

DRAFT LIMERICK DEVELOPMENT PLAN 2022-2028

Strategic Environmental Assessment

12th March 2022

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1.0 Non-Technical Summary

1.1 Introduction

Strategic Environmental Assessment (SEA) is a formal process carried out as part of the review of the existing Limerick County Development Plan 2010 – 2016 (as extended) and the Limerick City Development Plan 2010 – 2016 (as extended). A Draft Limerick Development Plan 2022 – 2028 has been prepared to replace both existing Development Plans. This is the first Development Plan prepared by Limerick City and County Council which was formed in 2014. This will be the second public display period for the draft plan which will take place from the 12th of March 2022 to the 11th of April 2022. The first public display period had taken place in the autumn of 2021. The responses received during this informed the preparation of the Material Amendments to the proposed Plan.

The preparation of the Draft Development Plan has included an update of policy in accordance with the introduction of new international, national and regional level policy documents and guidance. Amongst the changes following the first public display period are:

- 1) **Changes to policies to reflect the National Planning Framework and the Regional Spatial and Economic Strategy for the Southern Region and changes to reflect the content of the submission from the Office of the Planning Regulator and other statutory bodies, much of which is based on the NPF and RSES;**
- 2) **Changes to the plan to reflect the importance of climate action**, including the incorporation of comments received from the public and statutory agencies (June 2019) and the contents of the Climate Action and Low Carbon Development Amendment Act 2021; A commitment has also been included to take into account on going compliance with emerging climate action legislation and guidance.
- 3) **Changes to both policy content in the plan and the zoning matrix** to reflect the new policy content following additions to Section 28 and other guidance and the changed planning requirements, including a Strategic Flood Risk Assessment which has informed the plan content;
- 4) **Re-zoning of lands** where it is considered necessary to accommodate changes required since the preparation of the draft plan;
- 5) **Rationalisation of residential and other zoning** to maintain consistency with the population and housing and other targets as specified in the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) for the Southern Region and the Core Strategy prepared in accordance with these higher tier plans.

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

In accordance with the legislation, an Environmental Report was prepared and the environmental authorities were consulted during public display period as did the general public and other agencies. The following are the Environmental Authorities:

- The Environmental Protection Agency;
- The Department of the Housing, Local Government and Heritage;
- The Department of Culture, Arts, Gaeltacht, Sport and Media;
- The Department of Environment, Climate and Communications;
- The Department of Agriculture, Food and the Marine.

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

Following the issue of a Chief Executives Report on public consultation with an Environmental Assessment of the Proposed Material Amendments, on the 26th of November 2021 (see Section 6.1.1), the Elected Members considered the proposed amendments and have suggested further amendments to the plan, which are presented in this report. These amendments are presented in Chapter 6 of this document and are a key consideration of this environmental report. These amendments were put forward at the Special Council Meeting of Limerick City and County Council on the 18th of February 2022.



Figure 1: Limerick's Municipal Districts

1.2 Contents and Main Objectives of the Draft Limerick Development Plan

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

The chapter headings in the plan are shown in the Table 1 below. These have been revised since the preparation of the draft plan was prepared and informed by submissions received during the public display period.

Table 1: Layout of Written Statement

Overall Strategy

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

Chapter 2 – Core Strategy - This Chapter sets out the Core Strategy and Settlement Strategy, which informs the overall framework for the objectives and policies throughout the draft plan.

Chapter 3 Spatial Strategy (replaces chapter 3 and 10 of the previous draft plan, with elements of Chapter 3 relocated to Chapter 2 and 4)-

This chapter sets out the Spatial Strategy for the sustainable population growth of Limerick in accordance with the Core Strategy, whilst achieving a balance between social economic and environmental factors.

Chapter 4 – Housing - This Chapter sets out the policies and objectives for the provision of housing in Limerick.

Chapter 5 – A Strong Economy - This Chapter sets out the policy objectives for economic development both urban and rural, to deliver a strong resilient economy, including Enterprise and Employment and Retail Development opportunities. The Draft Retail Strategy and the previously adopted Strategic Integrated Framework Plan for the Shannon Estuary (SIFP) helped inform this chapter.

Chapter 6 – Environment, Heritage, Landscape and Green Infrastructure - This Chapter sets out the policy objectives for the preservation and protection of our natural and built heritage, policies to safeguard Blue - Green Infrastructure and Biodiversity, Open Space, Parks and Recreation.

Chapter 7 – Sustainable Mobility and Transport - This Chapter sets out detailed policy objectives in relation to Sustainable Mobility and transition to a low carbon society, Roads and Transport and Traffic Safety.

Chapter 8 – Infrastructure - This Chapter sets out detailed policy objectives in relation to services infrastructure, including energy networks and environmental services.

Chapter 9 – Climate Action, Flood Risk and Transition to a Low Carbon Economy - This Chapter sets out detailed policy objectives in relation to climate action and the role of planning in climate change mitigation, climate change adaptation, including flooding and the transition towards a more climate resilient economy.

Chapter 10 – Sustainable Communities and Social Infrastructure - This Chapter sets out the policy objectives for community development and place-making, to deliver sustainable and liveable communities and neighbourhoods over the lifetime of the Plan and beyond.

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

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

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

The written statement is accompanied by land use zoning maps, this SEA Environmental Report, a Natura Impact Report, a Strategic Flood Risk Assessment and other supporting Strategies, such as Housing Strategy and Housing Need Demand Assessment, Building Height Strategy, Retail Strategy and Review of the Limerick 2030 Plan.

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

1.3 Current State of the Environment

1.3.1 Biodiversity, Flora and Fauna

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

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

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

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

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

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

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

1.3.2 Trees in the plan area

Trees can be as visually prominent as buildings and are an important landscape component. They are able to integrate with building structures providing important landscape features and visual variety. From an ecological viewpoint, whatever the species, it is important to ensure that adequate measures are in place to safeguard the existing tree stock. Limerick City and County Council are currently preparing a Tree Policy, which will assist in this regard.

Hedgerows also play an important role in the landscape and for biodiversity, the proposed Plan seeks to protect and incorporate hedgerows into development proposals where possible. In order to ensure their continued vitality and usefulness as landscape features and habitats, they require continuous management, particularly, if they are to be integrated within new developments.

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

1.3.3 Population and Human Health

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

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

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

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

The paper makes the following important point “it is important that a distinction is made between the employment of residents of Limerick and the number of jobs based in Limerick, and also a further distinction between where the jobs are located and where the workers reside for Limerick city”. These distinctions are important to gauge the significance of challenges and opportunities for employment generation in the local and regional context and to define commuter zones and travel to work catchments. The Covid 19 pandemic and the emergence of working from home as a new element of work is another aspect to consider. Changes have been made to policies in the plan to reflect this.

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

The commuting pattern also has implications for material assets in that commuting traffic often dominates Limerick Road usage particularly at morning and evening peak times. There has been much emphasis on the provision of new road infrastructure, with projects such as the Limerick Northern Distributor Road being an example of road infrastructure that could alleviate traffic congestion in the City itself. By passes of Newcastle West and Abbeyfeale are also planned as is the Foynes to Limerick Road, the Adare by pass. The M20 project is also considered in the proposed Development Plan.

1.3.4 Public facilities

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

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

The main Waste Water Treatment Plant for Limerick City is the plant located at Bunlicky. Capacity is adequate for the City's and Plan area needs with a population capacity of 180,000 population equivalent. The plant came into operation in 1999. While the question of it operating close to capacity has been raised, discussions with Irish Water and Water Services Section of Limerick City and County Council have indicated that new working procedures, in addition to the construction of an anaerobic digester and other upgrades, will ensure that the plant will be able to keep pace with development within the agglomeration that it serves. Upgrade and expansion proposals are currently being progressed by Irish Water.

There are five Seveso sites in the Plan area. Three are lower tier sites and include Grassland Agro, on the Dock Road, Exolum Shannon Ltd. at Foynes and Analog Devices International at Raheen. There are two upper tier sites in the County area, Atlantic Fuels Supply Company Ltd. Foynes, and Goulding's Chemical Ltd, Morgan's South, Askeaton, Co. Limerick. These are included in the Health and Safety Authority referral list, and are also referred to the Emergency Services for comments should any applications be received, either on those sites or close to them.

Ensuring social infrastructure, such as school development and adequate zoned lands to facilitate the development and expansion of schools and community facilities is crucial to support the projected growing population. There have been changes in the zoning pattern to cater ensure adequate lands are zoned appropriately to future proof school expansion. The Local Authority will continue to work with relevant stakeholders to progress such development.

1.3.5 Air Quality

Air quality in Ireland is generally of a high standard across the country. There are three air quality monitors located in and close to Limerick City, located at Mungret, Castletroy and in the Peoples Park. There is another located in Askeaton in County Limerick. The current air quality report from the Askeaton monitor is good (2nd February 2022). On occasion, particularly during holiday periods, through traffic traversing the City and towns in Limerick can create localised issues with traffic fumes, particularly with peak traffic flows along the nearby Dock Road. The Local Authority will continue to monitoring air quality and will progress mitigation measures as appropriate, such as traffic calming and active travel measures.

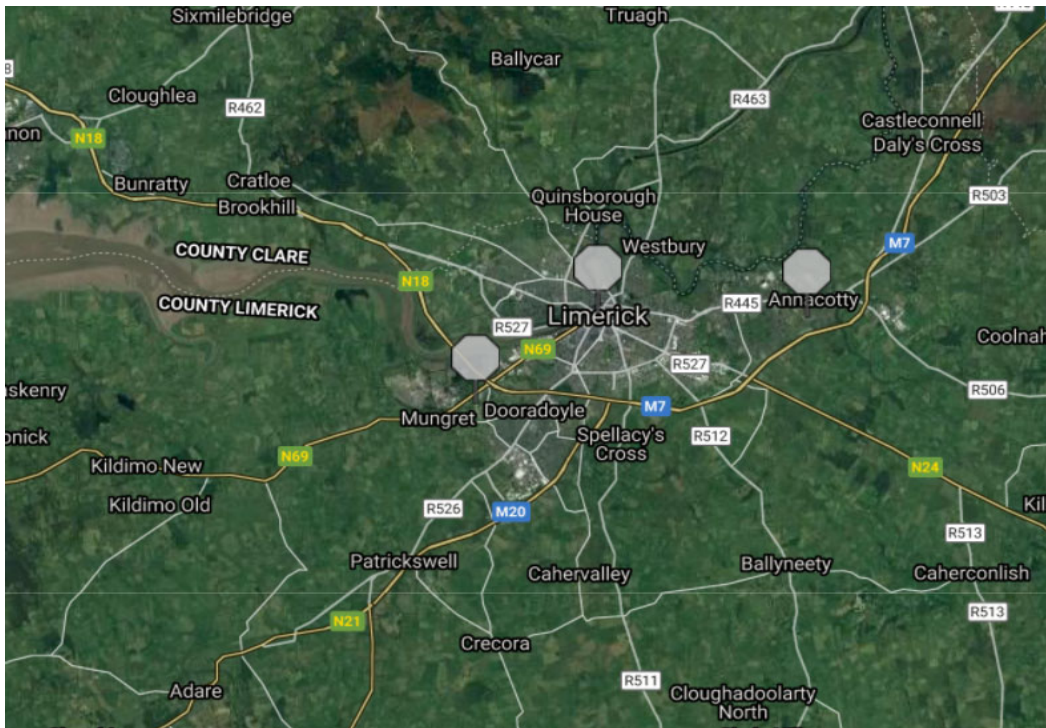


Figure 2: Air Monitoring Sites in Limerick City and Environs

1.3.6 Climate Change

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

A Strategic Flood Risk Assessment (SFRA) has been prepared for the City and Environs and settlements identified to support the Plan preparation process. The proposed amendments have also been subjected to flood risk assessment, where necessary. The SFRA accompanies this SEA Environmental Report.

The issue of climate mitigation and renewable energy has also been addressed in this report. Since the last Plan there has been huge changes in the technology used to harness renewable energy. Numerous solar energy applications have been received by Limerick City and County Council since 2010, however only one application has been received for wind energy. The

Plan policies require updating to reflect this. Wind energy sites are well established in Limerick and the region as a whole.

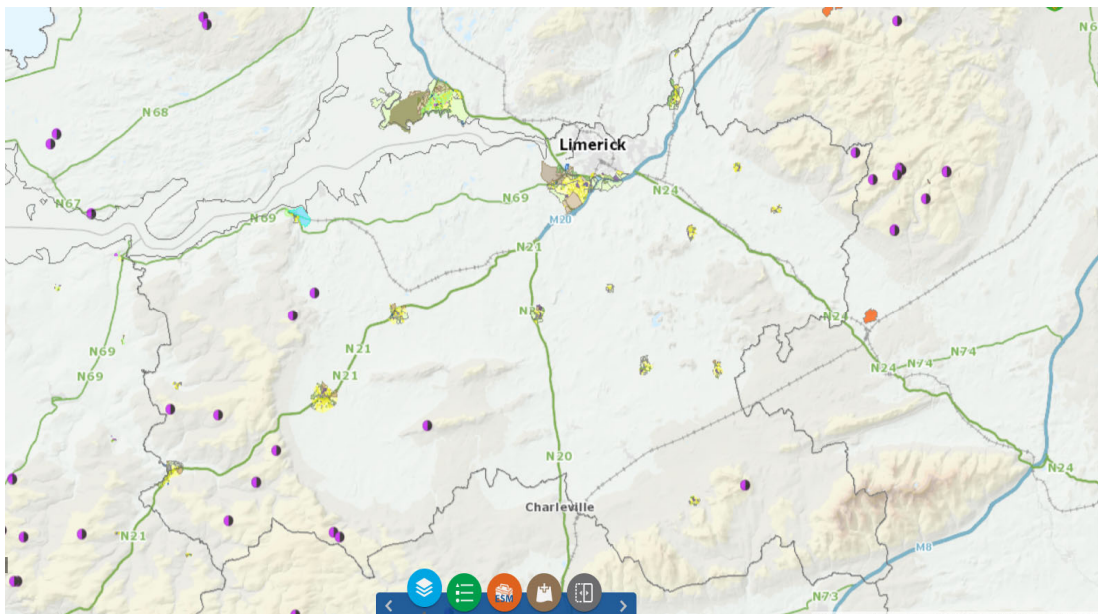


Figure 3: Wind Energy sites in Limerick (Source: ESM/ AIRO)

1.3.7 Geology and Soils

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

A geological heritage survey with the Geological Survey of Ireland has been completed with funding from the Heritage Council used to facilitate this work. This survey lists geological heritage sites in Limerick which are protected by plan policies.

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

1. Brown Earth Group;
2. Brown Podzolic Group;
3. Grey Brown Podzolic Group;
4. Gley Group;
5. Podzol Group;
6. Lithosol Group;

7. Organic Soils or Peats;
8. Lake Alluvial Soils;
9. River Alluvial Soils;
10. Estuarine Alluvial Soils;
11. Other Soils.

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

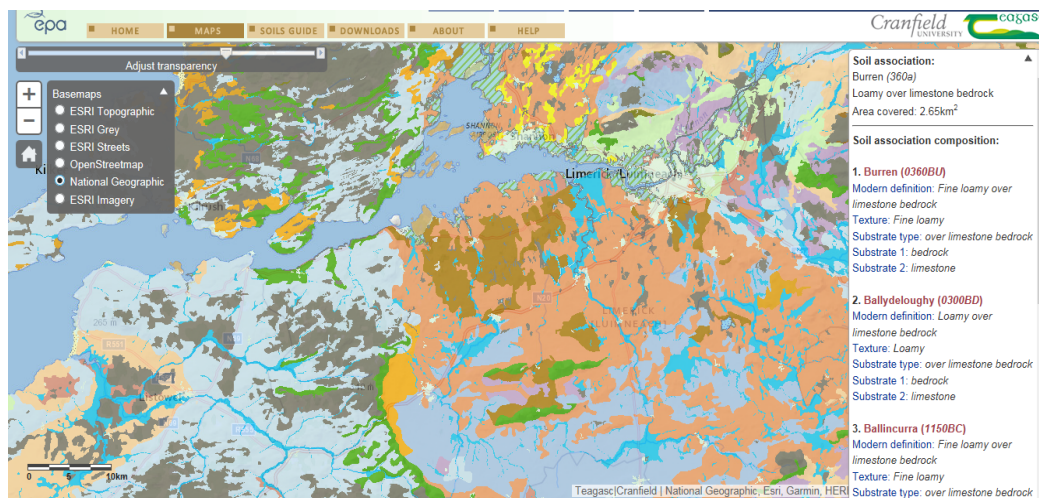


Figure 4: Soil Associations Northern Limerick (Teagasc)

One of the key questions in examining the issue of soils in Limerick, will be soil conservation. This is promoted through environmental objectives encouraging the re-use of brownfield sites and infill sites, adequate treatment and disposal of waste and re-use of soil following excavations works. Soil contamination has been identified in the course of planning applications, particularly on brownfields sites in the City. This has been addressed in Chapter 11 of the plan which contains the Development Management Standards, aimed at addressing this issue. One issue that is also connected with soil contamination is that of historic landfills, and as part of the Plan process a liaison has been established with the Waste Management and Licensing Section of the Local Authority to keep pace with any developments in that area.

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

1.3.8 Cultural Heritage

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

In general terms the Plan in both urban and rural areas, calls for high quality design and the sustainable reuse of the existing built environment, which would help retain the character of the area. Future developments will be required to be sympathetic to their settings in terms of design and building height. In this regard, there is a Building Height Strategy which has informed preparation of the Draft Plan. This document is important in informing planning response to higher buildings within the City area. Some of the strategy's recommendations in terms of tentative urban character areas reflect those suggested in the pre-draft Environmental Reports. The suburban areas in the environs of the City, all have newer development patterns than the old City areas, with much new housing development being constructed from the 1960s onwards.

Some of the Material Alterations relate to removal of individual buildings from the Record of Protected Structures. These are presented in Chapter Six.

1.3.9 Material assets

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

1.3.10 Other infrastructure

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

Irish Water are currently progressing proposals for upgrade and expansion of the existing infrastructure at Bunlicky.

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

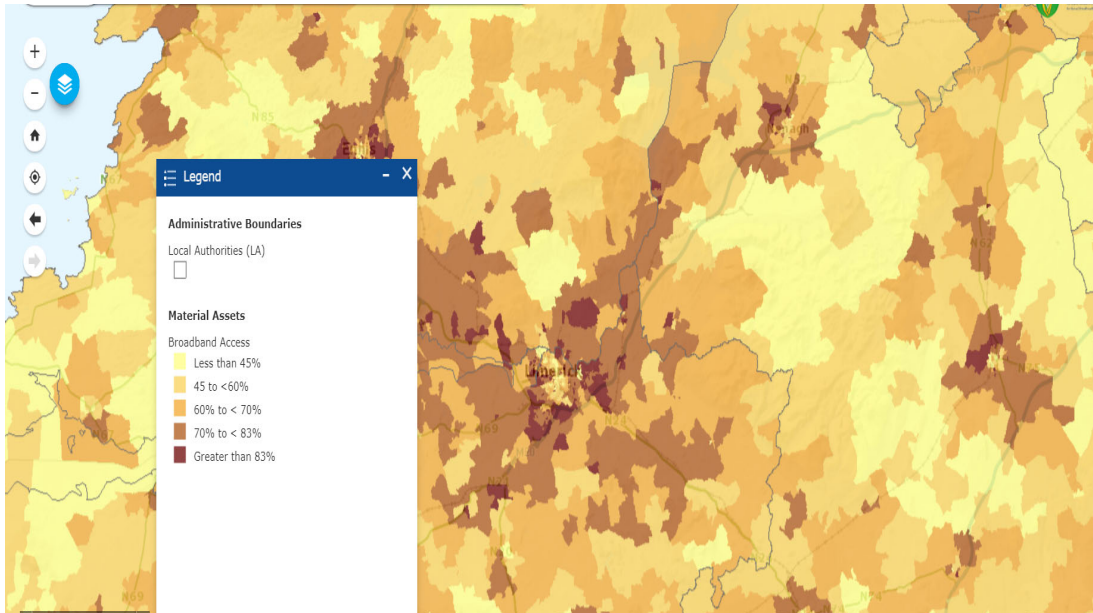


Figure 5: Broadband access (Source ESM/ AIRO)

With the potential for working from home as a means of reducing transport emissions the importance of access to broadband in both urban and rural areas is an important consideration from an environmental aspect.

1.4 Existing Environmental Issues

Key environmental pressures throughout Limerick include:

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

treatment. Limerick City and County Council will continue to work with Irish Water to progress critical infrastructure, as resources arise.

The question of water quality is also closely connected to that of human health and of human usage of the assimilative capacity of water courses for treated discharges from waste water treatment plants. Many of the settlements in Limerick lack adequate treatment facilities as outlined by a report produced by the Water Services Section of Limerick City and County Council in 2018 (Assessment of the Waste Water Treatment Plants within County Limerick 2015 – 2018). There are fifty two Waste Water Treatment Plants within Limerick. Limerick City and County Council operate twenty three EPA licence plants (plants over 500 population equivalent) and twenty seven EPA Certificate of Authorisation CoA (plants under 500 population equivalent) on behalf of Irish Water. The report examined how the plants performed over the period from 2015 - 2018. The report excluded both Limerick Main Drainage (Limerick City and Plan area) and Kilmallock WWTP's as they are run by private contractors and are under the control of Irish Water.

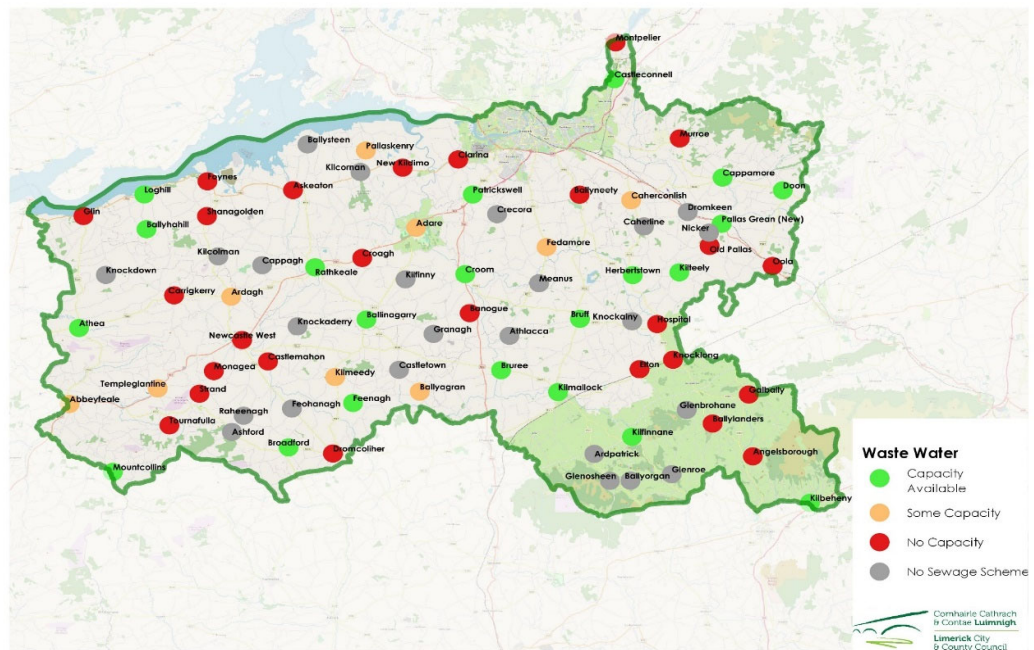


Figure 6: Wastewater Treatment Capacity

- Biodiversity including the avoidance of damage to the SAC, SPA, NHA and pNHA sites in the Plan area and establishment and enhancement of ecological corridors, for both amenity and nature conservation purposes. This includes emphasising the All Ireland

Pollinator Plan and the National Biodiversity Plans and supporting documents. Policies to this effect have been included in the Draft Plan.

- Cultural Heritage involving the need to maintain the character of the historical areas such as Limerick City and Kilmallock and those of the county towns and villages. Proposals for new developments will need to be carefully balanced with the requirement to maintain access to sites and areas of cultural heritage values, facilitating their continued development and maintaining their cultural heritage value. A key challenge for the architectural heritage of the City and County is sustainable and sympathetic reuse, regeneration and development of the built environment whilst retaining and protecting the distinctive character of the area. The policy content of the plan has been further enhanced in this regard through amendment proposed by an Elected Member. This is consistent with the NPF and RSES and policies that have been included in the Draft Plan area.
- Human health benefits through the maintenance and enhancement of the quality of the urban and rural surroundings and of ensuring continuing access to amenities and services is essential. This assumes a new importance with the following the emergence of Covid 19.

1.5 Consideration of Alternative Strategies

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

Legally this would not be possible as the Plans have been extended previously and are extremely outdated and the Planning and Development Act 2000 (as amended) requires that the existing Plans be reviewed to align with National and Regional Planning Policy. As indicated later in this report, the current Plans would not be considered an acceptable alternative.

The growing population of the Draft Plan area also provides its own challenges. One of the greatest needs for the population of the Plan area is the provision of facilities for the local population with young families. This placed a premium on amenity and educational facilities. There has been a number of recent applications within the City area and County for new school facilities. To enable the proper provision of new community facilities, it is necessary to update the Plan to ensure that they are provided in line with the latest guidance and requirements. This includes Section 28 Guidance and requirements of service providers such

as the Department of Education. One of the amendments calls for the establishment of a working group to work with relevant stakeholders to seek the delivery of additional educational facilities, in line with population growth. See Environmental Protection Objective HTP 1 in section 1.6 below.

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

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

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

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

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

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

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

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

Alternative Strategy Option 4 - The plan content as in the current Draft Plan:

Alternative Strategy - The review as presented with amendments voted on the 18th of February 2022:

Public consultation highlighted a number of necessary changes, as a result of policy evolution and updates. New content has been prepared following receipt of the OPR submission and those from the other statutory bodies. New amendments reflecting specific issues have been put forward by Elected Members. Changes have been made to the plan content and structure with additions to chapters relating to housing and climate action content. There has been a renumbering of chapters. In short the draft lacked some elements relating to housing, climate action, and infrastructure which required updating, as the plan process has progressed. It is now considered that the Material Alterations is more reflective of both national, regional policy and local input, which has shaped policy for Limerick.

Notwithstanding the above, it is noted that there are several locations that are flood prone, which have been included for development, by means of additional zonings in Limerick City and Environs. Material amendments made by the Elected Members at the Special Council meeting on February 18, 2022, included a number of proposals to rezone lands to more vulnerable uses. Site specific flood risk assessments and justification tests were submitted as part of the supporting documentation for the change of zoning. The information was reviewed as part of the SFRA on the material amendments, which concluded that these sites should be retained for less vulnerable uses as appropriate to the relevant flood zones.

Similarly, there are a number of amendments put forward by the Elected Members which differ from higher tier guidance, such as the NPF, RSES, or Section 28 Guidance, for example those relating to increasing Core Strategy figures or reducing residential density.

1.6 Environmental Protection Objectives (EPOs)

The Environmental Protection Objectives provide a standard against which the goals, policies and objectives of the Limerick Development Plan can be measured, in order to highlight those with the potential for environmental impact. These have been used as a guide for the preparation of the final objectives in the Draft Plan, which are listed in the appendix together. One additional EPO has been included following receipt of submissions from the public which outline the need to “conserve and record those aspects of cultural heritage that may be affected by planning related activities”. This has been included in C3 below. These EPOs are as follows:

Biodiversity, Flora and Fauna/Built and Architectural Heritage

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

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

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

B4: Preservation of the archaeological heritage.

