
1	<p>Amend Objective EH O10 Trees and Hedgerows to include revised as follows: It is an objective of the Council to:</p> <p>a) <u>Retain and protect</u> amenity and biodiversity value of the County and City by preserving as far as possible trees, woodlands and hedgerows, <u>having regard to the significant role that trees and hedgerows play in local ecology, climate change and air quality and their contribution to quality place making and the associated health and wellbeing benefits</u></p> <p>b) Require, in the event that mature trees or extensive mature hedgerow is proposed to be removed, that a comprehensive tree and hedgerow survey be carried out by a suitably <u>qualified tree specialist to access the condition, ecological and amenity value of the tree stock/hedgerow proposed for removal and to include mitigation planting and management scheme. The Council will seek in all cases to ensure when undertaking development or when permitting development that the loss of or damage to existing trees is minimised.</u></p> <p>c) Require the planting of native trees, hedgerows and vegetation and the creation of new habitats in all new developments and public realm projects. The Council will avail of tree planting schemes administered by the Forest Service, in ecologically</p>	<p>These changes will confer environmental benefits, when implemented and are consistent with 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.</p> <p>B2: Ensure that the continued conservation of the Natura 2000 sites, Natural heritage and Proposed Natural Heritage sites the review of the LDP These sites are important, both as an amenity and natural history resource.</p>

	<p>suitable locations, where this is considered desirable</p> <p><u>d) To identity and prepare TPO's where trees of exceptional amenity, cultural or environmental value are identified which warrant a high level of protection</u></p> <p><u>e) To implement the Limerick City and County Tree Policy when completed and review as appropriate.</u></p>	
2	<p>Amend Objective EH O9 Geological Sites to include:</p> <p>a) To protect from inappropriate development the County Geological Sites contained in the Limerick Geological Heritage Survey 2021.</p>	<p>Consistent with GS2: Protect geological sites within the plan area.</p>
3	<p>Add new objective to Section 5.5.3 as follows: <u>It is an objective of the Council to support the Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage 2019, as published by the Department of Culture, Heritage and the Gaeltacht and any subsequent guidance or plans for dealing with climate change and archaeological heritage and the Council shall see to:</u></p> <ul style="list-style-type: none"> - <u>Promote awareness and the appropriate adaptation of Ireland's built and archaeological heritage to deal with the effects of climate change;</u> - <u>Identify the built and archaeological heritage in local authority ownership and areas at risk from climate change including, but not necessarily restricted to, the Record of Monuments and Places, protected structures and architectural conservation areas designated in the development plan;</u> - <u>Undertake climate change vulnerability assessments for the historic structures and sites in its area, subject to resources and funding;</u> - <u>Develop disaster risk reduction policies addressing direct and indirect risks to the built and archaeological heritage in its area;</u> - <u>Develop resilience and adaptation strategies for the built and archaeological heritage in its area;</u> 	<p>Consistent with C1: Protect and conserve features of archaeological heritage and their setting.</p> <p>Consistent with AQC3: To include climate action concerns into the plan policies.</p>

	<ul style="list-style-type: none"> - <u>Develop the skills capacity within the local authority to address adaptation/mitigation/emergency management issues affecting historic structures and sites in order to avoid inadvertent loss or damage in the course of climate change adaptation or mitigation works.</u> 	
4	<p>Add the following text to Objective EH O1: <u>The Council, will through the planning enforcement process where applicable, seek to restore the ecological functions of designated sites, where they have been damaged through inappropriate development.</u></p>	<p>Consistent with 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.</p> <p>B2: Ensure that the continued conservation of the Natura 2000 sites, Natural heritage and Proposed Natural Heritage sites the review of the LDP These sites are important, both as an amenity and natural resource</p>
5	<p>Amend Objective EH O12 with the inclusion of the following text at the end of part b) <u>Projects which would be detrimental to existing Blue – Green Infrastructure features will not be permitted.</u></p>	<p>See response just above</p>
6	<p>Amend Landscape Character Area LCA05 Lough Gur to remove the following: e) any structures in ruinous condition will not be allowed to be re-development or adapted for housing</p>	<p>No significant effect.</p>
7	<p>Amend Section 5.3.3 as follows: <u>The Council will require all new developments, where possible to identify, protect and where appropriate enhance ecological features by making provision for local biodiversity and providing linkages to wider habitats.</u></p>	<p>Consistent with B1: Protect, conserve and enhance habitats, species and areas of regional and local importance, including aquatic habitats and</p>

		species and promote the sustainable management of ecological networks
8	<p>Amend Objective EH O15 Ground Water and Surface Water Protection and River Basin Management Plans to reflect the importance of Blue Dot Catchments with the addition of (d) <u>The Blue Dot Catchments programme is a key action under the River Basin Management Plan for Ireland 2022-2028. The aim of the programme is to protect and restore high ecological status to a network of rivers and water bodies in Limerick. In Limerick the following rivers and water bodies are Blue Dot Catchments Bleach Lough, the Ogeen River and the Behanagh River.</u></p> <p><u>The Council will take a precautionary approach to development which might affect water quality in these areas in line with requirements of the Water Framework Directive.</u></p>	W2: Ensure that the requirements of the Water Framework Directive are incorporated into the plan.
9	<p>Amend EH O15 to reference the River Management Cycle 2018 – 2021 <u>2022 – 2028.</u></p>	W2: Ensure that the requirements of the Water Framework Directive are incorporated into the plan.
10	<p>Insert the following in Chapter 5:</p> <p><u>New Section: Ecosystem Services Approach</u> <u>Ecosystem services are defined as the direct and indirect contributions of ecosystems to human wellbeing, and have an impact on our survival and quality of life. This includes the ability of humans to obtain products from ecosystems, such as food, water and resources; benefits obtained from the natural processes such as climate regulation, pollination and water purification; and the cultural services that benefit people through recreation and appreciation of nature.</u></p> <p>Insert new objective as follows: Ecosystem Services Approach It is an objective of the Council to promote an Ecosystem Services Approach, subject to suitable assessment, in the</p>	Consistent with 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.

	preparation of lower-level Plans, Strategies and in the Development Management process.	
11	<p>Insert the following into Objective EH O12:</p> <p>Objective EH O12 Blue Green Infrastructure: It is an objective of the Council to:</p> <p><u>e) Seek to advance the use of an ecosystem services approach and ecosystem services valuation as a decision-making tool in plans and projects, subject to appropriate ecological assessment.</u></p>	Consistent with 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

Chapter 7: (Formally Chapter 6: Sustainable Mobility and Transport)

	Chapter 6 Amendments	Response
1	Replace Chapter 6 of the Draft Plan with a new Chapter 7 Sustainability Mobility and Transport in response to submissions received during the public consultation process.	Ensures compliance with higher tier plans as per SEA guidance.

No	Amendment	Response
1	<p><u>6.2.2 National Level Guidance</u></p> <p><u>The Department of Transport is currently developing its new high-level strategic framework for prioritising future investment in the land transport network. Underpinned by the National Strategic Objectives, the transport strategy establishes high-level investment priorities to address key transport challenges and to ensure that transport investment is aligned with and supports Government’s overarching spatial and climate change objectives, as articulated in the National Planning Framework and Climate Action Plan.</u></p>	Ensures compliance with higher tier plans and complies with climate action requirements AQC3 and HTP1

	<p><u>In addition, the Department of Transport’s Five Cities Demand Management Study identifies transport demand drivers, and assesses the suitability of measures to reduce demand in Ireland’s five largest urban centres—Dublin, Cork, Waterford, Limerick, and Galway. The study looks at international best practice and examines measures to assess impact in reducing emissions, tackling congestion, improving air quality, and improving the overall urban environment of the five cities. The Strategy provides a focused and evidence based approach to addressing the carbon, congestion and air quality challenges facing Irish Cities.</u></p> <p><u>Policy TR P1 - National Investment Framework for Transport Investment: It is an objective of the Council to support the implementation of the Department of Transport’s National Investment Framework for Transport Investment.</u></p> <p><u>Policy TR P2 - Five Cities Demand Management Study: It is an objective of the Council to support the recommendations of the Department of Transport’s Five Cities Demand Management Study.</u></p>	
2	<p>A number of transport projects, both road infrastructure and sustainable transport improvements are considered key enablers for the successful economic, social and sustainable growth of Limerick as outlined in the RSES. Whilst the Draft Plan supports the rebalancing of the transport system towards more sustainable modes of transport, it is recognised that the road network maintains a critical position in the economic growth of Limerick to allow for the movement of people, goods, services and freight on a well- connected and accessible road network. Key projects which are critical to enabling the sustainable mobility and economic growth in Limerick include:</p>	<p>Text updates to Section 6.4 Key Enablers include identification of key projects to permit the sustainable growth of Limerick. The importance of active travel is stressed but so too is that of existing infrastructure such as roads. Consistent AQC 3 and HTP1 and seeks to make the best use of</p>

<ul style="list-style-type: none"> - Delivery of the full BusConnects programme (inclusive of ticketing systems, bus corridors, additional capacity, new bus stops and bus shelters) for the Limerick City Metropolitan Area; - Development of a Park and Ride programme for Limerick, linked with BusConnects Programme; - Delivery of a comprehensive cycling and walking network for Limerick City Metropolitan Area; - N/M20 Cork to Limerick Scheme, which is key to the delivery of improved connectivity between the urban centres and the wider region; - Foynes to Limerick (including Adare Bypass) Road, which will link the port of Foynes with the M7/N18 at Limerick and enhance regional and international connectivity; - N21 Newcastle West and N21 Abbeyfeale Road Scheme – key projects in enhancing regional connectivity with the South West Region and alleviating congestion in both Newcastle West and Abbeyfeale; - N24 Cahir to Limerick Junction - Current Constraints Study Area (CSA) extends into the Limerick administrative area (North of Oola and Brookes bridge); - Limerick Northern Distributor Road - improving accessibility to the City from County Clare, relieving pressure on the existing river crossings in the City Centre and providing significant improvement in connectivity between different areas along the northern fringe of the City; - O’Connell Street Improvement Works – Provision of enhanced public realm, widened footpaths and segregated cycle ways on Limerick’s main thoroughfare, as well as facilitating future transport mode needs in accordance with the requirements of LSMATS. <p style="color: green; margin-top: 20px;">Objectives in support of road projects identified as key growth enablers are outlined in Section 6.8 Strategic Roads Infrastructure</p>	<p>existing and planned infrastructure.</p>
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<p>3</p>	<p>6.5 Sustainable Mobility</p> <p>Insert:</p> <p><u>The Department of Transport is carrying out a review of sustainable mobility policy which will deliver on the ambitions of the new Programme for Government replacing the existing 2009 policy document Smarter Travel, A Sustainable Transport Future 2009-2020 and the National Cycle Policy Framework. The new policy will be closely aligned with the national strategic outcomes of Project Ireland 2040, will support the actions in the Climate Action Plan and will also consider the impacts of COVID-19.</u></p> <p>Objective TR O2 - Design Manual for Urban Roads and Streets: <u>It is an objective of the Council to support the appropriate road design standards of all roads and streets within the urban areas, including suburbs, towns and villages within the 60 kph zone shall be as per the Design Manual for Urban Roads and Streets</u></p> <p><u>A universal design approach, in line with the ‘Whole of Government’ National Disability Inclusion Strategy (NDIS) 2017-2022 and the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) will insure high-quality, accessible and permeable transport links are incorporated into all urban realm design</u></p>	<p>Ensures consistency with higher tier plans and guidance and incorporates climate action. It also provides policy support for transport for disabled or those who find it difficult to access transport.</p> <p>Consistent with P1: Facilitate a good standard of quality of life for all of the population of the Limerick through ensuring high quality residential, recreational, educational and working environments</p>
<p>4</p>	<p>Objective TR O5 - Limerick – Shannon Metropolitan Area Transport Strategy – It is an objective of the Council to facilitate the implementation and delivery of the proposals that will be contained in the final Limerick Shannon Metropolitan Area Transport Strategy, in conjunction with the National Transport Authority, Transport Infrastructure Ireland and Clare County Council and other relevant stakeholders <u>to achieve successful integration between land use and transport planning and targeted growth along high quality public transport corridors and sustainable higher densities</u></p>	<p>Ensures coherent planning and links transport with planning elements such as zoning and other infrastructure. Such a coordinated approach should be more resource efficient and encourage compact development.</p> <p>Consistent with AQC3: To include climate</p>

		action concerns into the plan policies.
5	<p>6.1.1 <u>Avoid-Shift-Improve Concept</u></p> <p><u>The A-S-I approach to transport planning seeks to achieve a reduction in greenhouse gases, reduced energy consumption, less congestion and enabling more liveable environments by creating alternative mobility solutions and developing sustainable transport systems. The ‘avoid’ means reducing the need for travel by integrating land use and transport planning, creating an environment where the need to travel and trip length is reduced. The ‘shift’ means moving away from energy consuming transport modes to more sustainable transport. The ‘improve’ means improving the efficiency of transport modes including energy efficiency and enhance the attractiveness of public transport. The Draft Plan focuses on integrating land use and transportation to help reduce greenhouse gas emissions and facilitate the transition to a low carbon society, promotion of the 10-minute town/neighbourhood and the move towards sustainable transport options with the implementation of both infrastructure and behavioural change measures. Table 6.1 below outlines the Draft Plan’s Policies and Objectives which support the A-S-I Concept</u></p>	Consistent with AQC3: To include climate action concerns into the plan policies and complements initiatives such as active travel already under way in Limerick.
6	<p>6.1.1 Promoting Active Travel</p> <p>The term ‘active travel’ has been defined by the Department of Transport, Tourism and Sport as ‘travelling with a purpose using your own energy’. Generally, this means walking (including all users of footpaths) or cycling as part of a purposeful journey.</p> <p><u>Active travel is a concept of travel that includes only those forms of transport that require using your own energy to travel. This includes walking, cycling or other non-motorised wheel based transport modes for purposeful travel rather than for leisure reasons. Active travel is usually focused on shorter trips as a</u></p>	See above re comments on active travel, its earlier iteration smarter travel has resulted in series of sustainable transport links in the city which were supported by planning policies. Consistent with AQC 3.

	<p><u>natural choice for every day journeys such as to school, work, social or shopping. There are many positive health, environmental and economic benefits from participating in active travel including reduced road congestion, improved air quality, addressing climate change, increased access to employment and reduced social exclusion.</u></p> <p><u>Following the announcement of significant funding by the Department of Transport, a new Limerick active travel unit has been established within Limerick City and County Council. The Council is committed to supporting active travel measures including the investment in sustainable infrastructure to better connect communities creating new walking and cycling links and reducing the physical barriers that currently exist. Redesigning our streets to prioritise walking, cycling and other non-motorised wheel based modes is just one crucial aspect of enabling and creating a modal shift from the private car, we also need to support individual citizens to make the switch to active travel through behavioural change projects and support initiatives.</u></p> <p><u>One of the main focus areas is to achieve a modal transfer from short duration car mode trips to more active and public transport modes. More focused investment (be it infrastructure or behavioural change measures) on increasing walking and cycling for short trips is required to increase uptake of sustainable transport options and in doing so, reducing car mode share.</u></p>	
7	<p><u>6.1.1 Promoting Modal Split</u></p> <p><u>To ensure the effective planning, implementation and monitoring of the development plan in relation to sustainable mobility and transport, it is important to first look at where Limerick is with regards to existing baseline modal split. Analysis of</u></p>	<p>This is a follow on from the previous amendment above. Table 6.2 presents the situation regarding different transport modes and table 6.3</p>

