SEA Environmental Report
Appendix III – Non-Technical Summary

FOR

Variation No. 3
TO THE
Limerick Development Plan
2022-2028

for: Limerick City and County Council

Comhairle Cathrach & Contae Luimnigh
Limerick City & County Council

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Section 1 Introduction and Terms of Reference

This is the Non-Technical Summary of the Environmental Report for Variation No. 3 to the Limerick Development Plan 2022-2028, as varied. The purpose of the Environmental Report is to provide a clear understanding of the likely environmental consequences of decisions regarding the adoption and implementation of the Variation. The Environmental Report has been prepared as part of a Strategic Environmental Assessment (SEA) process for the Variation.

What is SEA?
SEA is a systematic process of predicting and evaluating the likely environmental effects of implementing a proposed plan, or other strategic action, in order to ensure that these effects are appropriately addressed at the earliest appropriate stage of decision-making on a par with economic, social and other considerations.

Why is SEA needed? The Benefits
SEA is the planning authority's and the public's guide to what are generally the best areas for development.

SEA has enabled the planning authority to direct development under the Variation towards what are generally robust, well-serviced and connected areas – thereby facilitating the general avoidance of incompatible development in the most sensitive, least well-serviced and least well-connected areas. This approach will contribute towards environmental protection and sustainable development, including flood risk management, and climate mitigation and adaptation.

Compact development can be accompanied by placemaking initiatives to enable Limerick to become a more desirable place to live, work and visit.

Compatible sustainable development in sensitive areas is also provided for, subject to various requirements relating to environmental protection and management being met.

SEA provides greater certainty to the public and to developers. Plans, and variations to plans, are more likely to be adopted without delays or challenges and planning applications are more likely to be granted permission. Environmental mitigation is more likely to cost less.

How does the SEA work?
All of the main environmental issues were assembled and considered by the team who prepared the Variation. This helped them to devise a Variation that contributes towards the protection and management of environmental sensitivities. It also helped to identify wherever potential conflicts between the Variation and the environment exist and enabled these conflicts to be mitigated.

The SEA was scoped in consultation with designated environmental authorities.

What is included in the Environmental Report that accompanies the Variation?
- A description of the environment and the key environmental issues;
- A description and assessment of alternatives for the Variation;
- An assessment of the provisions of the Variation; and
- Mitigation measures, which will avoid/reduce the environmental effects of implementing the Variation and will contribute towards compliance with important environmental protection legislation.

Difficulties Encountered during the SEA process
No significant difficulties have been encountered during the undertaking of the assessment to date.

What happens at the end of the process?
An SEA Statement is prepared which summarises, inter alia, how environmental considerations have been integrated into the Variation.

Section 2 The Variation

2.1 Overview

The purpose of Variation No. 3 is to accelerate housing delivery and respond to recent changes in National planning policy, namely the publication of the National Planning Framework (NPF) First Revision and the publication of the following Section 28 Ministerial Guidelines:

- NPF Implementation: Housing Growth Requirements, Guidelines for Planning Authorities (2025);
- Planning Design Standards for Apartments, Guidelines for Planning Authorities (2025); and
- Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024).

In addressing the housing growth requirements and other changes to National planning policy, the Variation provides changes to the Volume 1, Written Statement and appendices, Volume 2a, Level 1 Limerick City and Suburbs (in Limerick) Mungret and Annacotty, Maps and Settlement Capacity Audit, Volume 6, Housing Strategy and Housing Need Demand Assessment, and the Building Height Strategy for Limerick City of the Limerick Development Plan 2022-2028 to address specific immediate updates that are needed to implement national policy.

Variation No. 3 provides changes as follows:

- Volume 1, written statement and appendices, including changes to Chapter 1 Introduction, Vision and Strategic Overview, Chapter 2 Core Strategy, Chapter 3 Spatial Strategy, Chapter 4 Housing, Chapter 5 A Strong Economy, Chapter 6 Environment, Heritage, Landscape and Green Infrastructure, Chapter 7 Sustainable Mobility and Transport, Chapter 8 Infrastructure, Chapter 9 Climate Action, Flood Risk and Transition to Low Carbon Economy, Chapter 10 Sustainable Communities and Social Infrastructure, Chapter 11 Development Management Standard, Chapter 12 Land Use Zoning Strategy, Chapter 13 Implementation and Monitoring and Appendix 1: Section 28 Guidelines Compliance.

- Volume 2a Maps and Settlement Capacity Audit, including:
  - Amendments to land use zoning for a number of identified lands to facilitate residential uses and for strategic planned projects within the boundary of Limerick City and Suburbs including Mungret and Annacotty.
  - Amendments to land use zoning to reflect developments that have occurred since the adoption of the Plan and to capture the current land use context within the boundary of Limerick City and Suburbs, including Mungret and Annacotty.
  - Amendments to the Settlement Capacity Audit maps and tables for Limerick City and Suburbs reflective of zoning changes and the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024).

- Volume 6, Supporting Strategies:
  - Updated Housing Strategy and Housing Need Demand Assessment, to inform policy for the remaining period of the Limerick Development Plan to 2028 and beyond.
  - Amendments to Policy in the Building Height Strategy and subsequent changes to Development Plan objectives in so far as it relates to building height.

For additional detail, refer to Variation No. 3 as made.

The Variation is also responding to Pillar 1: Activating Supply as set out in the Government Action Plan on Housing Supply and Targeting Homelessness" Delivering Homes, Building Communities, 2025-2030 (November 2025) The zoning of sufficient land is seen as a key enabler to delivery.