Population and Human Health

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

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

Water

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

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

W3: Ensure that wetland and peatland sites are preserved.

Air Quality and Climate

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

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

AQC3: Include climate action concerns into the Plan policies.

Geology and Soils

GS1: Encourage development of brownfield sites, in terms of the delivery of compact growth, which can make 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 as identified in the Draft Development Plan.

Material Assets

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

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

Compliance with Higher Tier Plans

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

1.7 Likely Significant Effects on the Environment of Implementing the Limerick Development Plan

Assessment of the policies and development objectives in the draft Limerick Development Plan, showed that overall these policies and development objectives will not pose a significant adverse impact on the environment. Many of the policies and objectives are considered positive, setting out to manage and protect aspects of the environment such as compact growth, climate action measures, water quality, landscape, heritage resources and

management of flood risk. The overwhelming thrust of the review is hugely positive in that it will update the Plan to take into account the policy content of both the National Planning Framework and the Regional Spatial and Economic Strategy for the Southern Region. Continued adherence to both the policies of the RSES and NPF is emphasised. It is also an opportunity to take into account the climate action guidance and legislation that has been put in place over the last number of years.

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

1.8 Monitoring Proposals

Measures are proposed as part of the SEA process to monitor the effects on the environment of implementing the new Plan. It should also be noted that there will be substantial changes in the monitoring regime of the new draft plan following on publication of the Draft Development Plan Guidelines (August 2021). The frequency of publication of monitoring reports will be increased. Section 8.0 of this report details are provided for surveys which help inform monitoring and also provide a baseline against which to assess the planning applications that will be assessed under the plan policies. Monitoring for SEA will be carried out as part of the overall monitoring of the Limerick Development Plan and using the material presented in the draft Development Guidelines to assist in measuring the implementation of planning policy.

2.0 Introduction to SEA

2.1 Background

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

2.2 Strategic Environmental Assessment

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

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

This is the Environmental Report for the proposed Limerick Development Plan for its second public display period and has been carried out in accordance with Schedule 2B of S.I. 436 of 2004 and SI 201 of 2011, which sets out the information that is required to be included in SEA and Environmental Reports. This report should be read in tandem with the Draft Plan and the Natura Impact Assessment, Strategic Flood Risk Assessment and the Material Alterations document.

Additional text to be included in the proposed Development Plan is identified in green underlined and text to be removed in red strikethrough.

2.3 The Contents and Main Objectives of the Draft Plan

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

Limerick – A Green City Region on the Waterfront

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

The key ambitions supporting this vision are as follows:

1. A Green Region

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

2. Embracing the River Shannon

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

3. Resilient, Connected and Inclusive Communities

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

4. A Sustainable, Innovative and Competitive Economy

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

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

The following are the interlinked strategic objectives of the Draft Plan:

1. Grow Limerick's economy and create opportunity through maximising the potential for development through the promotion and enhancement of the **competitive advantages of Limerick**, including its strategic location, connectivity and accessibility to international markets, a skilled workforce and a high quality of life. The Limerick Brand shall be used to internationalise the city. The Limerick Brand shall be used to internationalise the city. Any further brands created within and by the Local Authority,

including organisations owned by the Local Authority, shall work within the framework outlined in the 'Limerick Atlantic Edge, European Embrace' brand.

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

five key drivers – Greenways, Waterways, Activities, Heritage, Arts and Culture, in an urban and a rural environment.

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

2.4 Relationship of the Draft Limerick Development Plan with other Plans

International Conventions and Agreements

Ireland has ratified a range of international agreements in relation to the environment. Such agreements place legal obligations on the State with respect to the conservation and management of our environment and heritage.

National, Regional and Local Planning Policy Context

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

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

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

3.0 SEA Methodology

3.1 Steps in the SEA Process

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

- 1. Introduction to and familiarisation with the SEA process.**
- 2. Setting out the background to the review of the Limerick Development Plan.**
- 3. Consultation** with the Environmental Authorities, the public and officials with a range of expertise within the Local Authority. Scoping was carried out with the environmental authorities prescribed in the legislation: -The Environmental Protection Agency (EPA), Department of Housing, Local Government and Heritage, Department of Tourism, Culture, Arts, the Gaeltacht, Sport and Media, Department of Agriculture, Food and the Marine and the Department for Environment, Climate and Communications and adjoining Local Authorities of Tipperary, Clare, Cork County and Cork City and Kerry. These were all consulted in order to determine the scope and the level of detail to be included in the environmental report.
- 4. Establishment of an Environmental Baseline and Trends for the Limerick Development Plan area:** Baseline data was collected on the basis of the information included in the scoping report, as well as having regard to the requirements of the SEA Directive. The various factors used to describe the current state of the environment include biodiversity, population and human health, water, air quality, landscape, soils and geology, archaeology and built heritage and the inter-relationships between these factors. Much of the data was extracted from existing data sources. There is no requirement for generating new data under the SEA process.
- 5. Identifying significant Existing Environmental Issues in the proposed amendments:** The Chief Executive's Report was presented to the Elected Members of Limerick City and County Council on November 26th 2022, it set out a series of Material Alterations, the Elected Members were briefed on the contents of the Chief Executive's Report and the environmental implications of the proposed amendments, which was facilitated by a series of meetings to discuss differing element of the plan following

publication of The Chief Executives Report on Public Consultation. Additional amendments have been put forward by the Elected Members in line with the Planning and Development Act 2000 (as amended) and it is through all of these amendments that the content of the draft LDP, is now proposed to be amended. These amendments are assessed against the Environmental Protection Objectives (EPOs), the preparation of the EPOs was an important step as they serve as a guide for the planning team preparing the plan.

6. **Reasonable and realistic alternative strategies** were considered regarding options for the amendments. Zoning patterns are altered from those set out by the draft Plan. These were altered to reflect the content of new national and regional guidance and to respond to development and housing and educational needs. Monitoring measures are identified in order to quantitatively assess the consequences of the identified impacts.
7. **Public Consultation:** The Environmental Report and the Material Alterations is made available for public consultation as per the statutory process provided for under the Planning and Development Act 2000 (as amended). Along with prescribed bodies the documents are made available to neighbouring Local Authorities. See 9 below.
8. **Plan Process to date:** as the SEA process is part of the wider development Plan process it is worth considering the development plan process as a whole and the Steps taken so far.

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

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

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

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

A Chief Executives Report on Public Consultation Issued to the Elected Members on the **26th November 2021.**

We are now considering the amendments of the Chief Executive, as set out in the Chief Executive's Report dated 26th November 2021 and the amendments prepared by the Elected Members based on the contents of that report. The amendments which resulted were put forward at the Council meeting of the 18th of February 2022.

3.2 Difficulties Encountered in Compiling the Required Information

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

https://www.limerick.ie/sites/default/files/strategic_integrated_framework_plan_for_the_shannon_estuary_-_written_statement.pdf.

Difficulties encountered in compiling data for the previous plan include the lack of availability of information relating to geology and also in relation to surface water drainage. This was remedied by carrying out a survey of the Geological Heritage of Limerick in 2021. Funding was been obtained from the Heritage Council to support the geological survey. As noted both the Plan and Report are evolving documents which can incorporate new information when it comes available. The Strategic Flood Risk Assessment which informed the earlier draft of the plan has been updated to take into account the proposed amendments. An update flood report to serve as a back drop to assessing the amendments of the 18th of February was also prepared.

Table 2 below details data sources used in the preparation of to the Environmental Protection Objectives. Please note the addition of EPO C3.

Table 2: Environmental Protection Objectives and Data Sources

Biodiversity, Flora and Fauna/Built and Archaeological Heritage	Data Sources
<p>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>Information was drawn from NPWS reports and individual planning applications, in addition to site inspections. The County Botanical Recorder has also provided an inventory of sites based on botanical surveys to inform the knowledge base.</p>
<p>B2: Ensure the continued conservation of the Natura 2000 sites, Natural Heritage and Proposed Natural Heritage sites. These sites are important, both as an amenity and natural history resource.</p>	<p>See above.</p>
<p>B3: Preservation of the character of the historic built fabric.</p>	<p>Much has been published on Limerick’s built heritage in particular. More detailed site specific material is available in planning files and Protected Structures Records in addition to the National Inventory of Architectural Heritage.</p>
<p>B4: Preservation of the archaeological heritage.</p>	<p>Council Archaeologist.</p>
Population and Human Health	Data Sources
<p>P1: Facilitate a good standard quality of life for the population of Limerick through ensuring high quality residential, recreational, educational and working environments.</p>	<p>CSO. Council Monitoring and EPA discharge licence.</p>
<p>P2: Provide policy support for the provision of suitable employment and facilities for the local population.</p>	<p>Irish Water, Physical Development Section of Limerick City and County Council.</p>

Water Resources	Data Sources
W1: Ensure that wastewater infrastructure keeps pace with development proposals.	Good data available - EPA water quality Data, Inland Fisheries Ireland. Council monitoring.
W2: Ensure that the requirements of the Water Framework Directive are incorporated into the Plan.	See Above.
W3: Ensure that wetland and peatland sites are preserved.	NPWS site synopsis.
Soils and Geology	Data Sources
GS1: Encourage development of brownfield sites, in terms of the delivery of compact growth, which can make 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.	Data available - GSI, EPA. Planning Assessments and Council Plan Map also used.
GS2: Protect geological sites within the Plan area.	See above. A survey was carried out in 2021 to address information deficiencies.
Air and Climatic Factors	Data Sources
AQC1: Increase energy efficiency and the proportion of energy generated from renewable sources and where necessary to ensure the sensitive application of energy saving measures to the historic built fabric of Limerick.	Limerick Clare Energy Agency Energy Balance Audit. Published UL sources. Carbon balance paper being prepared which will help with background information.
AQC2: Avoid deterioration of air quality in the Plan area.	See above.
AQC3: Include climate action concerns into the Plan policies.	Data from Limerick Climate Change Adaptation Strategy.

Cultural Heritage	Data Sources
C1: Protect and conserve features of archaeological heritage and their setting.	Good Data available through Record of Monuments and Places, also Council Archaeologist. Text was included in the Plan in order to emphasise the importance of archaeological heritage in the area.
C2: Protect, conserve and promote the sustainable re-use of architectural heritage.	Good Data available through Record of Protected Structures and the local Conservation Officer. NIAH reports.
C3: Conserve and record those aspects of cultural heritage that may be affected by planning related activities	Limerick Studies Centre. Planning Assessments, local newspapers historical groups.
Landscape	Data Sources
L1: Protect and conserve the quality, character and distinctiveness of the Limerick landscape, both urban and rural.	Planning Assessments NIAH reports. This will involve detailed consultation with the architectural heritage unit of the DAHG.
L2: Retain listed views in the county area.	Development Management Planners, Heritage Officer, Forestry Reports, Council Archaeologist, Conservation Officer.
Material Assets	Data Sources
MA1: Maintain sustainable access to assets such as open spaces, water resources and all other physical and social infrastructure.	Planning and local engineering Assessments, particularly in relation to amenity provision. Environmental Section Assessments for discharge licences.

<p>MA2: Ensure that there is adequate policy support for infrastructural provision in the Plan area.</p>	<p>See above.</p>
<p>Compliance with higher tier plans</p>	<p>Data Sources</p>
<p>HTP 1: Ensure compliance with higher tier plans such as the National Planning Framework and the Regional Spatial and Economic Strategy and other Section 28 guidance that might be issued by the Department.</p>	<p>Reference to RSES and NPF policies and Section 28 guidance.</p>

4.0 Current State of the Environment

4.1 Introduction

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

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

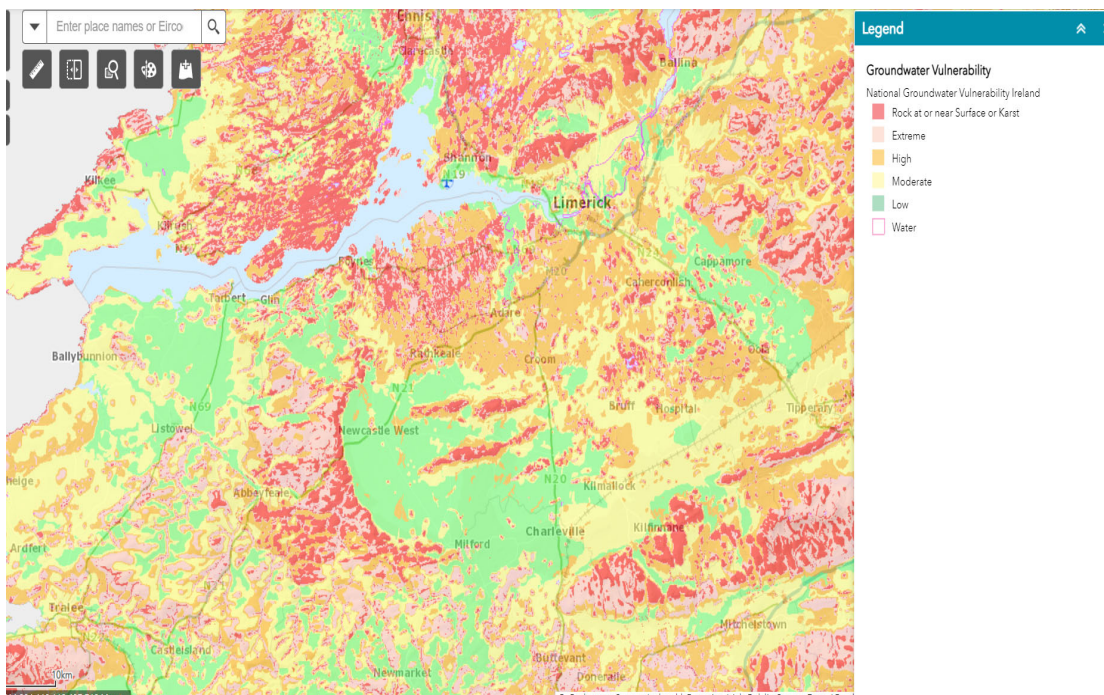


Figure 7: Groundwater vulnerability in Limerick (Source: OSI Ground Water Data Viewer)

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

Biodiversity, Flora and Fauna

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

Since the LDP is a policy document the opportunity has been taken to update policy content in relation to nature conservation. The National Parks and Wildlife submission to the First Issues pre-Draft Plan consultation, mentioned the need to place nature conservation on a prominent footing in the Plan, by referencing the National Biodiversity Action Plan (NBAP). References to the National Biodiversity Action Plan and the All-Ireland Pollinator Plan have been incorporated into the Plan. In this environmental report, the monitoring section has been updated with content from the NIS to ensure that ecological issues are adequately monitored and trends identified. A programme of surveys has been presented to help achieve this end.

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

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

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

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

- Rivers, streams and riparian zones (such as River Shannon, River Maigue, River Feale and River Allaghoun);
- Loughs (such as Lough Gur, Dohyle Lough);
- Bogs and Fens (such as Griston Bog and Ellaha Fen).

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

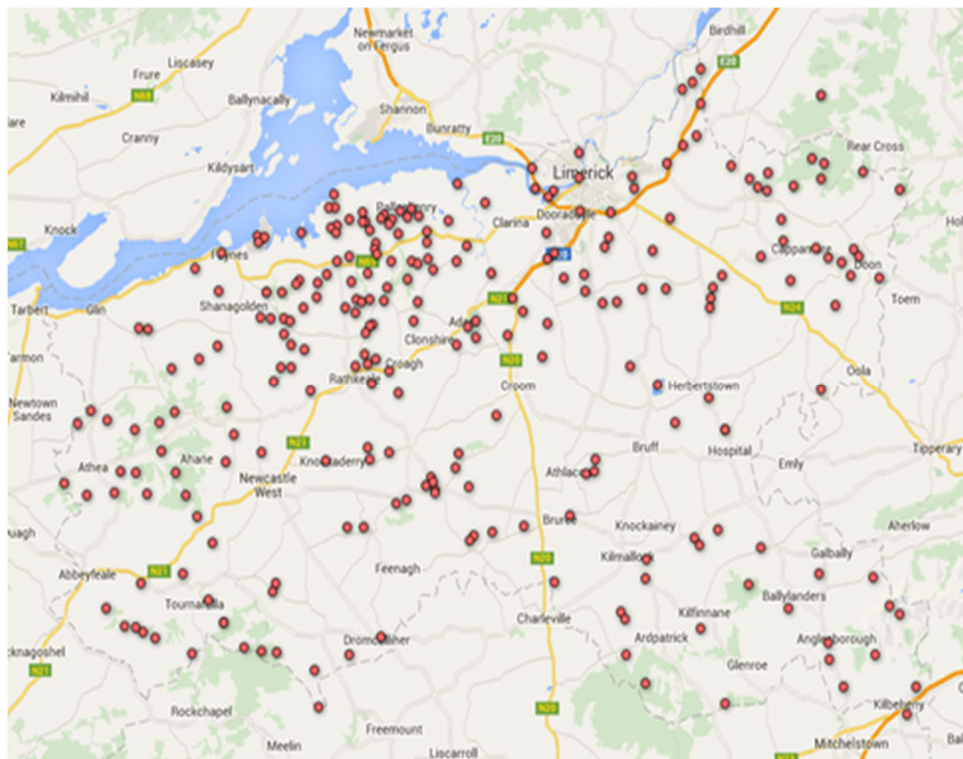


Figure 8: Preliminary wetlands map (Source: Wetlands Surveys Ireland)

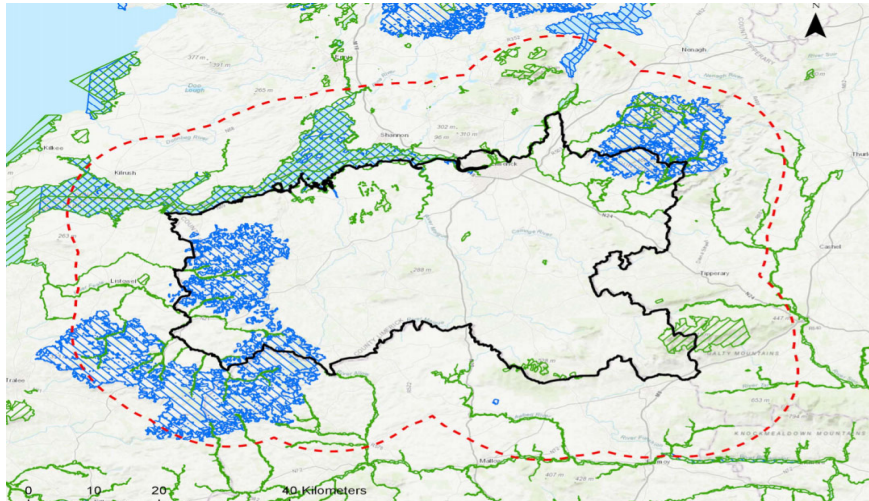


Figure 9: Natura 2000 sites in Limerick and within 15km of the county boundary (Source: Enviroguide 2019)

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

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

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

Special Protection Areas

Site Name: [River Shannon and River Fergus Estuaries SPA](#) (004077)

Site Name: [Slievefelim to Silvermines Mountains SPA](#) (004165)

Site Name: [Stack's to Mullaghareirk Mountains, West Limerick Hills and Mount Eagle SPA](#) (004161)

Trees in the Plan area

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

Closely related to trees in the landscape are hedgerows. These are part of the fabric and history of the landscape. Apart from their visual contribution, they are also important habitats in their own right. In order to ensure their continued vitality and usefulness as landscape features and habitats, they require continuous management, particularly, if they are to be integrated within new developments, the Draft Development Plan seeks to safeguard and integrate hedgerows into new developments where possible.

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

Existing Environmental Pressures for Biodiversity, Flora and Fauna

One of the most pressing issues is prevention of encroachment on sites of ecological interest, both designated and non-designated. There is increasing pressure for public access, which has intensified since the Covid 19 pandemic. This increased disturbance and footfall can cause both physical damage and disturbance to habitats and species.

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

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

Population and Human Health

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

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

The population growth targets of the NPF has implications for the Development Plan, given the increased emphasis on placing housing and development generally within the boundaries of existing settlement throughout the county, both to avail of and support services and to ensure the growth of stronger settlements. Chapter 4 of the Plan Housing Strategy aims to form a balance between compact growth and sustainable communities, while recognising that service capacity in the settlements has to be managed carefully. Chapter 4 itself says..."by placing an increased emphasis on the future development of existing settlements within the county, this Plan seeks to foster sustainable live-work patterns which reinforces existing urban centres whilst safeguarding the agricultural sector and rural areas from urban generated development pressures. The Settlement Strategy addresses a range of settlement scales within urban and rural contexts that provide for a variety of levels of employment, services and housing choice commensurate with their position in the Settlement Hierarchy".

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

unemployment rate of 5.4%. Economic conditions have changed significantly in Limerick in recent years. With the economic upturn across the state, the wider urban area of Limerick has shown significant improvements in job creation, employment/ unemployment and investment. Across the local authority area, some 20,000 jobs have been created since 2013, with some 7,000 of those jobs in the City. The Covid 19 pandemic has had a serious effects on the Limerick economy and will require a number of years to address. Work by the local Enterprise Office (LEO) has done much to offset these effects. Although 148 jobs were lost throughout 2021, 327 new jobs brought the overall employment level in LEO supported Limerick companies to 1,825 by the end of December.

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

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

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

Existing Environmental Pressures/ Problems for Population and Human Health

Key environmental issues in the Plan area are:

- The need to integrate the policy content of both the NPF and the RSES with their emphasis on concentration of development and the population figures assigned to Limerick.
- The need to ensure that Waste Water and Water Supply infrastructure keeps pace with development, in rural towns and villages in particular.
- Ensuring adequate zoning for Community and Educational usage, including provision of medical and leisure at a level appropriate to the settlement position in the hierarchy.
- Maintenance and enhancement of the quality of the urban and rural surroundings and ensuring continued access to amenities and services is essential for human health and wellbeing.

Water

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

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

Agency | Water Quality in Ireland 2013 – 2018). This might be a reflection of intensive land usage in their catchments.

According to the EPA, the WFD Transitional Waterbody status (2010-2015) of the River Maigue, River Deel and River Ahacronane and Shannon Estuary is 'moderate' status and 'at risk' of not achieving good status. The Upper Shannon Estuary just west of Limerick City Docks has 'poor' status.

Groundwater

While ground water is an important resource as a potable water source in County Limerick in particular, Figure 7 above indicates that it is also a vulnerable resource. Possible pollutants include fertiliser residues, poorly managed farmyard waste. Some of the original 1995 Geological Survey of Ireland Source Protection Reports (see <https://www.gsi.ie/en-ie/publications/Pages/Limerick-Groundwater-Protection-Scheme-Reports.aspx>) indicated that this was a threat to some sources. A later report in 2013 indicates that this is still the case. In other areas the report also indicates that possible contamination from domestic wastewater treatment systems is also an issue. This is the case where one proposed amendment, proposed by the Elected Members is the inclusion of Roxborough as a Level 6 settlement. The area already has a high concentration of poorly functioning treatment systems in poor ground conditions with pollution of ground and surface water arising. Additional development as identified in the proposed amendments will increase pressure on ground water at this location.

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

Water Supply

Water for domestic consumption is extracted from 28 water resource zones (WRZs) to supply Limerick City and County with a potable water supply. As part of the National Water Resource Plan (currently being prepared by Irish Water) it has been determined that the following WRZs may require further investigative studies or interventions to facilitate

significant new connections to the network: Glenosheen – Jamestown, Kilmallock, Carrigkerry, Croom, Knocklong – Hospital, Galbally, Ballingarry, South West Regional, Glin Water Supply, Murroe, Herbertstown, Doon, Castletown – Ballygran, Abbeyfeale, Fedamore, Rathkeale, Rockhill – Bruree, Ballylanders, Kildeely and Oola – Pallasgreen. The NWRP has assessed that it is likely that further investigative studies or interventions will be required in the following WRZs: Cappamore Foilen, Foynes Shannon Estuary and Kilfinane-Ardpatrick water supplies. These WRZ serve rural hinterlands and other settlements other than the settlements listed above. The full options assessment stage of the NWRP is being prepared both by Irish Water and the Water Services Department of the Council to identify the preferred interim and long-term interventions required to ensure a sustainable water supply in Limerick.

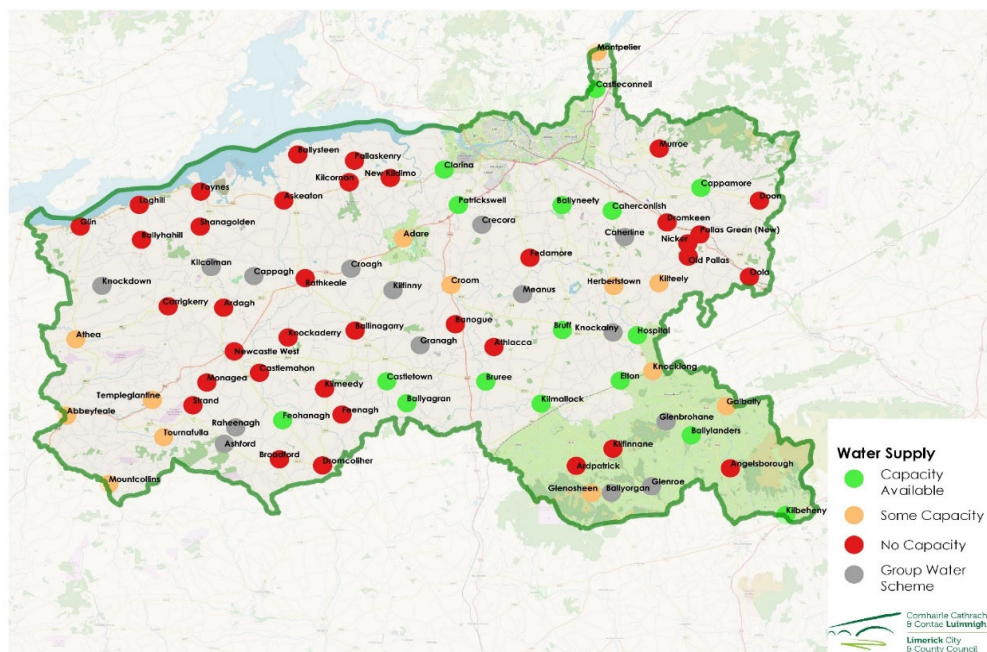


Figure 10: Water supply and capacity status in Limerick

Existing Environmental Pressures/ Problems for Water

The existing environmental pressures and problems in relation to water in Limerick are listed below:

1. Quality of both surface and ground water resources in Limerick.
2. Ensuring that there is sufficient capacity in Waste Water Treatment Plants to avoid pollution from these sources and to ensure that their capacity keeps pace with development.