<p><u>POWSCAR data for Limerick shows the obvious imbalance of our transport system to the private car for all trips. It also presents where opportunities exist for movements to more sustainable and active transport options. A full breakdown of baseline modal split is provided in Table 6.2</u></p> <p><u>On analysis of POWSCAR trip data for education and work based travel, the following travel patterns were established.</u></p> <ul style="list-style-type: none"> <u>• The most popular means of travel for those living in Limerick City and Environs was by car (44%) which increased to 64% for those travelling for work purposes only.</u> <u>• 37% of those living in Limerick City and Environs travelling for work purposes are travelling within six minutes of their workplace (15,424 people); 22% use walking as their primary mode for work and school (16% to work, 33% educational) and 4% are travelling by bike (4% to work, 3% for educational purposes).</u> <u>• The most popular means of travel for Newcastle West was by car 52%, however, 56% of those commuting for work purposes are within a 7-minute journey time of their workplace; 476 people living in Newcastle West are within a 4-minute drive of their workplace. 14% of workplace/educational trips were made by walking. This increased to 24% for education purpose trips only.</u> <u>• The most popular means of travel for those living outside Limerick City and Environs is by car at 54% but this increases to 80% for work purposes only. Total number of those who travel by walking for work and/or school purposes is 7% (Work (4%), Education (12%)). Trips taken by bike are at 1% for both education and work purposes.</u> 	<p>presents target modes for both urban and rural settlements. The scale of the challenge is indicated.</p> <p>The policies and targets as presented in Table 6.3 are in line with AQC 3.</p>
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<p>8</p>	<p>6.1.1 Bus Network</p> <p><u>Objective TR O12 Limerick BusConnects</u></p> <p><u>Programme:</u> It is an objective of the council to <u>Support the implementation of the Limerick BusConnects programme including the following:</u></p> <p><u>(i) An improved Metropolitan Bus Service Network which will deliver a step change in the quality of the bus service across the city and suburbs;</u></p> <p><u>(ii) A programme of Core Bus Corridors, which will seek to provide end-to-end full bus priority on key bus routes via measures such as new bus lanes; bus gates and bus priority signals, in order to ensure that bus services are no longer subject to traffic congestion impacts in Limerick, with the following corridors a priority:</u></p> <ul style="list-style-type: none"> • <u>from the M7/Dublin Road junction to the City Centre;</u> • <u>from Mungret, Raheen and Dooradoyle to the City Centre;</u> • <u>on the Ennis Road to the City Centre;</u> • <u>on the Ballysimon Road from the proposed Park and Ride site to the City Centre; and on Childers Road between Parkway Roundabout and Ballinacurra Road;</u> <p><u>(iii) To provide for further bus priority measures on radial routes into the city centre, as identified by the NTA and Limerick City and County Council as part of BusConnects Limerick;</u> <u>(iv) To provide for bus priority measures through the development site to the rear of Colbert Station, as part of an emerging masterplan to be agreed between the NTA, Limerick City and County Council, the landowner, and other stakeholders;</u></p> <p><u>(v) To provide for bus priority through Limerick City Centre linking the Dublin Road Bus Corridor to the Raheen/Dooradoyle corridor, with a preference for O’Connell Street as the most direct route into the centre, delivering passengers as</u></p>	<p>BusConnect is one of the most important elements of sustainable travel in Limerick and the improved network should ensure more use of public transport. Consistent with AQC 3 – integrating climate action into plan policies.</p> <p>Working with the NTA will ensure coherent transport responses.</p>
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	<p><u>close as possible to their destinations;</u> <u>(vi)To increase the capacity of Sarsfield Bridge by reallocating the carriageway to the movement of buses, cyclists, pedestrians and taxis;</u> <u>To carry out any minor works required to facilitate additional and altered service patterns arising out of a review of the service network under BusConnects</u> <u>Objective TR O13 - Core Bus Corridors:</u> It is an objective of the Council to safeguard the proposed Core Bus Corridors from inappropriate development and ensure adequate set back is maintained to facilitate the implementation of the programme, in consultation with the NTA</p> <p><u>Objective TR O14 Management of Coaches:</u> It is an objective of the Council to: Prepare a strategy for the management of coaches in collaboration with the National Transport Authority</p>	
9	<p>6.5.8 Rail connections Objective TR O16 - Rail Network - It is an objective of the Council to:</p> <p><u>(a)Explore a pathway to rail-based development in the review of the RSES and MASP in conjunction with the National Transport Authority and the Southern and Western Regional Assembly</u>Support and encourage, and facilitate new and upgrading of existing rail networks, railway stations and services across Limerick as identified in LSMATS and protect, as required, lands necessary for the upgrading of existing railway lines or stations, which would improve journeytimes and enable an increase in the frequency of services and connections</p>	Consistent with AQC 3 in promoting public transport and reducing car dependency
	<p>6.5.9 Park and Stride Objective TR O18 - Park and Ride Facilities - It is an objective of the Council to facilitate the provision of Park and Ride facilities in line with the final Limerick – Shannon Metropolitan Area Transport Strategy and investigate the feasibility of the provision of ‘park and ride’ facilities, with suitable electric charging structures, carpooling, car sharing and bike sharing facilities to</p>	Consistent with AQC 3 in promoting integrated transport and reducing car dependency

	<p>incorporate car parking and a bus stop/terminus at appropriate locations as identified in the final LSMATS.</p> <p><u>In pursuing the objective to facilitate the provision of Park and Ride, the Council will co-operate closely with relevant transport bodies, authorities and agencies</u></p>	
10	<p>6.5.10 Electric Vehicles</p> <p><u>Compressed Natural Gas (CNG) is natural gas that has been compressed to fit into a vehicle's tank and is particularly suitable for use in commercial vehicles. The development of CNG infrastructure will enable fuel switching from diesel to CNG for HGVs and buses. CNG is an established technology that is used in many countries around the world. CNG contains virtually no particulate matter (PM) and also has low emission levels of nitrogen oxides (NOx)² which is beneficial from an air quality perspective. CNG vehicles can be run on 100% renewable gas. This is a renewable and carbon neutral fuel, produced using anaerobic digestion technology from existing waste streams and a variety of sustainable biomass sources, including grass, animal waste, crop residues and food waste. Infrastructure development for CNG is already underway in Ireland, with 14 fast fill CNG stations being installed across the Core TEN-T road network via a project called the Causeway Study that is supported by the European Commission through the CEF Transport Fund and the Commission for Regulation of Utilities (CRU). The Council will support the use of gas in transport by a presumption in favour of applications for CNG refueling infrastructure, provided planning and environmental criteria are satisfied.</u></p> <p>Objective TR O21- Electric and Compressed Natural Gas Vehicles: It is an objective of the Council to:</p> <ol style="list-style-type: none"> a) Encourage the switch to Electric Vehicles and e-bikes through the roll-out of additional electric charging points at appropriate locations, throughout Limerick, in association with relevant agencies and stakeholders; b) Facilitate the provision of electricity charging infrastructure for electric vehicles, both on 	<p>Ensures inclusion of another technology. Consistent with AQC3: To include climate action concerns into the plan policies. Gas may be produced from Anaerobic Digestion which will be a feature of future supplies.</p> <p>It also provides policy support for future infrastructure. This is consistent with MA2: Ensure that there is adequate policy support for infrastructural provision and protection in the plan area.</p>

	<p>street and in new developments, in accordance with the Development Management Standards set out in Chapter 11.</p> <p>c) <u>Encourage the switch to Compressed Natural Gas (CNG) vehicles through the roll-out of additional CNG points at appropriate locations, throughout Limerick, in association with relevant agencies and stakeholders</u></p>	
11	<p>6.6 Rural Transport</p> <p>Insert:</p> <p><u>Objective TR O24 - Inter-city, Regional, Commuter Services: It is an objective of the Council to support and facilitate the on-going review and enhancements to the inter-city, regional and commuter services as is committed by the National Transport Authority.</u></p> <p><u>Objective TR O25 - Bus Transport Infrastructure: It is an objective of the Council to support the development of bus shelters and bus stops that shall incorporate universal access and bicycle parking facilities where possible</u> .</p>	<p>Both measures should help with providing more access to public transport in rural areas, thereby reducing car usage. Consistent with AQC 3 and MA2: Ensure that there is adequate policy support for infrastructural provision and protection in the plan area.</p>
12	<p>6.1 Strategic Roads Infrastructure</p> <p><u>The road network is a vital part of Limerick’s transport infrastructure due to the widespread use and reliance on road transport for economic movements as well as for social journeys. Key projects which are critical to enabling sustainable mobility and economic growth in Limerick, as identified in RSES are outlined earlier in the chapter. The importance of providing a safe, efficient road system in the county to support enhanced connectivity within Limerick and between the regions is critical to Limerick’s economic growth. The Draft Plan provides the following objectives in support of this</u></p>	<p>The LNDR is hugely important for opening up the Northern part of the city and ensuring that it is accessible. It will play a central role in the development of a huge part of the Limerick City and by facilitating urban development it will be an important catalyst for sustainable</p>

<p><u>growth</u></p> <p>6.1 Strategic Roads Infrastructure</p> <p><u>The road network is a vital part of Limerick’s transport infrastructure due to the widespread use and reliance on road transport for economic movements as well as for social journeys. Key projects which are critical to enabling sustainable mobility and economic growth in Limerick, as identified in RSES are outlined earlier in the chapter. The importance of providing a safe, efficient road system in the county to support enhanced connectivity within Limerick and between the regions is critical to Limerick’s economic growth. The Draft Plan provides the following objectives in support of this growth</u></p> <p>Objectives TRO 28 Cork to Limerick Road Objective TRO 29 (Foynes to Limerick including Adare by pass Road)</p> <p><u>The development of the Limerick Northern Distributor Road (LNDR) is a key strategic road infrastructure project as outlined in RSES. The LNDR will improve access to the University of Limerick and the IDA National Technology Park and will reduce City Centre traffic. It will provide a direct link between Shannon International Airport, the businesses and industries in the Shannon area and the university campus. In terms of land use planning policy, although the LNDR will be a Regional route, it will be treated in a similar way to National roads and the Spatial Planning and National Roads Guidelines will be applied to potential changes to land use policy on this corridor. Aside from what is proposed in RSES and the associated Local Authority Core Strategies, any significant developments along the LNDR will not be supported and its strategic function will be protected.</u></p> <p>TR O35 - Limerick Northern Distributor Road - It is an</p>	<p>development. It is consistent with MA2: Ensure that there is adequate policy support for infrastructural provision and protection in the plan area. By supporting urban development it is also consistent with P1: Facilitate a good standard of quality of life for all of the population of the Limerick through ensuring high quality residential, recreational, educational and working environment.</p>
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	<p>objective of the Council to</p> <p>a) Support the development of the Limerick Northern Distributor Road, which will connect the Coonagh to Knockalisheen Road Scheme to the existing R445 (old N7) and adjoining roadnetwork to the east of Limerick City, which will incorporate Smarter Travel measures, in accordance with all environmental and planning assessments.</p> <p>b) <u>Ensure the LNDR will be subject to the Spatial Planning and National Roads Guidelines and its implementation will not support any significant development along the route, subject to any strategic and/or national considerations.</u></p>	
13	<p>6.9 Protection of Road Hierarchy</p> <p>Policy TR P10 - Road Safety and Carrying Capacity of the Road Network - It is a policy of the Council to seek improvements to road safety and enhance carrying capacity of the road network throughout Limerick, through minimising existing traffic hazards, <u>including access onto roads, which are substandard in terms of width and alignment and</u> preventing the creation of additional or new traffic hazards in the road network, maintaining the carrying capacity and securing appropriate signage</p>	<p>Protects existing infrastructure, consistent with MA2: Ensure that there is adequate policy support for infrastructural provision and protection in the plan area.</p>
14	<p>6.1.1 National Road Network</p> <p>TR P11 - Safeguard the Capacity of National Roads - It is a policy of the Council to:</p> <p>a) Protect the capacity of the national road network, having regard to all relevant Government guidance <u>and associated junctions</u>, including DoECLG <i>Spatial Planning and National Roads Guidelines</i> (DoECLG, 2012) in the carrying out of Local Authority functions and;</p> <p>b) Ensure development does not prejudice the future development, or impair the capacity of, the planned national roads, which includes the N/M20 Cork to Limerick Scheme and Foynes to Limerick Road</p>	<p>See response above.</p>

(including Adare Bypass) projects and other schemes referenced in Section 6.4;

Continue to engage, at an early stage, with relevant transport bodies, authorities and agencies in respect of any plans or projects that are located in proximity to national road infrastructure.

Objective_TR O38 - National Roads - It is an objective of Council to:

a) Prevent, except in exceptional circumstances as outlined in the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012), inappropriate development on lands adjacent to the existing national road network, which would adversely affect the safety, current and future capacity and function of national roads and having regard to reservation corridors, to cater for possible future upgrades of the national roads and junctions;

b) Avoid the creation of any new direct access points from development, or the generation of increased traffic from existing direct access/egress points to the national road network, to which speed limits greater than 60kmphObjective apply;

c) Facilitate a limited level of new accesses, or the intensified use of existing accesses, to the national road network on the approaches to, or exit from, urban centres that are subject to a speed limit of between 50kmph and 60kmph. Such accesses will be considered where they facilitate orderly urban development and would not result in a proliferation of such entrances;

~~c) Consider permitting access where members of the farming community wish to build their houses for their own occupation, on their own land where the house is required for occupation by a member of the farming community, in connection with the working of the farm and where no reasonable alternative access is available to them and where that access is safe and the traffic levels generated are reasonably low. Such developments shall be subject to a Road Safety Audit~~

15	<p>TR O43 - Link Roads - It is an objective of the Council to:Support and complete delivery of new and improved link roads and junctions accommodating public transport, cycle and pedestrian connections, including new road links as outlined in LSMATS. The layout and design of such works shall have cognisance to the context and interface with surrounding land uses in compliance with the <i>Design Manual for Urban Roads and Streets</i> (DoECLG 2019) 2020 DMURS Interim Advice Note – Covid -19 Pandemic Response; and TII Publication DN-GEO-03084 ‘The Treatment of Transition Zones to Towns and Villages on National Road’s; ;</p>	<p>Ensures permeable transport infrastructure which can support urban development. consistent with MA2: Ensure that there is adequate policy support for infrastructural provision and protection in the plan area.</p>
16	<p>Insert in Objective TR O44 - Industrial and Enterprise and Employment lands adjacent to Junction 2, Dock Road (h) All development proposals undertake all relevant Transport Assessments, including the cumulative impact of development, to ensure planned development can be accommodated complementary to safeguarding the strategic function of the national road network and associated junctions.</p>	<p>This would contribute to sustainable transport patterns which is consistent with AQC3.</p>
17	<p>6.10 Traffic Management</p>	

<p>TR O45 - Limerick City Centre Traffic Management Plan - It is an objective of the Council to facilitate the completion and implementation of the Limerick City Centre Traffic Management Plan, for the rebalancing of the City’s street network towards sustainable modes of transport and management of all transportation modes, in compliance with the principles of LSMATS. This will include a review of the traffic system and the quantum, location and layout of on-street parking, with the aim of providing for safe and convenient movement by walking</p>	<p>Consistent with AQC 3 as it promotes active travel</p>
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and cycling.	
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New Chapter 8: Infrastructure (Formerly Chapter 7)

No	Amendment	Response
1	<p>Amend Section 7.5.1 as follows: The Commission for Energy Regulation (CER) Commission for Regulation of Utilities (CRU) is the economic regulator of public water services. The CER's CRU's;</p>	Noted
2	<p>Amend IN O5 b) as follows: Collaborate with Irish Water in the protection of water supply sources to avoid water quality deterioration and reduce the level of treatment required in the production of drinking water, in accordance with Article 7(2) of the WFD. Protection and restoration of drinking water at the source can have co-benefits for biodiversity and climate change</p>	Consistent with W2: Ensure that the requirements of the Water Framework Directive are incorporated into the plan
3	<p>Amend IN O5 e) as follows: Ensure that development proposals connecting to the public water and/ or wastewater networks comply with Irish Water Standard Details and Codes of Practice the standards and requirements of the Irish Water: Code of Practice for Water Infrastructure (December 2016) and any updated version of this document during the lifetime of the Draft Plan. Where relevant, ensure developments comply with the EPA Code of Practice for Domestic Waste Water Treatment Systems 2021.</p>	Consistent with W2: Ensure that the requirements of the Water Framework Directive are incorporated into the plan and that the latest guidance on the topic is included.
4	<p>Replace IN O6 as follows: Public Water Supply It is an objective of the Council to: a) Promote and support water conservation and demand management measures among all water users in new developments.</p>	Consistent with W2: Ensure that the requirements of the Water Framework Directive are

	<p>b) Restrict development within the zones of contribution for wells used as sources of water supply, except where established by Irish Water and to the Council's satisfaction, that the development would not compromise the quality, quantity or pressure of the public supply extracting from the well.</p> <p><u>Drinking Water Source Protection:</u> <u>Protect both ground and surface water sources, to avoid water quality deterioration and reduce the level of treatment required in the production of drinking water, in accordance with Article 7(2) of the Water Framework Directive.</u></p> <p><u>1. New developments which could pose an unacceptable risk to drinking water sources will not be permitted.</u></p> <p><u>2. New development should not conflict with the protection guidelines set out in the Limerick Groundwater Protection Scheme and/ or Groundwater Source Protection Zone reports.</u></p>	<p>incorporated into the plan.</p>
<p>5</p>	<p>Amend Section 7.5.3 Public Waste Water Treatment as follows:</p> <p>Further analysis by the Council has identified the following: • 7.3% of settlements in Limerick have adequate wastewater capacity to facilitate future growth; • Three settlements that have limited wastewater capacity for future growth and currently do not comply with the Waste Water Discharge Licence granted by the EPA are Adare, Caherconlish and Kilfinane; • 20% of settlements have no spare wastewater capacity, including Newcastle West, Askeaton and Foynes; • There is chronic overloading of the Waste Water Treatment Plants (WWTP) in Askeaton, Hospital, Dromcollogher and Murroe.</p> <p>Irish Water's current <u>2019 wastewater treatment</u> capacity register for County Limerick, states that there is capacity available in 41 no. of the 53-no. waste water treatment plants (WWTPs). These include Bunlicky and Castletroy WWTPs, which serve the Limerick City Metropolitan Municipal District. These WWTPs require some upgrading and it is envisaged by Irish Water that, <u>with the completion of these upgrades</u>, there will be sufficient spare capacity</p>	<p>Noted included to update text. It is also noted that improvement are planned for Limerick waste water treatments plants. There was one consultation meeting with the Planning Section in Spring 2021 about such works. These works may be regarded as SID</p>

	to accommodate the projected growth in Limerick city and environs , as set out in the RSES and the Core Strategy, over the lifetime of the Draft Plan, subject to planning and other approvals .	
6	Amend Objective INO10 Surface Water and SuDs as follows: m) To prohibit the discharge of additional surface water to combined (foul and surface water) sewers in order to maximise the capacity of existing collection systems for foul water .	Consistent with W2: Ensure that the requirements of the Water Framework Directive are incorporated into the plan
7	Change the text in Section 7.7.1.3 as follows: A current example is the potential for transferring jobs from peat extraction and processing to new green jobs, such as reinstatement and protection of wetlands and replace with Current examples include organisations involved in designing out waste and those in equipment lease, reuse and repair sectors and materials recycling .	Consistent with AQC3: To include climate action concerns into the plan policies.
8	Relocate Section 7.7.1.2 Circular Economy for Building Design and Construction Projects to Chapter 11.	No effects.
9	Change Section 7.7.1.2 to include the following: An important source of information is the Environment Protection Agency’s Draft Best Practice Guidelines for the preparation of Resource Management Plans for Construction and Demolition Waste Projects .	Ensures compliance with higher tier guidance.
10	Include the following in Subsection 7.7.1.5: The National Waste Management Plan for a Circular Economy will include the new guidance document ‘Waste Management Infrastructure – Guidance for Siting Waste Management Facilities include reference in Subsection 7.7.1.5	Ensures compliance with higher tier guidance
11	Amend Objective IN O10 to include: Require green roofs for all roof areas for the following development types and encourage for all other types of development unless otherwise agreed with Limerick City and County Council's planning department: - Apartment Developments; - Employment Developments;	Can contribute both to SuDs and local ecology