For the purposes of clarity and the avoidance of doubt, the Variation has taken due account of the relevant National Planning Policy Guidance, noting that under section 27 of the Planning and Development Act 2024, section 28 guidelines under the 2000 Act are deemed to be National Planning Policy Guidance until a National Planning Statement is issued.

Zoning in this variation relates to lands within the settlement boundary of Limerick City and Suburbs including Annacotty and Mungret only. Further variations will be progressed concentrating on accelerating housing in zoned settlements across the county as appropriate and in due course. A full review of the Limerick Development Plan 2022-2028 will take place subsequently, in accordance with the provisions of the Planning and Development Act 2024, as introduced in the recently commenced sections of the Planning

and Development Act, 2024 (as amended). It should be noted that this variation does not constitute a comprehensive review of all relevant policies, objectives, or guidance of the Limerick Development Plan.

2.2 Strategic work undertaken by the Council to ensure evidence-based planning

In preparing the Variation, information relating to various sectors, from different Departments within the Council and from different bodies and organisations, was gathered and analysed, contributing towards the development of evidence-led provisions. This work included: preparing this SEA Environmental Report; preparing a Screening for Appropriate Assessment; preparing an Addendum to the existing Plan's Strategic Flood Risk Assessment; considering information on capacity/delivery with respect to existing and planned infrastructure; and updating the Building Heights Strategy, the Housing Need Demand Assessment and Housing Strategy. The undertaking of the SEA process was part of this strategic work and contributed towards the integration of environmental considerations into the Variation as summarised in Section 6 of this report.

2.3 Relationship with other relevant Plans and Programmes

It is important to note that when reading the Variation, the provisions of the Development Plan are relevant and, in this regard, both documents should be read in tandem with each other.

The existing Development Plan to be varied sits within a hierarchy of statutory documents setting out public policy for, among other things, land use planning, infrastructure, sustainable development, tourism, environmental protection and environmental management. The Variation must comply with relevant higher-level strategic actions and will, in turn, guide lower-level strategic actions.

The First Revision of the National Planning Framework sets out Ireland's planning policy direction up to 2040. The National Planning Framework is to be implemented through Regional Spatial and Economic Strategies and lower tier Development Plans and Urban Area Plans. The Regional Spatial and Economic Strategy for the Southern Region sets out objectives for land use planning, tourism, infrastructure, sustainable development, environmental protection and environmental management that have been subject to environmental assessment and must, as relevant and appropriate, be implemented through the Development Plan to be varied.

In order to be realised, projects included in the Variation (in a similar way to other projects from any other sector) will have to comply, as relevant, with various legislation, policies, plans and programmes (including requirements for lower-tier Appropriate Assessment, Environmental Impact Assessment and other licencing requirements as appropriate) that form the statutory decision-making and consent-granting framework.

Section 3 The Environmental Baseline

3.1 Introduction

A summary of the environmental baseline is described in this section. This baseline together with the Strategic Environmental Objectives, which are identified in Section 3.11, is used in order to identify, describe and evaluate the likely significant environmental effects of implementing the Variation and in order to determine appropriate monitoring measures.

3.2 Likely Evolution of the Environment in the Absence of a Variation

In the absence of a Variation, the framework for development across the settlements would be provided by the Development Plan and other related documents. There would be no Variation to provide additional detail beyond that provided already through the existing planning framework as how to achieve sustainable development and environmental protection and management.

As a result, there would be both:

- A decreased likelihood in the extent, magnitude and frequency of the positive environmental effects identified by this assessment occurring; and;
- An increased likelihood in the extent, magnitude and frequency of the adverse environmental effects identified by this assessment occurring.

3.3 Biodiversity and Flora and Fauna

Information on biodiversity and flora and fauna which is relevant to project planning and development and associated environmental assessment and administrative consent of projects includes available information on designated ecological sites and protected species, ecological connectivity (including stepping stones and corridors) and non-designated habitats.

The Limerick Biodiversity Action Plan 2025-2030 provides a framework for biodiversity action for the next five years. A key aim of the plan is to focus the efforts and resources of Limerick City and County Council, public sector bodies, nature conservation groups and others to protect and enhance biodiversity and halt biodiversity loss in Limerick and to further incorporate the ecosystem services that biodiversity provides. The Limerick Biodiversity Action Plan puts forward an ambitious programme of a sixty-six actions to reverse the decline in biodiversity by 2030. The actions are based upon recommendations made in ecological studies and on proposals put forward by the Limerick Biodiversity Forum, nature conservation groups, NGOs, members of the public, Strategic Policy Committee members and various Council Departments.

Designated ecological sites within and close to Limerick include European sites comprising Special Areas of Conservation[1] (SACs) and Special Protection Areas[2] (SPAs).

There are 15 European sites designated within Limerick (12 SACs and three SPAs):

- Curraghchase Woods SAC (Site Code: 000174);
- Barrigone SAC (Site Code: 000432);
- Tory Hill SAC (Site Code: 000439);
- Galtee Mountains SAC (Site Code: 000646);
- Clare Glen SAC (Site Code: 000930);
- Glen Bog SAC (Site Code: 001430);

[1] SACs have been selected for protection under the European Council Directive on the conservation of natural habitats and of wild fauna and flora (92/43/EEC) due to their conservation value for habitats and species of importance in the European Union. The Habitats Directive seeks to establish Natura 2000, a network of protected areas throughout the EU. It is the responsibility of each member state to designate SACs to protect habitats and species, which, together with the SPAs designated under the 1979 Birds Directive, form Natura 2000. The European Communities (Birds and Natural Habitats) Regulations 2011 consolidate the European Communities (Natural Habitats) Regulations 1997 to 2005 and the European Communities (Birds and Natural Habitats) (Control of Recreational Activities) Regulations 2010. The Regulations have been prepared to address several judgments of the Court of Justice of the European Union (CJEU) against Ireland, notably cases C-418/04 and C-183/05, in respect of failure to transpose elements of the Birds Directive and the Habitats Directive into Irish law.