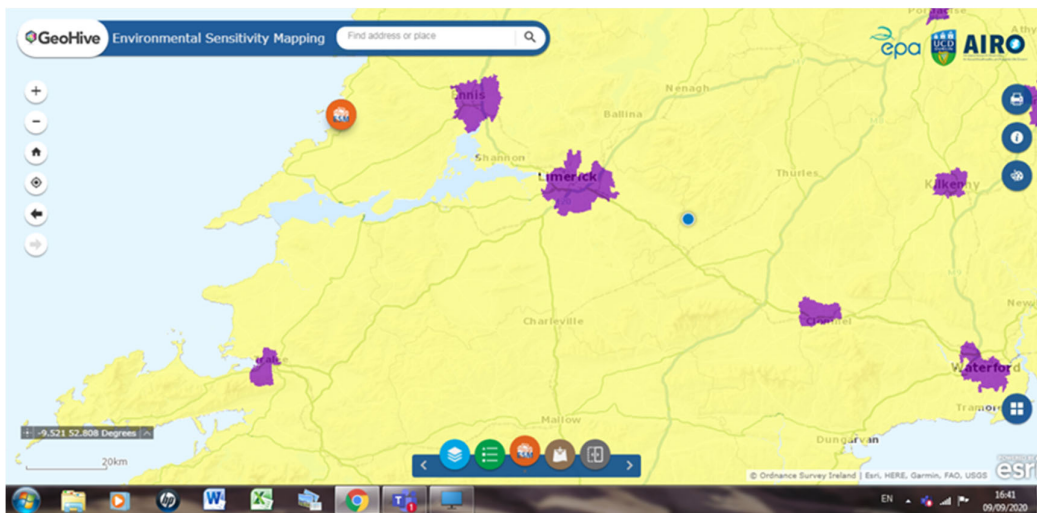
3. Ensuring that there is sufficient potable water resources to serve Limerick's population. It is important to avoid over abstraction as this will have adverse hydrological and ecological effects. Two settlements Adare and Croom have had new bore holes excavated since 2018 to ensure continuity of supply.

4. Ensuring that the issue of water management as a whole is addressed in Limerick. There is a need for water management to take into account not just flooding but variations in supply and demand as demand grows. There is also a need to ensure that the water supply system can function in a climate altered future, in a fashion that will not have adverse ecological and hydrological effects.

Air Quality and Climate

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

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



Development itself can cause issues for air quality and the contaminants that might be released during disturbance of previously developed brownfield sites. While this can give rise to air contamination principally in the form of dust, it can also create problems for local hydrology, through pollution of aquifers and water courses. This is likely to become more of an issue, with both the NPF and the RSES emphasising compact growth and the development

of infill and use of brownfield sites. The Development Management section of the Plan (Chapter 11) refers to this issue as follows: “the redevelopment of certain brownfield sites, particularly sites where previous industrial type activities may have left a legacy of contamination could possibly affect human health and/or have adverse impacts on the environment, including on ground and surface waters, soils and air quality. Examples of such sites include those formerly used for manufacturing/industry, landfill, tanneries, petrol filling stations, oil/gas storage, and scrap yards and railway lands”.

The Council will require that sites with the potential to contain contaminants are subject to proper investigation and if necessary remediation, to industry-best practice standards prior to redevelopment. Such site investigation and remediation should be undertaken and managed by appropriately qualified personnel, will require screening for Appropriate Assessment under the Habitats Directive and may be subject to licensing/permits required under other Acts, including the Waste Management Act.

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

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

Climate

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

There will also be indirect impacts arising from societal responses to climate change in terms of both adaptation (e.g. changes in land use, such as construction of flood defences or use

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

The approach in the draft Plan has been to prepare a dedicated chapter dealing with climate action but also to include climate issues into each chapter. This means that the specifics of climate action as it relates to issues such as transport infrastructure can be found in that chapter, while a broader response is in the climate action chapter. This will be the first Limerick Development Plan with such an approach. In terms of the amendments, greater clarity has been achieved through clear identification of climate targets.

A number of proposed material amendments made by the Elected Members, include proposals to rezone this lands to accommodate more vulnerable uses. Site specific flood risk assessments and justification tests was submitted as part of the supporting documentation for the changes of zonings. The information was reviewed as part of the SFRA on the material alterations, which concluded that these sites should be retained for less vulnerable uses as appropriate to the flood zone. Zoning of lands for vulnerable uses in flood zones is contrary to the 2009 Flood Risk Guidance and not consistent with higher tier plans.

Existing Environmental Pressures/ Problems for Air and Climate

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

Climate change impacts may present challenges to future land use and location of development in the Plan area. Predicted impacts from projected temperature rises include more concentrated periods of higher rainfall and more exposure to flood risk. As indicated earlier in this report, tidal flooding is a huge part of the flood risk in Limerick. A comprehensive Strategic Flood Risk Assessment has informed examination of the amendments and the zoning pattern has been guided by this. Amendments to zone those areas that are at flood risk, though put forward are not favoured by the executive.

There is the continued need to comply with current and emerging guidance on climate adaptation and mitigation as it emerges from central government. At present the Limerick Climate Change Adaptation Strategy 2019 – 2025 is the most evolved of internal climate response documents in the Council and has informed the climate action sections of the Plan. This and further climate action responses will be informed by new guidance and legislation as it emerges including the Climate Action and Low Carbon (Amendment) Act 2021.

Geology and Soils

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

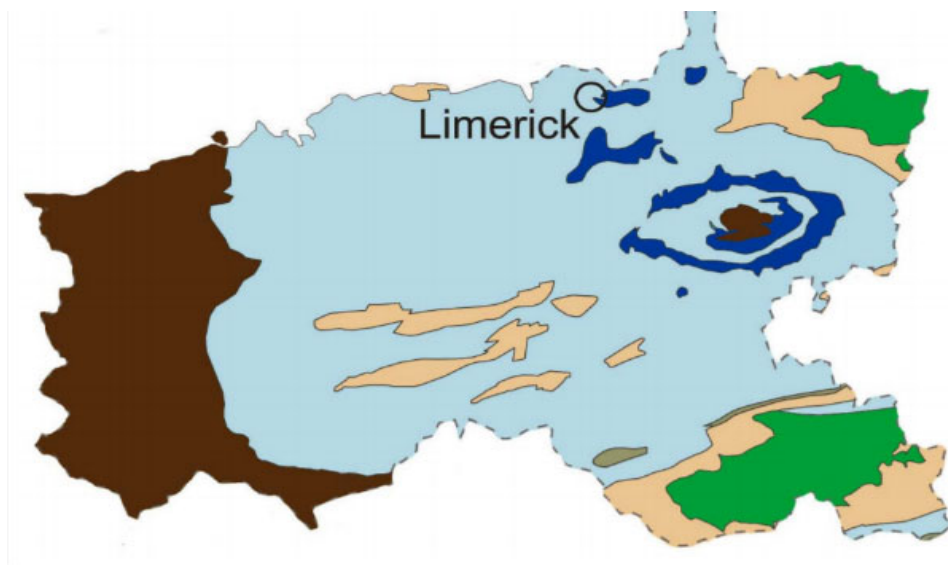


Figure 12: Geological map of Limerick (Source: geoschol.com)

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

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

A geological heritage survey with the GSI has been carried out and funding was obtained from the Heritage Council to facilitate this work in 2021. This survey will inform the Local Authority in carrying out its functions.

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

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

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

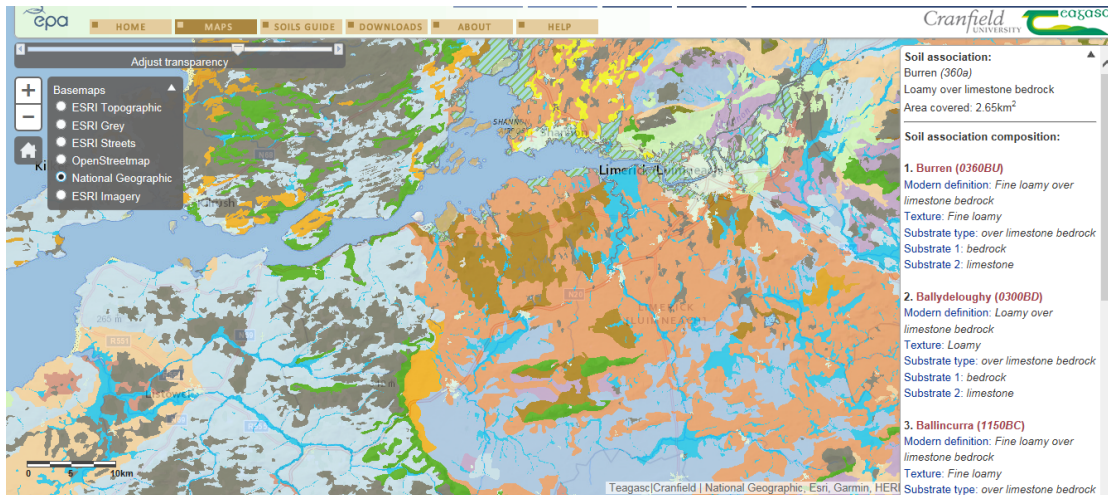


Figure 13: Soil associations in part of Limerick (Source: Teagasc)

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

Geology is also discussed in the Sections on water in the Environmental Report.

Existing Environmental Pressures/ Problems for Soils and Geology

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

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

Archaeological Heritage

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

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

Cultural Heritage

Built Heritage

The number of buildings and structures on the Record of Protected Structures is over 4,000 buildings, structures and features in Limerick. The Draft Plan review process included a review of the RPS in order to consider those structures that may need to be delisted or indeed new structures added, a challenging task given it has been over ten years since the last two Plans were prepared.

In Limerick City a number of substantial redevelopment projects have been permitted/planned such as the Opera Project and Cleeves Riverside Campus. The updated RPS will ensure adequate protection and recognition is afforded to older buildings of merit in the city and will inform future development proposals and design integration into the cityscape.

The new Building Height Strategy will have particular implications for Limerick City and Environs up until now, with rare exceptions it has been a low rise City. The new Building Heights Strategy will offer valuable guidance on the integration of taller development in carefully selected sites in the City. The Strategy enables a coordinated approach to the development of taller buildings within the cityscape and is a step forward for building design in the City. The Strategy provides ecological opportunities for buildings, as part of the design process, to incorporate nesting sites for swifts or other urban birds. Taller buildings are often used by raptors such as the peregrine in default of natural features such as cliffs. The Strategy aligns with the urban character assessment of the City and Environs suggested in the Draft Plan, referring to the suburbs as a separate entity from the older City developments and the historical City Centre (Avison Young 2021, p.64).

Landscape Character

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

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

1. The **City Area** includes the City Centre and its immediate suburbs, including Garryowen, Lord Edward Street, Thomondgate etc. This includes the Georgian quarter and the older parts of the City.
2. The **Castletroy Environs area** to the east of the City and containing the University of Limerick and the National Technology Park.
3. The **Southern Environs Area** to the south and west of the City contains the University Hospital Limerick, Raheen Business Park and many modern housing developments dating from the 1960s. Currently major housing projects are proposed in this area.
4. The **Caherdavin Area** to the west and north of the City contains many housing developments from the 1960s, the Technological University of the Shannon and Thomond Park an important sporting focal point in the City.

Proposals to remove individual structures from the list of protected structures put forward as part of the amendments have the potential to have local effects but will not result in the deterioration of the urban character areas as a whole.

Marine /Seascape

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



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

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

Existing Environmental Pressures/ Problems for Cultural Heritage

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

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

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

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

Material Assets

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

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

Existing Environmental Pressures/ Problems Material Assets

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

- 1.** Protection of the carrying capacity and the strategic transport function of the transport network is an objective of the Draft Limerick Development Plan and requires continuous assessment.
- 2.** It will be important to ensure that the provision of WWTP capacity keeps pace with development.
- 3.** All new infrastructure is required to be designed and built in a fashion so as to ensure it can function in a climate altered future. This issue has been included in policy content in Chapter 9 – Climate Action, Flood Risk and Transition to a Low Carbon Economy.

4.2 Interrelationships between the environmental factors

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

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

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

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

The most significant element of the amendments that would have environmental effects is the zoning of areas that are at risk of flooding. Quite apart from placing eventual users of these areas at risk, it is unnecessary as sufficient land has been zoned for development purposes within the plan area for the lifetime of the plan.

Table 4: Inter-Relationships between Environmental Topics

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

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

Many of the activities regulated by planning legislation have the potential to cause environmental and ecological damage if carried out inappropriately, or at the wrong scale or location. The Development Management Chapter informed by planning policy is important in dealing with these issues.

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

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

The Climate Action and Low Carbon Development (Amendment) Act 2021 sets ambitious targets to reach carbon neutrality by 2050 with a reduction of 51 per cent in carbon emissions overall by 2030 compared to 2018 figures. The new plan allows the incorporation of relevant elements of this bill into planning policy. Without the adoption of the plan the opportunity to incorporate this, the latest and perhaps most ambitious of climate legislation, would be lost.

The latest State of Environment report, 'Ireland's Environment-An Integrated Assessment' (EPA,2020) describes further deterioration in Ireland's environment and submissions from agencies such as the NPW outlines policy measures that could help with ecological decline. The Draft Plan is an opportunity to put these in place to inform planning and development activities.

The amendments in Chapter 6 also outline up to date concerns relayed by the Elected Members to the Executive and are a valuable means of updating the plan policy taking into account local concerns from throughout the City and County.

4.4 Conclusion – Significant Environmental Issues

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

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

Biodiversity: Including maintenance of the Natura 2000 site network, conservation of sites of local and national and international biodiversity interest, enhancement of ecological corridors and retention of urban open space. The role of ecological corridors and Green Blue Infrastructure also needs to be emphasised, subject safeguards for existing habitats. Individual species of conservation interest, such as Barn Owls and the Lesser Horseshoe Bat also have specific policy mention to emphasise their vulnerability. It is intended to work with relevant organisations and agencies within the lifetime of this plan to help with the conservation status of these two species, in particular. A Barn Owl survey will be carried out in the summer of 2022 to inform planning responses to the conservation of this species. Also the Local Authority is working with the Vincent Wildlife Trust (VWT) to facilitate elements of conservation programme for the Lesser Horseshoe Bat in East Limerick.

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

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

A key challenge for the management of the architectural heritage of Limerick is sustainable and sympathetic reuse, regeneration and development of the built environment, whilst retaining and protecting the distinctive character of Protected Structures and their settings. Policies in relation to archaeology also have been updated, with a particular emphasis required for the setting of archaeological monuments.

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

Climate Action: The opportunity has been taken to broaden the scope of references to climate change in the Plan across all of the chapters. However some of the amendment run counter to coherent climate action, these include the proposed zoning of areas at risk of flooding, setting urban housing density figures at lower levels than recommended.

4.5 Consideration of Alternative Strategies

Consideration of Alternative Strategies is outlined in Section 1.5 above and reiterated here for emphasis.

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

Legally this would not be possible as the Plans have been extended previously and are out of date and do not align with national or regional policy. As indicated later in this report, the current Plans would not be considered an acceptable alternative.

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

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

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

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

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

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

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

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

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

To ensure balanced provision of services with appropriate policy support, it was considered best to proceed with the review. This ensures that the Plan will be consistent with the contents of the RSES, the NPF and National Development Plan, which is essential for seeking

investment from central government. Compliance and support of national policy objectives is a prerequisite for the allocation of resources.

Alternative Strategy Option 4

Alternative Strategy - The review as presented with amendments voted on the 18th of February 2022.

Public consultation identified updates required to be incorporated into the Draft Plan. Additional content has been prepared following receipt of the OPR submission and those from the other statutory bodies. New amendments reflecting specific concerns have been put forward by Elected Members. Changes have been made to the plan content and structure with additions to chapters relating to housing and climate action content. There has been a renumbering of chapters. In short the draft, has been amended to include additional information as a result of policy changes. It is considered that this draft is more reflective of both national regional policy and local input.

Notwithstanding the above, it is noted that there are several locations that are flood prone, which have been included for development, by means of additional zonings in Limerick City and Environs. Material amendments made by the Elected Members at the Special Council meeting on February 18, 2022, included a number of proposals to rezone lands to more vulnerable uses. Site specific flood risk assessments and justification tests were submitted as part of the supporting documentation for the change of zoning. The information was reviewed as part of the SFRA on the material amendments, which concluded that these sites should be retained for less vulnerable uses as appropriate to the relevant flood zones.

Similarly, there are a number of amendments put forward by the Elected Members which differ from higher tier guidance, such as the NPF, RSES, or Section 28 Guidance, for example those relating to increasing Core Strategy figures or reducing residential density.

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

5.1 Introduction

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

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

5.2 Environmental Protection Objectives

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

Biodiversity, Flora and Fauna/Built and Architectural Heritage

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

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

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

B4: Preservation of the archaeological heritage.

Population and Human Health

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

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

Water

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

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

W3: Ensure that wetland and peatland sites are preserved.

Air Quality and Climate

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

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

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

Geology and Soils

GS1: Encourage development of brownfield sites, in terms of the delivery of compact growth, which can make 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 set out 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 within the Plan area.

Compliance with Higher Tier Plans

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

5.3 Use of Environmental Protection Objectives

The Environmental Protection Objectives set out in the previous section have been used to carry out the SEA in accordance with relevant legislation. They provide a standard against which the amendments to the Plan were measured for their environmental sustainability. A cross-checking process was used whereby the amendments were checked against the Environmental Protection Objectives, so that potential for significant adverse environmental impacts were highlighted in addition to significant positive impacts. Alternative options, outlined previously, were considered and measured against the EPOs.

6.0 SEA of Proposed Material Amendments to the Draft Limerick Development Plan 2022 **- 2028**

6.1 Content of the proposed Draft Limerick Development Plan

The Chief Executive's Report on submissions received during the public consultation was issued to the Elected Members on November 26th 2021. This also included Volume 3(a), which was an Environmental Assessments of Proposed Material Amendments, set out in that report. These are included below in S 6.1.1 below. This report was considered over a series of briefings sessions by the Elected Members, during January and February 2022, which culminated in the meeting of 18th February where the additional amendments were proposed by the Elected Members. These are considered in Section 6.1.2 below, following Section 6.1.1 outlining amendments in sequential order.

6.1.1 Environmental Assessments of Proposed Material Amendments set out in the Chief Executive's Report

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 Material Amendments to each chapter of the written statement, text to be omitted ~~struck through in green~~ and wording to be inserted underlined in red. Where policies or objectives are proposed to be included or altered, the policy / objective numbers of those in the Draft may need to be revised.

Chapter 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 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 green while text deletions are outlined in red .	Ensures compliance with higher tier plans in relation to Core Strategy Consistent with EPO HTP1

2	<p>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).</p> <p>Kilmallock has been moved to being a Level 3 town. Drombanna and Patrickswell (Lough Gur) have been added to the Level 6 Settlements.</p>	<p>Ensures compliance with higher tier plans as per SEA guidance and the OPR submission.</p> <p>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.</p>
3	<p><u>2.3.5.3 Settlement Capacity Audit Tiered Approach to Zoning</u></p> <p>In accordance with the methodology set out in Appendix 3 of the NPF, a <u>Settlement Capacity Audit tiered approach to zoning</u> was applied through the carrying out of an infrastructural assessment for each of the zoned settlements</p>	<p>The audit will ensure that up to date information on Infrastructure will be available in order to inform development decisions. This will have environmental benefits.</p>
4	<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</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.</p> <p>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. Ensures the future capacity of transport infrastructure. Consistent</p>

	<p><u>a case-by-case basis having regard to all relevant planning criteria.</u></p> <p><u>Objective XXX Phase 2 Residential Development</u></p> <p><u>Lands:</u> <u>It is an objective of the Council to:</u> <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.</u> <u>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><u>Policy CSP P5: Road Network</u> – <u>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</u></p> <p><u>Policy CSP P6: LSMATS</u> - <u>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</u></p>	<p>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>
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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 evidencebased 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>
6	<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 Local Area Plans</u>, 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</u></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</p>

	<p><u>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 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>sensitive reuse of existing buildings, reducing the need for new build.</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</u> for <u>the</u> sustainable population growth for <u>of</u> Limerick, in accordance with the Core Strategy, whilst achieving a balance between social, economic and environmental factors.</p> <p><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> <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 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. -Section 2b Limerick County, which outlines the spatial</u></p>	<p>Sets out clear planning principles in line with NPF and RSES and national S28 Guidance. Consistent with HTP1</p>

	<p><u>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. 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</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>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>	
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<p>5</p>	<p>Insert:</p> <p>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 those which support the compact growth, revitalisation, brownfield and infill development objectives of the National Planning Framework.</u></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</u></p>	<p>Ensures compliance with higher tier plans, delivery of sustainable transport.</p> <p>Consistent with HTP 1.</p>
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	<p><u>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</u></p> <p><u>Region’s three Cities and their Metropolitan Areas and Galway in the Northern and Western Region. Limerick City and County Council are committed to a collaborative intraregional 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</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>are committed to continuing the collaborative approach undertaken with Clare County Council to ensure the sustainable and coordinated 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 CGR O1- 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 CGR O2 - Capacity of 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>	Renumbering of policies for clarity.

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>c) 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>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 this Draft Plan.</p> <p>d) 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</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><u>compact growth within an urban context, subject to Development Management Standards set out under Chapter 11 of this Draft Plan.</u></p> <p>e) 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>f) 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>g) CGR P2 - Monitoring of Brownfield/Infill Sites: <u>It is policy of the Council to monitor the development of brownfield and infill sites and their contribution to delivering on the targets established, over the lifetime of the plan</u></p>	
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<p>10</p>	<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 SCOT 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>
<p>11</p>	<p>Insert: 3.4.1</p> <p>3.4.1 Developing a Spatial Strategy 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</p>	<p>Emphasises the coherent development of the lands within the development boundary taking into account the targets set by</p>

	<p>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</p>	<p>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>Flood Risk Management Guidelines for Planning 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</p>	
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	<p>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 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>	
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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</u></p>	<p>Emphasises the coherent development of the lands within the development boundary taking into account the targets set by</p>
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	<p><u>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 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>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 adequate policy support for infrastructural provision in the plan area.</p>
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<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 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>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>
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3.4.4.2 Building Height Strategy

Implementation of the National Planning Framework requires increased density (Refer to [Chapter 2: Core Strategy](#)), 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 [and achieve the transformational objectives of the MASP.](#)

In accordance with the requirements of the *Urban Development and Building Height Guidelines for Planning Authorities* (2018), a Building Height Strategy for Limerick City has been prepared to accompany this Plan as set 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. [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](#)

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.

This is 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 and HTP!

	<u>Development Management</u>	
14	<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>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</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 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</p>

	<p>sustainable manner than developing a greenfield site on the outskirts of the City.</p> <p>3.4.3.1 Opera Square Site</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, 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 <u>Square</u> 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.</p> <p>3.4.3.2 Opera Square Site</p>	<p>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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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 on brownfield lands while acting as a catalyst for other major City Centre investments. **Mungret Framework Masterplan**

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. [A number of housing developments have recently been granted planning permission in this area.](#) 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.

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 [framework](#) ~~masterplan~~ 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 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 the public realm.

	<p>Objective CSC O1 – Caherdavin Shopping Centre: It is an objective of the Council to:</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>	
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<p>15</p>	<p>3.4.1.1 Southill</p> <p>Insert: <u>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 facilitate and encourage indigenous SME sub suppliers to the Film Industry to locate in a regeneration area.</u></p> <p>Objective LEDP O1 - Limerick Enterprise Development Partnership: It is an objective of the Council to:</p> <ul style="list-style-type: none"> 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> 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><u>Facilitate and encourage employment creation by SMEs</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>
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<p>16</p>	<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><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.</u></p>	<p>As indicated above</p> <p>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 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</p>
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	<p><u>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>	Tier Plans.
17	<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>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</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 preparation of a Local Transport Plan for Newcastle West, which will consider sustainable mobility and placemaking, as a key element of the growth of Newcastle West</u></p> <p>Objective SS-07 <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 s 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</p>	<p>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>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</u></p>	

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:

- Supporting home ownership and increasing affordability;

Eradicating homelessness, increasing social housing delivery and supporting social inclusion

- Increasing new housing supply;
- Addressing vacancy and efficient use of existing stock;

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.

In order to align with the provisions of the NPF and 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>	<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. 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 development is achieved in all new developments</u></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</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>and Communications are in the process of developing a new Local Authority Energy Efficiency Retrofit Loan proposal for 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>b)</p>	<p>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 in appropriate and accessible locations 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), and (2005) National Student Accommodation Strategy (2017)</u> 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</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>existing dwellings to facilitate student accommodation, must include details outlining the presence and distribution of any permanent residential occupiers, the extent of students 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>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>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 Housing for All, A New Housing Plan for Ireland</u> Rebuilding Ireland, an Action Plan for Housing and Homelessness (2016) set ambitious targets for the delivery of social <u>and affordable</u> housing and</p>	<p>Supports community led housing initiatives. Consistent with EPO P1. Seeks to provide housing supplies for social and affordable housing needs. Consistent with</p>

	<p>put in place the mechanisms to support an increase in the supply of housing.</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 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 and Affordable 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 policy as 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 housing during 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 determine the appropriateness of 'Part V' Cost Rental and/or affordable purchase delivery on individual sites on a case-by-case basis. All new social and affordable housing schemes shall promote a social and tenure</u></p>	<p>EPO P1. Operates within Zoned lands.</p>
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	<p><u>mix. Support the provision of affordable housing through affordable purchase, cost rental and new build incremental schemes.</u></p>	
	<p>4.2.8 Housing Delivery Action Plan <u>Limerick City and County Council’s Housing Development Directorate are currently developing a Housing Delivery Action Plan for Limerick covering the next five years. The Plan will 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 objective of the Council to support the implementation of the forthcoming Limerick Housing Delivery Action Plan.</u></p>	<p>For clarity no environmental effect.</p>
	<p>4.2.17 Homeless Accommodation <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> 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 style="text-align: center;">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 style="text-align: center;">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><u>(a) Implement government policy in relation to the provision of accommodation for refugees and asylum seekers.</u></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>Consistent with EPOP1 P2 and HTP1.</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 is not a material amendment.</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>
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	<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>
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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 lowlying 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. 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><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></p> <p><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: It is an Objective of the Council to support and accommodate the growth of ‘Click and Collect’ retail services and grocery home shopping as appropriate.</p>	<p>This has to be viewed in the context of the current pandemic and could be a useful means of dealing with this and any future population level health issues that may arise.</p>
4	<p>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”;</p>	<p>Ensures clarity- no environmental implications</p>
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</u></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>

	<p><u>Limerick’s economy and will endeavour to protect access to these resources, where known.</u></p> <p>Section 4.7.17 include Mineral Deposits Map/Aggregates Map</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>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>

Maritime Planning Bill 2021

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:

- A forward planning regime for the maritime area;
- 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

	<p><u>Planning</u></p> <p><u>It is an objective of the Council to</u></p> <p>a) <u>Support and facilitate the implementation of the National Marine Planning Framework (NMPF) and the Maritime Area Planning Bill 2021 upon its adoption.</u></p> <p><u>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 particular management requirements and, where appropriate set out any requirements that may exist for Maritime Spatial Plans.</u></p> <p><u>(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</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</p>

	<p><u>processing, forestry and forestry processing and the equine sector). Its</u></p> <p><u>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 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>	<p>concerns into the plan policies.</p>
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8	<p>Replace Objective ECON O35 as follows: 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 Fáilte 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:</p> <p>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.</p> <p>Such developments should respect the existing fabric of the settlement, both in scale and design.</p>	<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.</p>
12	<p>Amend ECON P6 as follows:</p> <p>b) to include reference to <u>Limerick Wild Atlantic Way Gateway City Strategy</u>;</p>	<p>Could promote tourism in urban areas where it would be easily serviced.</p>
13	<p>Include a new Objective in Chapter 4 Section 3 as follows:</p> <p><u>Objective ECON OXX 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 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. 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>	<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>

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: <u>Objective ECON OXX Festivals</u> <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</p> <p><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:</p> <p><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, collaborate and drive economic growth and competitiveness.</u></p>	<p>The points about creating networks is taken to mean collaborative networks as well as sharing ideas and resources and this would not have environmental implications</p>
22	<p>Amend Rural Housing Settlement Strategy Map</p>	<p>Not significant-ensures consistency with text.</p>
23	<p>Insert the following Objective into Chapter 4 Section 4.4 Strategy:</p> <p>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</p>	<p>Supports compact development and development of urban areas consistent with EPO HTP1 GS1 and MA1</p>
24	<p>Update ECON O14 to remove the word Strategic from title.</p>	<p>Text Change. Not significant.</p>
25	<p>Insert the following into Objective ECON O44: (c)</p> <p><u>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></p>	<p>Ties in with mention of Foynes Port as such a centre in the plan. Existing infrastructure can be used to support off shore developments.</p>
26	<p>Include new objectives in Chapter 4 as follows:</p> <p><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></p>	<p>Reflects the town natural hinterlands- the promotion of local development would be good from a environmental perspective as it would reduce the need for long distance commutes.</p>

<p>27</p>	<p>Insert the following Text in Chapter 4 A Strong Economy as follows:</p> <p><u>New Section: Economic Principles:</u></p> <p><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></p> <p><u>Smart Specialisation</u> - <u>bringing together key stakeholders (local communities, national enterprise bodies, higher education institutions and private enterprises) to identify the competitive advantages of an area with the view of developing economic opportunities.</u></p> <p><u>Clustering</u> - <u>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</u> – <u>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>Ensures consistency with higher tier plans (HTP1)</p> <p>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 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><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>	
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 Initiative, to share assets, collaborate and drive economic growth and competitiveness.</u></p>	<p>The points about creating networks is taken to mean collaborative networks as well as sharing ideas and resources and this would not have environmental implications.</p>
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 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>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"> 1. <u>Consider pedestrianisation and public realm improvements (new attractive hard</u> 2. <u>landscaping) to encourage pedestrian activity within the core retail area.</u> 3. <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> 4. <u>Encourage and facilitate the reuse of vacant buildings or under-utilised sites throughout the City Centre, with a focus on brownfield sites.</u> 5. <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> 	Promotes city centre development. This is sustainable and consistent with the NPF and RSES.