	<ul style="list-style-type: none"> - <u>Retail Developments;</u> - <u>Leisure Facilities;</u> - <u>Education Facilities;</u> <p><u>All roofs of 300m² or greater to provide a minimum of 60% green roof coverage, unless exempted/ partially exempted.</u></p>	
12	<p>Amend wording in Section 7.7.1.2 To adopt the principle of the circular economy more fundamentally, applicants shall be encouraged required to submit a Resource Management Plan, including a Circular Economy Statement.</p>	Consistent with AQC3
13	<p>Amend IN O11 to include a new bullet point as follows: <u>Ensure that in the delivery of energy infrastructure, the strategic function of the national road network is safeguarded in accordance with national policy by utilising available alternatives.</u></p>	Safeguards national infrastructure.
14	<p>Insert the following text as additional bullet point (h) into Objective IN O2 Digital Connectivity: Objective IN O2 Digital Connectivity: <u>(h) Support emerging innovations in the digital transformation of transportation, E-Mobility and sustainable mobility in line with RPO 160 Smart Mobility, including those identified in LSMATS.</u></p>	MA2: Ensure that there is adequate policy support for infrastructural provision in the plan area
15	<p>Delete the following textbox from Section 7.5.3 Public Waste Water Treatment:</p> <ul style="list-style-type: none"> • 7.3% of settlements in Limerick have adequate wastewater capacity to facilitate future growth; • Three settlements that have limited wastewater capacity for future growth and currently do not comply with the Waste Water Discharge Licence granted by the EPA are Adare, Caherconlish and Kilfinane; • 20% of settlements have no spare wastewater capacity, including Newcastle West, Askeaton and Foynes; • There is chronic overloading of the Waste Water Treatment Plants (WWTP) in Askeaton, Hospital, Dromcollogher and Murroe. 	

16	<p>Insert a new objective into Section 7.4 Digital Connectivity and Limerick’s Digital Strategy as follows:</p> <p>Digital Innovations: Limerick Shannon Metropolitan Area: <u>It is an objective of the Council to continue to develop digital services and work with relevant stakeholders to enhance digital innovations and digital transformation throughout Limerick and the Limerick Shannon Metropolitan Area, as opportunities arise.</u></p>	<p>A2: Ensure that there is adequate policy support for infrastructural provision in the plan area</p>															
16	<p>Include updated table 7.1 to accompany map identifying all SEVESO sites in Limerick.</p> <p>Table 7.1 Seveso Sites in Limerick</p> <table border="1" data-bbox="338 779 1040 1512"> <thead> <tr> <th>Tier</th> <th>Name</th> <th>Location</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Lower Tier</td> <td>Grassland Agro</td> <td>Dock Road, Co. Limerick</td> </tr> <tr> <td>Exolum Shannon Ltd. (formerly Interterminals Shannon Ltd)</td> <td>Foynes Harbour, Foynes, Co. Limerick</td> </tr> <tr> <td>Analog Devices International</td> <td>Bay F1, Raheen Business Park, Co. Limerick</td> </tr> <tr> <td rowspan="2">Upper Tier</td> <td>Atlantic Fuel Supply Company Ltd.</td> <td>Foynes Harbour, Co. Limerick</td> </tr> <tr> <td>Goulding Chemical Ltd.</td> <td>Morgan's South Durnish Askeaton, Co. Limerick</td> </tr> </tbody> </table> <p>Source: www.hsa.ie (2021)</p>	Tier	Name	Location	Lower Tier	Grassland Agro	Dock Road, Co. Limerick	Exolum Shannon Ltd. (formerly Interterminals Shannon Ltd)	Foynes Harbour, Foynes, Co. Limerick	Analog Devices International	Bay F1, Raheen Business Park, Co. Limerick	Upper Tier	Atlantic Fuel Supply Company Ltd.	Foynes Harbour, Co. Limerick	Goulding Chemical Ltd.	Morgan's South Durnish Askeaton, Co. Limerick	<p>Noted for clarity.</p>
Tier	Name	Location															
Lower Tier	Grassland Agro	Dock Road, Co. Limerick															
	Exolum Shannon Ltd. (formerly Interterminals Shannon Ltd)	Foynes Harbour, Foynes, Co. Limerick															
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	Goulding Chemical Ltd.	Morgan's South Durnish Askeaton, Co. Limerick															

**-New Chapter 9: Climate Action, Flood Risk and Transition to Low Carbon Economy
(Formally Chapter 8)**

No	Amendment	Response
1	<p>Amend Objective CAF O21 Identified Flood Risk to include the following: <u>B) Clarify location i.e. South of Toppins field.</u> <u>C) Ensure any planning application, including proposals for water compatible uses, on the lands in Flood Zones A and B, adjacent to the Coonagh LIT campus, zoned for Education and Community, shall include a comprehensive Site-Specific Flood Risk Assessment, incorporating a drainage assessment for the lands, which demonstrates that the flood risk can be mitigated and that water compatible uses can be accommodated without adversely impacting on the flood risk of neighbouring residential properties.</u></p>	Complies with 2009 Flood Risk Guidance
2	<p>Amend Objective CAF O21 Identified Flood Risk to include the following: <u>D) No works including the undertaking of ground level changes shall commence on the lands in the National Technology Park subject to flood risk, until all flood mitigation measures have been put in place.</u></p>	Avoids effects on other properties
3	<p>Amend Objective CAF O21 Identified Flood Risk to include the following: <u>E) Any planning application shall include a comprehensive Site-Specific Flood Risk Assessment, which demonstrates that the flood risk can be mitigated and that access/egress, roads and water compatible uses can be accommodated without adversely impacting on the flood risk off site.</u></p>	Complies with 2009 Flood risk Guidance
4	<p>Insert Objective in Section 8.5.4 as follows: <u>It is an Objective to support the life-extension and repowering of existing wind farms, where considered appropriate and subject to an appropriate level of environmental and planning assessment.</u></p>	Should result in less turbines see AA screening that follows
5	<p>Amend Section 8.5.10 to include the following: <u>It must be recognised that natural gas, particularly renewable and indigenous gas, will continue to have a role to play in the transition to a low carbon economy. As such, renewable energy developments</u></p>	Of use in transition period but could also

	<u>may require support from such sources in times of high energy demand.</u>	use gas from AD.
6	Update Section 8.2.3 to include the following: <u>including the retention and integration of existing natural landscape features such as trees and hedgerow into the design of all new development.</u>	Consistent with B1: Protect, conserve and enhance habitats, species and areas of regional and local importance
7	Amend Section 8.5.3 to include: <u>Support utility scale solar PV development at suitable locations where it can be demonstrated that there are no significant adverse impacts.</u>	Noted will contribute to climate mitigation.
8	Amend Objectives CAF O23 Flood Relief Schemes to include: It is an objective of the Council to support and facilitate the development of Flood Relief Schemes as identified in the CFRAM 10 Year Investment Programme <u>and ensure development proposals do not impede or prevent the progression of these measures.</u>	Noted, will help with climate adaptation
9	Amend Objective CAF O24 Minor Flood and Mitigation Works and Coastal Protections Schemes to include: It is an objective of the Council to support and facilitate the Office of Public Works Minor Flood and Mitigation Works and Coastal Protections Schemes <u>and ensure development proposals do not impede or prevent the progression of these measures</u>	Noted, will help with climate adaptation
10	Include reference to the Climate Action Bill (2021) in Chapter 8	Ensures compliance with Higher tier plans and integrate climate action into the plan
11	Insert Renewable Energy Targets potential for Limerick within the lifetime of the Plan in Chapter 8:	This may have

<u>Table 1 Renewable Energy allocations for differing technologies</u>						implications for ecology- see AA screening which follows.
<u>Output Current and Projected</u>	<u>Wind</u>	<u>Anaerobic Digestion</u>	<u>Solar</u>	<u>Hydro</u>	<u>Geothermal</u>	
<u>Current capacity MW</u>	<u>234.35</u>	<u>2.0</u>	<u>113.49</u>	<u>0.1 MW</u>	<u>0</u>	
<u>Target Capacity MW (2030)</u>	<u>386.45 (+65%)</u>	<u>20 (+1000%)</u>	<u>227.0 (+100%)</u>	<u>0.3MW (+300%)</u>	<u>0.5MW</u>	
<u>Note: Baseline figures drawn from LCCC sources June 2020</u>						
12	Amend CAF O1 Compliance as follows: (b) <u>Support the implementation of</u> Cognisance shall be had to the Limerick Climate Change Adaptation Strategy (2019) <u>while cognisance shall be had to</u> any revised or forthcoming adaptation, mitigation or climate action strategies or plans at local, regional and national level in the formulation of any plans or policies.					Consistent with AQC3

New Chapter 10: Sustainable Communities and Social Infrastructure (Formerly Chapter 9)

No	Amendment	Response
1	Amend the title of Objective SCS1 O18 from Public Open Space to <u>Open Space and Recreation</u> .	No effects
2	Change Objective SCS1 O26 to add (d) as follows: <u>'Require developers of new residential schemes commensurate with the scale and purpose of the development to provide in situ, natural play areas for children, or as the case may be, small play grounds, where it is considered necessary and opportune to address local deficits in provision as set out in Table DM1 'Open Space Hierarchy'.</u>	Provides local play areas where they are needed. Consistent with P1: Facilitate a good standard of quality of life for all of the population of the Limerick through ensuring high quality residential, recreational, educational and working environments.

3	<p>Change numbering of SCSi O24 Local Sports Plan to SCSi O25 to avoid duplication with SCSi O24 ‘Limerick City Centre Leisure Strategy’, above this section, and all subsequent Objectives in this chapter are to be renumbered accordingly.</p>	No effects.
4	<p>Change Objective SCSi O9 as follows: a) <u>To ensure that existing and new school sites are protected for educational use and that lands adjacent to existing schools are protected for future educational use in order to allow for expansion of these schools, if required, subject to site suitability.</u> Reserve lands to facilitate the delivery of new educational facilities, including extensions of existing schools in cooperation with the Department of Education.</p>	Consistent with P1: Facilitate a good standard of quality of life for all of the population of Limerick through ensuring high quality residential, recreational, educational and working environments.
5	<p>Change Objective Amend SCSi O9 as follows: c) <u>In order to ensure availability of educational provision to meet projected increased requirements arising from the consolidation and densification of development within the City Centre, all existing City Centre schools (and land buffers around them if available) should be protected so that they can be purposed to meet future educational requirements.</u> Support the provision of new City Centre schools, with a general presumption against the relocation of City schools away from the City Centre.</p>	Consistent with P1: Facilitate a good standard of quality of life for all of the population of Limerick through ensuring high quality residential, recreational, educational and working environments. The provision of educational facilities close to the population catchment minimises the need for travelling.
6	<p>Amend Objective SCSi O36 as follows: e) Ensure protection of water quality, in particular drinking water sources, with any proposed development.</p>	Consistent with W2 and helps safeguard water quality.
7	<p>Include a new objective in Section 9.14 as follows: <u>Objective SCSi XX Undertake a cultural audit and create a dynamic database and associated</u></p>	Consistent with P1: Facilitate a good standard of quality of life for all of the population of Limerick

	<u>map of existing and future locations and landmarks that incorporates or has the potential to incorporate cultural/creative arts.</u>	through ensuring high quality residential, recreational, educational and working environments.
8	Amend Objective SCSi O28 as follows: to include the word <u>support</u> ;	No effect
9	Include a new objective in Section 9.4 as follows: <u>Health Place Audits: It is an objective of the Council to support the creation of attractive, enterprise development friendly, liveable, well designed, high quality places that are home to a diverse enterprise base mix and integrated communities by using tools such as Health Place Audits to audit locations in meeting necessary conditions.</u>	Consistent with P1: Facilitate a good standard of quality of life for all of the population of Limerick through ensuring high quality residential, recreational, educational and working environments
10	Remove the following text from SCSi P2: Policy SCSi P2 Location of Community Facilities It is a policy of the Council to ensure that adequate provision is made in land use zoning, in the layout of developments and residential densities to ensure optimum accessibility to local community facilities and amenities, particularly by sustainable modes of transport and insofar as opportunities allow , that barriers to pedestrian access to such social infrastructure should be removed.	Consistent with P1: Facilitate a good standard of quality of life for all of the population of Limerick through ensuring high quality residential, recreational, educational and working environments
11	Amend Objective SCI O38 as follows: Objective SCSi O38 Public Rights of Way It is an objective of the Council to encourage the preservation of existing public rights of way within the plan area <u>It is an objective of the Council to examine the feasibility of identifying and mapping new public rights of way in the recreational and amenity area in Limerick in the context of emerging national guidance, within the lifetime of the Plan.</u>	Promotes open air activity and healthy recreation- all beneficial from the perspective of human health.

Chapter 11: Development Management Standards

No	Amendment	Response
1	<p>Change the Bicycle Parking Standards: To include minimum standards of 20-25% for all locations for employment uses.</p>	Ensures coherent development
2	<p>Amend Table DM 5 Design Guide for Service Stations – Retail Unit to clarify and to comply with the Retail Planning Guidelines and the Draft Retail Strategy as follows: Where applications are made for retail units associated with a petrol station, with a retail unit in excess of 100m², the sequential approach to retail development will apply.</p>	Ensures coherent development, manages retail outlets in line with strategy
3	<p>Amend Section 11.6.10 as follows: Pre-planning discussion with Irish Water is required..... Water mains shall be located under footpaths where possible. New connections to public water and wastewater networks are subject to Irish Water’s Connections Charging Policy and Standard Details and Codes of Practice. Adequate separation between all utility mains (water/gas/sewer/electricity etc.) as required by the relevant authority shall be provided. The inclusion of the following objective is suggested: To support Irish Water in the promotion of effective management of trade discharges to sewers in order to maximise the capacity of existing sewer networks and minimise detrimental impacts on sewage treatment works.</p>	Safeguards infrastructure.
4	<p>Amend Section 11.6.10 as follows: In assessing an application for development (whether for a new quarry or an extension to anwill be considered, together with the following: • Impact on water supply sources;</p>	Consistent with W2: Ensure that the requirements of the Water Framework Directive

		are incorporated into the plan.
5	<p>Update Section 11.6.10 to include reference to the Draft Policy Statement on Mineral Exploration and Mining in Ireland.</p> <p>Update Development Management standards, section 11.6.10 as follows:</p> <ul style="list-style-type: none"> • Description of development works including buildings, mine shafts, fixed and mobile plant, roads, fuel tanks, stockpiles, storage of soil, overburden and waste materials, settling ponds; • Estimated working life of quarry or mine, including phasing programme; • Water supply, de-watering and discharge requirements; <p>The Planning Authority will support the extractive and mineral extraction industry by issuing planning permission that extends over the estimated life of the quarry or mine. It will be necessary, however that the applicant sets out a phasing proposal for the development to assess the time-scale of the proposal. The Planning Authority will impose strict conditions on planning permissions relating to the appropriate mitigation measures to control the impacts on the environment and surrounding area. Limited duration on permissions may be issued by the Council to allow for re-evaluation of the development in light of unforeseen implications or changes in environmental standards and technology.</p> <p>A standard contribution and in certain circumstances, a special contribution under the Development Contribution Scheme and a financial bond will be required to ensure appropriate restoration and reinstatement works are undertaken within 12 months of the cessation of works. It is obligatory for new mining developments to obtain an Integrated Pollution Control Licence Industrial Emissions Licence from the EPA. All aspects of air and water pollution, noise and waste are covered by this single integrated licence. Refer to dcca.gov.ie/Minerals-Exploration-Mining.</p>	For clarity-mines had not been mentioned in the last plan and are now included together with guidance on their management.
6	<p>Update Section Section 11.7.2.1 to include the following:</p> <p>Amend text in Section 11.7.2.1 to the following:</p> <p>Turbines shall be no closer than 100m from the boundaries of adjacent properties without the written consent of the landowner in areas preferred for wind farm development. In areas open to consideration they shall be no closer than 150m from the boundary</p>	Ensures compliance with higher tier plan HTP1