[2] SPAs have been selected for protection under the 1979 European Council Directive on the Conservation of Wild Birds (79/409/EEC) - referred to as the Birds Directive - due to their conservation value for birds of importance in the EU.

- Glenstal Wood SAC (Site Code: 001432);
- Ballyhoura Mountains SAC (Site Code: 002036);
- Carrigeenamronety Hill SAC (Site Code: 002037);
- Lower River Shannon SAC (Site Code: 002165);
- Blackwater River (Cork/Waterford) SAC (Site Code: 002170);
- Askeaton Fen Complex SAC (Site Code: 002279);
- River Shannon and River Fergus Estuaries SPA (Site Code: 004077);
- Stack's to Mullaghareirk Mountains, West Limerick Hills and Mount Eagle SPA (Site Code: 004161); and
- Slievefelim to Silvermines Mountains SPA (Site Code: 004165).

Two of these sites, the Lower River Shannon SAC and the River Shannon and River Fergus Estuaries SPA, are situated partially within Limerick City.

SPAs and SACs within a 15 km buffer around Limerick are mapped on Figure 3.1.

Other important areas for biodiversity considered by the SEA included:

- The wildlife corridor surrounding the Lower River Shannon SAC, and associated importance for the Lesser Horseshoe Bat; and
- Groody Valley wildlife corridor and flood management zone, including the Groody River, supporting a variety of habitats and species, including Annex I habitat Petrifying springs with tufa formation and bats.

Existing Problems
Ireland's Article 17 report on the Status of EU Protected Habitats and Species in Ireland (NPWS/DHLGH, 2025) provides the most recent assessment of EU-protected habitats and species in Ireland. The report confirms that the overall conservation status of habitats remains poor, with 90% assessed as unfavourable and over half showing declining trends. While some species are better - 58% are in favourable status and many exhibit stable or improving trends - the report highlights that significant pressures persist, despite ongoing positive actions and targeted conservation measures.

Ireland's Article 12 Birds Directive Reports and the 6th National Report under the Convention of Biological Diversity identify similar issues.

The Variation includes measures to contribute towards the protection of biodiversity and flora and fauna and associated ecosystem services.

Previous changes in land uses arising from human development have resulted in a loss of biodiversity and flora and fauna; however, legislative objectives governing biodiversity and fauna were not identified as being conflicted with.

3.4 Population and Human Health

The results of Census 2022 recorded a population of 209,536 persons within Limerick of whom 102,287 lived in Limerick City.

The First Revision of the NPF was approved and published in April 2025. It identified the need to plan for approximately 50,000 additional households per annum to 2040 at national level. Arising from this, the Government issued Guidelines entitled NPF Implementation: Housing Growth Requirements under Section 28 of the Planning and Development Act (2000 as amended) to implement and interpret the national targets at county level. In order to implement the objectives of these guidelines, including increased housing targets for Limerick, it is necessary to vary the Plan and increase the quantum of land zoned for residential purposes.

The population provided for in the Variation will interact with various environmental components. Potential interactions include:

- Recreational and development pressure on habitats and landscapes;
- Contribution towards increase in demand for waste water treatment at the municipal level;
- Contribution towards increase in demand for water supply and associated potential impact of water abstraction;
- Potential interactions in flood-sensitive areas; and
- Potential effects on water quality.

With regard to human health, impacts relevant to the SEA are those which arise as a result of interactions with environmental vectors (i.e. environmental components such as air, water or soil through which

contaminants or pollutants, which have the potential to cause harm, can be transported so that they come into contact with human beings). Hazards or nuisances to human health can arise as a result of exposure to these vectors e.g. interactions with human health that could occur in urban locations that experience high-levels of traffic congestion and associated particulate matter and noise emissions to air.

Emission limits for discharges to air, soil and water are set with regards to internationally recognised exposure limit values. These are generally set to be many times the safe exposure limit - in order to provide protection. In the event that a plan or programme began to have adverse health effects on surrounding populations it is likely that it would have been identified as being in breach of such emission standards at a very early stage - and long before the manifestation of any adverse health effects in the population.

In the absence of mitigation, contaminated materials have the potential to adversely impact upon human health, water quality and habitats and species. As is the case with other historically developed areas across the country, there is potential for contamination at local sites within Limerick, especially where land uses occurred in the past in the absence of the high standards of today's environmental protection legislation.

Existing Problems
The number of homes within Limerick with radon levels above the reference level is within the normal range experienced in other locations across the country.

Sources of flood risk within Limerick include: coastal; fluvial; pluvial (rainwater); and surface drainage systems sources. There is historic and predictive evidence of flooding throughout Limerick.