	<ol style="list-style-type: none"> 6. <u>Promote access to Limerick’s historic core through improved signage/street maps to make visitors aware of the presence and location.</u> 7. <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> 8. <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> 9. <u>Undertake an access audit of the built environment to seek to improve</u> 10. <u>accessibility within the City for people with disabilities.</u> 11. <u>Support the retail charter for operators and landlords to sign-up to high quality goals for retail in the City Centre.</u> 12. <u>Support synergy with non-retail uses that attract footfall to the City Centre.</u> <ol style="list-style-type: none"> a. <u>Work to define character areas and invest in marketing campaigns to communicate a broad City Centre experience to attract visitors and consumers.</u> 13. <u>12. Develop multi-channel synergy between the retail, service and cultural offer of the City Centre.</u> 	
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New Chapter 6: Environment, Heritage, Landscape and Green Infrastructure

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><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>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> 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 suitable locations, where this is considered desirable</p> <p><u>To identify and prepare TPO's where trees of exceptional</u> amenity, cultural or environmental value are identified which warrant a high level of protection</p> <p><u>To implement the Limerick City and County Tree Policy when completed and review as appropriate.</u></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>

2	<p>Amend Objective EH 09 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> - <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</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>

	<u>inadvertent loss or damage in the course of climate change adaptation or mitigation works.</u>	
4	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>	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. 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
5	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>	See response above
6	Amend Landscape Character Area LCA05 Lough Gur to remove the following: e) any structures in ruinous condition will not be allowed to be redevelopment or adapted for housing	No significant effect.
7	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>	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
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>	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.

	<p>Insert new objective as follows:</p> <p>Ecosystem Services Approach It is an objective of the Council to promote an Ecosystem Services Approach, subject to suitable assessment, in the preparation of lower-level Plans, Strategies and in the Development Management process.</p>	
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>	<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</p>

Chapter 7: Sustainable Mobility and Transport

	Chapter 6 Amendments	Response
	<p>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.</p>	<p>Ensures compliance with higher tier plans as per SEA guidance.</p>
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. In addition, the Department of Transport’s Five Cities</u></p>	<p>Ensures compliance with higher tier plans and complies with climate action requirements AQC3 and HTP1</p>

	<p><u>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><u>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:</u></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>

<p><u>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;</u></p> <p><u>Development of a Park and Ride programme for Limerick, linked with BusConnects Programme;</u></p> <p><u>Delivery of a comprehensive cycling and walking network for Limerick City Metropolitan Area;</u></p> <p><u>N/M20 Cork to Limerick Scheme, which is key to the delivery of improved connectivity between the urban centres and the wider region;</u></p> <p><u>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;</u></p> <p><u>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; -</u></p> <p><u>_____ N24 Cahir to Limerick Junction - Current Constraints Study Area (CSA) extends into the Limerick administrative area (North of Oola and Brookes bridge);</u></p> <p><u>- 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;</u></p> <p><u>O’Connell Street Improvement Works –</u></p> <p><u>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.</u></p> <p><u>Objectives in support of road projects identified as key growth enablers are outlined in Section 6.8 Strategic</u></p>	<p>existing and planned infrastructure.</p>
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	<u>Roads Infrastructure</u>	
3	<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><u>Objective TR O2 - Design Manual for Urban Roads and Streets:</u> <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>

4	<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 a 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 action concerns into the plan policies.</p>
5	<p><u>6.1.1 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</u></p>	<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.</p>

	<p><u>measures. Table 6.1 below outlines the Draft Plan's Policies and Objectives which support the A-S-I Concept</u></p>	
<p>6</p>	<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 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>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>

	<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>	
<p>7</p>	<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 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. 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> 	<p>This is a follow on from the previous amendment above.</p> <p>Table 6.2 presents the situation regarding different transport modes and table 6.3 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>

	<ul style="list-style-type: none"> • <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> 	
8	<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>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>i) <u>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> 	<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. Working with the NTA will ensure coherent transport responses.</p>

	<ul style="list-style-type: none"> • <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; (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 close as possible to their destinations; (vi) To increase the capacity of Sarsfield Bridge by reallocating the carriageway to the movement of buses, cyclists, pedestrians and taxis;</u></p> <p><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></p> <p>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</u></p>	
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	<p>Objective TR O14 Management of Coaches: 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</p> <p>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 <u>and services across Limerick as identified in LSMATS</u> and protect, as required, lands necessary for the upgrading of existing railway lines or stations, which would improve journey times and enable an increase in the frequency of services and connections</p>	<p>Consistent with AQC 3 in promoting public transport and reducing car dependency</p>
	<p>6.5.9 Park and Stride</p> <p>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 incorporate car parking and a bus stop/terminus at appropriate locations as identified in the final LSMATS. <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>	<p>Consistent with AQC 3 in promoting integrated transport and reducing car dependency</p>

<p>10</p>	<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> <ul style="list-style-type: none"> a Encourage the switch to Electric Vehicles and ebikes 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 street and in new developments, in accordance 	<p>Ensures inclusion of another technology.</p> <p>Consistent with AQC3: To include climate action concerns into the plan policies.</p> <p>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</p>
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	<p>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>	<p>protection in the plan area.</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:</p> <p>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 Limericks economic growth. The Draft Plan provides the following objectives in support of this growth</u> 6.1 Strategic Roads Infrastructure</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 development. It is</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 Limericks 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>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>TR O35 - Limerick Northern Distributor Road - It is an objective of the Council to</p> <p>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 road network to the east of Limerick City, which will incorporate Smarter Travel measures, in accordance with all environmental and planning assessments.</p> <p><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>	
<p>13</p>	<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>
<p>14</p>	<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>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>See response above.</p>

	<p>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 (including Adare Bypass) projects and other schemes referenced in Section 6.4;</p> <p><u>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.</u></p> <p>Objective_TR O38 - National Roads - It is an objective of Council to:</p> <p>Prevent, <u>except in exceptional circumstances as outlined in the Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ (DoECLG, 2012)</u>, 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;</p> <p>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;</p> <p>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;</p>	
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	<p>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</p>	
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 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</p>	<p>Consistent with AQC 3 as it promotes active travel</p>

	<p>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. <u>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 and cycling.</u></p>	
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New Chapter 8: Infrastructure

No	Amendment	Response
1	<p>Amend Section 7.5.1 as follows: The Commission for Energy Regulation (CER) <u>Commission for Regulation of Utilities (CRU)</u> is the economic regulator of public water services. The CER's <u>CRU's</u>;</p>	Noted
2	<p>Amend IN O5 b) as follows: Collaborate with Irish Water in the protection of water supply sources <u>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</u></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 <u>connecting to the public water and/ or wastewater networks comply with Irish Water Standard Details and Codes of Practice</u> 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. <u>Where relevant,</u> ensure developments comply with the EPA</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.

	Code of Practice for Domestic Waste Water Treatment Systems 2021.	
4	<p>Replace IN O6 as follows:</p> <p>Public Water Supply</p> <p>It is an objective of the Council to:</p> <p>a) Promote and support water conservation and demand management measures among all water users in new developments.</p> <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></p> <p><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>	Consistent with W2: Ensure that the requirements of the Water Framework Directive are incorporated into the plan

<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. 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 to accommodate the projected growth <u>in Limerick city and environs</u>, as set out in the RSES and the Core Strategy, over the lifetime of the Draft Plan, <u>subject to planning and other approvals.</u></p>	<p>Noted included to update text. It is also noted that improvement are planned for Limerick waste water treatments plants, such as Bunlicky and Hospital village.</p>
<p>6</p>	<p>Amend Objective INO10 Surface Water and SuDS as follows:</p> <p>m) <u>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.</u></p>	<p>Consistent with W2: Ensure that the requirements of the Water Framework Directive are incorporated into the plan</p>

7	<p>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 <u>Current examples include organisations involved in designing out waste and those in equipment lease, reuse and repair sectors and materials recycling.</u></p>	<p>Consistent with AQC3: To include climate action concerns into the plan policies.</p>
8	<p>Relocate Section 7.7.1.2 Circular Economy for Building Design and Construction Projects to Chapter 11.</p>	<p>No effects.</p>
9	<p>Change Section 7.7.1.2 to include the following: <u>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.</u></p>	<p>Ensures compliance with higher tier guidance.</p>
10	<p>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</p>	<p>Ensures compliance with higher tier guidance</p>
11	<p>Amend Objective IN O10 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> - <u>All roofs of 300m² or greater to provide a minimum of 60% green roof coverage, unless exempted/ partially exempted.</u> 	<p>Can contribute both to SuDs and local ecology</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><u>Digital Innovations: Limerick Shannon Metropolitan Area: 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>	A2: Ensure that there is adequate policy support for infrastructural provision in the plan area															
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="415 747 1068 1581"> <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	Noted for clarity.
Tier	Name	Location															
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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

No	Amendment	Response
1	<p>Amend Objective CAF O21 Identified Flood Risk to include the following: <u>Clarify location i.e. South of Toppins field.</u> <u>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 SiteSpecific 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																		
	<p><u>Table 1 Renewable Energy allocations for differing technologies</u></p> <table border="1"> <thead> <tr> <th><u>Output Current and Projected</u></th> <th><u>Wind</u></th> <th><u>Anaerobic Digestion</u></th> <th><u>Solar</u></th> <th><u>Hydro</u></th> <th><u>Geothermal</u></th> </tr> </thead> <tbody> <tr> <td><u>Current capacity MW</u></td> <td><u>234.35</u></td> <td><u>2.0</u></td> <td><u>113.49</u></td> <td><u>0.1 MW</u></td> <td><u>0</u></td> </tr> <tr> <td><u>Target Capacity MW (2030)</u></td> <td><u>386.45 (+65%)</u></td> <td><u>20 (+1000%)</u></td> <td><u>227.0 (+100%)</u></td> <td><u>0.3MW (+300%)</u></td> <td><u>0.5MW</u></td> </tr> </tbody> </table> <p><u>Note: Baseline figures drawn from LCCC sources June 2020</u></p>	<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>	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>															
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12	<p>Amend CAF O1 Compliance as follows:</p> <p>(b) <u>Support the implementation</u> of 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.</p>	Consistent with AQC3																		

New Chapter 10: Sustainable Communities and Social Infrastructure

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:	Provides local play areas where they are needed. Consistent with P1:

	<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>	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	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.	No effects.
4	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.	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	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.	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	Amend Objective SCSI O36 as follows: e) Ensure protection of water quality, in particular drinking water sources, with any proposed development.	Consistent with W2 and helps safeguard water quality.
7	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 map of existing and future locations and landmarks that incorporates or has the potential to incorporate cultural/creative arts.</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.
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	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

	access to such social infrastructure should be removed.	
11	<p>Amend Objective SCI O38 as follows:</p> <p>Objective SCS1 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</p> <p><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></p>	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:</p> <p><u>To include minimum standards of 20-25% for all locations for employment uses.</u></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:</p> <p><u>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.</u></p>	Ensures coherent development, manages retail outlets in line with strategy
3	<p>Amend Section 11.6.10 as follows:</p> <p>Pre-planning discussion with Irish Water is required..... Water mains shall be located under footpaths where possible. <u>New connections to public water and wastewater networks are subject to Irish Water’s Connections Charging Policy and Standard Details and Codes of Practice.</u> 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</p>	Safeguards infrastructure.

	objective is suggested: <u>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.</u>	
4	<p>Amend Section 11.6.10 as follows:</p> <p>In assessing an application for development (whether for a new quarry or an extension to anwill be considered, together with the following: • <u>Impact on water supply sources;</u></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, <u>mine shafts</u>, fixed and mobile plant, roads, fuel tanks, stockpiles, storage of soil, overburden and waste materials, settling ponds; • Estimated working life of quarry <u>or mine</u>, including phasing programme; • Water supply, <u>de-watering</u> and discharge requirements; <p>The Planning Authority will support <u>the extractive and mineral extraction</u> industry by issuing planning permission that extends over the estimated life of the quarry <u>or mine</u>. 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</p>	For clarity-mines had not been mentioned in the last plan and are now included together with guidance on their management.

	<p>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 <u>Industrial Emissions Licence from the EPA</u>. 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>	
<p>6</p>	<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> <p>Appropriate setback distance shall be determined on a case-by-case basis in line with the Wind Energy Guidelines 2006 and any subsequent update.</p>	<p>Ensures compliance with higher tier plan HTP1</p>
<p>7</p>	<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>	<p>Contribute s to SuDS</p>

<p>8</p>	<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> • <u>The Council will liaise with other agencies to secure the retrospective provision of EV recharging points within the public realm of settlements where appropriate</u> 	<p>Integrates sustainable transport infrastructure</p>
<p>9</p>	<p>Update Section 11.7.2.2 Development Management Standards to seek a <u>decommissioning plan</u> rather than a decommissioning statement</p>	

<p>10</p>	<p>Amend Table DM 6 Development Management Standards as follows:</p> <p>Table DM6</p> <p>Site Coverage and Plot Ratio <u>Site Coverage</u></p> <p>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.</p> <p>a plot ratio and site coverage of 1:5 and 70% will generally be expected.</p>	<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>
<p>11</p>	<p>Amend Section 11.4.1.3 as follows:</p> <p>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:</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>

<p>12</p>	<p>Amend Section 11.4.2: 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: 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>13</p>	<p>Include a Development Management Standard 11.2.1 Design Criteria as follows: The following criteria will be taken into account when assessing applications: Consistency with Sustainable Residential Density Guidelines for Planning Authorities 2009 and any subsequent update thereafter</p>	<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</p>
<p>14</p>	<p>Amend Section 11.3.5 Roads, Footpaths, Water Services and Landscaping to include the 2020 DMURS Interim Advice Note – Covid -19 Pandemic Response</p>	<p>Noted.</p>

15	<p>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)</p>	<p>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.</p>
16	<p>Amend Section 11.9.5 first lineto include reference Motorhome/Caravan parking (Aires).</p>	<p>No effects</p>
17	<p>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 nonmotorway national roads and their junctions as per Section 2.8 of the Spatial Planning & National Road Guidelines for Planning Authorities</p> <p>‘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’;</p>	<p>Ensures compliance with higher tier plans</p>
18	<p>Update the text under Section 11.7.2.2 from ‘Glint and Glare impacts on roads and other sensitive receptors’ to ‘Glint and Glare Assessments on roads including in the vicinity of the strategic national road network, and other sensitive receptors.</p>	<p>Ensures public safety</p>

<p>19</p>	<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> <p>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;</p> <p>Proximity to public transport service;</p> <p>Sustainable travel infrastructure supported by a Mobility Management Plan;</p> <p>Availability of car sharing and bike/e-bike sharing facilities on-site and in the vicinity;</p> <p>Existing car parking in the vicinity, including on street and the potential for dual use subject to agreement and management details;</p> <p>Impact on traffic safety and the capacity of the road network; •</p> <p>Urban design, regeneration and civic benefits of the proposal including enhancement of public realm</p> <p>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.</p>	<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.</p>
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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 onsite layout characteristics and flexibility may be employed where performance-based criteria can be adequately demonstrated.</p>	<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 environment</p>
22	<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
23	<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>Consistency with Sustainable Residential Density Guidelines for</p>	<p>Ensures compliance with higher tier guidance</p>

	<u>Planning Authorities 2009 and any subsequent update thereafter</u>	
24	<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 <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.

<p>25</p>	<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> <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>Safeguards water quality and promotes compact development by offering an alternative to one off housing.</p>
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26	<p>Add the following text and table under a new Section 11.1.3 Building Heights: All new developments in the City shall comply with the guidance set out in the Building Heights Strategy,</p>	Ensures coherent development of higher buildings
27	<p>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</p>	Ensures coherent development

<u>Character Area</u>	<u>Area Objectives</u>	<u>Tall Building Recommendations</u>	<u>Criteria for consideration from the Building Heights Guidelines, 2018 and Development Management Guidance</u>
<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 complex elements which contribute to the character of the built environment of Newtown Pery, is understood.</p> <p><u>Important vertical landmarks that are of key and local significance which should be protected by future development include:</u> <u>Tait's Clock;</u> <u>People's Park, Rice's Memorial;</u> and <u>St. John's Cathedral.</u></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 set-backs are possible subject to good design, high quality materials and overall townscape considerations.</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</u></p>	<p><u>Through the application of the modifiers (pg.140 BHS), a 'taller or landmark building' as defined in the 'Tall Building Classifications', may be appropriate;</u></p> <p><u>Additional height may be permitted on streets where there is a mix of building heights 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</u></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.</p> <p><u>Responds to its built environment & streetscape:</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.</p> <p><u>Materials / building fabric well Considered:</u> The strong continuity of building materials - stone and stucco ground floors and brick upper storeys - and the characteristic Georgian fenestration patterns should be acknowledged in new development</p> <p><u>Sense of scale and enclosure of public spaces, thoroughfares and waterfronts:</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.</p> <p><u>Contribution to legibility and cohesiveness:</u> The very strength and orientation of the current street grid can inhibit wayfinding through the wider City. New development 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.</p>

	<p><u>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 within the inner block.</u></p>	<p><u>building of exceptional architectural quality.</u></p>	<p><u>Positively contributes to the mix of uses in the neighbourhood: The commercial and residential functions of the area should be strengthened by increasing its desirability. Developments should contribute to streetscaping and deliver building renovation.</u></p> <p><u>Contributes to the building/ dwelling typologies in the area: New development in this area should be designed to emphasis and consolidate the area's existing character.</u></p>
<p><u>English Town: 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 Castle and St. Mary's Cathedral. There are some street corners which rise slightly in height but usually no more than 3/4 storeys.</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 landmark buildings in order to prevent</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: 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 environment & streetscape: The narrow streets and irregular grid should be respected, with typical building heights of 2 - 4 storeys.</u></p> <p><u>Materials / building fabric well Considered: Use of traditional materials - stone, stucco, brick - should be acknowledged.</u></p> <p><u>Sense of scale and enclosure of public spaces, thoroughfares and waterfronts: The general low scale of the area, with clear prominence of the Castle, its walls, and the Cathedral and the narrow</u></p>

<p><u>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.</u></p> <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>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/placemaking argument; and</u></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>winding street pattern does not encourage larger scale development.</u></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> <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.</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</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>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>The scale of buildings in 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.</p> <p>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.</p> <p>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</p>	<p>should seek to contribute to place making;</p> <p>3. Due to the mixed nature of the urban fabric within Irish Town, development in this area will have to be thoroughly assessed on a case by case basis;</p> <p>4. New buildings in Irish Town should respond to the essential character and general scale of existing buildings and streets;</p> <p>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</p> <p>6. Assessment of any proposed buildings by a verified view analysis and a landscape and visual impact assessment will be required, notwithstanding</p>		<p>Materials / building fabric well Considered: Existing buildings vary greatly in style and materiality, but are typically characterised by more detailed and articulated facades. This should be acknowledged.</p> <p>Sense of scale and enclosure of public spaces, thoroughfares and waterfronts: 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>Contribution to legibility and cohesiveness: Building height within properly located new development could add to the legibility and wayfinding of the area.</p> <p>Positively contributes to the mix of uses in the neighbourhood: Irish Town has a rich mix of unique destination uses that could be added to by new developments.</p> <p>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.</p>
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<p><u>in building height. The lack of finished block structures results in 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.</u></p> <p><u>Important vertical landmarks of key and local significance 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>contemporary buildings of outstanding quality which could provide new landmarks in and of themselves and should be welcomed from a place making point of view.</u></p>		
<p><u>Transition Area: The area south of English Town and west of Irish Town serves as a transitional area between</u></p>	<p><u>1. New high buildings in this area should define a new and changing urban form while also responding closely to the</u></p>	<p><u>Through the application of the modifiers (pg. 162), a 'taller or landmark building' as defined in the 'Tall Building</u></p>	<p><u>Makes a positive contribution to the urban neighbourhood: 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.</u></p>

<p><u>Irish Town and Newtown Pery. This area borders one of the main entrance points to the City and comprises 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.</u></p>	<p><u>general scale of existing buildings; and</u></p> <p><u>2. Continuous high building frontage should be avoided with adequate distances maintained between buildings.</u></p>	<p><u>Classifications', may be appropriate.</u></p>	<p><u>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.</u></p> <p><u>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.</u></p> <p><u>Sense of scale and enclosure of public spaces, thoroughfares and waterfronts: 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: Building height within properly located new development could emphasis particular places and add to the legibility and wayfinding of the area.</u></p> <p><u>Positively contributes to the mix of uses in the neighbourhood: New development in this area should seek to deliver a mix of uses. Developments should also contribute to delivering building renovation and reuse.</u></p> <p><u>Contributes to the building/ dwelling typologies in the area: There is already a rich mix of building typologies in this area that should be supported and enhanced by new developments.</u></p>
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<p>The Quays: The existing movement strategy of the City results in a waterfront that is isolated from the rest of the City. 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 as a public realm.</p> <p>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</p>	<ol style="list-style-type: none"> 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; 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; 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 4. Where appropriate, an increase in building scale at 	<p>‘Taller, landmark and gateway buildings’ as defined in the ‘Tall Building Classifications’, are appropriate;</p> <p>Height will be encouraged 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; and</p> <p>This area should deliver a gateway building(s) given its significance as a shopfront to the City.</p>	<p>Makes a positive contribution to the urban neighbourhood: 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</p> <p>Responds to its built environment & streetscape: New development of comparable scale would be appropriate to reinforce the existing viewscape.</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 skyscape.</p> <p>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 the northern end of the Quay, to mark this significant location.</p> <p>Contribution to legibility and cohesiveness: 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.</p> <p>Positively contributes to the mix of uses in the neighbourhood: The Quays is an important destination for tourists and visitors and can accommodate hotels and other such</p>
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<p><u>height as more amenities are provided.</u></p>	<p><u>bridges may be required to improve the legibility of entrance points, draw people down to the Quays and to enhance the sense of place.</u></p>		<p><u>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> Additions to the existing mix of building typologies should consider the opportunity to deliver a cluster of varying height.</p>
<p><u>Colbert Quarter:</u> <u>Colbert Station is an important entrance 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>1. A strong placemaking piece is required within this area, whether it be art or building in order to enhance 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>Subject to the Framework Plan, '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 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</u></p>	<p><u>Makes a positive contribution to the urban neighbourhood:</u> <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> <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> <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>a high quality townscape and placemaking; and</u></p> <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>Positively contributes to the mix of uses in the neighbourhood:</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 accommodate major educational, cultural or other destination institutions, as well as new shopping activity.</p> <p><u>Contributes to the building/ dwelling typologies in the area:</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.</p>
<p><u>Cleeves site:</u> 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><u>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 within this area. The site is also large enough to house a</u></p>	<p><u>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;</u></p> <p><u>2. New buildings should have appropriate scaling to the existing houses, with a balance of height and economic use taken into account;</u></p> <p><u>3. The fabric of the area as well as the complex elements that contribute to the</u></p>	<p><u>Subject to a Masterplan, 'taller, landmark, gateway and city landmark buildings' as defined in the 'Tall Building Classifications', are appropriate;</u></p> <p><u>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;</u></p> <p><u>Taller buildings within a cluster of varying height that relate to each other and their</u></p>	<p><u>Makes a positive contribution to the urban neighbourhood:</u> 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><u>Responds to its built environment & streetscape:</u> The existing uses and context provide limited guidance, beyond the significant scale and massing of the industrial buildings and chimney.</p> <p><u>Materials / building fabric well Considered:</u> The design of new buildings should acknowledge the industrial heritage of the built environment and traditional materials where appropriate.</p> <p><u>Sense of scale and enclosure of public spaces, thoroughfares and waterfronts:</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, providing views of and from the City.</p>

<p><u>coherent cluster of new buildings, given its location and the existing presence of the very prominent chimney stack.</u></p>	<p><u>character of the site need to be protected;</u></p> <p><u>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 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>surrounding urban context in terms of street layout, massing and design are encouraged;</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>Contribution to legibility and cohesiveness: The presence of a taller building in this area could help frame the River and the pattern of taller buildings along the Quays.</u></p> <p><u>Positively contributes to the mix of uses in the neighbourhood: The site has considerable and attractive mixed-use potential.</u></p> <p><u>Contributes to the building/ dwelling typologies in the area: Contributing to the 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</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</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>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 presents the opportunity to establish a new city district.</u></p>

<p>the City. A clear urban structure in the form of a docklands area masterplan is required for this area.</p> <p>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. 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 neighbouring Clayton Hotel.</p> <p>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</p>	<p>to the Docklands Framework which has already been set in place;</p> <p>2. New high buildings in the docklands area should define a new and changing urban form; and</p> <p>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.</p>	<p>This site should facilitate a gateway building given its significant location;</p> <p>This site can be considered appropriate for a 'City Landmark Building' as defined in the 'Tall Building Classifications', subject to a Masterplan;</p> <p>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</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>Responds to its built environment & streetscape: 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.</p> <p>Materials / building fabric well Considered: Limited guidance is provided by the area's built context, but the presence of strong water and dock features should be highlighted.</p> <p>Sense of scale and enclosure of public spaces, thoroughfares and waterfronts: A unique opportunity exists for a site closest to the existing city fabric to accommodate a taller building visible at the city-scale.</p> <p>Contribution to legibility and cohesiveness: The Docklands should be developed as an extension of the City, with new building at the interface providing city-scale address.</p> <p>Positively contributes to the mix of uses in the neighbourhood: 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>Contributes to the building/ dwelling typologies in the area: Contributing to the building/dwelling typologies in this area is not applicable given the nature of the Docklands. However, consideration should be given to providing for taller buildings within a cluster of varying height.</p>
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<u>through considerate design must be implemented.</u>			
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Chapter 12 Land Use Zoning Strategy

No	Amendment	Response
1	<p>Include definition for Residential Institution as follows:</p> <p><u>The use of a building or land as a convent, monastery, hostel, or home for older persons.</u></p>	For the purposes of clarity.
2	<p>Amend the purpose of the 'Education and Community Infrastructure' zoning objective as follows:</p> <p>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.</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.
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>	<p>Could help revitalize areas currently underused with beneficial effects</p>
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 views from the monastic complex/deserted settlement.</u></p>	<p>Consistent with C1: Protect and conserve features of archaeological heritage and their setting</p>
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: 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: <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 <u>Footnote 8 “Purpose built student/ancillary accommodation only”</u></p>	<p>Could help revitalize areas currently underused with beneficial effects</p>

Chapter 13: Implementation and Monitoring

No	Amendment	Response
1	<p>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</p>	<p>This is also consistent with SEA guidance the new Draft Development Plan guidance and EPA guidelines</p>

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 15 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.