	Appropriate setback distance shall be determined on a case-by-case basis in line with the WindEnergy Guidelines 2006 and any subsequent update.	
7	<p>Amend Section 11.3.11 to include: <u>Require green roofs for all roof areas for the following development types and encourage for all other types of development unless otherwise agreed with Limerick City and County Council's planning department:</u></p> <ul style="list-style-type: none"> - <u>Apartment Developments;</u> - <u>Employment Developments;</u> - <u>Retail Developments;</u> - <u>Leisure Facilities;</u> - <u>Education Facilities;</u> <p><u>All roofs of 300m² or greater to provide a minimum of 60% green roof coverage, unless exempted/ partially exempted;</u></p>	Contributes to SuDS
8	<p>Update Section 11.8.6 as follows: All new car parks (other than residential development) will provide the necessary wiring/ducting capable of accommodating electric vehicle charging points at a rate of 10% of the total car park spaces and to the requirements of the ESB Networks and IEC 61851 Standard for Electric Vehicles Conductive Charging Points. This will also apply to applications seeking extensions to existing car parks. In new residential developments, each dwelling will be provided with charging point infrastructure and all parking spaces in an apartment/ duplex complex will be provided with EV infrastructure by the developer.</p> <ul style="list-style-type: none"> • <u>Infrastructure for Electric Vehicles will be integrated into developments in line with national requirements;</u> • <u>New applications for non-residential developments are to provide for at least one recharging point and the installation of up to 10% of the total car parking spaces for EV recharging for developments consisting of more than 10 car parking spaces (or as required by national policy should such requirement specify a higher provision);</u> • <u>In all new residential developments and residential developments undergoing major renovations, a minimum of one car parking space per ten car parking spaces shall be equipped with one fully functional EV Charging Point. Where parking is provided within the curtilage of the dwelling, charging point infrastructure shall be provided to accommodate future charging points;</u> 	Integrates sustainable transport infrastructure

	<ul style="list-style-type: none"> The Council will liaise with other agencies to secure the <u>retrospective provision of EV recharging points within the public realm of settlements where appropriate</u> 	
9	<p>Update Section 11.7.2.2 Development Management Standards to seek a <u>decommissioning plan</u> rather than a decommissioning statement</p>	
10	<p>Amend Table DM 6 Development Management Standards as follows:</p> <p>Table DM6 Site Coverage and Plot Ratio <u>Site Coverage</u> On greenfield sites, the indicated site coverage is generally 40 – 50% flexibility in the development standards will be considered on a case by case basis, appropriate to the location, unless the design characteristics of the scheme, the site context, the proposed uses and the Mobility Management Plan. indicate the need for higher site coverage. In urban locations, in order to facilitate the development of a compact centre, a flexible design solution will be considered where a proposal fulfils objectives for compact growth and regeneration, while achieving a high level of design and amenity. a plot ratio and site coverage of 1:5 and 70% will generally be expected.</p>	<p>P1: Facilitate a good standard of quality of life for all of the population of Limerick through ensuring high quality residential, recreation al educationa l and working environme nt.</p>
11	<p>Amend Section 11.4.1.3 as follows:</p> <p>. Amend Section 11.4.1.3 as follows: In general, a minimum an appropriate separation distance of 22m is required between opposing windows in the case of apartments up to three storeys in height. <u>Discretion of this standard will be dependent on-site layout characteristics and flexibility may be employed where appropriate design can be adequately demonstrated</u></p>	<p>P1: Facilitate a good standard of quality of life for all of the population of Limerick through ensuring high quality residential, recreation</p>

		al educationa l and working environme nt.
1 2	<p>Amend Section 11.4.2:</p> <p>As per NPF National Policy Objective NPO13 the 2009 Sustainable Residential Guidelines, in the interest of residential amenity the following applies:</p> <ul style="list-style-type: none"> A minimum of 22m separation distance between directly opposing rear windows at first floor level in the case of detached, semi-detached and terraced units will be dependent on-site layout characteristics and flexibility may be employed where performance-based criteria can be adequately demonstrated. (For example, where a side garden of equal or greater dimensions can be substituted for rear garden space and where a situation of overlooking is demonstrably avoided). 	<p>P1:</p> <p>Facilitate a good standard of quality of life for all of the population of Limerick through ensuring high quality residential, recreational educational and working environment</p>
1 3	<p>Include a Development Management Standard 11.2.1 Design Criteria as follows:</p> <p>The following criteria will be taken into account when assessing applications:</p> <p><u>Consistency with Sustainable Residential Density Guidelines for Planning Authorities 2009 and any subsequent update thereafter</u></p>	<p>Consistent with P1:</p> <p>Facilitate a good standard of quality of life for all of the population of Limerick through ensuring high quality residential,</p>

		recreational educational and working environments.
14	Amend Section 11.3.5 Roads, Footpaths, Water Services and Landscaping to include the 2020 DMURS Interim Advice Note – Covid-19 Pandemic Response	Noted.
15	Insert reference to Whole of Government’ National Disability Inclusion Strategy (NDIS) 2017-2022 in Chapter 11 Section 11.3.5 Roads, Footpaths, Water Services and Landscaping and Section 11.8.1 Access to Roads, Traffic and Transport Assessments (TTAs) and Road Safety Audits (RSAs)	Consistent with P1: Facilitate a good standard of quality of life for all of population of Limerick through ensuring high quality residential, recreational educational and working environments.
16	Amend Section 11.9.5 first line to include reference to Motorhome/Caravan parking (Aires) .	No effects
17	Insert additional text into Section 11.6.3 Petrol Stations Table DM 5 in relation to the provision of off-line motorway service areas at national road junctions including road side service facilities on non-motorway national roads and their junctions as per Section 2.8 of the Spatial Planning & National Road Guidelines for Planning Authorities	Ensures compliance with higher tier plans

	<u>'The provision of off-line motorway service areas at national road junction and road side service facilities on non-motorway national roads and junctions shall have regard to Section 2.8 of the DoECLG Spatial Planning and National Road Guidelines and the TII Policy on Service Areas';</u>	
1 8	Update the text under Section 11.7.2.2 from 'Glint and Glare impacts on roads and other sensitive receptors' to <u>'Glint and Glare Assessments on roads including in the vicinity of the strategic national road network, and other sensitive receptors.</u>	Ensures public safety
1 9	<p>Amend Table DM 8(b) Parking Standards as follows:</p> <p>Parking requirements may be relaxed in exceptional circumstances. <u>Car free developments will be considered for all proposals in Zone 1 on a case-by-case basis. In some limited circumstances, a higher or lesser standard may be appropriate. Proposals for the provision of car parking for residential development at a reduced rate to the maximum standards will be considered where the Planning Authority are satisfied that good public transport links are already available or planned.</u> The developer will submit a Justification Assessment in the Mobility Management Plan providing the rationale for the deviation from the parking standards above and of national planning guidance for their proposed development. Applicants are advised to avail of pre-planning consultations with the Planning Authority prior to submitting planning applications.</p> <p>Exceptional circumstances may include:</p> <ul style="list-style-type: none"> • Limited/Restricted site area - Site size whereby refurbishment on sites of any size or urban infill schemes on sites of up to 0.25ha, car parking provision may be relaxed in part or whole, on a case-by-case basis, subject to overall design quality and location; • Proximity to public transport service; • Sustainable travel infrastructure supported by a Mobility Management Plan; • Availability of car sharing and bike/e-bike sharing facilities on-site and in the vicinity; • Existing car parking in the vicinity, including on street and the potential for dual use subject to agreement and management details; • Impact on traffic safety and the capacity of the road network; • Urban design, regeneration and civic benefits of the proposal including enhancement of public realm 	Consistent with P1: Facilitate a good standard of quality of life for all of the population of Limerick through ensuring high quality residential, recreational and working environments.

	Amend the Bicycle Parking Standards to include an increase to the minimum standards set for locations for employment uses. This has been increased to 25-20% for all locations for employment uses.	
20	Update Table DM8 Car and Bicycling Standards (a)	See above.
21	<p>Amend Section 11.4.1.3 as follows:</p> <p>In general, a minimum separation distance of 22m is required between opposing windows in the case of apartments up to three storeys in height. Discretion of this standard will be dependent on-site layout characteristics and flexibility may be employed where performance-based criteria can be adequately demonstrated.</p>	Consistent with P1: Facilitate a good standard of quality of life for all of the population of Limerick through ensuring high quality residential, recreational and educational and working environment
21	<p>Amend Section 11.4.2:</p> <p>As per NPF National Policy Objective NPO13 the 2009 Sustainable Residential Guidelines, in the interest of residential amenity the following applies:</p> <ul style="list-style-type: none"> A minimum of 22m separation distance between directly opposing rear windows at first floor level in the case of detached, semi-detached and terraced units will be dependent on-site layout characteristics and flexibility may be employed where performance-based criteria can be adequately demonstrated. (For example, where a side garden of equal or greater dimensions can be substituted for rear garden space and where a situation of overlooking is demonstrably avoided). 	See above

2	<p>Include a Development Management Standard 11.2.1 Design Criteria as follows:</p> <p>The following criteria will be taken into account when assessing applications:</p> <p><u>Consistency with Sustainable Residential Density Guidelines for Planning Authorities 2009 and any subsequent update thereafter</u></p>	Ensures compliance with higher tier guidance
2 4	<p>Amend text in Section 11.7.21 to the following:</p> <p>Turbines shall be no closer than 100m from the boundaries of adjacent properties without the written consent of the landowner in areas preferred for wind farm development. In areas open to consideration they shall be no closer than 150m from the boundary</p> <p><u>Appropriate setback distance shall be applied on a case-by-case basis in line with the Draft Revised Wind Energy Guidelines 2019 and the DCCAE Code of Practice for Wind Energy Development.</u></p>	Ensures compliance with higher tier guidance.
2 5	<p>Amend first two paragraphs in section 11.4.1 Serviced Sites as follows:</p> <p>Serviced sites refer to a number of individual residential plots <u>typically, of the order of 0.1HA</u> of not less than 0.1 ha with access to services such as utility connections, paths, lighting and within walkable distance of town or village centres, close to the urban core. Serviced sites offer an alternative to the single one-off rural house, to self-build according to one’s own design, but located in a town or village. The density is generally 10 housing units per hectare.</p> <p>It is desirable that serviced sites of not less than 0.10 ha. (0.25 acres) are provided on this land, except in exceptional circumstances. Larger sites may be required for housing with a floor area exceeding 250sqm to allow sufficient space for private amenity space, parking and landscaping.</p> <p><u>There is no additional wastewater treatment capacity in a number of settlements in County Limerick. Where there are no plans to upgrade the wastewater treatment plants in the Irish Water Investment Plan, current at the time of making an application, the Council will allow developments of multiple units where each house is served by individual on-site waste water treatment systems (OSWWTS). However, a technical assessment will be required to demonstrate that such developments pose no risk of pollution or nuisance, either individually or cumulatively. The assessment of discharges to groundwater should be risk-based and receptor-focused and undertaken in accordance with <i>Guidance on the Authorisation of Discharges to Groundwater (EPA 2011)</i>. The level of the assessment should be proportionate to the risk posed by the discharge.</u></p>	Safeguards water quality and promotes compact development by offering an alternative to one off housing.

	<p><u>Under no circumstances will discharges to surface water from such developments be permitted. At the time of construction, provision must be made for the houses to tie into the public sewerage system once capacity is available. The necessary pipe work must be clearly indicated on the planning drawings. Once connected, the individual system should be decommissioned.</u></p>				
<p>2 6</p>	<p>Add the following text and table under a new Section 11.1.3 Building Heights: <u>All new developments in the City shall comply with the guidance set out in the Building Heights Strategy,</u></p>				<p>Ensures coherent development of higher buildings</p>
<p><u>Character Area</u></p>	<p><u>Area Objectives</u></p>	<p><u>Tall Building Recommendations</u></p>	<p><u>Criteria for consideration from the Building Heights Guidelines, 2018 and Development Management Guidance</u></p>		
<p><u>Newtown Pery:</u> This area lies within the Inner City Core Area as defined in Section 5. The distinct qualities of the area are well established and the need to preserve the Georgian fabric, as well as the</p>	<p><u>1.</u> In areas where there is a classical and reasonably consistent parapet /shoulder height, any new interventions to the front of buildings, on street elevation, should respect this height and within reason, match the parapet /shoulder height of the existing street. It is possible that after the parapet /shoulder height, investigations as to roof profiles and</p>	<p>Through the application of the modifiers (pg.140 BHS), a ‘taller or landmark building’ as defined in the ‘Tall Building Classifications’ , may be appropriate; Additional height may be permitted on streets where there is a mix of building heights</p>	<p><u>Makes a positive contribution to the urban neighbourhood:</u> Building heights should reinforce the distinct character of the area and the reuse of buildings, specifically historic buildings. <u>Responds to its built</u></p>		

	<p><u>complex elements which contribute to the character of the built environment of Newtown Pery, is understood</u></p> <p><u>Important vertical landmarks that are of key and local significance which should be protected by future development include: Tait's Clock; People's Park, Rice's Memorial; and St. John's Cathedral.</u></p>	<p><u>set-backs are possible subject to good design, high quality materials and overall townscape considerations.</u></p> <p><u>There are opportunities for additional height positioned within the city block where this does not negatively impact on the overall streetscape. The above will preserve and conserve the overall fabric of more classical streets.</u></p> <p><u>2. Streets where there is a mix of building heights resulting in the variation of the topography of the skyline can incorporate areas of height which accentuates and improves the existing elevation. These locations may also incorporate areas of height located</u></p>	<p><u>provided the building responds to the essential character and general scale of existing buildings and/or it accentuates and improves the existing elevation. This also applies to building within the inner block in such areas; and</u></p> <p><u>The application of the modifiers to provide a 'landmark building' would be limited to one standout building of exceptional architectural quality.</u></p>	<p><u>environment & streetscape:</u> <u>Newtown Pery has a very regular street grid and sense of building scale which should be respected. Any minor additions to typical building scale should be appropriately designed and set back on upper floors.</u></p> <p><u>Materials / building fabric well Considered:</u> <u>The strong continuity of building materials - stone and stucco ground floors and brick upper storeys - and the characteristic Georgian fenestration patterns should be acknowledge</u></p>	
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		<p><u>within the inner block.</u></p>		<p><u>d in new development</u></p> <p><u>Sense of scale and enclosure of public spaces, thoroughfares and waterfronts:</u> <u>Newtown Pery's street grid and scale set up a strong sense of scale and enclosure that should be augmented, not challenged by new development</u></p> <p>-</p> <p><u>Contribution to legibility and cohesiveness</u> <u>: The very strength and orientation of the current street grid can inhibit wayfinding through the wider City.</u> <u>New development</u></p>	
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				<p><u>should relate to the adjacent contextual height, although there may be opportunities to utilise building height, if appropriately set-back and designed, to emphasis particular places or buildings within the area.</u></p> <p><u>Positively contributes to the mix of uses in the neighbourhood:</u> <u>The commercial and residential functions of the area should be strengthened by increasing its desirability. Development should contribute to streetscaping and deliver</u></p>	
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				<p><u>building renovation.</u></p> <p><u>Contributes to the building/dwelling typologies in the area:</u></p> <p><u>New development in this area should be designed to emphasis and consolidate the area's existing character.</u></p>	
	<p><u>English Town:</u> <u>The urban grain is very diverse in this area. The nature of the streets of English Town is predominantly no more than 2 storeys, the main features of height being the historical buildings, in particular King John's</u></p>	<p><u>1. New buildings within the English Town Character Area must respect the existing grain of the area and respond closely to the essential character and general scale of the streets, in particular where development potential lies within smaller infill sites;</u></p> <p><u>2. Building development must not impinge on the overall height markers, existing key and local</u></p>	<p><u>Through the application of the modifiers (pg. 148 BHS), which may allow for increased height in certain limited circumstances, a 'taller building' as defined in the 'Tall Building Classifications' , may be appropriate.</u></p>	<p><u>Makes a positive contribution to the urban neighbourhood:</u></p> <p><u>Building height should respect the areas character that is strongly established by the medieval King John's Castle and St. Mary's cathedral.</u></p> <p><u>Responds to its built</u></p>	