3.5 Soil

The most dominant soil types[3] surrounding the built-up areas[4] of Limerick are: brown earths (well-drained mineral soils, associated with high levels of natural fertility); surface water and groundwater gleys (wetland soils with slowly permeable horizons resulting in seasonal waterlogging); rendzinas (very shallow soils over bedrock, liable to drought); luvisols (generally fertile, widely used for agriculture and associated with significant accumulation of clay); and alluvial soils (associated with alluvial clay, silt or sand river deposits). Peat soils (both minerotrophic and ombrotrophic) are found throughout Limerick. Other soil types occurring within Limerick include: podzols, brown podzols, lithosols, rocks and tidal marshes.

The most dominant soil type surrounding the built-up areas of Limerick City are brown earths, luvisols, brown podzols, tidal marshes and alluvial soils.

The GSI (Geological Survey Ireland) have a suite of data sources available that would be useful in planning and assessing individual projects with regard to the environmental topic(s) of soil and/or material assets. These include:

- Aggregate Potential Mapping;
- Bedrock mapping;
- Quaternary and Physiographic mapping; and
- National Aquifer and Recharge mapping.

Geological Survey Ireland coordinate the Irish Geological Heritage Programme, whereby an objective has been set to identify and select sites of geological interest within each county across the country. County Geological Sites (CGSs) do not receive statutory protection like Natural Heritage Areas but receive an effective protection from their inclusion in the planning system. The audit of CGSs in Limerick was completed in 2022, which identified 30 CGS identified in Limerick. There are no CGSs occurring within Limerick City.

The term "landslide" describes a wide variety of processes that result in the downward and outward movement of materials such as rock, debris, earth, mud and peat under the force of gravity. Issues such as existing ground conditions, slope stability and storage of excavated material have the potential to

[3] All soil types belong to a Sub-Group and so in turn to one of the 11 soil Great Groups. Great Groups and Sub-Groups are a hierarchical arrangement of soils used for taxonomical classification (http://gis.teagasc.ie/soils/soilguide.php).
[4] The built-up areas are mainly made up of urban soils. Urban soils are soils, which have been disturbed, transported or manipulated by human activity in the urban environment and are often overlain by a non-agricultural, man-made surface layer that has been produced by mixing, filling or by contamination of land surfaces in urban and suburban areas.

influence susceptibility to landslides/bog bursts. The potential impacts of landslides include loss of human life/injury, flooding, pollution of watercourses and impacts upon aquatic biodiversity. The GSI have identified[5] Limerick, including Limerick City, as having mainly low levels of landslide susceptibility, with moderately high and high levels of landslide susceptibility occurring in foothill and upland areas.

Existing Problems
Legislative objectives governing soil were not identified as being conflicted with.

3.6 Water

Since 2000, Water Management in the EU has been directed by the Water Framework Directive 2000/60/EC (WFD). The WFD requires that all Member States implement the necessary measures to prevent deterioration of the status of all waters - surface, ground, estuarine and coastal - and protect, enhance and restore all waters with the aim of achieving *good status*. All public bodies are required to coordinate their policies and operations so as to maintain the *good status* of water bodies that are currently unpolluted and improve polluted water bodies to *good status.*

Catchments draining Limerick include: Tralee Bay-Feale, Shannon Estuary South, Blackwater (Munster), Suir and Lower Shannon.

The current WFD status (2019-2024)[6] of surface waterbodies that drain Limerick ranges from *high* to *good* to *moderate* to *poor* to *bad*. The WFD surface water status (2019-2024) of the River Shannon's transitional section within and surrounding Limerick City is identified as *poor*, while the upper section of the Ballinacurra Creek waterbody that drains the south of the city is identified as *moderate.*

The WFD status (2019-2024) of groundwater underlying Limerick is currently generally identified as being of *good* status and meeting the objectives of the WFD; however, there is an area of groundwater underlying an industrial facility identified as being of *poor* status in the south-east of Limerick, where the groundwater is currently not meeting the objectives of the WFD.

Subject to exemptions provided for by Article 4 of the WFD, water bodies of *moderate*, *poor* or *bad* status will need improvement in order to comply with the objectives of the WFD.

Figure 3.3 illustrates the WFD surface and ground water status within and surrounding Limerick.

A Strategic Flood Risk Assessment (SFRA) document accompanies this SEA Environmental Report and the Variation. Requirements in relation to SFRA are provided under 'The Planning System and Flood Risk Management Guidelines for Planning Authorities' (Department of Environment and Office of Public Works, 2009) and associated Department of the Environment, Community and Local Government Circular PL2/2014.

Flood risk management and drainage provisions are already in force through the Limerick Development Plan 2022-2028. Predictive flood risk mapping is available from the Office of Public Works and included in the accompanying Strategic Flood Risk Assessment. Sources of flood risk within Limerick include: coastal; fluvial; pluvial (rainwater); and surface drainage systems sources. There is historic and predictive evidence of flooding throughout parts of Limerick.

Existing Problems
Subject to exemptions provided for by Article 4 of the WFD, based on available water data, the recorded status of certain water bodies will need improvement in order to comply with the objectives of the WFD. The Development Plan includes provisions that will contribute towards improvements in the status of waters.

There is elevated levels of flood risk from fluvial sources at various locations across Limerick. The preparation of the Variation, SEA and SFRA has taken place concurrently and the findings of the SFRA have informed both the Variation and the SEA.

[5] https://www.gsi.ie/en-ie/programmes-and-projects/geohazards/projects/Pages/Landslide-Susceptibility-Mapping.aspx
[6] As per EPA's WFD Status 2019-2024 classification (https://gis.epa.ie/EPAMaps/).