6.1.2 Material Amendments to the Draft Limerick Development Plan and supporting documents made by the Elected Members at the Special Council Meeting of the 18th of February 2022.

This section sets out the amendments made by the Elected Members of Limerick City and County Council at a Special Council Meeting on February 18th 2022 and the assessment below examines the potential for significant environmental effects, which they may have. All of the amendments put forward were included in the Environmental Report to ensure that all were assessed. The SEA is broader in scope than the AA process and where an amendment was thought to have an effect on the Natura 2000 site network it was put forward for assessment in the NIS document which is part of the plan assessment. Where this occurs this is mentioned below.

The proposed amendments and responses to each Material Alteration are indicated below:

1. Amendment - Revision to Settlement Strategy Plan from previous draft:

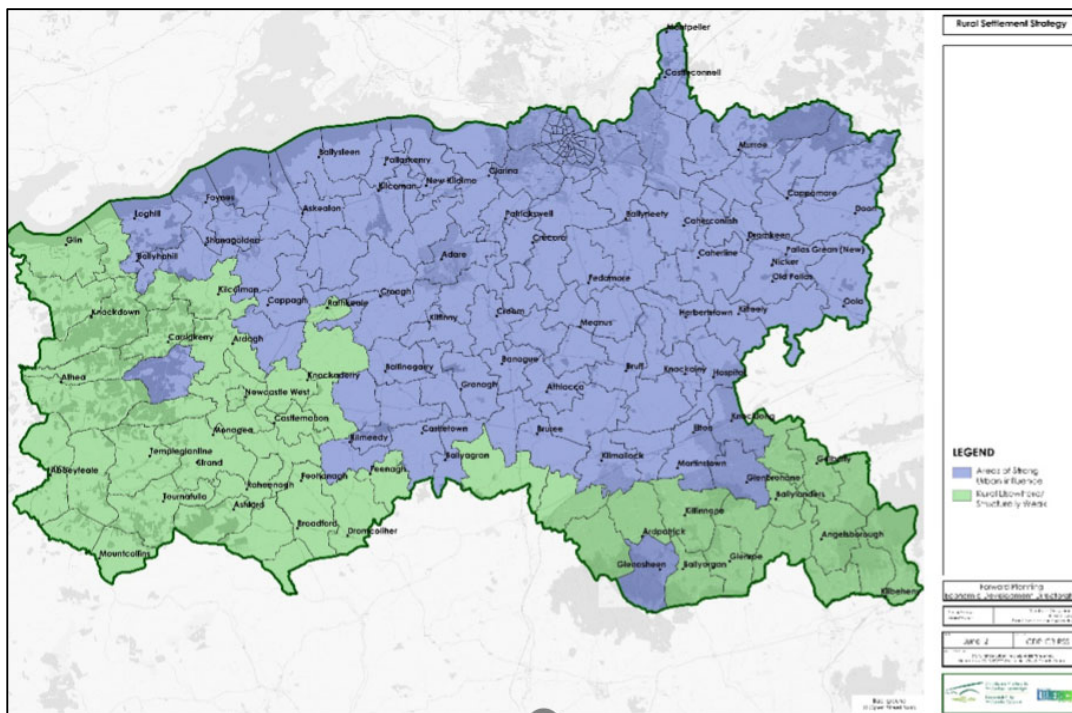
This Council shall revert to the Rural Settlement Strategy Map (Map attached), which was put on public display at Draft Plan stage.

Reasons:

- In preparing the Draft Limerick Development Plan, Limerick City and County Council complied with the requirements of the National Planning Framework in determining the extent of 'Area Under Strong Urban Influence'. This required'. This required analysis of commuting population for work purposes to Limerick City. The analysis identified all Electoral Divisions, where greater than greater than 15% of the population commuted to Limerick City for work purposes. Furthermore, the NPF states that it is important to differentiate on the one hand, between rural areas

located within the commuter catchment of the five cities (in this case Limerick city) and our largest towns and centres of employment and, on the other hand, rural areas located outside these catchments. Limerick has no large towns or centres of employment as defined in appendix 4 of the NPF. The OPR broadened the scope of the criteria in their submission to the Draft Plan, which is not acceptable.

- Many towns and villages in County Limerick have inadequate capacity in terms of wastewater and/or water supply. Accordingly, until such time as adequate capacity is delivered by Irish Water, growth will be difficult to deliver in these settlements, therefore an alternative is required to accommodate the growth in population.
- In the interest of supporting rural schools, rural sporting clubs and rural communities throughout Limerick.



SEA Comments: It is considered that the above map does comply with EPO **HTP 1**, which seeks to ensure compliance with higher tier plans such as the National Planning Framework and the Regional Spatial and Economic Strategy and other guidance issued by the Department.

2. Amendment - Removal of RPS. No. 4057 - 'Biarritz', O'Connell Avenue

The removal of RPS. No. 4057 - 'Biarritz', O'Connell Avenue from the Record of Protected Structures

Reason: There is insufficient funding to support homeowners to maintain and upkeep structures listed on the Record of Protected Structures and the designation places an additional burden in already challenging times.

SEA Comments: The structure has been included by the Minister on the National Inventory of Architectural Heritage and identified for inclusion on the Record of Protected Structures. It is considered that the structure warrants inclusion on the Record of Protected Structures.

3. Amendment - Extend the development boundary of Carrigkerry

Extend the development boundary of Carrigkerry to include the lands outlined on the attached map in the dashed red line.



Reasons:

- The proposed lands are an integral part of the village core and take account of permission recently granted.
- The proposed lands will support compact growth, in line with national and regional planning policy.

SEA Comment: In line with national and regional policy on compact growth, the proposal seeks to develop the core of Carrigkerry. Permission has been granted on part of the lands identified for inclusion within the boundary. An outline permission 18/600 was granted with the take up following in permission of 21/1234. Though there is a slight encroachment into the West Limerick Hills SPA, it is considered that since this area is close to the village core it is already subject to human disturbance and would not be suitable foraging or nesting habitat for the hen harrier. Noted also that a 2009 Circular from the NPWS mentions that

rural housing does not generally affect the ecological status of the hen harrier. This is dealt with further in the Natura Impact Statement.

4. Amendment - Extension of the development boundary in Templeglantine

Extend the development boundary of Templeglantine to include the lands outlined on the attached map in the dashed red line.



Reasons:

- The proposed lands are an integral part of the village and are in community ownership and will facilitate expansion of community facilities.
- The proposed lands will support compact growth, in line with national and regional planning policy.

SEA Comments: The proposed lands will support compact growth, in line with national and regional planning policy. This is consistent with the contents of the NPF, RSES and consistent with EPO HTP1.

5. Amendment - Removal of the proposed addition of St. Mary's National School, Bishop St., King's Island from the Record of Protected Structures (reference to RPS No. 3343 relates to adjoining Convent Structure)

Reason: The designation of St Mary's National School as a Protected Structure will impede future development and necessary upgrading of the building.

SEA Comments: St. Mary's National School is a modern innovative design reflecting an original minimalist architectural character. It is considered that St. Mary's should be included in the record Protected Structures for its Architectural, Artistic, Historical, Social, Technical value. However, the addition or not of the structure from the RPS would not have any significant environmental or visual effects.

6. Amendment - Remove the recommended addition

St. Lelia's Church, Ballynanty from the Record of Protected Structures

Reason: The designation of St. Lelia's Church as a Protected Structure will impede future development or necessary upgrading of this building.

SEA Comments: The Church is modern in construction of unique architectural merit. However, the addition or not of the structure from the RPS would not have any significant environmental or visual effects.

7. Amendment - Amend the zoning of the lands (0.3 ha.) adjoining the Model School from Existing Residential to Community and Education.

Reason: In line with the submission received from the Department of Education, in relation to the need for additional schools, safeguarding the expansion of existing schools and in support of the objectives of the National Planning Framework and Regional Spatial and Economic Strategy around compact growth, it is considered these lands are required to safeguard and facilitate the future expansion of the Model School.



SEA Comments: The Local Authority recognises the importance of safeguarding the expansion of existing schools throughout Limerick in line with the recommendations of the Department of Education. This is 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.

8. Amendment - Amend Objective CGR O4 e) Urban Lands and Compact Growth in Chapter 3 – Spatial Strategy as follows:

e) Require **multiple** owners of **large-scale** urban sites, in instances where phased development is proposed, or where such land adjoins other undeveloped, zoned land in third party ownership, 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. 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. The masterplan should clearly detail how adjoining undeveloped, zoned land in third party ownership, can be accessed and serviced in an integrated and coherent manner.

Reason: To allow consideration of adjoining lands with respect to provision of key services, including access, water infrastructure and connectivity. To facilitate coordinated and holistic development, inform site specific development proposals for large sites and provide consideration in the context of multiple planning applications on large scale sites and adjoining lands.

SEA Comments: The proposed amendment will add clarity, allow for coordinated development and facilitate the servicing of lands for future development. The use of masterplans will ensure development is in line with the requirement of proper planning. 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.

9. Amendment – Amend Objective ECON O13 a) Strategic Employment Locations Limerick City and Environs - Chapter 5 – A Strong Economy as follows in green:

Ensure that a comprehensive framework plan shall be prepared and agreed with the Planning Authority in advance of development on the ‘High Tech/Manufacturing’ zoned lands to the west of Raheen Business Park. The framework should clearly set out the key infrastructure requirements for the site and identify, responsibility for and the timeframe for delivery of such infrastructure. The Framework Plan shall be subject to the following:

- 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.

Reason: To allow consideration of adjoining lands with respect to provision of key services, including access, water infrastructure and connectivity. To facilitate coordinated and holistic development, inform site specific development proposals for large sites and provide consideration in the context of multiple planning applications on large scale sites and adjoining lands.

SEA Comments: The proposed amendment will add clarity, allow for coordinated development and facilitate economic development with an infrastructure led approach. This is 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.

10. Amendment - Amend High Tech/Manufacturing zoning objective and purpose text in Chapter 12 – Land Use Zoning Strategy

Amendment to the **High Tech/Manufacturing** land use zoning objective and purpose text in Chapter 12 – Land Use Zoning Strategy as follows:

Objective: to provide for office, research and development high technology, regional distribution/logistics, manufacturing and processing type employment in a high quality built and landscaped campus style environment.

Purpose: To facilitate opportunities for high technology, advanced manufacturing including pharmaceutical and food production, major office, regional distribution/logistics, and research and development-based employment, within high quality, highly accessible, campus style settings. The zoning is for high value-added businesses and corporate facilities that have extensive/specific land requirements, such as those located at Raheen Business Park and the National Technology Park.....

Reason: Amending the zoning objective and purpose will facilitate the expansion of existing uses on lands zoned High Tech/Manufacturing, maximising the potential of this zone to create employment and the return from investment in infrastructure

SEA Comments: The motion will add clarity, allow for coordinated development and facilitate economic development. The Local Authority recognises the importance of flexibility in the uses permitted to enable, facilitate and support economic development. Consistent with EPO **P2:** Provide policy support for the provision of suitable employment and facilities for the local population.

11. Amendment - Amend High Tech/ Manufacturing Land Use Zoning Matrix as follows:

Change **Logistics** from 'Open for Consideration' to 'Generally Permitted' and **Warehousing** from 'Generally Not Permitted' to 'Generally Permitted' in the High Tech/ Manufacturing zone.

Reason: Amending the zoning matrix will facilitate the expansion of existing uses on lands zoned High Tech/Manufacturing, maximise the return from investment in infrastructure and increase the potential of this zone to create new employment.

SEA Comments: The proposed amendment will ensure clarity, allow for coordinated development and facilitate economic development. The Local Authority recognises the importance of flexibility in the uses permitted to enable, facilitate and support economic growth and investment. Consistent with EPO **P2:** Provide policy support for the provision of suitable employment and facilities for the local population.

12. Amendment– Amend Projected Population Growth for Patrickswell

Amend the Core Strategy Table figures in relation to the projected growth for Patrickswell as follows:

- Population growth totals 2028 – **1270**
- Population growth as % of 2016 base - **50%**
- Additional households forecasted 2022 –2028 -**158** households
- Amend the City and Environs Population Growth and Additional Household Figures to reflect this change.

Reasons:

- Sewerage capacity to accommodate an additional 2,987 units, following the upgrade to facilities in 2013.
- The school is currently at 58% capacity and has the ability to accommodate an additional 100 students in its current building.
- Patrickswell has designated cycle connection to Raheen Industrial Estate and the City Centre.
- Significant investment in 2022 to occur on the main street improving public realm in the region of €1.25 million which has been funded by the NTA.
- Patrickswell Community Centre received planning permission in 2021, with €500,000 in funding already committed, which will enhance the community facilities on offer.
- Patrickswell GAA are in the process of improving facilities with the support of the second highest Sports Capital Grant funding allocation in the county in 2020.

SEA Comments: Concerns have been raised by the OPR in relation to the rate of growth proposed for Patrickswell. This is not in accordance with EPO HTP 1: Ensure compliance with higher tier plans such as the National Planning Framework and the Regional Spatial and Economic Strategy and other guidance, issued by the Department.

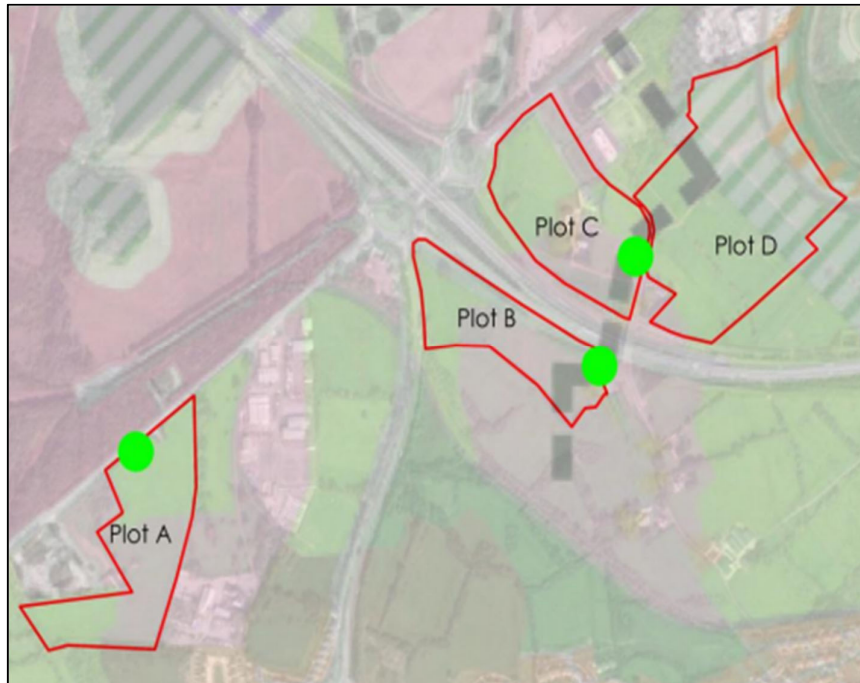
13. Amendment - Change of Zoning City and Environs – Lands at Ballykeeffe

Proposal a change of zoning from Agriculture be changed to Enterprise and Employment at Ballykeeffe - the proposed amendment relates to 4 plots of lands Plot A (5.57ha), Plot B (4.25ha), Plot C (5.57ha) and Plot D (10.22ha). Lands zoned Semi - Natural Open Space are precluded from the rezoning, it only applies to Agriculturally zoned lands.

Reasons:

- The flood risk assessment accompanying the Draft Development Plan is based on the precautionary approach and the Flood Guidelines sets out that there are no uncertainties in datasets and assessment techniques
- Areas at risk of flooding along the Dock Road and adjoining the former Racecourse are zoned for Enterprise and Employment, with a high risk of flood. Flood risk is not an impediment to development for Enterprise and Employment.
- The Development Plan Justification Test submitted justifies the suitability of the lands for Enterprise and Employment and measures to prevent flood inundation, including the raising of floor levels.

Strategic location of the site with accessibility and connectivity to the inter-regional transport network and other transport modes supports optimisation of land use at this location for economic development.

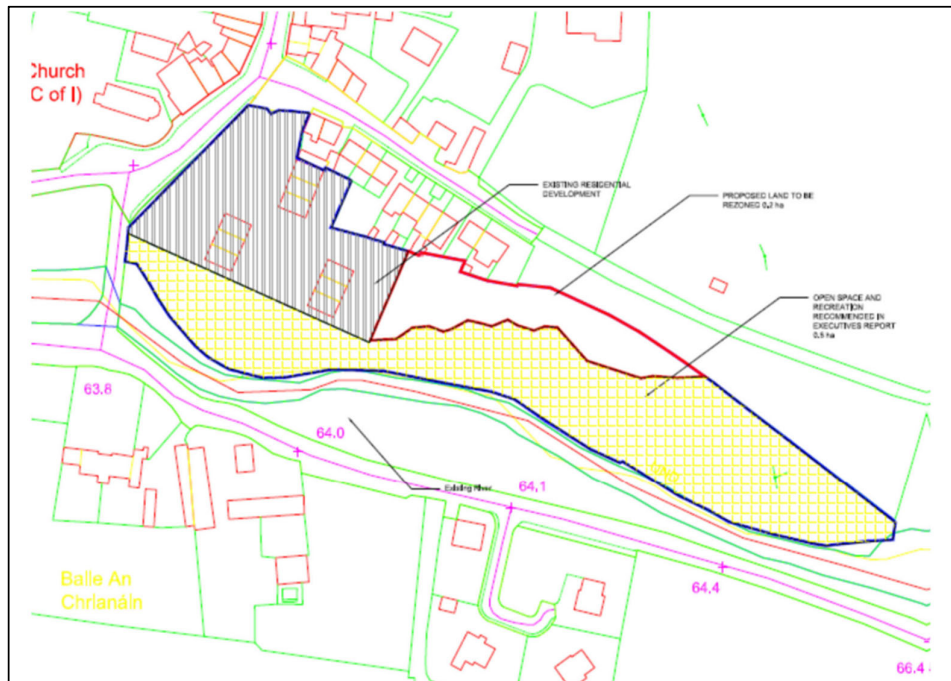


Lands at Ballykeeffe

SEA Comments: The proposed material amendment made by the Elected Members, included a proposal to rezone this land to Enterprise and Employment use. A site specific flood risk assessment and justification test was submitted as part of the supporting documentation for the change of zoning. The information was reviewed as part of the SFRA on the material alterations, which concluded that site should be retained for less vulnerable uses as appropriate to the flood zone. The proposal is also inconsistent with HTP 1: Ensure compliance with higher tier plans such as the National Planning Framework and the Regional Spatial and Economic Strategy and other guidance, issued by the Department. See also comments in NIS in relation to loss of open space lands and its implications for the River Shannon and Fergus SPA.

14. Amendment - Amend zoning of lands from Open Space /Recreation to New Residential (0.2 ha.) in Bruff

Proposal to amend to the Zoning Map for Bruff to rezone 0.2 hectares of land from Open Space and Recreation to Residential as identified in the Map below and maintain 0.8 hectares of land as Open Space and Recreation use to facilitate the provision of public walks and trails adjacent to the Morningstar River, in accordance with Objectives BR 02 and BR 06 of the Draft Plan.



Reasons:

An independent, expert Site-Specific Flood Risk Assessment (SSFRA) confirms that the land where zoning is sought, is not subject to flooding.

In accordance with a 'Methodology for a Tiered Approach to Land use Zoning' as set out in the Draft Plan, the subject land can be classified as Tier 1 Zoned Land. This means that the land has all the infrastructure necessary to ensure that residential development can be applied for and constructed in the short term.

OMC Homes commits to developing the subject land within the lifetime of the Development Plan and subject to market demand. This commitment is demonstrated by the fact that Phase 1 of a permitted residential development on part of the adjoining lands has already been developed.

SEA Comments: The area is limited and can only accommodate limited development as a result. Environmental effects of such development would be limited. The maintenance of 0.8 ha of land as open space is welcomed as it will continue to provide a buffer between open space and the river which would facilitate the dispersion of species such as otters. No significant environmental effects.

15. Amendment - Amend Objective ECON 040 – Location of Tourism Accommodation as follows:

- (a) Ensure that holiday accommodation including campsite (i.e. static and touring caravans, campervans, glamping pods, and tents) developments should be concentrated within or adjoining existing towns, villages and settlements, 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.
- (b) In limited cases, such accommodation may be appropriate in rural locations, where it compliments an existing tourism asset and where there is a justifiable need, such as its proximity to established tourism trails/routes. In rural locations, structures should be integrated into the existing landscape or proposals should demonstrate that appropriate landscaping will be designed around the structure.
- (c) Proposals to reinstate, conserve and/ or renovate existing, vacant, derelict or disused buildings for holiday accommodation in both urban and rural areas, will be considered subject to normal planning and environmental criteria.

All such development will be considered, having regard to the environmental conditions and sensitivities, scenic amenity, availability of services and the cumulative impact of such developments on the environment

Reasons:

- Limerick needs a better variety of tourist accommodation options. For example, glamping/pods locations and sites. Tourist attractions in Limerick such as the Galtees, Ballyhoura and Limerick Greenway are all, by their nature, outdoor/rural attractions. These outdoor experiences attract visitors such as hikers, cyclists, mountain bikers and an alternative accommodation choice should be afforded to these tourists in appropriate rural/countryside settings. Villages and town settings or locations 'adjoining existing towns, villages and settlements' (as per ECON O40) will not allow for this type of tourist accommodation. Therefore, the policy needs to be amended to provide some flexibility.
- During the Covid Pandemic, we have all seen the need for accommodation options which provide an alternative to hotels or BnB's whereby visitors are somewhat self-sufficient. Furthermore, these accommodation options offer an alternative in terms of price point for families and tourists. Limerick will lose out on tourism related revenue if the policies are not flexible, or do not support rural (and tourist) enterprises in a meaningful manner.

SEA Comments: The Local Authority seeks to support the development of tourist accommodation **in appropriate locations** to support the tourism industry throughout Limerick, in a sustainable manner. The objective seeks to support the development of tourist accommodation within or adjoining settlements as the primary location for such development. This is in line with EPO **MA2:** Ensure that there is adequate policy support for infrastructural provision and protection in the plan area. In this case the provision of tourism accommodation in suitable locations can be regarded as essential infrastructure for the development of rural tourism.

16. Amendment – Change to Objective ECON O40 Location of Tourism Accommodation and new policy re niche tourism

Proposal a further amendment to **Objective ECON O40 – Location of Tourism Accommodation** as follows:

(b) In limited cases, such accommodation may be appropriate in rural locations, where it compliments an existing tourism asset /service and where there is a justifiable need, such as its proximity to established tourism trails/routes/food and craft businesses. In rural locations, structures should be integrated into the existing landscape or proposals should demonstrate that an appropriate landscape will be designed around the structure.

Reason: To support the development of tourism in Limerick

SEA Comments: The Local Authority seeks to support the development of tourist accommodation in appropriate locations to support the tourism industry throughout Limerick, in a sustainable manner. This is in line with EPO **MA2:** Ensure that there is adequate policy support for infrastructural provision and protection in the plan area. In this case the provision of tourism accommodation in suitable locations can be regarded as essential infrastructure for the development of rural tourism.

17. Amendment - New Objective as follows:

Objective ECON-----: *It is an objective of the Council to cluster niche tourist / visitor services and infrastructure, including locations where the service or tourist attraction currently exists.*

Reason: To support the development of tourism in Limerick

SEA Comments: The Local Authority seeks to support the development of tourism products in appropriate locations to support the tourism industry throughout Limerick, in a sustainable manner. This is in line with EPO **MA2:** Ensure that there is adequate policy support for infrastructural provision and protection in the plan area. In this case the provision of tourism facilities in suitable locations can be regarded as essential infrastructure for the development of rural tourism.

18. Amendment – Objective CGR 06 – Vacant Site Levy

Amend Objective CGR 06 – Vacant Site Levy:

It is an objective of the Council to utilise the provisions of the Urban Regeneration and Housing Act 2015 (As amended), including the continued maintenance of a Vacant Site Register to facilitate the appropriate re-use and development of vacant and underutilised sites on zoned lands in Limerick that are in need of renewal or revitalisation.

a) This objective should also apply to all lands in the ownership of Limerick City and County Council.

b) This objective should not apply to any lands where public utilities are not available or are deemed inadequate.

Reason: To ensure fairness in interpretation

SEA Comment: The Local Authority seeks to support the development of residential development in appropriate locations throughout Limerick, in a sustainable manner.

19. Amendment - Objective CGR 07 – Derelict Sites

Amend Objective CGR 07 – Derelict Sites:

It is an objective of the Council to utilise the provisions of the Derelict Sites Act 1990, including the maintenance of a Derelict Site Register and CPO powers to address instances of dereliction and decay in the urban and rural environment and bring properties back into active re-use.

Reason: In the interest of clarity.

SEA Comment: This is in line with EPO C2: Protect conserve and promote the sustainable reuse of architectural heritage.

20. Amendment – Requirements for Developments within Level 4 Settlements

Amend Objective CGR 016 – Requirements for Developments within Level 4 Settlements:

It is an objective of the Council within these settlements to facilitate development, subject to compliance with the following:

- a) To ensure that the scale of the new housing developments both individually and cumulatively shall be in proportion to the pattern and grain of existing development. Generally, no one proposal for residential development shall increase the existing housing stock by more than 10 – 15% within the lifetime of the Draft Plan, unless the applicant can demonstrate that the settlement has adequate capacity in terms of both physical and social infrastructure to support additional growth.
- b) The development of these centres shall provide for serviced sites and a variety of other house types and densities as appropriate.
- c) New commercial developments shall generally be located within the core area and shall contribute positively to the village urban fabric and streetscape.
- d) New community and social facilities shall be provided in conjunction with residential development as required.
- e) Where there is no treatment plant or limited capacity in the existing treatment plant, sewerage treatment for serviced sites shall generally be by means of individual treatment systems, subject to satisfactory site assessment and compliance with EPA guidelines. All systems shall be so constructed so as to allow connection to public sewers in due course when capacity becomes available.

Reason: To ensure delivery of housing in settlements with no infrastructure capacity.

SEA Comments: Such developments should comply with the requirements of the Code of Practice Domestic Waste Water Treatment Systems (Population Equivalent ≤ 10) and be constructed so as to be able to link with a centralised sewage scheme when it becomes available. This is compliant with the NPF and RSES emphasis on centralised development. Any population allocations to settlements should be in line with Core Strategy to ensure compliance with Higher Tier plans.