	<p><u>Castle and St. Mary's Cathedral.</u> There are some street corners which rise slightly in height but usually no more than 3/4 storeys.</p> <p>Unlike other areas of the City there are few gaps within the elevation of the streetscape, with the exception of some smaller opportunity sites dotted throughout the area and a couple of larger opportunity sites which are located at the northern point along Island Road.</p>	<p><u>landmark buildings in order to prevent development which would obstruct views of them;</u></p> <p><u>3. New buildings should normally be low profile and in the range of 2-4 storeys unless there is a high quality townscape/placement argument;</u> and</p> <p><u>4. New buildings must also respond with care to the width of the streets in the English Town area which are characteristically more narrow than other parts of the City.</u></p>		<p><u>environment & streetscape:</u> The narrow streets and irregular grid should be respected, with typical building heights of 2 - 4 storeys.</p> <p><u>Materials / building fabric well Considered:</u> Use of traditional materials - stone, stucco, brick - should be acknowledged.</p> <p><u>Sense of scale and enclosure of public spaces, thoroughfares and waterfronts:</u> The general low scale of the area, with clear prominence of the Castle, its walls, and the Cathedral</p>	
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	<p><u>Important vertical landmarks of key and local significance which should be protected by future development include: King John's Castle; Bishops Palace; City Hall; and St. Mary's Cathedral.</u></p>			<p><u>and the narrow winding street pattern does not encourage larger scale development</u></p> <p>:</p> <p><u>Contribution to legibility and cohesiveness</u> <u>: The areas strong legibility and character provided by historic buildings and street pattern should be respected and reinforced.</u></p> <p><u>Positively contributes to the mix of uses in the neighbourhood</u> <u>: The low-scale mix of shopping and residential should be reinforced.</u></p>	
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				<p><u>Contributes to the building/dwelling typologies in the area:</u> <u>There is no significant change to the existing building or dwelling typologies required. Positive additions are to be encouraged.</u></p>	
	<p><u>Irish Town:</u> <u>This area is located within the Inner City Core. This area has a medieval style system of streets which, along with a lack of permeability, makes it difficult to navigate and orientate oneself within the area. The scale of buildings in</u></p>	<p><u>1. Any buildings of height in this area should aim towards finishing off previously established block structures to make them more legible;</u></p> <p><u>2. Any development of additional height, be it structure, art or building should seek to contribute to place making;</u></p> <p><u>3. Due to the mixed nature of the urban fabric within Irish Town, development in this area will have to be thoroughly</u></p>	<p><u>Through the application of the modifiers (pg. 156 BHS), a ‘taller or landmark building’ as defined in the ‘Tall Building Classifications’ , may be appropriate.</u></p>	<p><u>Makes a positive contribution to the urban neighbourhood:</u> <u>Irish Town is an interesting mix of building uses and types, all within a general scale of 2 - 7 storeys that should be augmented with new mixed-use development of a comparable scale.</u></p>	

	<p><u>this area varies from 2/3 storeys up to a 7 storey car park. There are a number of opportunity sites located within the area, which will require a case by case assessment due to the varying height and block structure. It is important when considering development in this area to keep in mind that connectivity is necessary for a city, in providing an easily navigable and functional space for people to live and work.</u></p>	<p><u>assessed on a case by case basis;</u></p> <p><u>4. New buildings in Irish Town should respond to the essential character and general scale of existing buildings and streets;</u></p> <p><u>5. Where appropriate an increase in building height to corners and a decrease in building height adjoining or adjacent to key and local landmark buildings will be required; and</u></p> <p><u>6. Assessment of any proposed buildings by a verified view analysis and a landscape and visual impact assessment will be required, notwithstanding contemporary buildings of outstanding quality which could provide new landmarks in and of themselves and should be</u></p>		<p><u>Responds to its built environment & streetscape:</u> <u>The current mix of buildings sets no consistent streetscape character, a confusion that adds to its character and this should be respected.</u></p> <p><u>Materials / building fabric well Considered:</u> <u>Existing buildings vary greatly in style and materiality, but are typically characterised by more detailed and articulated facades. This should be acknowledged.</u></p> <p><u>Sense of scale and enclosure of public</u></p>	
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	<p><u>New buildings or building alterations within this area need to respond carefully to the local area landmarks, namely the Milk Market and St. John's Cathedral. The Irish Town area has an unfinished nature to it, as development has had so many different approaches, in terms of a mixture of typologies within the street elevation as well as variation in building height. The lack of finished block structures results in</u></p>	<p><u>welcomed from a place making point of view.</u></p>		<p><u>spaces, thoroughfares and waterfronts:</u> Irish Town has a tight street scale and irregular street pattern that add to the sense of place and this should be respected by proposals.</p> <p><u>Contribution to legibility and cohesiveness:</u> Building height within properly located new development could add to the legibility and wayfinding of the area.</p> <p><u>Positively contributes to the mix of uses in the neighbourhood:</u> Irish Town has a rich mix of unique destination</p>	
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	<p><u>the legibility of the area becoming unclear. The block structure is not readable as many of the corner buildings are missing or not a large enough scale to impact on the overall formation of the block. Therefore, there is an opportunity in this area to try establish an overall structure of height that responds closely to the general scale of existing buildings and streets. Important vertical landmarks of key and local significance</u></p>			<p><u>uses that could be added to by new developments.</u></p> <p><u>Contributes to the building/ dwelling typologies in the area: The mix of building typologies is already rich and new uses and activities should be encouraged.</u></p>	
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	<p><u>which should be protected by future development include:</u></p> <ul style="list-style-type: none"> • <u>The Milk Market;</u> • <u>St. John's Cathedral;</u> • <u>St. Michael's Church; and</u> • <u>John's Square.</u> 				
	<p><u>Transition Area:</u> The area south of English Town and west of Irish Town serves as a transitional area between Irish Town and Newtown Pery. This area borders one of the main entrance points to the City and is</p>	<p>1. <u>New high buildings in this area should define a new and changing urban form while also responding closely to the general scale of existing buildings; and</u></p> <p>2. <u>Continuous high building frontage should be avoided with adequate distances maintained between buildings.</u></p>	<p><u>Through the application of the modifiers (pg. 162), a 'taller or landmark building' as defined in the 'Tall Building Classifications' , may be appropriate.</u></p>	<p><u>Makes a positive contribution to the urban neighbourhood:</u> Given the lack of urban structure in this area, building height, to an appropriate scale in its context, presents an opportunity to define this neighbourhood.</p>	

	<p>comprised largely of the Opera Square project which has begun construction. A number of more complex sites exist in the Transition Area, where the context provides no clear direction for height and massing. These sites should be the subject of individual urban design studies to provide a framework for development.</p>			<p>Responds to its built environment & streetscape: The Transition Area is an interesting mix of building types and variety of functions, with a general scale of 2 - 5 storeys that should be augmented with development, generally of a comparable scale.</p> <p>Materials / building fabric well Considered: The design of new buildings should acknowledge the character of the built environment and the variety in style and materiality.</p>	
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				<p><u>Sense of scale and enclosure of public spaces, thoroughfares and waterfronts:</u> <u>Building height should complement the natural features that already give this area a sense of enclosure, e.g. the Abbey River, and enhance this through the reinstatement of the street edge where required.</u></p> <p><u>Contribution to legibility and cohesiveness:</u> <u>Building height within properly located new development could emphasis particular places and add to the legibility and</u></p>	
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				<p><u>wayfinding of the area.</u></p> <p><u>Positively contributes to the mix of uses in the neighbourhood:</u> New development in this area should seek to deliver a mix of uses. Development s should also contribute to delivering building renovation and reuse.</p> <p><u>Contributes to the building/ dwelling typologies in the area:</u> There is already a rich mix of building typologies in this area that should be supported and enhanced by new development s.</p>	
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	<p><u>The Quays:</u> <u>The existing movement strategy of the City results in a waterfront that is isolated from the rest of the City.</u> <u>Currently areas of height are primarily focused to key junctions and crossing points, which should be maintained. Visibility of the waterfront from the inner city commercial centre is poor. Creating a visual connection to the Quays may be required in order to activate the waterfront</u></p>	<p><u>1. Modulation in parapet height along the Quays, that responds to its context, its distinctive position on the River Shannon and acknowledges the importance of this area is required;</u></p> <p><u>2. The development of buildings of height should consider the impact of the overall River Shannon, an assessment of building impact on key views should be conducted by verified views along the River Shannon;</u></p> <p><u>3. Existing landmark buildings should be protected by controlling the height of buildings adjoining and adjacent buildings while also preventing development which would undermine the quality of views to them; and</u></p>	<p><u>‘Taller, landmark and gateway buildings’ as defined in the ‘Tall Building Classifications’ , are appropriate;</u> <u>Height will be encouraged where delivered through excellent design and that achieves a high quality townscape and placemaking;</u> <u>Taller buildings within a cluster of varying height that relate to each other and their surrounding urban context in terms of street layout, massing and design are encouraged; and</u> <u>This area should deliver a gateway building(s) given its</u></p>	<p><u>Makes a positive contribution to the urban neighbourhood:</u> <u>The run of taller buildings along the quayside bank of the Shannon has become one of the signature views of the City. New development should strengthen this through appropriate building heights</u></p> <p><u>Responds to its built environment & streetscape:</u> <u>New development of comparable scale would be appropriate to reinforce the existing viewscape.</u></p>	
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	<p>as a public realm. A “ World Class Waterfront ” is part of the Limerick 2030 Economic and Spatial Plan, which includes a new river walk along the quayside. A fundamental element required, where areas of height are proposed, is accessibility to amenities. The proposed activation of the Quays would act as a starting point in the development of areas of height as more amenities are provided.</p>	<p>4. Where appropriate, an increase in building scale at bridges may be required to improve the legibility of entrance points, draw people down to the Quays and to enhance the sense of place.</p>	<p>significance as a shopfront to the City.</p>	<p>Materials / building fabric well Considered: Attention should be paid to patterns of roofline, fenestration and street-level design to contribute to the wider street and skyline. Sense of scale and enclosure of public spaces, thoroughfares and waterfronts: While the existing scale of up to 18 storeys of quayside buildings is appropriate for new additions, consideration should be given to a taller, or potentially uniquely designed, structure at</p>	
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				<p><u>the northern end of the Quay, to mark this significant location.</u></p> <p><u>Contribution to legibility and cohesiveness</u> <u>: The run of taller buildings along the Shannon provides an important legibility to the City's overall urban structure. Attention should be paid to enhancing views of these buildings from the rest of the City to assist in wayfinding.</u></p> <p><u>Positively contributes to the mix of uses in the neighbourhood:</u> <u>The Quays is an important</u></p>	
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				<p><u>destination for tourists and visitors and can accommodate hotels and other such facilities, as well as providing signature locations for important public buildings.</u></p> <p><u>Contributes to the building/dwelling typologies in the area:</u> <u>Additions to the existing mix of building typologies should consider the opportunity to deliver a cluster of varying height.</u></p>	
	<p><u>Colbert Quarter:</u> <u>Colbert Station is an important entrance</u></p>	<p><u>1. A strong placemaking piece is required within this area, whether it be art or building in order to enhance</u></p>	<p><u>Subject to the Framework Plan, ‘taller, landmark and gateway buildings’ as</u></p>	<p><u>Makes a positive contribution to the urban neighbourhood:</u></p>	

	<p><u>node of the City. Development of a new neighbourhood at the Colbert Quarter must refer to the Limerick 2030 Plan, whereby the main concept is integrated place making, with compact, dense, sustainable urban design. A clear urban structure is required for this area as it is of key strategic importance for the development of the City.</u></p>	<p><u>the legibility of the area and highlight a sense of place; and</u></p> <p><u>2. Any proposal for this 69 hectare site should include a marker building of height, whereas the rest of the future development should be cognisant of the essential character and general scale of existing buildings and streets.</u></p>	<p><u>defined in the ‘Tall Building Classifications’ , are appropriate;</u></p> <p><u>This site should facilitate a gateway building given its significance and scale;</u></p> <p><u>The delivery of a ‘City Landmark Building’ as defined in the ‘Tall Building Classifications’ , subject to the Framework Plan, should be encouraged;</u></p> <p><u>Height/areas of height will be encouraged, in line with the Framework Plan, where delivered through excellent design and that achieves a high quality townscape and placemaking; and</u></p>	<p><u>The development of the Colbert Quarter lands is a major city-making opportunity that should be used to provide a wide range of building types and heights and cityscape opportunities .</u></p> <p><u>Responds to its built environment & streetscape:</u> <u>Other than the strategically located station building, the existing area and context provide little guidance on street layout, massing and character, providing a great new city building opportunity.</u></p>	
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			<p><u>Taller buildings within a cluster of varying height that relate to each other and their surrounding urban context in terms of street layout, massing and design are encouraged.</u></p>	<p><u>Materials / building fabric well Considered:</u> <u>Limited guidance is provided by the area context, other than the need to complete and enhance the station square.</u></p> <p><u>Sense of scale and enclosure of public spaces, thoroughfares and waterfronts:</u> <u>A unique opportunity exists, potentially for a site adjacent to the station, to accommodate a taller building visible at the city-scale and that would deliver a sense of scale.</u></p>	
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				<p><u>Contribution to legibility and cohesiveness</u> <u>: The station is an important destination in the City and will become the ‘front door’ of a large new city district on the rail lands. New development should provide that city-scale legibility.</u></p> <p><u>Positively contributes to the mix of uses in the neighbourhood:</u> <u>The Colbert Quarter site is large enough to accommodate a wide range of uses. In addition to the residential opportunity, the potential exists to accommodat</u></p>	
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				<p><u>e major educational, cultural or other destination institutions, as well as new shopping activity.</u></p> <p><u>Contributes to the building/dwelling typologies in the area:</u> <u>Contributing to the building/dwelling typologies in this area is not applicable given the nature of the Colbert Quarter Area. However, consideration should be given to providing for taller buildings within a cluster of varying height.</u></p>	
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	<p>Cleeves site: The Cleeves site is located at a major crossing point on the River Shannon. It is a significant site for increased height due to this position at an important crossing point at the base of the Shannon Bridge.</p> <p>Due to its location within the wider City context, on approach to Limerick City from Shannon airport, a building of significant height has the ability to enhance the legibility and sense of place</p>	<p>1. Height should be considered on the impact of the overall River Shannon and height must also be assessed by verified views along the River Shannon;</p> <p>2. New buildings should have appropriate scaling to the existing houses, with a balance of height and economic use taken into account;</p> <p>3. The fabric of the area as well as the complex elements that contribute to the character of the site need to be protected;</p> <p>4. It is recognised that there may be an impact on neighbouring residential buildings as the height is generally lowline in the surrounding area. However, there is a high quality townscape and placemaking argument which</p>	<p>Subject to a Masterplan, 'taller, landmark, gateway and city landmark buildings' as defined in the 'Tall Building Classifications' are appropriate;</p> <p>Height/areas of height will be encouraged, in line with the Masterplan, where delivered through excellent design and that achieves a high quality townscape and placemaking;</p> <p>Taller buildings within a cluster of varying height that relate to each other and their surrounding urban context in terms of street layout, massing and design are encouraged;</p>	<p>Makes a positive contribution to the urban neighbourhood:</p> <p>The Cleeves site is the only major development opportunity on the right bank of the Shannon. It should take its essential character as a gateway and vista of and from the City.</p> <p>Responds to its built environment & streetscape:</p> <p>The existing uses and context provide limited guidance, beyond the significant scale and massing of the industrial buildings and chimney.</p> <p>Materials / building</p>	
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	<p><u>within this area. The site is also large enough to house a coherent cluster of new buildings, given its location and the existing presence of the very prominent chimney stack.</u></p>	<p><u>can be deemed appropriate for an area of height due to the nature of the site; and</u></p> <p><u>5. The development of this area requires the implementation of a strategic masterplan that allocates areas of height in a careful manner, while responding to existing guidance within the Limerick 2030 Plan.</u></p>	<p><u>This site should facilitate a gateway building given its significant location; and</u></p> <p><u>This site could facilitate a city landmark that isn't a building, such as a significant art piece.</u></p>	<p><u>fabric well</u> <u>Considered:</u> <u>The design of new buildings should acknowledge the industrial heritage of the built environment and traditional materials where appropriate.</u></p> <p><u>Sense of scale and enclosure of public spaces, thoroughfares and waterfronts:</u> <u>The surrounding context provides little guidance as to scale and height, but the unique locational and prominence of existing site buildings suggest a unique opportunity for a taller building,</u></p>	
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				<p><u>providing views of and from the City.</u></p> <p><u>Contribution to legibility and cohesiveness</u> : The presence of a taller building in this area could help frame the River and the pattern of taller buildings along the Quays.</p> <p><u>Positively contributes to the mix of uses in the neighbourhood:</u> The site has considerable and attractive mixed-use potential.</p> <p><u>Contributes to the building/dwelling typologies in the area:</u> Contributing to the</p>	
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				<p><u>building/dwelling typologies in this area is not applicable given the nature of the Cleeves site. However, consideration should be given to providing for taller buildings within a cluster of varying height.</u></p>	
	<p><u>The Docklands: The Docklands Area is of key strategic importance for the development of the City, due to its location at one of the major entrance points to the City. A clear urban structure in</u></p>	<p><u>1. The development of this area requires the implementation of a strategic masterplan that allocates areas of height in a careful manner, which also responds to the Docklands Framework which has already been set in place;</u></p> <p><u>2. New high buildings in the docklands area should define a</u></p>	<p><u>Subject to a Masterplan, 'taller, landmark and gateway buildings' as defined in the 'Tall Building Classifications', are appropriate;</u></p> <p><u>This site should facilitate a gateway building given its significant location;</u></p>	<p><u>Makes a positive contribution to the urban neighbourhood: The Docklands area is a major city building opportunity with a large site likely to be developed over a considerable time period. The development</u></p>	