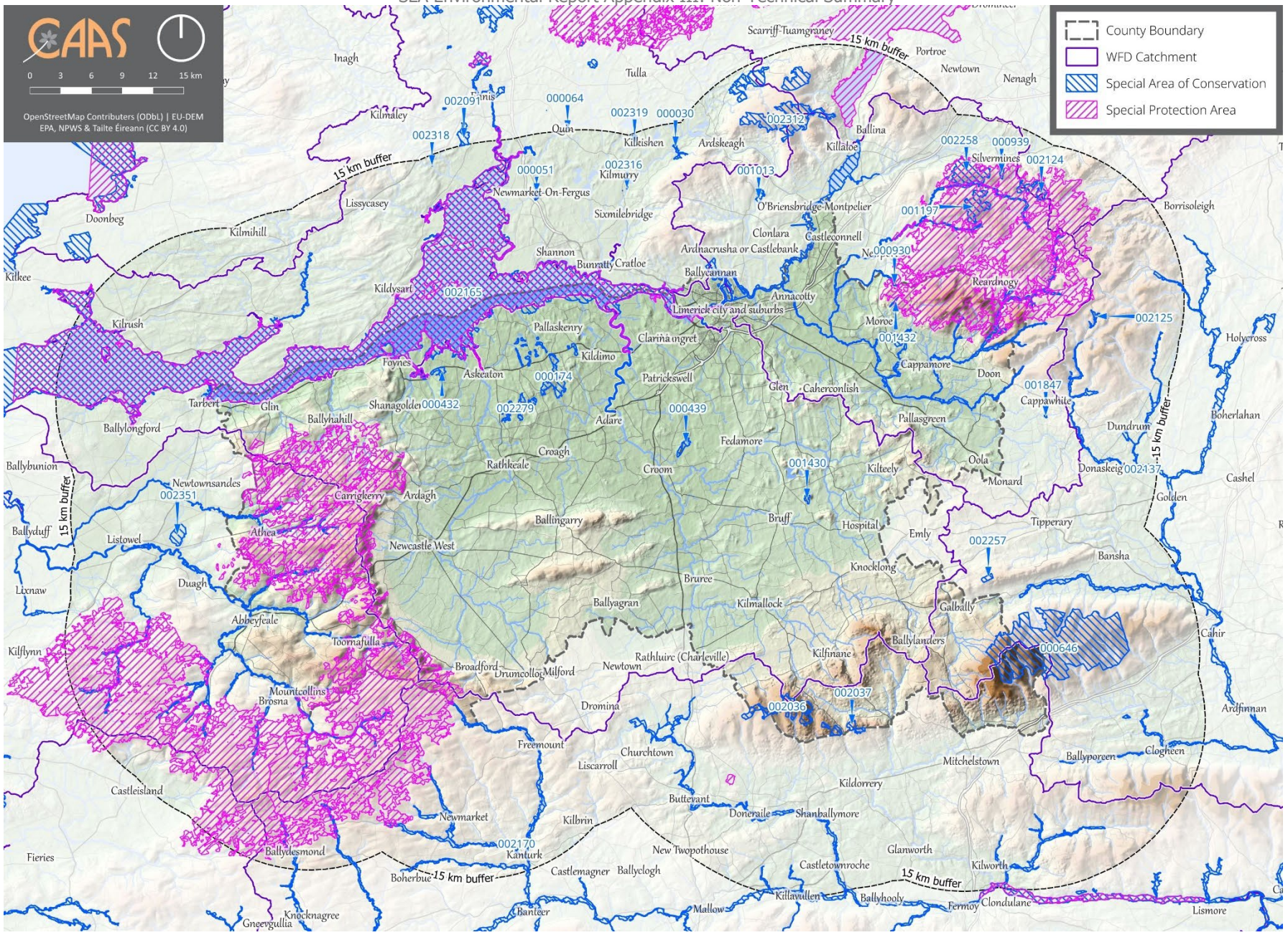


Figure 3.1 European Sites within and within 15 km buffer of Limerick

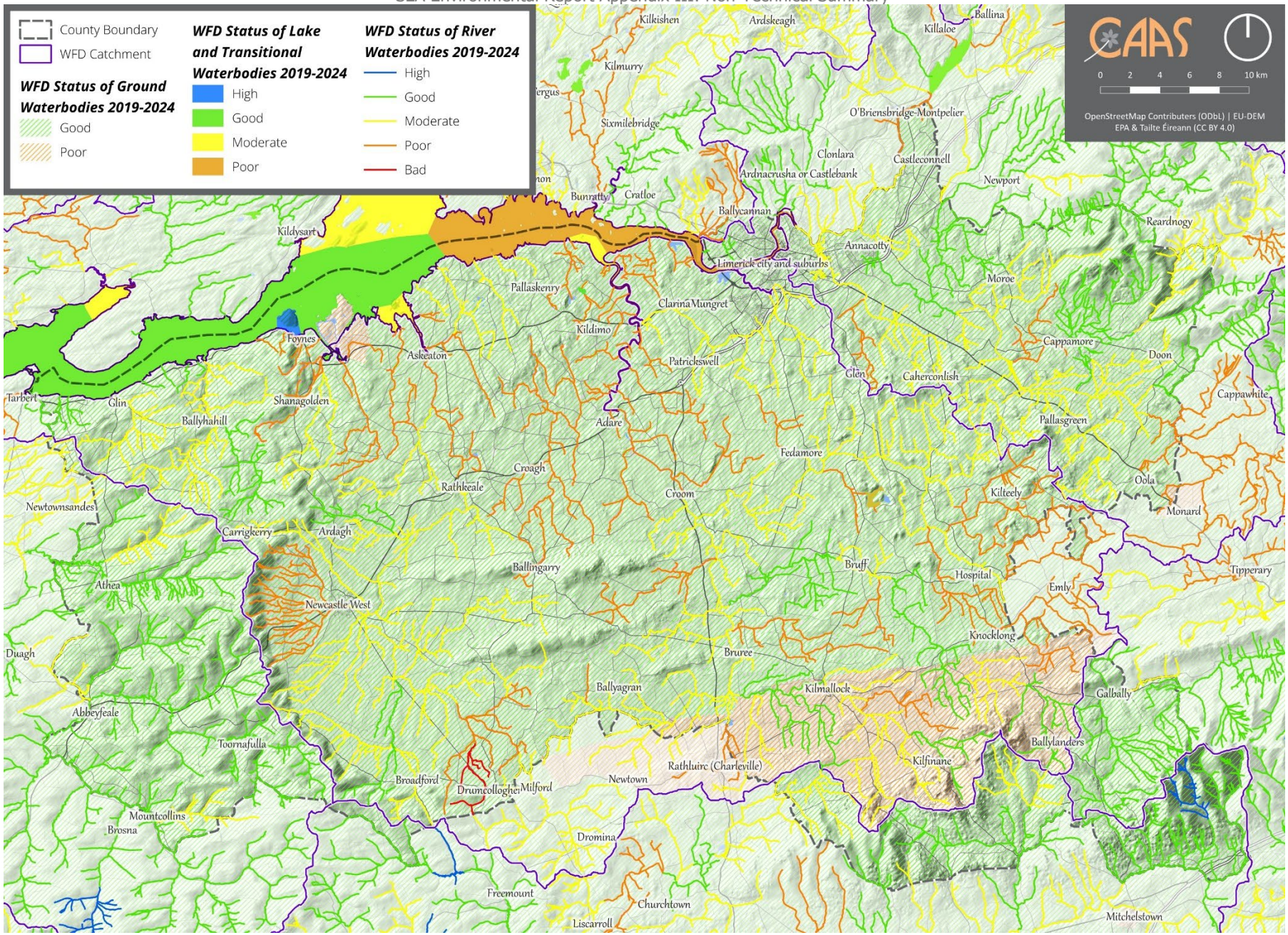


Figure 3.2 Surface and Ground Water Status (2019-2024)

3.7 Air and Climatic Factors

Total emissions of greenhouse gases by humans come from various sectors including transport, agriculture, energy industries, manufacturing combustion, industrial processes, residential developments, commercial services developments, waste management processes and fluorinated gases equipment (such as refrigeration and fire protection systems).

In 2023, Ireland's greenhouse gas emissions are estimated to be 55.01 million tonnes carbon dioxide equivalent (Mt CO_2 eq), which is 6.8% lower (or 4.00 Mt CO_2 eq) than emissions in 2022 (59.00 Mt CO_2 eq) and follows a 2.0% decrease in emissions reported for 2022. Emissions are 1.2% below the historical 1990 baseline for the first time in 33 years. In 2023, emissions in the stationary EU Emissions Trading System emissions (covering emissions from sectors including Agriculture, Transport, Energy, Industries, Residential, Manufacturing Combustion and Industrial Processes) decreased by 17%. When land use, land-use change and forestry is included, total national emissions decreased by 3.8%. Emissions under the Effort Sharing Regulation (covering emissions from the electricity and heat generation, industrial manufacturing and aviation sectors) decreased by 3.4%. Decreased emissions in 2023 compared to 2022 were observed in the largest sectors except for transport which showed an increase of 0.3%.

Climate mitigation describes the action to reduce the likelihood of climate change occurring or reduce the impact if it does occur. This can include reducing the causes of climate change (e.g. emissions of greenhouse gases) as well as reducing future risks associated with climate change. The National Climate Action Plan 2025 is the third statutory update to the plan since the Climate Action and Low Carbon