21. Amendment - Objective CGR 018 – Requirements for Developments within Level 5 Settlements

Amend Objective CGR 018 – Requirements for Developments within Level 5 Settlements:

It is an objective of the Council within these settlements to facilitate development, subject to compliance with the following:

- a) The scale of new residential schemes shall be in proportion to the pattern and grain of existing development and shall be located within the development boundary, thus avoiding 'leap frogging' of development and delivering compact growth and providing for the organic and sequential growth of the settlement. Infill and brown field sites will be the preferred location for new development. In this regard, any development shall enhance the existing village character and create and create or strengthen a sense of identity and distinctiveness for the settlement.
- b) New commercial developments shall generally be located within the core area and shall contribute positively to the village urban fabric and streetscape.
- c) New community and social facilities shall be provided in conjunction with residential development as required.
- d) The development of these centres shall provide for serviced sites and a variety of other house types and densities as appropriate.
- e) Where there is no treatment plant or limited capacity in the existing treatment plant, sewerage treatment shall generally be by means of individual treatment systems, subject to satisfactory site assessment and compliance with EPA guidelines. All systems shall be so constructed so as to allow connection to public sewers in due course when capacity becomes available.

Reason: To ensure delivery of housing in settlements with no infrastructure capacity.

SEA Comments: Such developments should comply with the requirements of the Code of Practice Domestic Waste Water Treatment Systems (Population Equivalent ≤ 10) and be constructed so as to be able to link with a centralised sewage scheme when it becomes available. This is compliant with the NPF and RSES emphasis on centralised development. Any population allocations to settlements should be in line with Core Strategy to ensure compliance with Higher Tier plans.

22. Amendment – Reuse of Existing Buildings

Amend Objective HO 04 – Re-use of Existing Buildings:

It is an objective of the Council to encourage redevelopment and reuse, including energy retrofitting, of existing housing stock and conversion of other suitable buildings to sustainable housing accommodation.

Reason: In the interests of sustainable development

SEA Comments: Consistent with NPF and RSES with an emphasis on brown field development and reuse of older buildings. Consistent too with LCCC Climate Adaptation Strategy 2019 and EPO **C2:** Protect conserve and promote the sustainable reuse of architectural heritage.

23. Amendment – Proposal to re-zone from Agriculture to Residential zoning of 2.4ha. in Clonmacken, south of the Clondell Road.



The shaded lands are the land in question; these are the additional lands to be zoned which are in a flood zone.

Reasons:

- The site is located in close proximity to the City Centre, will facilitate the development of compact growth in line with national and regional planning policy;
- Site is located in an established residential area with sustainable transport links to the Jetland District Centre and City Centre;
- SHD pre-planning discussions will facilitate the delivery of residential units over the lifetime of the plan and contribute to population growth;
- The Site-Specific Flood Risk Assessment indicates that enabling/mitigation works would bring much of the site out of the flood risk zones and includes a Justification Test which has passed.

SEA Comments: The proposed material amendment made by the Elected Members, included a proposal to rezone this land to residential use. A site specific flood risk assessment and justification test was submitted as part of the supporting documentation for the change of zoning. The information was reviewed as part of the SFRA on the material alterations, which concluded that site should be retained for less vulnerable uses as appropriate to the flood zone. This proposed amendment is inconsistent with EPO HTP 1 which requires compliance with higher tier plans such as the National Planning Framework and the Regional Spatial and Economic Strategy and other guidance, issued by the Department.

24. Amendment - Zoning of 3.08ha. of land as Serviced Sites in Ballingarry Village.

Amendment to the Zoning Map for Ballingarry Village to include the land (3.08ha.) identified in purple on the attached map below as **Serviced Sites**.



Reasons:

- The proposed sites offers an opportunity for development in the village of Ballingarry, until such time as the wastewater treatment plant is upgraded.
- The proposed lands are available and developable within the lifetime of the Development Plan.
- The lands offer an opportunity within the village to support compact growth, in line with national and regional policy.

SEA Comments: The lack of sewerage infrastructure in the village is recognised. The use of individual treatment systems would allow the development of development within the village area without overloading existing services which are already insufficient. It would also concentrate development which would be more easily serviced when facilities are upgraded. Centralising development is in accordance with **HTP 1:** Ensure compliance with higher tier plans such as the National Planning Framework and the Regional Spatial and Economic Strategy and other guidance, issued by the Department.

25. Amendment-Change to Objective IN O10 Surface Water and SuDS and Development Management Standard Section 11.3.11 SuDS

An amendment to **Objective IN O10 Surface Water and SuDS and Development Management Standard Section 11.3.11** as follows:

Encourage ~~Require~~ green roofs ~~for all roof areas~~ for the following types of development ~~and encourage for all other types of development unless otherwise agreed with Limerick City and County Council's planning department:~~

- Apartment Developments;
- Employment Developments;
- Retail Developments;
- Leisure Facilities;
- Education Facilities;

~~All roofs of 300m² or greater to provide a minimum of 60% green roof coverage, unless exempted/partially exempted.~~

Reasons:

- The cost of the installation of green roofs is considered excessive and having regard to increasing costs of materials is not considered appropriate, particularly in terms of the additional materials required to support the development of green roofs.
- Green roofs are not suitable in all instances and very much dependent on the design of the structure, it is not considered appropriate as a requirement of the Draft Plan.

SEA Comments: The Local Authority supports the use of sustainable construction methods/use of materials in the interest of supporting sustainable development. It would also help add local ecological features to the built environment and help delay run off with consequent benefits to local wildlife and management of surface water run-off. Consistent with EPO **W2:** Ensure that the requirements of the Water Framework Directive are incorporated into the plan.

26. Amendment – Change to Zoning – City and Environs

Request that the zoning of the lands at Rhebogue identified on the attached image, outlined in red are changed from Groody Valley Green Wedge to New Residential (0.94ha.).



Reasons:

Two parallel 110kv high voltage electricity cables and pylons transverse the site. The significant cost of relocating the cables has not been defined. No cost benefit analysis supports the viability or otherwise of relaying the ESB cables underground. It is premature to determine that the repositioning of electrical infrastructure would severely restrict the development of the site when the details are unknown. Practicality, cost and viability must be determined.

SEA Comments: Following consultation with the ESB, the Planning Authority have been informed that relocation of the high voltage infrastructure cannot be facilitated at this location. Therefore, the potential development of the site is seriously restricted. Retention of green wedge zoning in part would also ensure maintenance of levels of open space within the plan area. This is dealt with further in the NIS, where it is indicated that the retention of this area as green space would prevent further encroachment the River Groody green wedge and avoid disturbance to sensitive species.

27. Amendment - (a) Change to Zoning on P. Downes Site, Pa Healy Road

Proposal to amend zoning from 'Community and Education' land use zone be changed to 'Mixed Use' (1.7ha, outlined in red).



(b) Insert new objective Chapter 10 re Pa Healy Road

Insert a new section 10.4.2.14 Pa Healy Road into the Draft Plan as follows:

Section 10.4.2.14 Pa Healy Road

The 1.7 ha. Site is in a prominent location with road frontage onto the Pa Healy Road. The site and adjoining land (former Dawn Dairies) require significant regeneration. In a coordinated and holistic manner, facilitating mixed uses and associated synergies whilst ensuring sustainable compact growth.

Objective – Pa Healy Road: It is an objective of the Council to:

- A) Require the preparation of a masterplan for the land which utilises the low-lying land to the west for recreational purposes and facilitates a mixed-use/ residential development to the west with vehicular access off the existing permitted entrance which was constructed as part of the link road (Pa Healy Road);
- B) Enhance the character of the area through urban design and placemaking, incorporating buildings of high-quality design having regard to the sites prominent location on the Pa Healy Road;
- C) Require provision of an integrated sustainable mobility network, with walking, cycling and public transport as the main components;
- D) Facilitate connectivity between the low lying land to the west and the adjoining O'Briens public park to the south;
- E) Ensure green infrastructure is a key component of the design and layout;
- F) Promote a site-specific approach, reflecting emerging best practice, in addressing flood risk and prepare a Site Specific Flood Risk Assessment in accordance with the Planning System and Flood Risk Management Guidelines for Planning Authorities

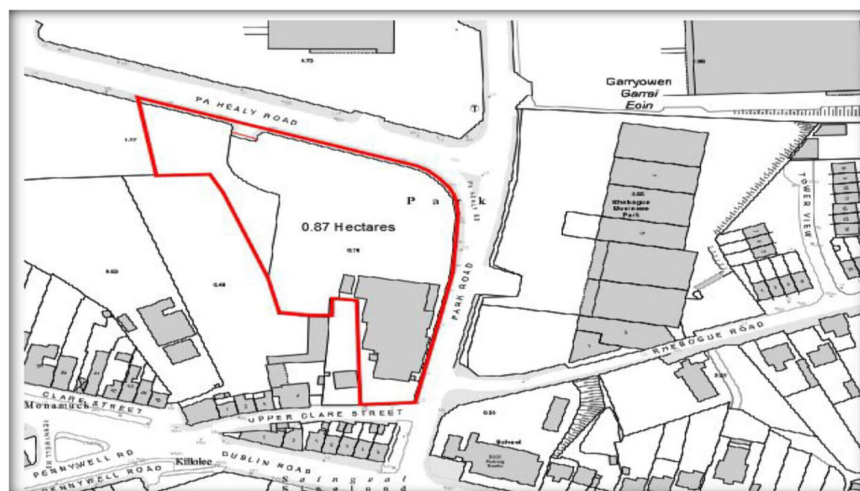
Amend Section 12.3 of the draft plan: Mixed Use Land Use Zoning:

Objective: To provide for a mixture of residential and compatible commercial uses.

Purpose: To facilitate the use of land for a mix of uses, making provisions, where appropriate for 'primary' uses i.e. residential and combined with other compatible uses e.g. offices as 'secondary'. These secondary uses will be considered by the Local Authority, having regard to the particular character of the area. A diversity of uses for both day and evening is encouraged. These areas require high levels of accessibility, including pedestrian, cyclists and public transport (where feasible). Opportunity sites set out in Chapter 3 Spatial Strategy, include Mixed Use zoned lands located at Towlerton, Parkway Valley, Thomond Park and [the Pa Healy Road](#), which have been accounted for in the Core Strategy figures. In addition, the Draft Retail Strategy has identified capacity for additional retail floor space in Moyross, which could be accommodated on the Mixed Use lands at The Bays identified for employment uses only.

SEA Comments: The proposed material amendment made by the Elected Members, included a proposal to rezone this land to mixed use, which includes an element of residential use. A site specific flood risk assessment and justification test was submitted as part of the supporting documentation for the change of zoning. The information was reviewed as part of the SFRA on the material alterations, which concluded that site should be retained for less vulnerable uses as appropriate to the flood zone. This proposed amendment is inconsistent with EPO HTP 1 which requires 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. This is not in accordance with EPO **HTP 1:** Ensure compliance with higher tier plans such as the National Planning Framework and the Regional Spatial and Economic Strategy and other guidance issued by the Department.

28. Amendment - (a) Change to Zoning on Shannon Minerals Site, Pa Healy Road from Enterprise and Employment to Mixed Use (0.9 hectares).



Amendment – (b) new objective Chapter 10 re Pa Healy Road

Insert a new section 10.4.2.14 Pa Healy Road into the Draft Plan in chapter 10: Compact Growth and Revitalisation as follows:

The Brownfield site is in a prominent location with road frontage on three sides. The site and adjoining land (former Dawn Dairies) require significant regeneration in a coordinated and holistic manner, facilitating mixed uses and associated synergies whilst ensuring sustainable compact growth.

Objective – Pa Healy Road: It is an objective of the Council to:

A) Facilitate creation of a mixed use/ residential development;

B) Enhance the character of the area through urban design and placemaking, incorporating buildings of high-quality design having regard to the sites prominent location surrounded by public roads on three sides;

C) Require provision of an integrated sustainable mobility network, with walking, cycling and public transport as the main components;

D) Ensure green infrastructure is a key component of the design and layout;

E) Provide a single coordinated access from Pa Healy Road to the site with provision made for access to the adjoining Dawn Diaries site to the south west;

Facilitate connectivity between the low lying land to the west and the adjoining O'Briens public park to the south;

F) Promote a site-specific approach, reflecting emerging best practice, in addressing flood risk and prepare a Site Specific Flood Risk Assessment in accordance with the Planning System and Flood Risk Management Guidelines for Planning Authorities.

Amend section 12.3 of the draft plan: Mixed Use Land Use Zoning:

Objective: To provide for a mixture of residential and compatible commercial uses.

Purpose: To facilitate the use of land for a mix of uses, making provisions, where appropriate for 'primary' uses i.e. residential and combined with other compatible uses e.g. offices as 'secondary'. These secondary uses will be considered by the Local Authority, having regard to the particular character of the area. A diversity of uses for both day and evening is encouraged. These areas require high levels of accessibility, including pedestrian, cyclists and public transport (where feasible). Opportunity sites set out in Chapter 3 Spatial Strategy, include Mixed Use zoned lands located at Towlerton, Parkway Valley, Thomond Park and [Pa Healy Road](#), which have been accounted for in the Core Strategy figures. In addition, the Draft Retail Strategy has identified capacity for additional retail floor space in Moyross, which could be accommodated on the Mixed Use lands at The Bays identified for employment uses only.

SEA Comments: The proposed material amendment made by the Elected Members, included a proposal to rezone this land to mixed use, which includes an element of residential use. A site specific flood risk assessment and justification test was submitted as part of the supporting documentation for the change of zoning. The information was reviewed as part of the SFRA on the material alterations, which concluded that site should be retained for less vulnerable uses as appropriate to the flood zone. This proposed amendment is inconsistent with EPO HTP 1 which requires compliance with higher tier plans such as the National Planning Framework and the Regional Spatial and Economic Strategy and other guidance issued by the Department. This is also contrary to EPO **HTP 1**: ensure compliance with higher tier plans such as the National Planning Framework and the Regional Spatial and Economic Strategy and other guidance issued by the Department.

29. Amendment – Designate Roxborough a Level 6 Settlement

Designate Roxborough as a Level 6 Settlement to allow for limited small scale residential development within the existing reduced speed zone area.



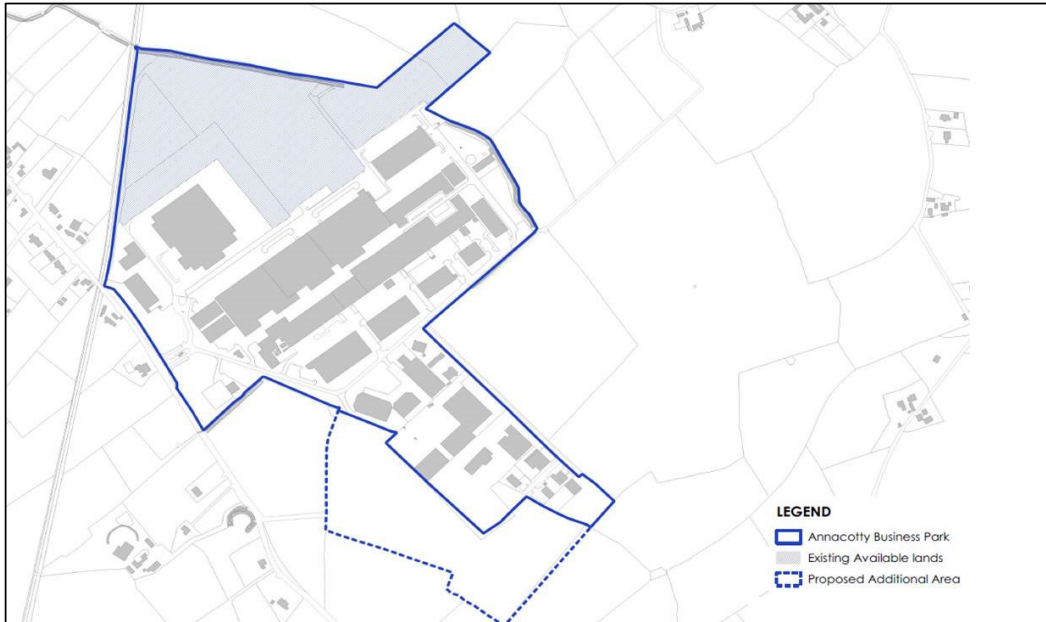
Reasons:

- Roxborough meets the criteria for designation as a Level 6 Settlement in line with the criteria identified in the Draft Development Plan, namely a National School and Limerick Golf Club with Bar and Restaurant.
- Furthermore, the settlement benefits from circa 90 dwellings within 500m of the National School, a reduced speed zone of 50km, public lighting, mains water, broadband, 2.5km travel distance of Raheen Business Park, 5km travel distance of the City Centre.

SEA Comments: The designation of this area as a Level 6 settlement, i.e. one school, does not meet the criteria that was used to designate other level 6 settlements. The area has also experienced a proliferation of housing in an unserviced rural area where the groundwater status in that area is mapped as poor, the subsoils are mapped as poorly draining Gleys which would indicate issues with septic tanks (subsoils to the east of the regional road are mapped at moderate to well-draining Podzolics). In areas where the subsoils are poorly draining, there would generally be increased land drainage and a tendency for septic tanks to discharge to these drains as the soils cannot take the loading from the household. There is a large amount of houses in this area on septic tank systems and therefore surface water quality is poor in the area. This is contrary to EPO **W2**: Ensure that the requirements of the Water Framework Directive are incorporated into the plan.

30. Amendment - Extend the boundary of the Annacotty Business Park (7.348ha)

Extend the Annacotty Business Park boundary to encompass an additional 7.348 hectares of additional lands to safeguard the expansion of the Business Park and to facilitate and promote enterprise and employment in Limerick City and County, as identified on the Map below.



Reasons:

- Annacotty Business Park is fully let, including all buildings and lands.
- Limerick and the South Region of Ireland are expected to grow in enterprise and employment.
- Annacotty Business Park is in a strategic and sustainable location for enterprise development.
- Annacotty Business Park provides the only enterprise and employment lands in the local area that caters for smaller businesses.
- It is a Council objective to facilitate the sustainable development of Annacotty Business Park. The expansion would facilitate that in principle, but for the Council's assurance, each application would be required to prove on a case-by-case basis that its "scale, phasing and character [was] compatible with surrounding land uses and capacity of the road network".

SEA Comments: This is an expansion of an out of centre location. While the zoning reflects current land usage, expansion at this location presents a number of challenges. While it is

important to ensure that enterprise development takes place equal consideration should also be given to traffic uses and amenity issues for those that that live nearby. It is recommended that should any expansion plan be put forward that they are accompanied by upgrades of the local road network sufficient to cater for planned traffic increases and that any new developments are adequately screened and landscaped.

31. Amendment - Limerick Brand

Add additional text under section 1.3, pt 1, Chapter 1:

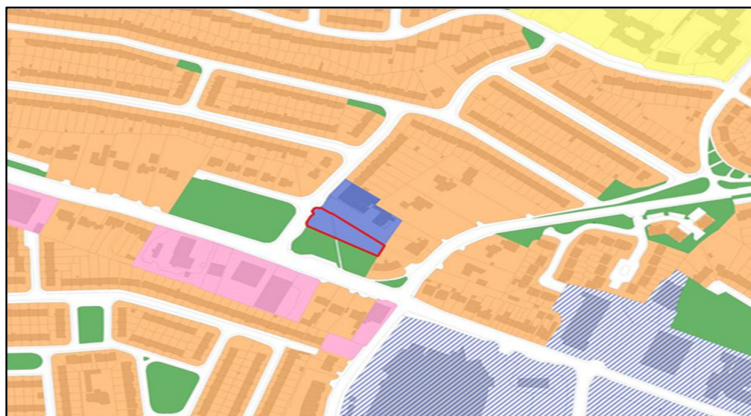
The Limerick Brand shall be used to internationalise the city. Any further brands created within and by the Local Authority, including organisations owned by the Local Authority, shall work within the framework outlined in the 'Limerick – Atlantic Edge, European Embrace' brand.

Reason: To support Brand Limerick.

SEA Comments: No environmental implications.

32. Amendment – Caherdavin Shopping Centre – Change to Zoning Map – City and Environs and removal of Section 3.4.5.3 and removal of the site from the Opportunities Map. This was submitted separately by two elected members.

Remove the proposal to extend the zoning to the Caherdavin Shopping Centre, for **Local Centre**(0.2Ha), revert back to **Open Space and Recreation** and that the associated supporting text identified in Chapter 3 in Section 3.4.5.3 and identification on the Opportunities Map be removed from the Plan.



3.4.5.3 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 the public realm~~

Objective CSC 01 – Caherdavin Shopping Centre: ~~It is an objective of the Council to:-~~

- ~~a) Require the highest quality of landmark design and layout with dual frontage onto the adjoining roadways and open space.~~
- ~~b) Facilitate local level shops and services commensurate with a Local Centre.~~
- ~~c) Facilitate purpose built and managed student accommodation, where deemed appropriate.~~
- ~~d) Require water compatible uses including car parking and open space within the flood zone, such car parking shall be adequately screened and sympathetically integrated.~~
- ~~e) Require connectivity for pedestrians and cyclists to the nearby bus stops and walking/cycling networks.~~
- ~~f) 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.~~

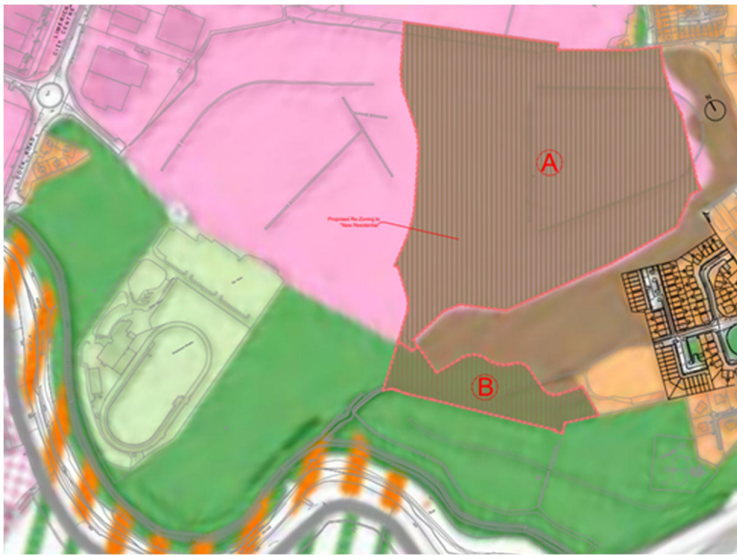
Reasons:

- Part of these lands are identified as being at flood risk in the Strategic Flood Assessment and supporting maps produced with the Draft Limerick Development Plan and accordingly to support the development of these lands would be contrary to proper planning and sustainable development.
- There is an overconcentration of student accommodation permitted and proposed to cater for the existing student population, in the area and this site is not considered appropriate for the further development of student accommodation, within the lifetime of this Development Plan.

SEA Comments: The Local Authority recognise that some of the lands are located in Flood A and B, however the Draft Plan sought to afford the site an opportunity for redevelopment

with a high-quality mixed-use development, enhanced public realm and connectivity and potential for some carparking on the lands at risk of flooding, subject to appropriate flood risk assessment and mitigation measures. The reversion to open space is beneficial from an ecological perspective as it mean more green space within the plan development boundaries, and less impermeable surfaces which is useful from surface water management perspective.

33. Amendment - Change to Zoning at Greenpark from Enterprise and Employment and Open Space to New Residential (14.71ha.)



Reasons:

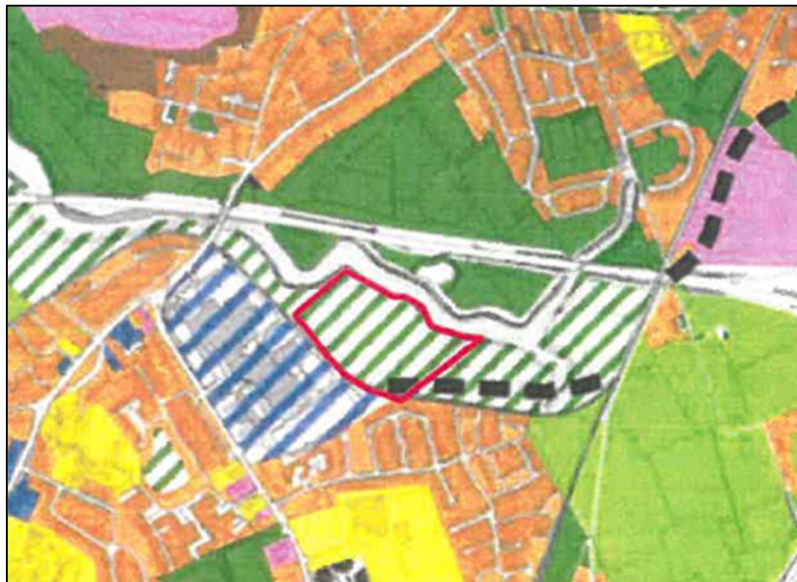
- To utilize a unique opportunity to create a new master planned mixed use sustainable neighbourhood with 950 no. new homes, commercial park and a public park with walking / cycling paths, ensure sufficient lands are zoned and available to develop the required number of homes over the lifetime of the plan and comply with the NPF requirement for 50% of homes within the existing footprint.
- Draft hasn't zoned enough land for residential development. Lands comply with national higher tier plans and Section 28 guidelines.
- The strategic lands follow the sequential approach and pass the Justification Test for Residential (submitted in response to the motion).

SEA Comments: The proposed material amendment made by the Elected Members, included a proposal to rezone this land to residential. A site specific flood risk assessment and justification test was submitted as part of the supporting documentation for the change of zoning. The information was reviewed as part of the SFRA on the material alterations, which concluded that site should be retained for less vulnerable uses as appropriate to the

flood zone. This proposed amendment is inconsistent with EPO HTP 1 which requires compliance with higher tier plans such as the National Planning Framework and the Regional Spatial and Economic Strategy and other guidance issued by the Department. Furthermore, concerns have been raised by the OPW with regard the prematurity of zoning of these lands pending the Limerick City Flood Relief Scheme being progressed.

34. Amendment- that the lands adjoining the Dooradoyle District Centre outlined in red on Figure 1 below be zoned as follows: Change site outlined in red from Zoning Objective: Semi Natural Open Space to Zoning Objective Enterprise and Employment

1) That the lands adjoining the Dooradoyle District Centre outlined in red on Figure 1 below be zoned from Zoning Objective: “Semi Natural Open Space” to Zoning Objective “Enterprise and Employment”



Lands adjoining the Crescent Shopping Centre

2) Add an objective to Chapter 5 (A Strong Economy) as follows:

Dooradoyle Urban Quarter:

- To promote the continued development of lands around the Dooradoyle District Centre and adjoining lands as a Strategic Employment Location through the delivery of additional office based employment uses in a phased manner in conjunction with supporting infrastructure development.

- To promote improvements to connectivity, signage and permeability within the wider area including pedestrian and cycle facilities linking to Portland Park and provide for the link road from Dooradoyle Road to Rosbrien Road
- To facilitate the early upgrading of the existing flood defence infrastructure, thus ensuring the long-term flood protection of the wider lands in Dooradoyle in a manner compatible with any future City Wide Flood Relief Scheme.
- Any application on lands at risk of flooding to be accompanied by a Site Specific Flood Risk Assessment which shall demonstrate that any development does not result in additional significant flood risk in the area and does not impede the future delivery of a wider flood relief scheme for Limerick.
- An overall framework plan / masterplan is to be prepared for the lands in advance or as part of any application for a portion of the currently undeveloped lands.

Reasons: The Dooradoyle area represents a strategically located parcel of lands providing a gateway to the city on an important public transport corridor within the built-up area of the southern suburbs of Limerick. The Dooradoyle District Centre and adjoining lands, extending to over 30 hectares, represent a strategically important large scale under-developed site within the inner suburbs with potential to be further developed at the heart of a comprehensive mixed-use Urban Quarter. The existing Crescent Shopping Centre alone already employs nearly 1,500 workers, and when fully built out the total site area has the capacity to accommodate in the order of 2,000 additional employees (additional jobs mainly in offices, technology and support services). Dooradoyle District Centre is therefore considered to be a Strategic Employment Location and has the potential for a significant intensification of employment. The designation as a Strategic Employment Location would ensure compliance with higher tier plans and Section 28 Guidelines.