	<p><u>the form of a docklands area masterplan is required for this area.</u> <u>The legacy of the industrial and trading character of the waterfront of Limerick City has gradually declined in use and a re-activation of this area is required.</u> <u>Most of the Docklands Area is comprised of low-rise warehouses and storage buildings with the exception of the 10 storey Ranks Silo which is considerably lower than the neighbourin</u></p>	<p><u>new and changing urban form; and</u> <u>3. Existing local and key landmark buildings, such as the Ranks Silo, the Dock Clock and Bannatyne Mill, should be protected by controlling the building height of new adjoining and adjacent buildings.</u></p>	<p><u>This site can be considered appropriate for a ‘City Landmark Building’ as defined in the ‘Tall Building Classifications’ , subject to a Masterplan;</u> <u>Height/areas of height will be encouraged, in line with the Masterplan, where delivered through excellent design, achieves a high quality townscape and delivers placemaking; and</u> <u>Taller buildings within a cluster of varying height that relate to each other and their surrounding urban context in terms of street layout, massing and</u></p>	<p><u>presents the opportunity to establish a new city district.</u> <u>Responds to its built environment & streetscape:</u> <u>The Docklands has a strong physical character established by the river and the docks, and some heritage buildings, that should be maintained, even as its use character changes completely.</u> <u>Materials / building fabric well Considered:</u> <u>Limited guidance is provided by the area’s built context, but the presence of</u></p>	
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	<p><u>g Clayton Hotel.</u></p> <p><u>As highlighted in the Docklands Framework, the uses must reflect urban philosophy, including economic, social and cultural activities. Therefore, it is vitally important that if areas of height are to be situated in this location, careful consideration towards multi-functionality through considerate design must be implemented.</u></p>		<p><u>design are encouraged.</u></p>	<p><u>strong water and dock features should be highlighted.</u></p> <p><u>Sense of scale and enclosure of public spaces, thoroughfares and waterfronts:</u></p> <p><u>A unique opportunity exists for a site closest to the existing city fabric to accommodate a taller building visible at the city-scale.</u></p> <p><u>Contribution to legibility and cohesiveness:</u></p> <p><u>The Docklands should be developed as an extension of the City, with new building at the interface providing city-scale address.</u></p>	
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				<p><u>Positively contributes to the mix of uses in the neighbourhood:</u> The Docklands site is large enough to accommodate a wide range of uses. In addition to the residential opportunity, the potential exists to accommodate a major educational, cultural or other destination institution, as well as new employment activity.</p> <p><u>Contributes to the building/dwelling typologies in the area:</u> Contributing to the building/dwelling typologies in this area is</p>	
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				<u>not applicable given the nature of the Docklands. However, consideration should be given to providing for taller buildings within a cluster of varying height.</u>	
2 7	Remove the following text from Section 11.8.3 as follows: Parking for cars and bicycles will be provided at a minimum in accordance with DM Table 8a/8b below				Ensures coherent development

Chapter 12 Land Use zoning Strategy

No	Amendment	Response
1	Include definition for Residential Institution as follows: <u>The use of a building or land as a convent, monastery, hostel, or home for older persons.</u>	For the purposes of clarity.
2	Amend the purpose of the 'Education and Community Infrastructure' zoning objective as follows: This land use will provide for community facilities, healthcare services, childcare, religious, social and civic infrastructure, ancillary purpose-built accommodation <u>such as residential care or institutions to support the main use only</u> , and other facilities.	Consistent with P1: Facilitate a good standard of quality of life for all of the population of Limerick through ensuring high quality residential,

		recreational, educational and working environments.
3	<p>Amend the zoning matrix table and add a new footnote to state that:</p> <p><u>Nursing Home/ Retirement Village are uses which are “Generally Not Permitted” in the Education and Community Infrastructure zone, “except at Milford Care Centre and Little Company of Mary Milford, where Nursing Homes are “Open for Consideration”.</u></p>	Satisfies need for specialized facilities at specific locations.
4	<p>Change the Zoning Matrix to include in the Sports Arena zone:</p> <ul style="list-style-type: none"> -Fast Food Outlet/ Take Away -Offices -Public House -Restaurant/Cafe -Retail Convenience </150m2 nfa. <p>As uses which are “Generally Permitted” with the caveat “Ancillary to the Primary Use Only”.</p>	Allows wider range of uses at public amenity which may increase its utility for Limerick as a whole.
5	<p>Amend the Land Use Zoning Matrix:</p> <p>To include purpose-built Student Accommodation as a separate use “Generally Permitted” in the City Centre, Town Centre, District Centre, Local/ Neighbourhood Centre, Existing Residential, New Residential and Mixed-Use zones, and “Generally Permitted” “Ancillary to the primary use only” in the Education and Community Infrastructure and University zones.</p>	Could help revitalize areas currently underused with beneficial effects
6	<p>Change the purpose of the Special Control Area as follows:</p> <p>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, <u>and in the case of Mungret, to protect</u></p>	Consistent with C1 : Protect and conserve features of archaeological heritage and their setting

	<u>views from the monastic complex/deserted settlement.</u>	
7	<p>Amend the University Zoning Purpose as follows:</p> <p>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. <u>General Office, Business and Enterprise uses may be considered on a limited basis on lands not within the ownership or for the benefit of the University.</u></p>	<p>Consistent with P1:</p> <p>Facilitate a good standard of quality of life for all of the population of Limerick through ensuring high quality residential, recreational, educational and working environment</p>
8	<p>Amend the Land Use Zoning Objectives in Chapter 12 Land Use Zoning Strategy to include a Data Centre Land Use Zoning as follows:</p> <p><u>Objective: To accommodate the provision of a Data Centre on the lands identified at Rosbrien and othe appropriately zoned lands.</u></p> <p><u>Purpose: To enable the development of a data centre campus consisting of multiple structures and associated power generating infrastructure as necessary, subject to compliance with all relevant planning criteria. Any proposed development shall adopt sustainable practices in terms of building design, materials, construction and operation. Any planning application shall include a landscaping plan incorporating dense trees to the site boundaries.</u></p>	<p>Located within development boundaries. The inclusion of a renewable energy component is noted, perhaps made necessary by the large energy requirement of such developments.</p>
9	<p>Amend the Land Use Zoning Matrix (Section 12.4) to state:</p> <p>that residential use is permissible in ‘Education and Community Infrastructure’ zones subject to Footnote 9 “Subject to compliance with the Rural Housing Policy <u>Footnote 8 “Purpose built student/ancillary accommodation only”</u></p>	<p>Could help revitalize areas currently underused with beneficial effects</p>

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Chapter 13: Implementation and Monitoring

No	Amendment	Response
1	Insert new Chapter 13 to include further details on Monitoring and Implementation in line with the recommendation of the OPR, which will address targets and metrics, which will be monitored over the lifetime of the Plan	This is also consistent with SEA guidance the new Draft Development Plan guidance and EPA guidelines

Additional notes: there have been additional changes to the other volumes but all are a follow on to the submissions outlined earlier in the Chief Executive's report and in the material alterations presented under the chapter headings above. These include additions/deletions to the list of protected structures, which were assessed by the Conservation Officer.

These also include changes to zoning maps, following from amendments outlined above. From the point of view of the Rural Settlement strategy map there has been changes in that a total of 13 Electoral Divisions have been altered from Rural Elsewhere/Structurally weak to Areas of Strong Urban Influence. This has been based on population analysis and shows that there has been population increases in these EDS. The change is consistent with higher tier guidance.

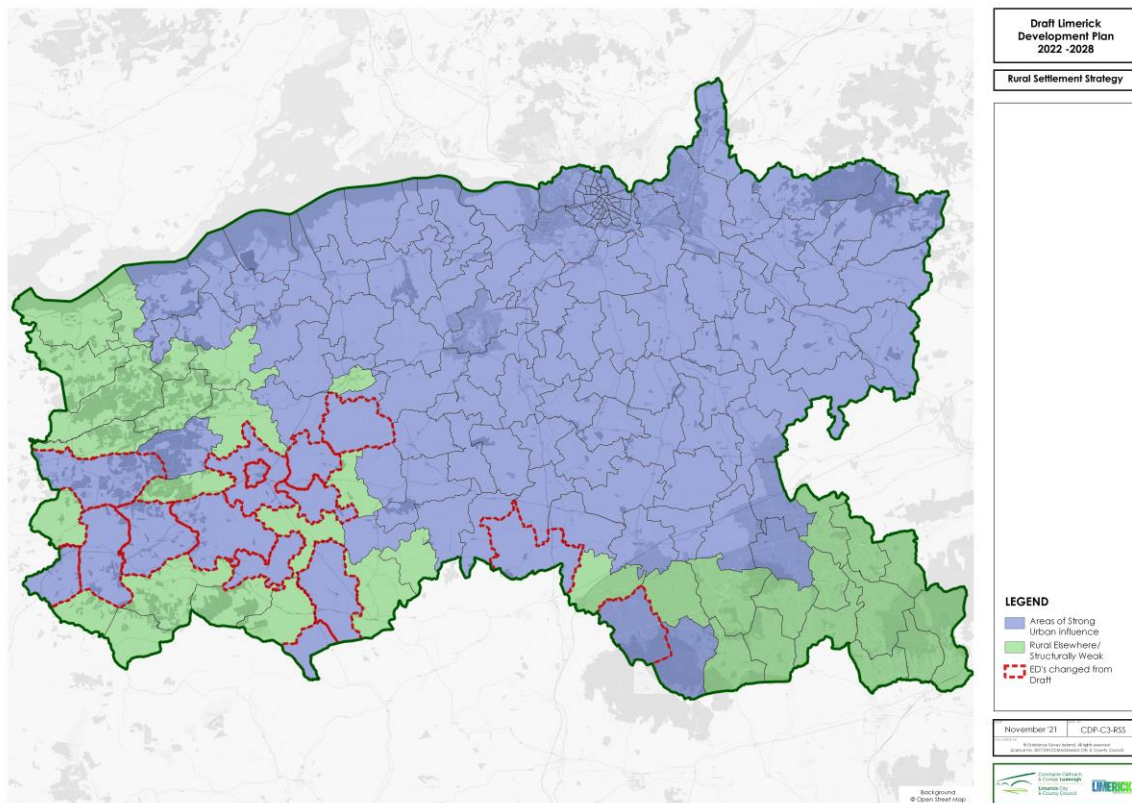


Figure 1: showing the changed EDS outlined in red.

The Strategic Flood Risk Assessment was updated following further modelling. This has resulted to updates to the flood maps.

There have also been amendments to the Limerick 2030 Plan which place a greater emphasis on connected neighbourhoods. The Housing Strategy and Housing Needs Demands Assessment (HNDA) also has updated guidance which will inform subsequent applications. All of these, as mentioned above follow from the submissions received and the resulting material alterations presented above and do not have the potential for significant environmental impacts.

2.0 SCREENING STATEMENT

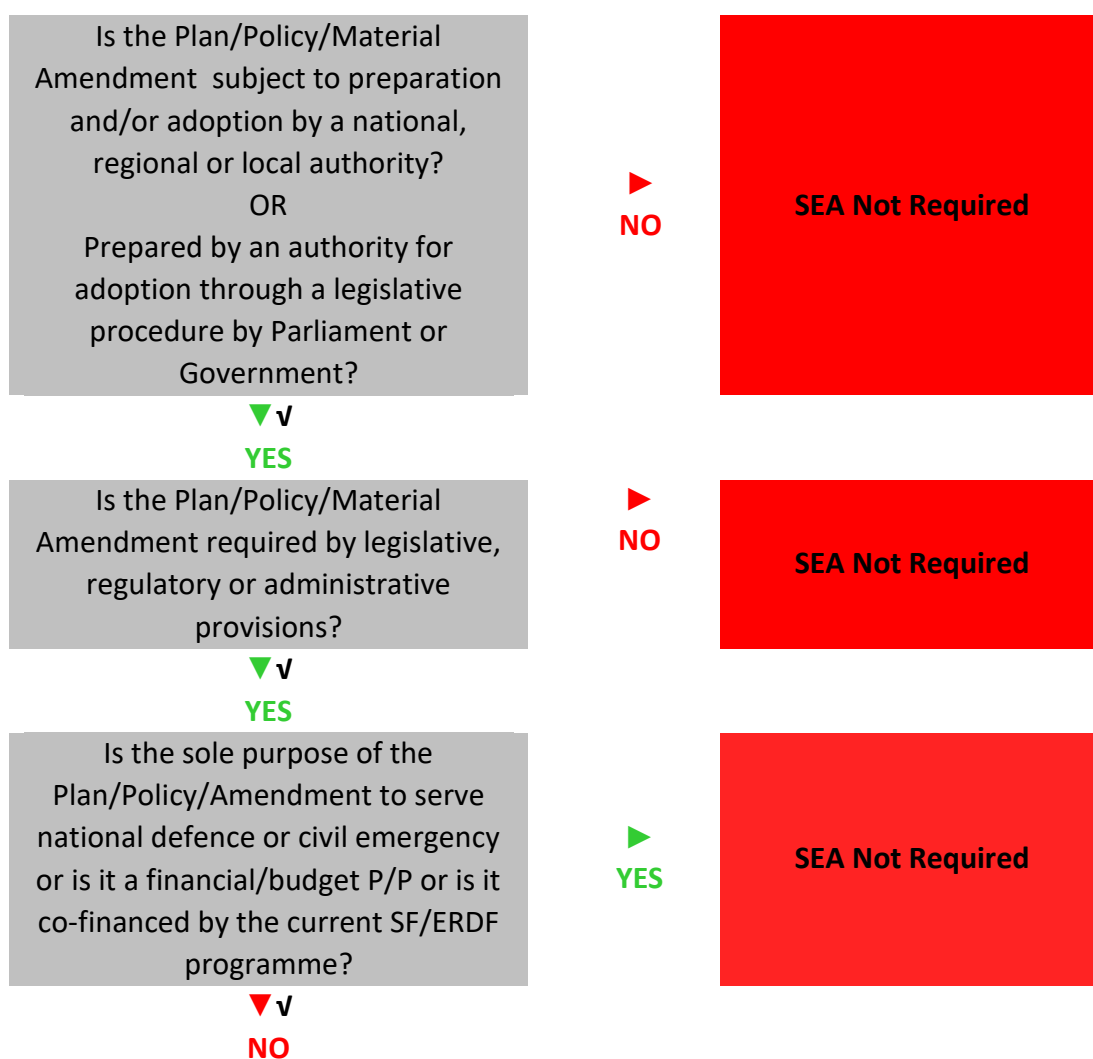
The Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. No. 436 of 2004) require case by- case screening of individual plans and associated material amendments, based on the criteria in Schedule 2A to the Planning and Development Regulations 2001. These criteria must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

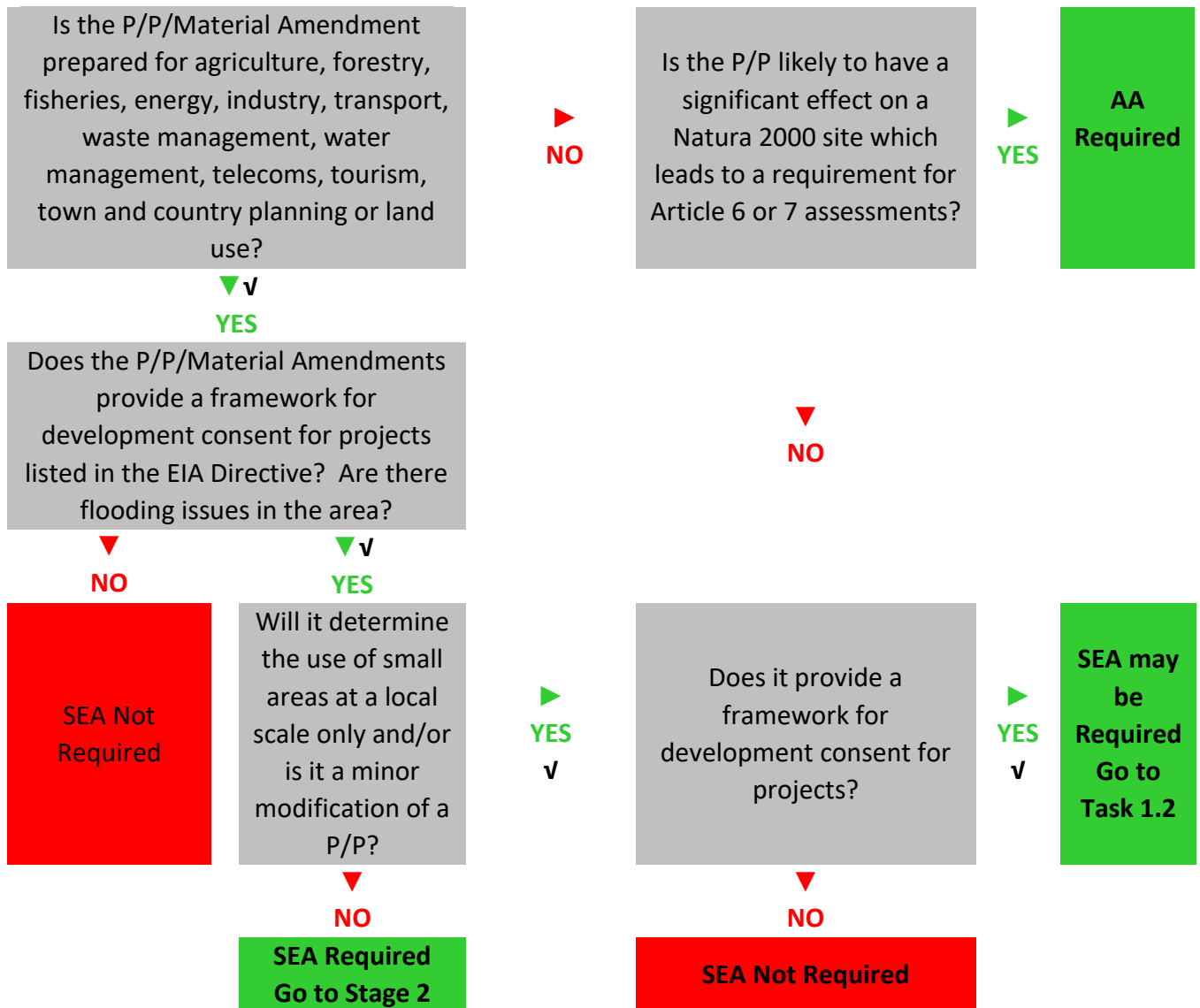
Stage One - Pre-Screening

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

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

Figure 2 Pre-Screening Decision Tree





Stage Two - (A) Environmental Significance Screening

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

Criteria for Determining the Likely Significance of Environmental Effects

Characteristics of the Plan/Programme

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

It is the purpose of the review of the Limerick Development Plan (LDP) to establish an updated Development Plan for the development of the city and County that will be based on updated policies and appropriately zoned land. The LDP is informed by the National Planning Framework and the Regional Spatial and Economic Plan for the Southern Region which lies above it in the hierarchy of plans. Any projects or other activities that fall within the remit of the Planning Act 2000 (as amended) and its associated regulations will be subject to the policy content of the plan and in terms of location will be guided by the zoning matrix which is part of the plan.