Development (Amendment) Act 2021 was signed into law, committing Ireland to 2030 and 2050 targets for reducing greenhouse gas emissions. It builds on Climate Action Plan 2024, outlining how Ireland will accelerate the actions required to respond to the climate crisis, putting climate solutions at the centre of Ireland's social and economic development.

Climate adaptation is a change in natural or human systems in response to the impacts of climate change. These changes moderate harm or exploit beneficial opportunities and can be in response to actual or expected impacts. The National Adaptation Framework (2024) aims to create a unified approach involving both government and society to adapt to climate change. It outlines how various sectors and local authorities can implement adaptation measures to minimise Ireland's vulnerability to climate change's adverse effects while taking advantage of any beneficial impacts. The Framework emphasises the importance of integrating adaptation strategies into all levels of policy making, infrastructure development, and local planning.

The Limerick Climate Action Plan 2024-2029 seeks to reduce greenhouse gas emissions from across the Council's own assets and infrastructure by 51% by 2030, with net-zero emissions no later than 2050. The Climate Action Plan acknowledges the need to rebalance the transport system and it seeks to reduce the modal split of cars by 50% by 2029. It also identifies public transport and active travel as key enablers to achieve modal shift, while the BusConnects programme is identified within the Climate Action Plan as a key action to support a reduction in emissions. As identified by the Limerick Climate Action Plan, Limerick's Decarbonisation Zone is located in the heart of the city and includes much of Newtown Perry. Decarbonisation Zones are designated areas where local authorities implement climate mitigation and adaptation measures to reduce greenhouse gas emissions and promote low-carbon energy solutions.