The lands are sequentially favourable for development, being located on the transition of the City and Southern Environs and comprise a significant infill site, which will be in accordance with national planning objectives for consolidated compact urban growth. The river, N18 and disused rail line historically have provided a physical barrier to permeability in the area which may be addressed as part of the comprehensive development of the lands. Development of the lands on the old boundary of the City and County Council's would be representative of the new single Authority approach to the sustainable and appropriate development of Limerick.

The development of the lands would further utilise existing infrastructure such as public transport and services. Therefore, these lands should be identified as a key opportunity

site for Limerick City and to give effect to such a designation, there is a requirement to have the lands appropriately zoned. The provision of Enterprise and Employment lands at this location will provide additional choice of land for companies and investment as an attraction to investment in Limerick in the short term having regard to the existing infrastructure including services, high quality bus services and pedestrian and cycle facilities.

Enterprise and Employment uses are classed as less vulnerable uses under the Flood Risk Guidelines and a suite of documentation is included as Appendices to this rationale, including:

- Appendix 1 – Dooradoyle Urban Quarter Strategic Flood Risk Assessment Summary Report;
- Appendix 2 – Plan Making Justification Test;
- Appendix 3 – Strategic Flood Risk Assessment;
- Appendix 4 – Geotechnical Analysis;
- Appendix 5 – Downstream Breach Assessment;
- Appendix 6 – IDA Submission on Draft Development Plan.

It is further noted that the IDA submission on the draft Development Plan contends sufficient employment lands to attract inward employment investment are not provided for by the draft Development Plan. The proposed amendments will help address this concern.

SEA Comments: The proposed material amendment made by the Elected Members, included a proposal to rezone this land to Enterprise and Employment. A site specific flood risk assessment and justification test was submitted as part of the supporting documentation for the change of zoning. The information was reviewed as part of the SFRA on the material alterations, which concluded that site should be retained for less vulnerable uses as appropriate to the flood zone. This proposed amendment is inconsistent with EPO HTP 1 which requires compliance with higher tier plans such as the National Planning Framework and the Regional Spatial and Economic Strategy and other guidance issued by the Department. Furthermore, concerns have been raised by the OPW with regard the prematurity of zoning of these lands pending the Limerick City Flood Relief Scheme being progressed.

35. Amendment - Zone 33 hectares at Ballysimon House, Commons Road, Ballysimon for the development of a Data Centre.



Reasons:

- The site has excellent grid connection opportunities with the infrastructure already in place on site with 110kV powerlines connecting to the adjacent 220kV power station, which would lead to minimal disruption to the surrounding area for the required power connections.
- The site is close to a natural aquifer, providing suitable water requirements to the site.
- The site is ideally located close to the motorway and key road links, close to existing employment areas, has flat topography and no known ecological, flooding or archaeological constraints. Low traffic movements associated with the development of a data centre would be appropriate for this location.
- Government and Limerick City and County Council recognise the need and opportunity for a data centre in Limerick.

SEA Comments: The Local Authority recognise the importance of a data centre development for Limerick and have zoned lands within the City and Environs boundary to accommodate such a development. The site proposed is outside the development boundary of the plan and is an un-serviced green field site. Its development would be contrary to the RSES and NPF emphasis on centre out and brown field development and would be contrary to EPO HTP1: ensure compliance with higher tier plans such as the National Planning Framework and the Regional Spatial and Economic Strategy and other guidance, issued by the Department.

36. Amendment – Change Agricultural zoning (1.6 hectares) to District Centre zoning at lands located within the Jetland District Centre at Caherdavin, Ennis Road

Change of zoning from Agriculture to District Centre of 1.6ha. as per the image below at the Jetland District Centre, Caherdavin, Ennis Road



Reasons:

- A comprehensive planning application has been submitted on the land for HSE sponsored Primary Care Centre
- A comprehensive Site-Specific Flood Risk Assessment (SSFRA) and Justification Test was submitted demonstrating that the site is at low risk of flooding and can be developed in accordance with Department Flooding Guidelines.
- Contrary to the consideration of the planning authority it is submitted that the proposed development does comply with the Justification Test, having regard to its location within and adjoining the core of an urban area.
- A substantial part of the site, adjoining the road is brownfield in nature and is in need of regeneration.
- There is no other alternative site available in the northwestern suburbs of Limerick City, surrounded by residential development, accessible by public transport with the ability to create synergies with other services and facilities, that can accommodate the development proposal.

SEA comments: The proposed material amendment made by the Elected Members, included a proposal to rezone this land to District Centre, which could include residential development . A site specific flood risk assessment and justification test was submitted as

part of the supporting documentation for the change of zoning. The information was reviewed as part of the SFRA on the material alterations, which concluded that site should be retained for less vulnerable uses as appropriate to the flood zone. This proposed amendment is inconsistent with EPO HTP 1 which requires “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”. This is also contrary to EPO **HTP 1**: ensure compliance with higher tier plans such as the National Planning Framework and the Regional Spatial and Economic Strategy and other guidance issued by the Department.

37. Amendment – Amend Development Management Standards Section 11.3.5 Roads, footpaths, water services and landscaping:

Propose an amendment to Development Management Standards **Section 11.3.5 Roads, footpaths, water services and landscaping** as follows:

Road and footpath design and construction shall be in accordance with DEHLG ‘Recommendation for Site Development Works for Housing Areas’ (1998) and design should also be informed by the Design Manual for Urban Roads and Streets, DTTS 2019, [DMURS Interim Advice Notice, COVID – 19 Pandemic Response and Whole of Government National Disability Inclusion Strategy \(NDIS\) 2017 - 2022](#) and any subsequent government guidance documents. Where there is a deviation in the general requirements, the primary consideration will be the safety of pedestrians, cyclists and access for emergency vehicles. ~~Dished kerbs shall be provided at junctions and vehicular entrances, to facilitate people with ease of movement.~~ [An assessment of pedestrian crossing requirements to be made at junctions and vehicular entrances with consideration given to appropriateness of dropped kerbs and/or continuous footpaths in each instance.](#)

Reason: To bring the Development Management Standard in line with objective TR O11 Universal design.

SEA Comments: The proposed amendment provides additional clarity and further promotes design of sustainable transport links. Consistent with EPO **AQC3**: To include climate action concerns into the plan policies.

38. Amendment – Amend text of the Draft Plan Section 6.5 Sustainable Mobility

Amendment to text of the Draft Plan Section **6.5 Sustainable Mobility** as follows: The promotion of use and increased delivery of sustainable modes of transport is fundamental to achieving Ireland’s carbon emission reduction requirements of ~~30%~~ 51% by 2030.

Propose an amendment to text of Draft Plan Section **6.2.1 Climate Action Plan** ~~2019~~ 2021.

Propose an amendment to text under Section **6.5.2 Promoting Active Travel** as follows: A transition towards more sustainable modes of transport is essential to reduce Ireland’s carbon emissions and reach the Government’s goal of a ~~50%~~ 51% reduction in carbon emissions by ~~2050~~ 2030.

Reason: In the interest of clarity.

SEA Comment: The proposed amendments provides additional clarity in relation to climate targets. Consistent with EPO **AQC3:** To include climate action concerns into the plan policies.

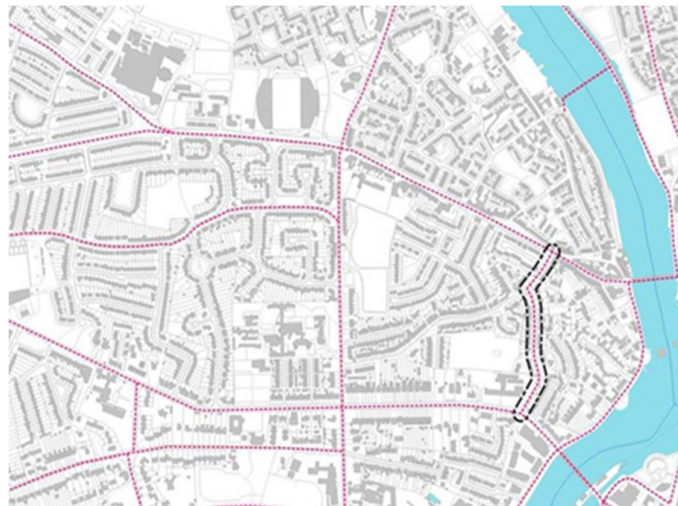
39. Amendment – Amend the Legend of the Transport Map for the City and Environs

Amend the **Legend of the Transport Map** for the City and Environs as follows: ~~Proposed~~ Indicative Cycle way/Walkway

Reason: To provide policy support for sustainable modes of transport and in the interest of clarity.

SEA Comments: The proposed amendment provides additional clarity.

40. Further amendment to the Transport Map for the City and Environs Map to include an indicative cycleway via Belfield Gardens as indicated on the Map.



Reason: To provide policy support for sustainable modes of Transport.

SEA Comments: The proposed amendment provides additional clarity. It provides for sustainable transport link in an already built up area which should help local transport links and permeability. Consistent with EPO **MA2:** Ensure that there is adequate policy support for infrastructural provision and protection in the plan area. Consistent with EPO **AQC3:** To include climate action concerns into the plan policies.

41. Amendment – Amend Objective ECON 036 Tourism

Propose an amendment to **Objective ECON 036 Tourism** to include an additional point as follows: It is an objective of the Council to support and promote the development of Shannon River Interpretative Centre in Limerick City.

Reason: Building on Fáilte Ireland’s Shannon River Tourism Masterplan to develop an interpretative centre in Limerick City would tell the rich story of the entire Shannon River from a heritage, ecological, social and industrial point of view. This would have very significant tourism, educational and economic benefits for the city and the region.

SEA Comments: The proposal to support the development of the tourism industry is welcomed. The creation of additional tourism infrastructure is consistent with **MA2:** Ensure that there is adequate policy support for infrastructural provision and protection in the plan area.

42. Amendment - Amend Objective ECON 037 Limerick Greenway:

Change the title of the Objective to Limerick ~~Greenway~~ Greenways and add an additional point as follows:

X) Support the development of a greenway link from Limerick City to connect with the Suir Blueway in Cahir, Tipperary, in so far as it falls within County Limerick, subject to ecological assessment and design.

Reason: Greenways are a very significant economic driver for rural areas, promoters of sustainable tourism, great local amenity sources and provide policy support for sustainable modes of transport and sustainable tourism options.

SEA Comments: The proposal to support the development of the tourism industry is welcomed. The creation of additional tourism infrastructure is consistent with **MA2:** Ensure

that there is adequate policy support for infrastructural provision and protection in the plan area. In addition it is noted that the Greenway is to be subject to suitable ecological assessment and design. This will help minimise any potential ecological effects. Consistent with EPO **AQC3**: To include climate action concerns into the plan policies.

43. Amendment - Change of zoning from Agriculture to New Residential zoned land (2.9 ha), Ballyclogh, Castletroy

Proposal the change of zoning from Agriculture to New Residential of 2.9ha. at Ballyclogh, Castletroy



Reasons:

- Compact growth, the site is connected by footpath to and within walking distance of the thriving Newtown Shopping Centre and the many local educational / community facilities.
- The site is accessible by public transport.
- Requirement for additional zoned land.
- Lands are not identified on CFRAM maps as being at flood risk.
- Noise separation corridor of 80m proposed.

SEA Comments: Any development of the lands would require an appropriate level of assessment of all the relevant issues on site, including noise, surface water management and ecology. See also NIS, which suggests mitigation measures. This is dealt with further

in the NIS as the Mulkear River which is part of the Lower River Shannon SAC site lies just to the east of the Site.

44. Amendment - Amend objective CAF 021 Identified Flood Risk and the IDA lands at the National Technology Park

Further amendment to Objective CAF O21 Identified Flood Risk to include the following:

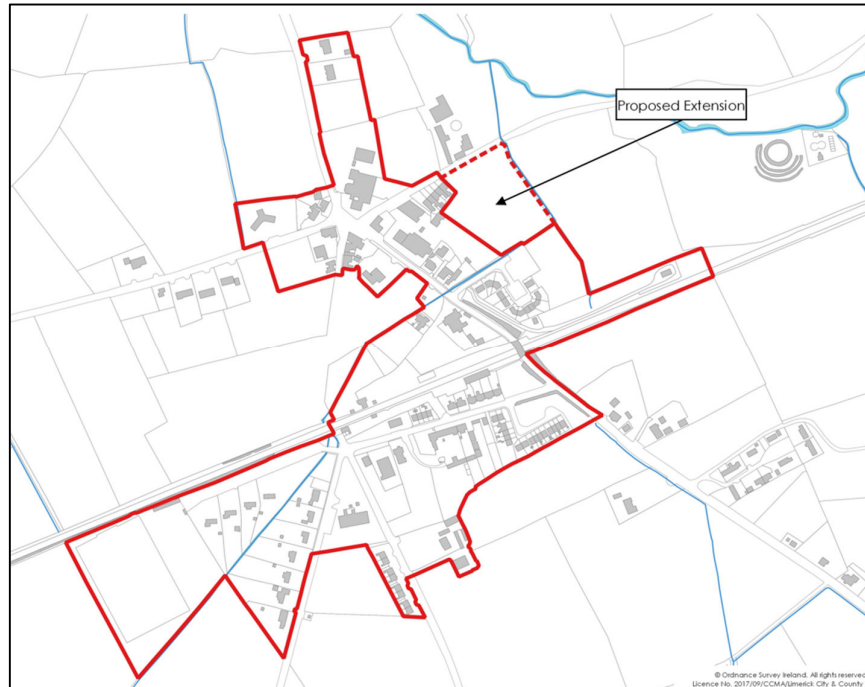
d) No works including the undertaking of ground level changes shall commence on the lands in the National Technology Park subject to flood risk, until all flood mitigation measures proposed on the site to facilitate future development of the IDA lands have been put in place. These measures shall form part of a, project-specific flood risk assessment being completed as part of the planning application.

Reason: In the interest of clarity.

SEA Comments: Consistent with the 2009 Planning and Flood risk guidance and EPO 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.

45. Amendment - To support the extension of the development boundary in Knocklong

Proposal to extend the development boundary in **Knocklong** to include the lands outlined in dashed red on the attached map.



Reasons:

The proposed lands are an integral part of the village core and will support the redevelopment of brownfield lands.

The proposed lands will support compact growth in line with national and regional planning policy

SEA Comments: In line with national and regional policy on compact growth, the proposal seeks to develop the core of Knocklong. Consistent with EPO **HTP 1:** Ensure compliance with higher tier plans such as the National Planning Framework and the Regional Spatial and Economic Strategy and other guidance, issued by the Department.

46. Amendment - Change of zoning from Residential to Mixed Use in Glin



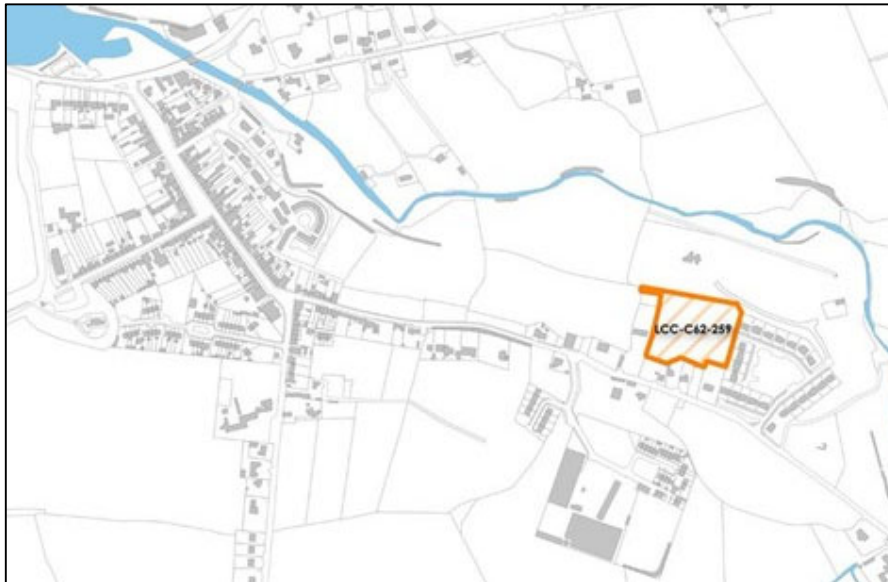
Include new objective GL08 as follows:

Mixed use zoned land: The purpose of this zoning is to facilitate a variety of uses that would support the further development of the village, including residential, health care, hotel, and tourism related activities. Notwithstanding the land-use zoning objective and purpose set out in section 12.3, Volume 1 and the land use zoning matrix, in order to protect the village centre, retail uses that could more appropriately be located in the village centre and or compete with existing uses in the village centre will not be permitted on this land.

Reason: The lands are in close proximity to the village core and have the potential to support a wide variety of uses on site, supporting the further development of the village, in line with the Draft Development Plan. The zoning could support the development of tourism in the village in line with Objective GL 03, which encourages new development for the tourist industry to be located within the village boundary to maximize existing services

SEA Comments: Having regard to the proximity of the site to the village core and the potential to develop such uses as health care or tourism facilities the site will help consolidate the core of the village. It is consistent with compact growth principle and with EPO **HTP 1:** Ensure compliance with higher tier plans such as the National Planning Framework and the Regional Spatial and Economic Strategy and other guidance issued by the Department.

47. Amendment - Add 1.2 ha of residential land in Glin



Reason: The change of zoning on site 1 from residential to mixed use results in a shortage of residential lands. Assuming that 20% of the mixed use lands will be used for residential there is capacity for 1.2 ha of land for residential use elsewhere. Planning permission was previously granted on this land for residential development. The site is located adjacent to an existing housing estate.

SEA Comments: The amount of land zoned complies with the core strategy requirements and with EPO **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 issued by the Department.

48. Amendment - Amend density assumptions for NCW from 35 Units Per Hectare to 22 Units Per Hectare

Propose to amend Table 2.6 so that the density assumption for Newcastle West (Key Town) are reduced from 35 to 22 Units per Hectares.

Reasons:

- Newcastle West towns status as set out in the existing Development Plan is superseded by Limerick City as the principal development hub thus enabling it and its surrounding smaller towns and villages to grow collaboratively together.
- Housing growth as projected in the 2010-2016 plan for Newcastle West was not achieved

- Newcastle West unlike rural agricultural settlements of its size does not have a Cattle Mart.
- The Current and Proposed Density Ratios are acting as a barrier to Sustainable Residential development within Newcastle West. Numerous planning grants for higher density housing have not progressed to build.
- Given the Lifestyle changes experienced through and post covid-19 larger living and open space area is an essential to accommodate healthy Residential Living. The higher density as currently being considered is a significant health concern. Over concentration of residential units is likely to compromise Peoples Mental Health
- The density levels as proposed will have the potential to leave our communities vulnerable to antisocial behavioural issues.
- The Road Infrastructure to the South & East of Newcastle West is presently inadequate to accommodate traffic flow
- Adaptation of Housing Density levels of similar size towns in surrounding counties i.e., Clonality, Fermoy, Listowel, Macroom, Roscrea & Tipperary Town would better position Newcastle West in terms of lifestyle thus making it a more attractive place to reside.

SEA Comments: The proposal to reduce the density assumptions for Newcastle West are contrary to Section 28 Guidelines **Sustainable Residential Developments in Urban Areas (2009)** and contrary to EPO HTP1. Ensure compliance with higher tier plans such as the National Planning Framework and the Regional Spatial and Economic Strategy and other guidance, issued by the Department.

49. Amendment - Amend the Zoning Map in Cappamore

Amendment to the Cappamore Zoning Map as follows:

- Remove Site No. 2 (Area 0.152ha) and realign the boundary to reflect existing residential on the ground;
- Change sites No.5 and No.6 to from Serviced Sites to New Residential;
- Zone the William O'Brien lands (Submission received) to include 0.65 ha Enterprise and Employment and 0.66ha as Serviced Sites.



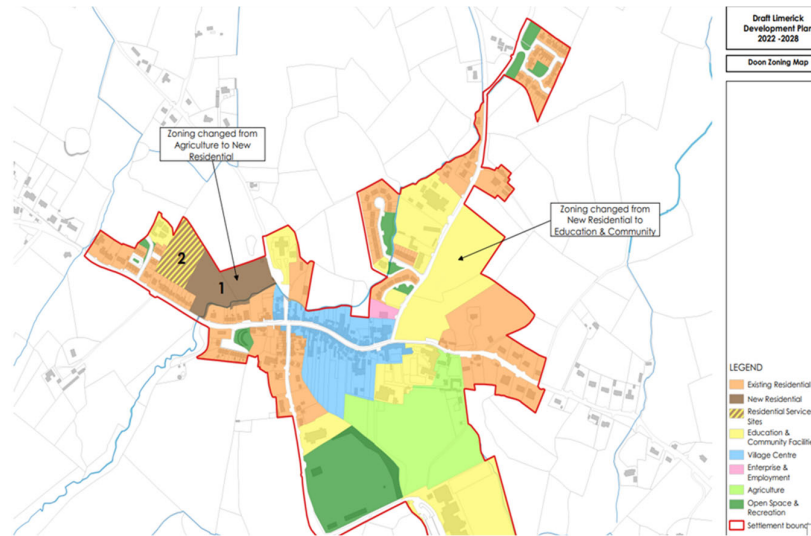
Reason:

The lands are more appropriately located than the identified by the Executive in this instance. The lands will allow for a more cohesive approach to development in Cappamore and consolidate the core of the village and support compact growth in line with national and regional planning policy.

SEA Comments: The proposal will support consolidation of the core of the village and support compact growth in line with national and regional planning policy. Consistent with EPO HTP1.

50. Amendment –Amend Zoning Map in Doon

Proposal to change of zoning from lands currently proposed for residential use to Community use and the zoning of additional lands for residential use as shown on site marked No.1 (1.73 ha) on the attached map.



Reason: The lands marked 1 had a previous planning permission on them and were de-zoned in the draft plan as they were identified as flood risk. However following additional flood assessment a new flood map was produced as part of the Chief Executives report in November 2021 and has identified the lands are not at risk of flooding. It is more likely that these lands will come forward for development within the lifetime of the plan.

SEA Comments: The proposal will support the consolidation of the core of the village and support compact growth in line with national and regional planning policy. Consistent with EPO HTP1.

1. Amendment - Removal of RPS No.229 from the Record of Protected Structure

Proposal the removal of **RPS. No. 229 – Leonard's Thatched Cottage, Castle-Erkin, Pallasgreen** from the Record of Protected Structures.



Reason: To remove a fire and health risk, due to its proximity to the roadside and being adjacent to the main homestead. Removal is requested to remove a fire and health risk due to its proximity to the roadside and being adjacent to the main homestead.

SEA Comments: It is considered that the structure warrants retention on the Record of Protected Structures. It was an old dairy and the thatched structure served the purpose of maintaining a more even temperature and hence preventing milk and milk products going sour. The property owner has benefitted from heritage funding to maintain the structure in the past (€5,315), as a result of Record of Protected Structure status. Its removal would not be consistent with EPO **B3**: Preservation of the character of the historic built fabric.

2. Amendment – Need for additional Schools

Proposal to amend policy in relation to provision of additional schools.

[Amend objective SCS1 09, educational facilities as follows:](#)

[\(d\) It is an objective of the Council to commence work, in conjunction with the Department of Education, to identify potential school sites in the city and environs that will address the future educational needs of the projected population](#)

Reasons:

- A comprehensive submission was made by the Department of Education at the 'Draft Plan' and public consultation stage, the submission included proposals for Limerick City East for Primary Level and Post-Primary Level, namely no. 3 primary school sites and no. 1 post-primary school site be zoned for City East.
- The Department anticipates that some requirements for additional educational accommodation may emerge over the lifetime of the Plan should the projected population increases materialise. Castletroy is one of the fastest growing urban areas in

the whole Mid-West region and there has been a huge increase in the population in recent years. Monaleen National School is the largest primary school in the city and county. Castletroy College was built to cater for about 700 students, and it now has over 1,200 students.

- The existing primary and secondary schools in the area are currently oversubscribed.
- The catchment area for the new secondary school which is still to be built in Castletroy is ALL Limerick City and not just the Castletroy area.

SEA Comments: 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.

3. Amendment – Support for the Development of innovative designs / Timber living homes

Insert into Section 11.4.6:

A variety of house types of innovative designs, including timber houses will be considered subject to the dwelling integrating into the local environment and compliance with building regulations.

Reason: In the interest of supporting development.

SEA Comments: Promotes innovative design which would be responsive to local settings and circumstances. 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.

4. Amendment - Addressing Homeless

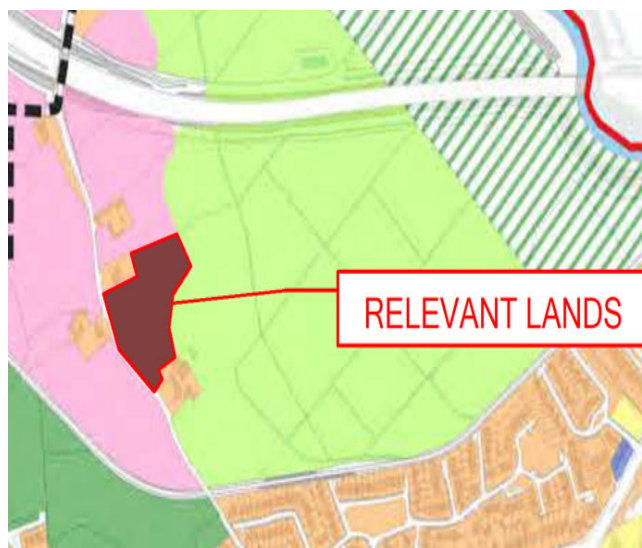
Proposal to include a new policy for inclusion in Section 3.7.16, as follows:

Limerick City and County Council will implement measures to address the homelessness crisis in Limerick

Reason: In the interest of addressing homelessness.

SEA Comments: In line with other policies in the Draft Plan. 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.

5. **Amendment - Amend City and Environs Zoning Map to change the zoning on lands of approx. 1.2 hectares within Ballykeeffe, from Enterprise and Employment” to Residential**



Reasons:

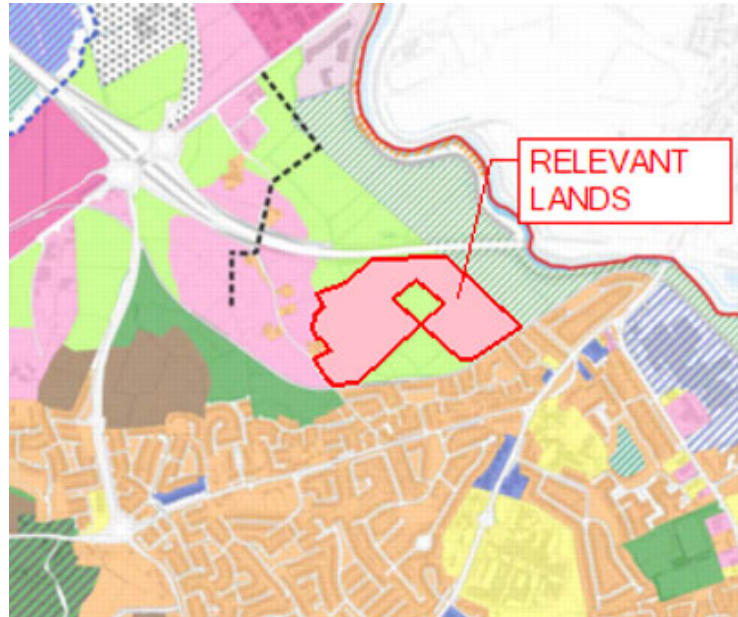
- The lands are located adjacent to the City boundary line, within an urbanised area, are serviced by water and drainage infrastructure and are located within a 10 minute cycle of Limerick City centre.
- The lands are also located adjacent to a disused rail line, which has the potential for sustainable mass travel.