There are other elements included in the plan which apply to the zoned areas of the metropolitan areas such as the Buildings Height Strategy and the update of the Limerick 2030 Strategy which provide specific guidance on particular issues or for specific areas.

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

The draft Limerick Development Plan (LDP) is set within the context of the Regional Spatial and Economic Plan for the Southern Region and the provisions of relevant planning guidelines issued by the DHPLG and the National Planning Framework. These influence the draft plan rather than the other way around. The LDP will, in turn, serve as planning policy guidance for the Draft Limerick Development Plan area.

The Draft LDP does provide guidance for planning decisions and for plans such as Local Area Plans for individual settlements. One thing to note is the inclusion of settlements that would have had Local Area Plans in the Draft Limerick Development Plan. Hospital and Cappamore are two examples. As a result of the plan review it will be necessary to review the series of LAPs to ensure compliance with higher tier guidance the Core Strategy. This was a point made in the Office of the Planning Regulator Submission. A review programme has begun with the review of Rathkeale having commenced in October 2021, while the remaining plans (Adare, Caherconlish Newcastle West, Abbeyfeale, Castleconnell and Patrickswell) will begin their review process over the coming months.

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

The draft Limerick Development Plan and its amendments, following its first public display period, is being prepared under the Planning and Development Acts, as amended, and therefore must adhere to the principles of planning and development of the area. It also comes under the ambit of Section 12(2)(c) of the Act states that a development plan shall include objectives for:

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

In this regard the ecological policies have been updated to take into account the concerns expressed by the National Parks and Wildlife Service. It should also note that where proposed submissions to the plan were found to be placing ecological sites at risk they were not included in further drafts of the plan. One example of this was the removal of the proposed pedestrian bridge running across the Shannon from Barringtons Pier (Submission 84). Not just would this have led to disturbance and works within the Lower River Shannon SAC site and the River Shannon and Fergus Estuary SPA, but it could also lead to disturbance to the Flora Protection Order Species Triangular Club Rush, which is present in that area (Reynolds, 2013).

A similar situation applied to a proposal to rezone part of Foynes Island but it was considered that the zoning would result in habitats loss, both in term of displacement through possible disturbance of bird species in the SPA but also possible loss of oak woodland an annex habitat. The relevant policy content of the plan ensured that this was taken into account and the proposals did not go ahead. This is dealt with in more detail in the AA screening document and the updated NIS.

With specific chapters on climate action and updated policy content based on both the RSES and the NPF, the opportunity has been taken to update the environmental policies in the previous city and county plans which owing to their age (both were prepared in 2010) were outdated.

iv. environmental problems relevant to the plan or programme;

The underlying environmental issues of the review of the LDP relate to the following;

- Avoidance of encroachment on the Natura 2000 network both Special Protection Areas and Special Areas of Conservation.
- Necessity to promote compact development and redevelopment of infill and brown field sites rather than the selection of greenfield locations.
- Continued updating of policy content as it relates to climate action, including zoning that reflects climate adaptation measures e.g., ensuring that flood prone areas are zoned only for suitable uses such as open space and agriculture.

At this stage in the plan preparation process, only one significant environmental problem can be identified in relation to the above issues, as to date policies in the draft plan have been drawn up to avoid effects on the issues listed above. In relation to this, the addition of new wind energy targets has been set taking repowering (Submission 113) into consideration. This means the installation of newer more capable turbines into existing sites rather than the construction of new wind farms. All of the wind farms in question has been constructed prior to the 2008 designation of Hen Harrier SPAs in Limerick. Generally repowering means the installation of fewer and more capable turbines which would have ecological benefits. These will of course be subject to the appropriate assessment process.

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

These plans and programmes are considered in the preparation of the draft and the response to the public submissions received. They have also been informed by the series of guidance documents issued by the department. The Limerick Development Plan, in particular in Chapters 6 and 9, outlines both planning guidance and community based environmental legislation within which planning policy documents operate.

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

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

It is anticipated that the key objectives and principles to be adopted as part of the draft LDP will ensure that the effects of the resulting changes to the existing environment will be controlled and governed by planning legislation which will seek to consolidate development patterns. The consolidation of development and increased use of brown field sites are central themes of both the National Planning Framework and the Regional Economic and Spatial Plan and have been carried forward into this plan. There are no

expansions of the development boundaries which ensures that direct effects such as expansion into green field sites outside boundaries the plan will not take place outside the boundaries of the plan area that were established in this draft. It is expected that the effects of the LDP in environmental terms will be controlled, both through plan policies and appropriate environmental and ecological guidance as laid down both in the SEA and NIS and also relevant higher tier guidance and legislation. While the effects of development within the development boundaries set by the plan are likely to be long term and not readily reversible there is a tradeoff in that the concentration of development will lead to development patterns that are more easily serviced.

ii. the cumulative nature of the effects

Cumulative negative environmental effects are likely to be localised within the plan boundaries and limited in nature. Development of zoned land that had been in agricultural use for instance will lead to the loss of semi-natural habitats but this has to be balanced against the need for concentrated development patterns. Similarly, the development of brown field sites may result in loss of natural features if they have been allowed to become over grown. One specific issue that has emerged in relation to brown field sites over the last number of years has been the growth of invasive alien species on sites that have remained undisturbed. Policy content has been updated in Chapter 5 Environment, Heritage, Landscape and Green Infrastructure and in Chapter 11 of the Plan which deals with Development Management Standards.

A key aim of the plan will be to attain a balance between growth and the need to conserve the best aspects of Limerick's environment. It should also be noted that there is increased emphasis on climate action in the new draft plan. When coupled with development activities and zonings within the wider metropolitan area it is likely that more brown-field and undeveloped sites will be built on during the course of the plan period and that pressure on existing infrastructure will increase. As indicated elsewhere there is sufficient capacity within the waste water treatment plant (WWTP) to deal with this. This infrastructure will be subject to improvements during the lifetime of the plan and will need to progress through the consent authorities (Irish Water Submission 205), either the Planning Authority or An Bord Pleanála.

It should be noted that two settlements, specifically Murroe and Hospital, have policies attached limiting growth until new Waste Water Treatment infrastructure is installed.

iii. the trans-boundary nature of the effects

Works on the amendment and consultation with neighboring local authorities indicate that transboundary effects, if any, are likely to be limited. Consultation has taken place with Cork, Kerry, Tipperary and Clare for instance, in relation to differing approaches in

relation to wind energy for example but LCCC remains satisfied that its approach serves best to deal with the issues of nature conservation and renewable energy production in a Limerick context (see response to OPR Submission and see Appropriate Assessment screening which follows).

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

None. It is expected that the draft plan will place development activities on a more coherent footing by updating the policies of the older plan. It is anticipated that the overall effects on human health and social issues, in as much as they are affected by the plan, will be largely positive. The emphasis on more sustainable transport modes is one element of the plan that would contribute to this. The facilitation of development within zoned areas subject to the policies of the LDP is expected to offer an environmentally beneficial alternative to more scattered forms of development. An updated list of Seveso sites has been included in the plan. Any applications close to them will be referred to the Health and Safety Authority.

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

The wider area that will be affected is that of the city and county of Limerick. This has an area of 2756km² and a population of 195,175.

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

- special natural characteristics or cultural heritage;

The Draft Limerick Development Plan identify the following protected areas/elements of the natural/cultural heritage:

- Protected Structures
- Sites of Archaeological Significance
- Areas with natural history designations
- Architectural Conservation Area
- Landscape Character Area
- Urban Character Areas.

The inclusion of Urban Character Areas are an addition to Chapter 5 and are intended to capture some of the character of the City Area and offer guidance for its protection and management. They are regarded as an extension of the Landscape Character Area of rural

County Limerick and reflect the council's new role as the Planning Authority for City and County alike.

- exceeded environmental quality standards or limit values;

It is not expected that any environmental quality standards will be exceeded or that the value of vulnerable areas will be limited as a result of the review of the Limerick Development Plan. There is a requirement in the plan that the capacity of waste treatment systems is not be exceeded. As indicated above two settlements Murroe and Hospital have restrictions based on development prior to the upgrading of their sewage schemes.

Based on climate action policy set out in the NPF and RSES, and fast changing climate guidance and legislation Climate Adaptation and Mitigation measures are included in the new plan. The Climate Action and Low Carbon Bill (2021) brought into law in July and targets set later in November is amongst the latest of these. The LDP, by acknowledging the importance of climate action adapts these national and regional policies and guidance for use at local level. The approach to development density, land use, design and movement is consistent with broader measures to address climate change in the areas of housing, sustainable travel, green infrastructure, flood risk adaption and renewable energy sources.

- intensive land-use;

It is a key objective of the LDP framework to ensure that future expansion of settlements and a controlled intensification of land uses does not undermine the area's physical or natural environment. Chapter 5 which deals with the built and natural heritage of the plan area, contains objectives which protect items of natural or cultural interest from inappropriate development. It should also be noted that the plan policy content reflects the emphasis placed on infill and brown field development that is present in both the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES). This is also reflected in Chapter 11 (Development Management Standards). The revised Chapter 3 (Spatial Strategy) also offers updated guidance for residential and settlement issues, which will ensure compliance with the Core Strategy which lays out population targets for Limerick.

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

See (vi) above. The Natura 2000 site network is well recognised by the Authority. Of other designations, there was an unsuccessful application for Lough Gur for candidate World Heritage Status. This was unsuccessful.

3.0 Stage Two – Summary + Conclusions + Recommendation

At this point in time, no strategically significant environmental problems can be identified in relation to the above amendments. Building on the lessons learned from the preparation of the plan to date and submissions received during the public display environmental improvements are expected as a result of the new plan primarily through the concentration of development in areas where it can be more easily serviced by appropriate infrastructure and the emphasis on sustainable travel and climate action.

Concentration of development is expected to reinforce the role of Limerick in the region as identified in the National Planning Framework (NPF). Appropriate services and infrastructure exist to service growth in the plan boundaries. Scattered development would increase overall environmental pressures such as car use, use of individual treatment systems and the associated difficulties and cost of servicing one off houses and isolated developments of other types with modern facilities and infrastructure.

Following the screening process, whereby the specific context of the draft Limerick Development plan and the material alterations outlined above has been assessed against the environmental significance criteria as contained in Annex II (2) of the SEA Directive, **it is concluded that a Strategic Environmental Assessment is not required for the material amendments to the Draft Limerick Development Plan.**

4.0 Appropriate Assessment Screening

Introduction: This is an Appropriate Assessment Screening of the material amendments to the draft Limerick Development Plan in accordance with the requirements of Article 6(3) of the EU Habitats Directive (92/43/EEC). The material amendments have resulted from submissions received during the recent public display period for the draft plan- see the SEA screening document which precedes this AA screening.

The material amendments to the Draft Limerick Development Plan LAP have been assessed to see if they need to be subject to an 'Appropriate Assessment'. Based on the *Methodological guidance on the provision of Article 6(3) and (4) of the Habitats Directive 92/43/EEC*, a 'Screening Matrix' and a 'Finding of No Significant Effects Matrix' have been completed.

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

4.1 Proposed amendments that have the potential for ecological effects:

Of the amendments that have been presented in the SEA screening it is considered that several would have had the potential to exert an influence on the Natura 2000 site network in the plan area. Those that were likely to have adverse effects were not implemented. Those whose implementation would be likely to have beneficial effects were implemented. Both types are shown below in order to indicate how the needs of the Natura 2000 site net-work was taken into account.

1 Setting targets for renewable energy production. Submission 225.

Table X Renewable Energy allocations for differing technologies

Output Current and Projected	Wind	Anaerobic Digestion	Solar	Hydro	Geothermal
Current capacity MW	234.35	2.0	113.49	0.1 MW	0
Target Capacity MW (2030)	386.45 (+65%)	20 (+1000%)	227.0 (+100%)	0.3MW (+300%)	0.5MW

Comments: The targets for wind energy have been set with regard to existing wind farms only and are mindful of the fact that the vast bulk of Limerick wind farms are now located within what are now Special Protection Areas for the Hen Harrier. These designations took place in 2008. No new applications have been received since 2008 within the SPAs, but the fact remains that existing wind farms are operational in what are now designated sites. The targets have been set with regard to repowering of existing wind farms rather than based on construction of new wind farms.

This means that a larger number of older less capable turbines would be replaced by smaller number of smaller more capable turbines. The reduction in turbine numbers would be beneficial from an ecological perspective as it would lessen possible displacement or disturbance effects and minimise the chances of direct mortality through collision. One harrier has collided with a wind turbine in Limerick in 2010.

2. Remove mention of development of a new pedestrian bridge from Barrington Pier and Ted Russell Park to Atlas Avenue as a longer-term aspiration to create new connections. Submission 103.

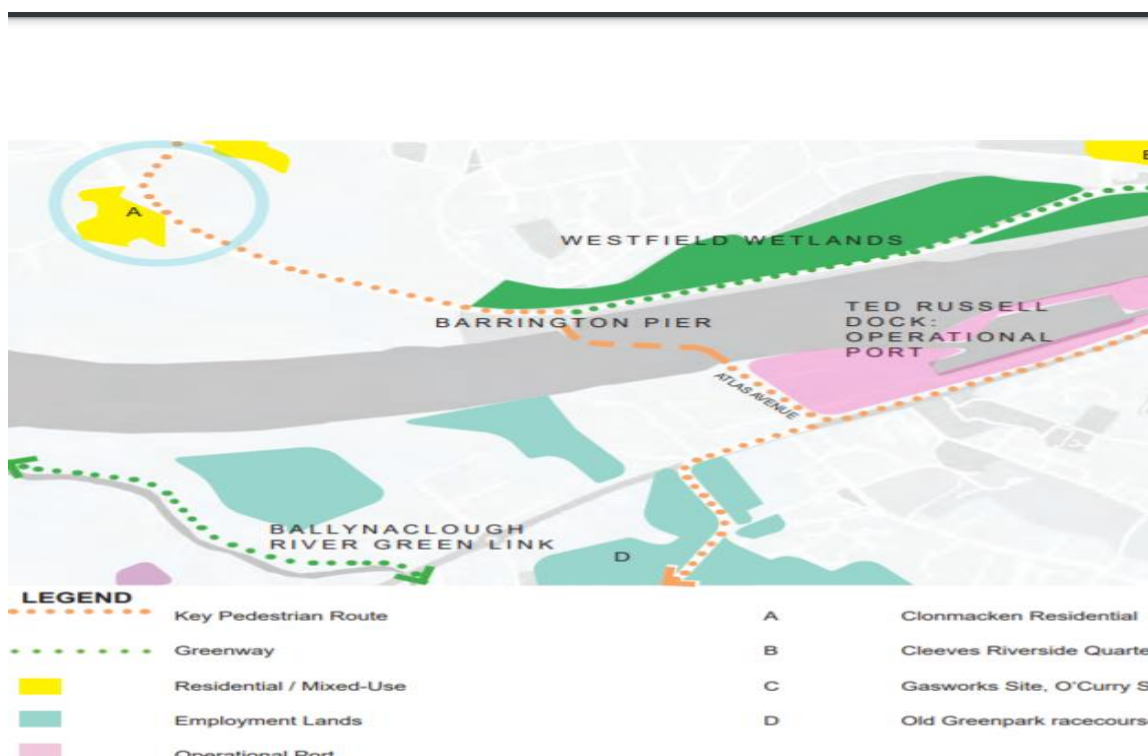


Figure 3: showing suggested route of the proposed pedestrian crossing between Barrington's Pier and Ted Russell Docks on the southern side of the river. Source: Limerick 2030.