The EPA's (2025) *Air Quality in Ireland 2024 Report* is based on data from Ireland's extensive air monitoring network of 115 stations. It reveals that, while Ireland currently meets EU air quality standards, it is projected to fall short of the stricter air quality standards set for 2030 under the new Ambient Air Quality Directive. The new EU Directive, part of the Zero Pollution Action Plan, aims to reduce premature deaths from air pollution by 55% by 2030. Ireland faces significant challenges in meeting these targets, with projected compliance levels of only 93 per cent for fine particulates ($PM_{2.5}$) and 78% for nitrogen dioxide (NO_2). Ireland also continues to fall short of achieving the more stringent World Health Organization health-based 2040 guidelines for several key pollutants. The report identifies that the primary sources of air pollution in Ireland are solid fuel burning and traffic emissions. The European Environment Agency estimates that in Ireland, more than 1,700 premature deaths annually are attributable to air pollution.

"Clean Air Together Limerick City"[7] is an EPA-led project, in partnership with Limerick City and County Council. The project aims to create a better understanding of NO_2 air pollution across our major cities. The air pollution measurements taken by citizens help verify national air quality maps produced using models developed within EPA's LIFE Emerald project[8]. The air quality maps and forecasts will be used to inform policies aimed at improving air quality and lowering levels of NO_2. The indicative results of the project show that NO_2 levels across Limerick's Metropolitan District area were generally low, with 73% of study results falling in the lowest NO_2 category (0-10 $\mu g/m^3$) and that higher levels of NO_2 were found along some of the busiest roads in Limerick City.[9]

Existing Problems
Significant progress is being made in the reductions of greenhouse gas emissions; however, Ireland is not on track to meet the 51% emissions reduction target (by 2030 compared to 2018) based on the projections contained in the latest (2025) assessment.

The Climate Change Advisory Council's *Annual Review 2025* outlines Ireland's commitment to achieving climate resilience by 2050, emphasizing the need for effective adaptation measures and coordinated government action, however, it points out that significant gaps remain in preparedness for extreme weather events, particularly in critical infrastructure such as electricity, water, and communication networks. The National Climate Change Risk Assessment and revised National Planning Framework are positive developments, but implementation of adaptation measures is urgently needed.

The Review details that four sectors (Transport, Flood Risk Management, Built and Archaeological Heritage, and Local Government) demonstrated good overall progress, four showed moderate progress (Agriculture, Forestry and Seafood, National Adaptation Framework, Electricity and Gas Networks, and Water Quality and Water Services Infrastructure), two showed limited progress (Communications Networks and Health), and one sector (Biodiversity) showed no progress and supplied insufficient evidence.

The overall results showed a slight decline compared with the results in 2024 review; however, the transport sector was one of the four sectors that demonstrated good overall progress in the 2025. The transport sector has made significant progress in climate adaptation, particularly in enhancing infrastructure resilience and exploring innovative solutions. However, the review emphasizes the need for sustained investment, improved planning, and stronger cross-border collaboration to address vulnerabilities and ensure long-term resilience in the face of increasing climate risks.

Air quality and noise can present challenges, especially in urban areas, as detailed under the relevant sub-sections above. With regard to air quality, air pollution from transport is dominated by NO_x emissions. Of these, NO_2 is particularly impactful from a health perspective. The Variation will help to facilitate reductions in emissions and a transition from dependence on fossil fuel combustion powered transport.

3.8 Material Assets

Other material assets, in addition to those referred to below, covered by the SEA include archaeological and architectural heritage (see Section 3.9) natural resources of economic value, such as water and air (see Sections 3.6 and 3.7).

Public Assets and Infrastructure
Public assets and infrastructure that have the potential to be impacted upon by the Variation, if unmitigated, include: resources such as public open spaces, parks and recreational areas; public buildings and services; transport and utility infrastructure (electricity, gas, telecommunications, water supply, waste water infrastructure etc.); and natural resources that are covered under other topics such as water and soil.

Land
The Variation has the potential to assist with the reuse and regeneration of brownfield sites thereby contributing towards sustainable mobility and reducing the need to develop greenfield lands and associated

[7] Clean Air Together is a citizen science project where people voluntarily sign up to measure levels of NO_2 pollution in their local area. NO_2 is predominantly a traffic-related air pollutant that can cause negative health impacts. NO_2 particularly impacts children, people with pre-existing heart and lung conditions such as asthma, outdoor workers, the elderly, and those communities who may be more exposed to air pollution because of where they live or work.
[8] Ireland's 3-day forecast, hourly updated and annual high resolution air quality maps are all available on www.airquality.ie.
[9] https://www.cleanairtogether.ie/

potential adverse environmental effects. Brownfield lands are generally located within urban/suburban areas.

Green Infrastructure
There is a variety of green infrastructure throughout Limerick. Parks and open space promote health and well-being, provide recreational facilities and range of habitats for various species. Green Infrastructure is also a crucial component in building resilient communities capable of adapting to the consequences of climate change with trees, woodlands and wetlands providing carbon capture and slowing water flows while improving air quality.

Woodland
Woodlands throughout Limerick provide recreational opportunities in addition to their heritage and economic benefits. They are a valuable resource in terms of biodiversity, recreation and tourism, and also important as links in the green infrastructure network.