The lands are located within Flood Zone C and therefore suitable for all types of development, including residential development.

SEA Comments: The proposal is outside the area at risk of flooding and would facilitate compact growth.

6. **Amendment - Zoning of Lands at Ballykeeffe, Mungret from Agriculture and Semi Natural Open Space to Enterprise and Employment**

Propose the re-zoning of lands at from Agriculture and Semi Natural Open Space to Enterprise and Employment.



Reasons:

- The site is located in close to existing residential development will facilitate the development of compact growth in line with national and regional planning policy.
- The owner considers that the lands are not at risk of flooding and meet the requirements of the Section 28 Guidelines in terms of flood risk, as the lands are defended by existing embankments.

SEA Comments: The proposed material amendment made by the Elected Members, included a proposal to rezone this land to Enterprise and Employment. A site specific flood risk assessment and justification test was submitted as part of the supporting documentation for the change of zoning. The information was reviewed as part of the SFRA on the material alterations, which concluded that site should be retained for less vulnerable uses as appropriate to the flood zone. This proposed amendment is inconsistent with EPO HTP 1 which requires compliance with higher tier plans such as the National Planning Framework and the Regional Spatial and Economic Strategy and other guidance issued by the Department.

6.2 Methodology for Assessment and Determination of Significance of Effects of the Amendments

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

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

Following on from the preparation and evaluation of the previous sections of the report, the above questions were considered in determining the significance of the proposed amendments.

1. Will the amendments, following the adopted motions, in the Draft Limerick Development Plan lead to a risk of environmental standards being breached?

For the most part this is not considered likely as sufficient protection has been incorporated into the Plan to ensure that this does not take place. However, in real terms this depends on compliance with the Plan contents and national guidance in the case of breaches of planning conditions would require enforcement of the relevant planning legislation. It is also necessary for the Council, in its own works, to have cognisance of the policies of the Plan and relevant environmental legislation. Amendments seeking the rezoning of flood risk lands for more intensive land uses lead of the risk of exposing eventual users to flood risk, while leading in other cases to loss of flood plan area.

The policies in relation to nature conservation have been substantially updated since the last Plan and reference has been made to specific species as requested by the NPWS in their submission. New biodiversity guidance documents such as the All Ireland Pollinator Plan 2021-2025 and supporting documents have been referenced in the Plan and are included in planning recommendations by the Heritage Officer to the Development Management process. This also applies to species mentioned in submissions such as the Barn Owl and Lesser Horseshoe Bats, which are also the subject of recommendations at project level. The Vincent Wildlife Trust (VWT), with local land owners in East Limerick has commenced work on European Innovation Project designed to help aid the movement of the Lesser Horseshoe bat across the wider landscape. The Planning Section (Development Management) and the

Heritage Officer have assisted the Vincent Wildlife Trust to help with delivery of the programme over the last few months. A geological heritage survey has also been carried out. Similarly it is intended to carry out a Barn Owl survey in Limerick in the near future to help inform actions to help with the conservation of this species. In these cases the policy content of the plan has contributed to ecologically beneficial projects. These have not been altered by the amendments. One amendment in relation to the connecting with the Suir Greenway/Blue way is phrased to include the “ecological assessment and design” ensuring that ecological concerns will be incorporated from the outset.

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

Given that it will be almost twelve years since the existing Plans were adopted, the opportunity has been taken to substantially update the environmental policy content of the Plan itself. This should ensure that with up to date policy there is a lesser chance of missing environmental targets or new directions in environmental policies. However, it should be noted that adherence to the Plan policies is of huge importance in ensuring compliance with environmental policies and achieving environmental targets, particularly since they have been informed by both the NPF and the RSES which emphasise these issue.

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

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

The climate action section of the plan has also been updated to include mention of the latest guidance together with a commitment to take on going issue of guidance legislation on climate topics into account. One of the amendments relates to clarification of carbon targets in the plan so this is welcomed. The amendments which call for the zoning of lands that are vulnerable to flood risk run counter to good climate adaptation practice. The monitoring section of the plan has also been updated to take into account the latest monitoring requirement as laid down in the Draft Development Plan guidelines. The increased

frequency of monitoring will mean that trends can be identified earlier and policies can be amended accordingly to avoid any failures.

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

One of the proposed amendments relates to the expansion of the development boundary of Carrigkerry which will encroach into the Stack's to Mullaghareirk Mountains, West Limerick Hills and Mount Eagle SPA (004161). This is minor in area and close to the village which means the set is already subject to human disturbance. Planning permission had been granted nearby. Bearing in mind its location close to the village centre, and the NPWS circular outlining that rural housing is not regarded as affecting the ecological integrity of the Hen Harrier this minor expansion of the settlement boundaries of Carrigkerry is not considered significant.

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

Some material amendments advocated zoning areas that are at risk of flooding and their zoning would lead to the loss of flood plain area but also to the loss of open space and wet grassland that could provide valuable stepping stones for species associated with both the River Shannon and Fergus Estuary SPA, such as wildfowl, and the Lower River Shannon SAC site, part of whose conservation interest is the Otter. While both areas are not part of the Natura 2000 site network they are part of a valuable chain of open space habitats in the city which allow movement of species of conservation concern. This, as the NIS indicates is of local significance as the city is surrounded by agricultural grassland, a short flight away to which wildfowl can disperse in the event of bad weather or high tides on the main Shannon Channel.

5. Are material amendments consistent with planning legislation?

For the most part yes. But see above in relation to zoning in areas that are on flood plains particularly those which are not previously developed. In certain situations, the removal of individual structures from the list of Protected Structures is not desirable. While this is the case, their removal on individual levels would not lead to significant environmental effects as they relate to individual structures such as buildings and not to larger areas such Architectural Conservation Areas (ACAs) which might define the character of whole parts of

a built up area. Another proposed material amendment is that of altering the residential density of zoned lands in Newcastle West. This is not consistent with national guidance.

6. Do the Material Amendments adequately incorporate climate action concerns?

Not in the case of the proposals to reduce density in residential lands which will lead to less efficient land usage. Similarly the zoning of lands that are subject to flood risk is not compliant with guidance on the topic and does not take into account the need for climate adaptation. The material amendments that clarify figures for greenhouse gas reductions, on the other hand, emphasise the need for climate action and by identifying the targets required add clarity to the plan. An amendment that identifies sustainable transport links does incorporate climate concerns.

7. Do the Material Amendments adequately incorporate biodiversity concerns?

One of the proposed amendments relates to the expansion of the development boundary of Carrigkerry which will encroach into the Stack's to Mullaghareirk Mountains, West Limerick Hills and Mount Eagle SPA (004161). This is minor in area and close to the village which means the site is already subject to human disturbance. Planning permission had been granted nearby. Bearing in mind its location close to the village centre, and the NPWS circular outlining that rural housing is not regarded as affecting the ecological integrity of the Hen Harrier this minor expansion of the settlement boundaries of Carrigkerry is not considered significant.

Where the material amendments advocated zoning areas at risk of flooding this is not consistent with good practice. Their zoning would lead to the loss of flood plain area, but also to the loss of open space and wet grassland that could provide valuable stepping stones for species associated with both the River Shannon and Fergus Estuary SPA, such as wildfowl, and the Lower River Shannon SAC site, part of whose conservation interest is the Otter. While both areas are not part of the Natura 2000 site network they are part of a valuable chain of open space habitats in the city which allow movement of species of conservation concern. These habitats, outside the Natura 2000 site network, are important from the point of view of Article 10 of the Habitats Directive, as they provide a chain of habitats that allow species of conservation concern to move across the wider countryside. However on the whole with the presence of grassland outside the city, the loss of habitats within the city, is expected to have a local not a regional effect.

6.3 Summary of Likely Significant Effects of Implementing the proposed Draft Plan with the adopted material amendments and Measures Proposed to Prevent, Reduce or Offset such effects

6.3.1 Introduction

In accordance with the SEA legislation, the likely significant effects on the environment of implementing the material amendments are summarised below. From the outset it should be noted that it will be impossible to mitigate against some of the measures contained in the amendments. This includes the zoning of flood prone lands for vulnerable uses. While it has been stated that there are flood defence embankments in the city area, these are for the defence of agricultural lands only and not for lands zone for developments uses such as residential. In any event the presence of flood defences will be have to be discounted. The Planning and Flood Risk Guidance document (2009, p.16) states the following; *“...the presence of flood protection structures should be ignored in determining flood zones. This is because areas protected by flood defences still carry a residual risk of flooding from overtopping or breach of defences and the fact that there may be no guarantee that the defences will be maintained in perpetuity.”*

6.3.1.1 Biodiversity, Flora and Fauna

In tandem with the SEA process and to comply with Article 6 (3) of the Habitats Directive, an Appropriate Assessment was carried out to examine the impacts of the material amendments on Natura 2000 habitats. Natura 2000 sites are located within the Plan area and it was important to carry out the process in order to establish if any of the material amendments might have effects on the Natura 2000 sites, such as the Lower River Shannon SAC site or the River Shannon and Fergus SPA or Stack's to Mullaghareirk Mountains, West Limerick Hills and Mount Eagle SPA. The assessment indicates that there would not be any significant direct effects on these areas with the implementation of the material amendments as presented. There would be a loss of flood plain area and related habitats, outside designated sites, should zoning amendments take place in flood prone areas. This would be locally significant and would have an effect on the wildfowl which would use the Special Protection Area as these species would move outside the SPA boundaries to feed or roost outside the site boundaries. However given the amount of grassland which exist close to the urban area and open space within the city, it is considered that this would have a local effect only.

A development boundary extension would not have significant effects on the hen harrier as the area is already subject to human disturbance being just to the north of the village centre.

6.3.1.2 Population and Human Health

Generally, potential impacts on population and human health arising from the material amendments are considered positive as the one of the material amendments provides for examination of potential sites for schools to cater for a growing population. One also relates to the provision of accommodation to help solve the homeless crises. Those amendments that seek to zone flood risk lands are not positive from the point of view of human health as they will expose the eventual users to risk.

6.3.1.3 Water/Wastewater

It is not considered that the that material amendments will have any significant effects on the issue of potable water provision or disposal of waste water, as by and large zoning is within the context of the population figures of the Core Strategy. The material amendment, proposing the designation of Roxborough as a Level 6 settlement is concerning due to the proliferation of individual waste water treatment systems, and poor drainage conditions. A 2015 survey of septic tanks in part of this area indicated that many of treatment systems were poorly functioning and for this reason. There is a risk associated with the designation of the settlement at this location.

6.3.1.4 Air Quality and Climate

Proposals to reduce density in residential lands will lead to less efficient land usage. Similarly the zoning of lands that are subject to flood risk is not compliant with guidance on the topic and does not take into account the need for climate adaptation. The material amendments that clarify figures for greenhouse gas reductions and identify sustainable transport routes, on the other hand, emphasise the need for climate action and by identifying the targets required add clarity to the plan.

6.3.1.5 Geology and Soil

No significant effects anticipated from the adoption of the material amendments.

6.3.1.6 Cultural Heritage

In certain situations, the removal of individual structures from the list of Protected Structures is not desirable. While this is the case their removal on individual level would not lead to significant environmental effects as they relate to individual structures such as buildings and not to larger areas such Architectural Conservation Areas (ACAs) which might define the character of whole parts of a built up area.

6.3.1.7 Landscape

There has been a substantial updating of landscape policies in the Plan to take into account the merging of the City and County areas. Four new Urban Character Areas have been added to reflect the inclusion of the City and the Metropolitan Areas. As outie above the removal of individual structures from the Record of Protected structures is not considered to have an effect on these.

6.3.1.8 Material Assets

No significant effects. The amendment in relation to establishing a working group to establish educational zoning requirements for educational facilities is a welcome step and is considered positive.

6.3.1.9 Flooding

Sites that are at risk of flooding, that have been zoned could lead to the loss of flood plain area and expose eventual users to flood risk.

6.4 In-combination Effects

It is from proposals to zone in areas of flood risk that the greatest concerns are anticipated. There is possible risk of flood displacement and effects on neighbouring properties and in case of rezoning of green fields sites, the loss of floodplain area with loss of wet grassland habitat.

Many of the other amendments relate to very specific issues often and are small in scale. It is not considered that they would have significant cumulative or in combination effects.

7.0 Conclusion

Table 6: Key Environmental Issues associated with Material Amendments.

Key Environmental Issue		Relevant Material Amendment
Water Quality	<ul style="list-style-type: none"> -Protection of Water Quality Framework Directive, incorporation of relevant objectives and measures -Surface and ground water protection -Drinking water -Wastewater treatment -Water conservation 	Designation of Roxborough as a Level 6 settlement. Due to poor ground water conditions its designation as a Level 6 Settlement dependant on individual treatment systems is contrary to good practice.
	<ul style="list-style-type: none"> -Integration of flood risk assessment into the Plan to ensure appropriateness of land use and inclusion of SUDS technology -Increased risk of flooding due to Climate Change 	Proposals to re-zone flood prone lands are contrary to the 2009 Flood Risk Guidance and expose vulnerable uses on these sites to flood risk.
	Protection of Biodiversity - Natura 2000 sites, pNHAs, non-designated habitats, riparian buffer zones, green infrastructure	The proposals to re-zone areas such as Ballykeefe and the lands to the rear of the Crescent will involve the loss of flood plain area should they proceed. This would not have direct effects but would, in the longer term, remove suitable areas that Wildfowl species might use during adverse weather or tide conditions on the main river channel.
	Conservation of the open spaces and Parklands in the LDP area	See above.
	Consideration of potential impacts of climate change	See above in relation to zoning of flood prone areas. The material amendment clarifying climate targets is beneficial.

	Sustainable modes of transport	One material amendment relates to identification of a sustainable transport link in the city, which would reduce car usage and hence energy usage
	Protection of air quality	No effects anticipated from the material amendments
	Consideration of potential impacts of climate change	One material amendment relates to identification of a sustainable transport link in the city, which would reduce car usage and hence energy usage. However proposals to zone flood risk areas contribute to risks from flooding and Climate change.
	Promotion of use of energy conservation	One material amendment relates to identification of a sustainable transport link in the city, which would reduce car usage and hence energy usage
	Architectural Heritage Protection	In certain situations, the removal of individual structures from the list of Protected Structures is not desirable.
Flooding.	Safe guarding against flood risk.	There are a number of sites included in the Material Amendments that are at flood risk. Their zoning would lead to the loss of flood plain area and expose eventual users to flood risk. Other re-zoning closer to the city centre involves previously developed or brown field sites, but zoning them for more vulnerable uses would lead to increased risk should they ever be developed.

7.1 Summary of how environmental considerations were factored into the amendments.

This was achieved principally through the use of the Environmental Protection Objectives which are a useful means of assessing the effects of the amendments. Existing designations and sensitive habitats were also used to establish effects e.g. the loss of wet grassland or floodplain habitats. Monitoring procedures have also been updated which would help detect, in a shorter time frame possible effects of the plan implementation.

The monitoring aspect of the plan will also be revised following publication of the Draft Development plan guidelines, in which the monitoring element of plans is expanded and increased in frequency.

However some amendments, particularly those that relate to zoning of flood risk lands for vulnerable uses is not favoured by the executive and is not consistent with good climate adaptation practice and exposes eventual users to risk.

7.2 Summary of how the Environmental Report and submissions received from Statutory Authorities following the last public display period were taken into account

A new structure has been adopted for the plan with revised chapter titles and content in order to incorporate climate action content and updates to the S28 guidelines such as the Draft Development plan guidelines. This will have particular implications for monitoring, the frequency which is to increase with the publication of a Core Strategy assessment on an annual basis and assessments of other elements of the plan on a two yearly basis.

New targets have been assigned to monitoring i.e. those which relate to renewable energy targets as mentioned by the OPR. These consist, not just of wind energy, but also of targets for solar and hydro and geothermal technologies. It is understood that these types of renewable energy technologies which are mentioned may need to be expanded as this field evolves, so it is likely that this element of monitoring will expand during the life time of the plan.

The Elected Members considered the Draft Plan and Chief Executive's Report, at the Council meeting on February 18th 2022 and the Material Alterations will go on public display. The submissions received will then be factored into the last stages of the plan and the final part of the SEA process, the SEA statement.

Climate action has been expanded in terms of contents and its resource throughout the plan is factor of the new plan layout. It is recognised that this is an ever evolving field and a commitment to comply with new climate action guideline and legislation as it emerges is included in the plan. However, as indicated above, proposals to zone flood risk areas for vulnerable uses is not consistent with good climate adaptation practice.

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

The option that was selected is the one presented with the amendments put forward at the Council meeting of the 18th of February.

Alternative Strategy - The review as presented with amendments voted on during the council meeting of the 18th of February 2022:

The public display period indicated several deficiencies in the previous draft. New content has been prepared following receipt of the OPR submission and those from the other statutory bodies. New amendments reflecting specific concerns have been put forward by elected members. Changes have been made to the plan content and structure with additions to chapters relating to housing and climate action content. There has been a renumbering of chapters. In short the previous draft lacked some important elements relating to housing, climate action, and infrastructure which required updating. It is considered that this draft is more reflective of both national policy and local input than any previous draft of the plan.

As previously stated there are several locations that are flood prone, which have been suggested for development zoning by some of the proposed amendments. This is significant in that zoning and eventual use of these flood prone areas would expose the users to unacceptable risk.

In the selection of alternatives, zoning of lands at flood risk for development, is an issue for concern, uses that are commensurate with the degree of risk and this would mean zoning only for flood compatible uses.

8.0 Monitoring

8.1 Introduction

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

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

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

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

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

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

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

8.1 Monitoring

It is anticipated that the monitoring schemes for ecological aspects of the plan will be tied in with the new procedures in the draft development guidelines which suggest annual reports on the core strategy implementation and bi-annual reports for other plan policies. These will be complemented by additional surveys of elements of Limerick's Environment which would help identify separately from the planning process, baselines and trends (see S8.2.1 below). The monitoring element identified in the NIS will also be integrated with that of the Plan and SEA. In many respects, this will involve close cooperation with the Development Management section within the Planning Authority as it is through the planning application process that the practical effects of the plan will be felt. It is best to be involved at the earliest possible stage in trying to shape the eventual form of planning applications to minimise their ecological and environmental effects, so involvement in pre-planning meetings will be important particularly from a mitigation perspective. It will also mean liaising with the Planning Enforcement Section. The Development Applications Unit / DAU submission placed particular stress on enforcement. Some types of planning application such as those required for Strategic Infrastructural Development are not dealt with by the council but by An Bord Pleanála. These would have to be referred to the Council for comment so it would be possible to keep track of these and their possible ecological effects and inform the applicant and the An Bord Pleanála accordingly.

It will also be necessary to keep in contact with local National Parks and Wildlife Service Personnel as they would be aware of wider happenings, outside of planning, as they relate to designated sites and through their monitoring of any changes would be able to inform the council of any ecological changes.

As the Draft Development Plan Guidelines point out the monitoring task of the planning authority for its development plan is made up of two monitoring elements: Core Strategy Monitoring and Plan Objectives Monitoring

The Core Strategy Monitoring is on an annual basis. The development plan has a primary role in land use and spatial development policy and in guiding new development, particularly housing. The monitoring must provide information on development patterns occurring under the settlement strategy of the development plan and type and location of new development that is occurring.

The development plan process should prepare plan objectives that are SMART (Specific, Measurable, Assignable, Realistic and Time-related) and easily monitored over the lifetime of the plan. Each development plan will have a set of objectives that are particular to each Local Authority area and are required to be monitored and reported on.

These must include: • Indicators that are that aligned with reporting for other related national policies (e.g. climate change, water quality, etc.) or for the purposes of monitoring the SEA. The monitoring of the significant environmental effects of the implementation of the plan is a statutory requirement of the SEA Directive and the planning authority shall refer to the EPA’s guidance document entitled “Guidance on Strategic Environmental Assessment (SEA) Statements and Monitoring” and any future review. Additional/supplementary indicators can be identified by individual planning authority for specific objectives. To assist in this it is the intention of LCCC to carry out a series of surveys to establish an ecological baseline for the plan. A description of these follows in section 8.2.1

Table 4.12 Ecological Monitoring Measures for the Plan

Measure	Information Sources.	Comment
Liaise with Development Management section	Planning applications including LSRD applications when received Individual ecological assessments. Appropriate Assessment register	Request Development Management planners to pass on details of ecologically sensitive applications.
Engage with pre-planning meetings	Pre-planning register	May be possible to shape development form and

		layout to minimise ecological effects. This would be an important mitigation measure.
Monitor SID and SHD* applications *until replaced with LSRD	Referrals by applicants and DM planners.	Dealt with by ABP, but input sought from the Council.
Liaise with Enforcement Section	Planning enforcement files as they relate to ecological issues and designated areas.	Emphasised by DAU NPWS submission.
Liaise with local National Parks and Wildlife Service personnel	NPWS monitoring	Could assist in monitoring of ecological locations through their Article 17 reports
Liaise with Local Inland Fisheries Ireland Personnel	IFI studies and inspections	Useful in relation to Lower River Shannon SAC site and other designated water courses
Liaise with Infrastructure providers such as RDO, TII and Iarnrod Eireann	NIS EIAR EclA material from their projects	Will inform our own policy review and help identify Environmental/Ecological trends.

The OPR has recommended that the renewable energy targets set out be used as targets in terms of the monitoring and simple implementation of the plan. These are shown in the table below. Please note that this might change during the plan period as new technologies could come into usage which would mean updating the table and including them.

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

8.1.1 Monitoring Actions for the Plan

Action 1: Identify ecological and environmental trends through enforcement and Article 17 reports, as they relate to Nature 2000 sites in particular.

Response: Modify policy content in the plan where deficiencies occur.

Action 2: Ensure that information and resources on climate change as received from the heritage council working group and CARO are fed into planning decisions and possible material for updates of the plan as they relate to designated sites and ecological issues generally.

Response; Update plan content during mid-term review. It will take at least this long to estimate trends.

Action 3: Identify trends and appropriate responses through monitoring the nature and amount of planning applications. As indicated renewable energy technology applications have changed almost entirely to solar applications over the last while. Monitoring planning application trends will indicate any future changes like this, which can be taken into account into ecological policy updates.

Response: Update plan content following preparation of reports as per new Development Plan Guidance, if necessary.

Action 4: Keep track of new Appropriate Assessment and Section 28 guidance as it emerges and update policy content.

Response: Update plan content, if necessary, following production of annual monitoring reports, as mentioned in the new draft Development Plan guidelines or on the production of new guidance.

Action 5: use renewable energy targets in chapter 9 to assist in achieving targets for green energy.

Response: this will enable trends to be identified quickly and planning responses to be put in place to promote new or merging technologies.

8.2 Monitoring Measures

What follows is firstly a brief account of surveys that have and will play an important part in establishing ecological and environmental baseline. These appeared in the draft of the Natura Impact Report and are now echoed in the environmental report as they can fulfil the requirements of establishing, both a wider environmental as well as an ecological baseline. The assistance of the National Bio-diversity Action Plan Funding (now called the Biodiversity Action fund) and the Heritage Council Heritage funding schemes are gratefully acknowledged. Included are measures that have been carried out and then some that are planned:

A joint initiative with Clare County Council in 2018 arrived at a methodology for controlling Giant Hogweed, which has since been employed by the Physical Development Section of Limerick City and County Council on the Loobagh River in south east Limerick. The project with Clare County Council was along a tributary of the River Shannon which was part of the Lower River Shannon SAC site. The intention of the joint initiative was to arrive at a methodology that could be used to control this species within Natura 2000 sites. This is reflected in the reference to invasive species in the DAU/NPWS submission.

In 2016 and 2017, in association with Clare County Council a twelve month survey of the Bird populations of the Shannon Estuary was carried out. This was the first time that such a year round survey was carried out and provides a valuable baseline for bird numbers within the River Shannon and Fergus Special Protection Area and provides a useful tool in informing planning decisions in relation to the estuary. It can also form a baseline for assessing possible climate change effects on these species. The impact of climate change was raised by the NPWS/DAU submission.

The Forward Planning section sits on the steering group for the Climate Action Regional Office. This is a very valuable working group to be involved in and allows the planning department to keep informed on climate action activities as they emerge. It is intended to continue with this, as indicated above this group can feed into monitoring of climate issues for the plan.

In terms of mitigation measures for pollinators, it is, over the last three years standard practice to request that landscaping plans take into account the measures of the All Ireland

Pollinator Plan (AIPP). Over the last year, in particular, it is encouraging to see that landscaping proposals, particularly for larger developments, including Strategic Housing Development proposals, now submit landscaping proposals guided by the AIPP and concentrate on native species. One useful and long-established publication in this regard is the Heritage Councils Conserving and Enhancing Wildlife in Towns and Villages (2005) which is recommended as a standard referral document for this purpose as it contains a useful list of native species together with their suitability for differing surroundings, both urban and rural.

In 2020, a joint survey with Cork County Council sought to establish the presence of the Nightjar (an Annex 1 species of the Birds Directive) in the area of the Cork Limerick border. This is a migratory species, which spends its breeding season in Ireland and is one, which has suffered from huge population declines. Unfortunately, none were present. Surveys of migratory birds may also help identify trends in movement of behaviour, which might be caused by climate change.

In 2012 a survey of Grageen bog, within the Slieve Felim to Silvermines Mountains SPA (004165) sought to establish the presence both Hen Harriers and grouse on site and also the types and condition of habitats present. Also present on site was the Grageen Bog and Fen Natural Heritage Area. The presence of both bird species was confirmed. The presence and an increased number of grouse on the site was confirmed by local NPWS staff in 2021. This emphasises the need to avoid disturbance to this area.

For the last two years in conjunction with Development Management process, planning conditions have been place on suitable developments for the establishment of swift nesting sites, prior to a survey for these birds being carried out next year. Birdwatch Ireland is working with the Council to provide information to support this initiative.

One of the information deficiencies highlighted in the Environmental report, part of the SEA process, was the need to survey the Geological Heritage sites in the county. To this end, funding was obtained from the Heritage Council under their County Heritage Plan funding programme (CHP) and the survey was carried out last year.

8.2.1 Future Programme of Survey Works to Inform Future Mitigation Works and Plan Monitoring

8.2.1.1 Swifts Survey

Forward Planning had intended to carry out this survey this year. This was discussed with local NPWS staff but we were unable to proceed with this survey this year. This survey is intended to complement a project that our Environmental Awareness Officer is promoting. In meantime Bird Watch Ireland, as indicated above, are providing us with information so we can continue to inform development management planners. This project was prompted, in part, by the NPWS submission to our Development Plan who stressed the need to integrate ecology into planning matters.

8.2.1.2 Wetland survey

It is hoped that this will take place this year. This is likely to be a multi-annual application as there are over 250 sites on an indicative list. Part of the reason the Planning Authority are re-thinking the format is to focus on climate change, flooding and catchments and as such this means there is more preparation to carry out prior to commencement. This would feed into our Development Plan and other council plans in the future. This is likely to commence this year. It will also help to set a monitoring baseline.

8.2.1.3 Barn Owl Survey

A survey is planned for the summer of 2022, in order to establish Barn Owl numbers and distribution in Limerick and to suggest measures to help with their conservation.