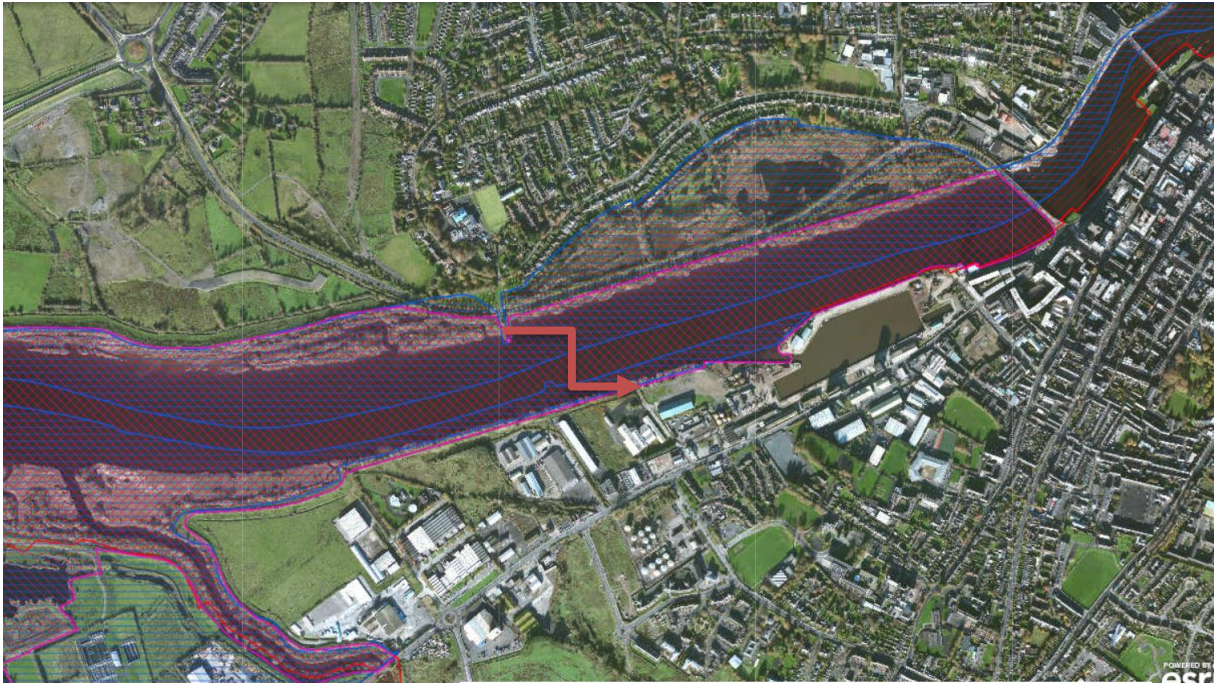


Figure 4: showing the location of the proposed pedestrian bridge within both the Lower River Shannon SAC site and the River Shannon and Fergus Estuary SPA. Source: NPWS

Comments: The pedestrian bridge crosses the River Shannon at a point where it is designated as both a Special Area of Conservation Site (Lower River Shannon 002165) and as a Special Protection Area (River Shannon and Fergus Estuaries 004077). The first is designated for series of tidal habitats in this location, while the second is for the protection of wildfowl. There is also a population of the Flora Protection Order Species Triangular Club Rush in this area, specifically at Barringtons Pier (Reynolds 2013 p. 38). The Triangular Club-rush (*Scirpus triquetrus*) is a rare and highly threatened vascular plant in Ireland with restricted distribution to tidal stretches of the River Shannon in “Limerick City and for some distance downstream” (Parnell and Curtiss 2012, p.77) It is protected under the Wildlife Acts (1976 and 2000) and is listed on the Flora Protection order 2015.

Given the range of tidal habitats including mudflats, fringing reed stretches (a feature of the upper estuary), the presence of two Natura 2000 sites and the presence of a Flora Protection Order species, it was decided to remove any reference to a pedestrian crossing in this location due to the amount of ecological damage that might result. From an SEA perspective it would have denied access to the port, an important part of Limerick Maritime Infrastructure.



Figure 5: Triangular Club Rush (*Scirpus triquetrus*). Source: BEC consultants

3. Potential Rezoning for marine use at Foynes Island, Submission 84.

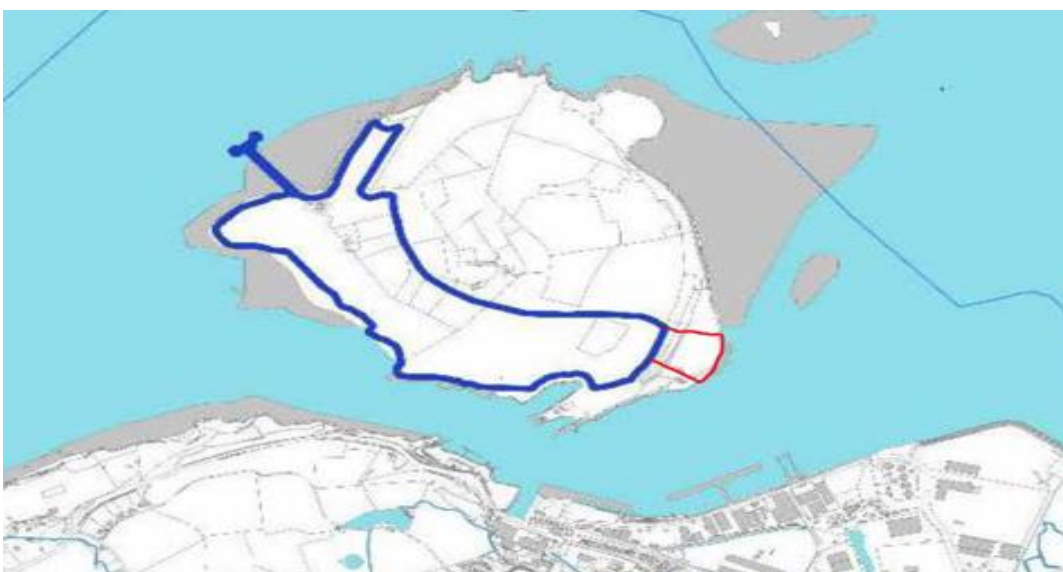


Figure 6: showing area in red for proposed zoning for marine use.

The area outlined in red was being proposed for zoning for marine related usage. Part of the area outlined in red in Figure 5 cut across part of the Lower River Shannon SAC site.



Figure 7: the arrow shows the area of the SAC through which the area for the proposed re-zoning cuts.

The proposed rezoning is to the south east of the island which would move any possible disturbance further to the east. There are mudflats in the lee of the island which are part of larger complex of mudflats in the estuary. These are the reason why many wintering wildfowl species visit the estuary as they are feeding grounds for them. The actual loss of this habitat and the disturbance effects of the re-zoning would be factors here.

Close to the proposed re-zoning area is Sturamus Island. This has been mentioned as a Tern colony in the site synopsis. This is very low-lying and is almost covered at high tide. In a visit to the island in 2017 no terns were present but such low-lying islands are valuable resting and preening areas for wildfowl and this too would have to be taken into account.

On Foynes island itself the re-zoning cuts through some of the Lower River Shannon SAC site. This part of the island has mixed woodland close to the shore. Patches of the broad-leaved woodland here has been described as having links with the Annex habitat old oak woodland (Doherty 2015 p.8) and it is not certain as to whether or not this would apply to the area in question.

One of the main reasons that the current zoned area, is considered as suitable for maritime use is because no Annex species lay within that area. This would not be the case with the current proposal.

The zoning is also very close to a protected structure though this is not an ecological concern. For these reasons the proposals for rezoning has not been accepted.

4. Change the zoning from Semi Natural Open Space to Utilities in the area of the landfill cells, a narrow margin around the cells and the compound at Longpavement Submissions 218, 277.

The area of the compensatory habitat in the south of the Longpavement site remains untouched by the change in zoning. The area of the solar array can also be allowed to revegetate naturally to create a grassland community similar to the one which exists at the moment. It should be noted that the grassland species that are present at the moment were the result of planting. Following the installation of the solar array it is recommended that the area be allowed to revegetate naturally to ensure that the grassland species would reflect local species and local genetic material. This is in line with current good practice (DNFC July 2021) which calls for the use of local seed materials and site management rather than the use of outside seed stock. The solar array will not encroach into the Lower River Shannon SAC site at the eastern site boundary.



Figure 8: The red arrow shows the compensatory habitats for works on the Limerick main drainage scheme in the early 2000s. It is a series of constructed wetlands and wetland vegetation.

5. Amendments sought by the Department of Housing, Local Government and Heritage.

2 (ii) Add the following text to Objective EH O1: The Council, will through the planning enforcement process where applicable, seek to restore the ecological functions of designated sites, where they have been damaged through inappropriate development;

(v) Amend Objective EH O12 with the inclusion of the following text at the end of part b) Projects which would be detrimental to existing Blue – Green Infrastructure features will not be permitted

Comment: the addition of (ii) above has the potential, through the planning and enforcement process to restore damage to designated sites, through the established planning condition and enforcement process.

It should be noted that blue green infrastructure is taken to mean what the DHLGH indicated in its initial submission to the plan last year. This means, not pathway or man-made constructions, but rather natural habitats and landscape features. This is in line with Policy EHP1 which is to “protect and conserve Limerick’s natural heritage and biodiversity”.

Screening determination: Progression to Stage 2 is not judged necessary as any of the suggested amendments that might have significant effects on the Natura 2000 network were not allowed to proceed. Those suggested amendments that would have beneficial effects were allowed to proceed.

4.2 Screening Matrix

Brief description of the project or plan:
This is the review of the Draft Limerick Development Plan.
Brief description of the Natura 2000 sites relevant to the amendments being screened:

The Lower River Shannon SAC site forms the northern boundary of the county along with the Shannon and Fergus Estuary SPA. This site has been selected because of a range of riparian habitats and species such as wet woodlands, tidal mudflats, estuaries and for species such as otter, salmon and lamprey. The SPA has been designated because of its importance for wildfowl, particularly as a roosting area for cormorants. Maintenance of high-water quality is an important factor in ensuring the preservation of these habitats.

Stack's to Mullaghareirk Mountains, West Limerick Hills and Mount Eagle SPA (004161) this upland area in west and south Limerick has been designated for the protection of the hen harrier. It is a mix of upland areas rough grassland and forestry of various ages.

Slievefelim to Silvermines Mountains SPA (004165) is located in the east of the county and is an upland area with a mix of open upland grassland, peatlands and rough grassland.

These four are the sites that are most important from the point of view of the amendments as they are the ones that are most likely to be affected by the proposed amendments if they had gone ahead. The Harrier SPAs from the point of view of the wind energy targets and the Lower River Shannon SAC site and the River Shannon and Fergus SPAs from the point of view of direct habitat loss through zoning for marine industries and disturbance from resulting activity.

Any other changes that were included in the SEA screening were within zoned lands which had been previously assessed as being suitable for zoning. There was a lack of connectivity to the other sites which meant that they would not be affected. These sites are outlined in the Natura Impact Statement which went on display with the last draft of the plan.

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

The main way in which impacts could be created would be, as indicated above, through direct habitat loss should zoning have taken place or through the creation of in-stream disturbance through the possible pedestrian construction. However, as outlined above these were removed as policy options and the possibility of impacts on Natura 2000 sites removed.

The repowering of wind farms has the potential to reduce the amount of turbines which could reduce their disturbance effects. Note that repowering of wind farms refers to existing and not new wind farm applications. These applications pre-date the SPA designation.

Note: there has been no expansion of the development boundaries of the plan which means that there has been no encroachment on the Natura 2000 sites in the plan area.

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

- **Size and scale;**

The area of the plan has been indicated in the SEA screening above. It is 2756km² and has a population of 195175 (2016 Figures).

- **Land-take;**

The development boundaries of the plan areas have not been expanded. There has been a revision of the number of the Local Area Plans. The emphasis on brown field development and compact development in both the NPF and RSES and incorporated into the plan should result in less dispersed development patterns and hence less use of green fields sites, reducing pressure on undeveloped areas and by extension ecological sites.

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

There are a total of 15 Natura 2000 sites within and adjacent to the county.

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

It will be necessary to abstract water through Irish water facilities for both domestic and industrial use.

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

In the plan there are policies designed to ensure that the pace of development does not over-reach the capacity of the available treatment systems. As outlined in the SEA screening which precedes this screening, policies are in place in specific settlements (i.e. Murroe and Hospital) to prevent growth pending the provision of adequate waste water treatment facilities.

- **Excavation requirements;**

It should be noted that any development activity will be the subject of assessment at planning application stage which put in place the relevant measures to prevent damage to Natura 2000 sites which are protected by plan policies.

- **Transportation requirements;**

All transport projects which might stem from the policies in this plan will be subject to either appropriate assessment of ecological impact assessment in order to minimise effects on ecology.

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

This is a planning policy document with a lifespan of six years.

- **Other**

None.

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

- **reduction of habitat area:**

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

- **disturbance to key species;**

No projects giving rise to disturbance to key species for Natura 2000 sites is likely to be granted within the boundaries of the plan. For example wind energy targets have been based on existing wind farms, which were constructed prior to SPA designation rather than relying on greenfield sites. As could be seen from the previous draft plan that went on public display the areas open for consideration for wind energy have been moved back from the estuary, thereby lessening the chances of ecological disturbance. The other issue that could cause disturbance is the Green and Blue Network whose trails are close to the Lower River Shannon SAC site and the River Shannon and Fergus Estuary SPA.

- **habitat or species fragmentation;**

There is a presumption in the plan against development that would cause ex-situ effects that will help to prevent fragmentation of habitats and the species that are contained within them. As indicated above there has been no expansion of the development boundaries of the plan.

- **reduction in species density;**

It is not envisaged that any reductions in species density would take place both through the fact that policies exist that protect the integrity of natural features and ecology. Policies also exist within the plan to conserve tree stocks and landscape features within the plan boundary and also to ensure that emphasis is placed on the use of native species in landscaping. The protection of semi-natural open space zoning in the zoned areas also helps to provide additional habitat space within the plan area which will help by providing habitat areas which should retain wildlife.

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

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

- **Climate change:**

The consolidation of development within the development boundaries of the plan area while at the same time recognising the importance of the conservation sites inside and outside the plan boundaries is not expected to result in climate change issues that would affect the sites. As noted in the SEA screening there is updated content in the plan which deals specifically with climate issues. This was not present in the previous plan.

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

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

None-see comments regarding improvement of sewage facilities which would reduce chances of ex-situ effect on the SAC site. The material alterations do not affect this objective. Policy EHP1 is important in this regard.

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

With the consolidation of development by the updating of the plan and the overall conservation objectives set out by the LDP it is not expected that the various factors that help designated sites function as particular habitats will be affected.

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

- **loss;**

Not applicable.

- **Fragmentation;**

Not applicable.

- **Disruption;**

Not applicable.

- **Disturbance;**

Not applicable.

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

Not applicable.

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

Not applicable.

4.3 Finding of No Significant Effects Matrix

<p>Name of Project or Plan:</p>	<p>Draft Limerick Development Plan LAP, material alterations.</p>
<p>Name and location of Natura 2000 sites relevant to the amendments being screened:</p>	<p>The Lower River Shannon SAC site forms the northern boundary of the county along with the Shannon and Fergus Estuary SPA. This site has been selected because of a range of riparian habitats and species such as wet woodlands, tidal mudflats, estuaries and for species such as otter, salmon and lamprey. The SPA has been designated because of its importance for wildfowl, particularly as a roosting area for cormorants. Maintenance of high-water quality is an important factor in ensuring the preservation of these habitats.</p> <p>Stack's to Mullaghareirk Mountains, West Limerick Hills and Mount Eagle SPA (004161) this upland area in west and south Limerick has been designated for the protection of the hen harrier. It is a mix of upland areas rough grassland and forestry of various ages.</p> <p>Slievefelim to Silvermines Mountains SPA (004165) is located in the east of the county and is an upland area with a mix of open upland grassland, peatlands and rough grassland.</p> <p>These four are the sites that are most important from the point of view of the amendments as they are the ones most likely to be affected by the proposed amendments if they had gone ahead. The Harrier SPAs from the point of view of the wind energy targets and the Lower River Shannon SAC site and the River Shannon and Fergus SPAs from the point of view of</p>

	<p>direct habitat loss through zoning for marine industries and disturbance from resulting activity.</p> <p>Any other changes that were included in the SEA screening were within zoned lands which had been previously assessed as being suitable for zoning. There was a lack of connectivity to the other sites which meant that they would not be affected.</p>
Description of the Project or Plan	As given in Screening Matrix above.
Is the Project or Plan directly connected with or necessary to the management of the site (provide details) ?	No. The material alterations are intended to provide for the proper planning and sustainable development content of the Draft Limerick Development Plan and includes policies and objectives to protect and manage in a suitable manner the natural heritage of the area.
Are there other projects or plans that together with the project of plan being assessed could affect the site (provide details)?	The LDP and the material alterations have been formulated to ensure that the uses, developments and effects arising from proposals and/or permissions based upon the policies and objectives of the Plan (either individually or in combination with other plans or projects) will not give rise to significant adverse impacts on the integrity of Natura 2000 sites, having regard to their conservation objectives.
The Assessment of Significance of Effects of the Material Alterations	
<i>Describe how the project or plan (alone or in combination) is likely to affect the Natura 2000 sites:</i>	The material amendments have not affected policies relating to nature conservation and are expected to have beneficial effects in this regard.
<i>Explain why these effects are not considered significant:</i>	Policies, including those set out in the amendments, should ensure that

	pollution, nuisance or other environmental effects that are likely to significantly and adversely affect the integrity of the Natura 2000 sites are not permitted.		
List of Agencies Consulted: Provide contact name and telephone or email address:	Screening Reports were sent to: The Manager, Development Applications Unit DoHLGH, Newtown Road, Wexford (T:053 9117382)		
Response to consultation	Awaited.		
Data Collected to Carry out the Assessment			
Who carried out the Assessment?	Sources of Data	Level of assessment Completed	Where can the full results of the assessment be accessed and viewed
Heritage Officer, Forward Planning Section, Limerick City and County Council.	Existing NPWS Site Synopses Site visits during plan preparation process.	Desktop study, site visits. AA screening, stage 1.	On display with the LDP.