Transport
Public transport in Limerick consists of bus, rail, rural transport services and taxi services. Limerick occupies a strategic location on the national road network, with a large number of national routes traversing through it.

There are local services that provide connections between settlements within Limerick and regional services that provide connections to the wider region and beyond.

There are three established rail transport corridors that serve Limerick, including Nenagh/Ballybrophy, Ennis/Galway and Dublin, together with the interchange at Limerick Junction for Cork/Tralee and Waterford. The three corridors converge at Limerick Colbert Station, which is progressing as a major transport hub for Limerick, providing a transformational integrated sustainable transport network. Castleconnell is the only operating station outside of Limerick City.

There are a number of Local Link bus routes in operation throughout Limerick, which provide vital public transport links for rural areas to key settlements within Limerick. In addition to bus routes operated under the Rural Transport Initiative, private bus operators service both urban centres and rural communities.

Limerick is strategically positioned within close proximity to Shannon International Airport and has significant port facilities in the natural harbour of the Shannon Estuary. These comprise of the ShannonFoynes deep-water cargo port, Limerick Docks in Limerick City and a jetty facility at Aughinish, between Foynes and Askeaton.

Water Services
The provision of well-maintained quality wastewater treatment infrastructure is essential to facilitate sustainable development of the town while also protecting the environment and public health. Uisce Éireann is now responsible for the collection, treatment and disposal of wastewater where public wastewater facilities exist.

As indicated by Uisce Éireann, spare capacity is available in most Waste Water Treatment Plants (WWTPs) within Limerick (including spare capacity within Limerick City and suburbs), except for Newcastle West WWTP, Murroe WWTP, Askeaton WWTP, Dromcollagher WWTP, Oola WWTP, Banogue WWTP, Croagh WWTP, Elton WWTP and Shanagolden WWTP, where there is no spare capacity available at present. In cases where a new development is planned, Uisce Éireann may need to make upgrades to the wastewater network to support the collection of the new load and to mitigate the risk of flooding from occurring to the existing infrastructure.

As indicated by Uisce Éireann, spare capacity or potential capacity is available in most of drinking water supplies in Limerick, except for Oola/Pallsgreen WSP and Doon WSP, where capital investment required to increase capacity.

Waste Management
The National Waste Management Plan for a Circular Economy (Regional Waste Management Planning Offices, 2024) sets out a framework for the prevention and management of waste in Ireland for the period 2024 to 2030. The Development Plan to which the Variation relates seeks to influence sustainable consumption and prevent the generation of waste, improve the capture of materials to optimise circularity and enable compliance with policy and legislation.

Existing Problems
The provisions of the Variation will contribute towards protection of the environment with regard to impacts arising from material assets. The provision of infrastructure and supporting services for development, particularly water and wastewater services, is critical.

3.9 Cultural Heritage

Archaeological Heritage

There are hundreds of Recorded Monuments within Limerick, including examples of megalithic tombs, churches, castles, linear earthwork and ringforts. Clusters of archaeological heritage are identified within and surrounding settlements. There are many Recorded Monuments (including several Monuments in State Care) within Limerick City, concentrated around the north-west parts of the city centre area, including two National Monuments in State Care: King John's Castle and Fanning's Castle.

Architectural Heritage
Records of Protected Structures are legislated for under Section 12 and Section 51 of the Planning and Development Act 2000 as amended. Protected structures are defined in the Planning and Development Act 2000 as amended as structures, or parts of structures that are of special interest from an architectural, historical, archaeological, artistic, cultural, scientific, social or technical point of view.

Similar to the general spatial spread of archaeological heritage, clusters of architectural heritage are indicated within the County's settlements and in certain rural areas.

Much of Limerick City's architectural heritage is characterised by a unique urban 18th and 19th century streetscape, centred around Newtown Pery. The area retains a fine grid pattern of broad streets and elegant Georgian townhouses, many of which are protected structures and contribute strongly to Limerick City's architectural and cultural identity. The area represents one of the country's most intact examples of Georgian urban design.

There various ACAs designated across Limerick, including a number of ACAs designated in Limerick City.

Existing Problems
The context of archaeological and architectural heritage has changed over time however no existing conflicts with legislative objectives governing archaeological and architectural heritage have been identified.

3.10 Landscape

Limerick is characterised by a diverse and gently varied landscape with river valleys, fertile lowlands, uplands and coastal areas. The lowland landscape is framed and enriched by prominent natural features such as the River Shannon and its estuary, which form a distinctive, expansive water-dominated landscape of high scenic, ecological and cultural value. To the south and east, the landscape rises to the Ballyhoura and Slieve Felim uplands, introducing a more rugged character of elevated ridgelines, forestry, bogland and open views.

Limerick City comprises a combination of natural and urban environments. The Shannon estuary runs through the centre of the city, stretching into the Atlantic Ocean on Ireland's south-west coast. The city centre and surrounding hinterlands are largely urban, containing a variety of heritage sites, public parks, trees and open spaces.

The different landscapes found across Limerick have varying visual and amenity values, topography, exposure levels and contain a variety of habitats. Each landscape type has varying capacity to absorb development related to its overall sensitivity

The Limerick Development Plan 2022-2028 identifies ten rural Landscape Character Areas within the Council's administrative area:

- LCA 1 Agricultural Lowlands
- LCA 2 Ballyhoura/Sileve Reagh
- LCA 3 Galtee Uplands
- LCA 4 Knockfierna
- LCA 5 Lough Gur
- LCA 6 Shannon Coastal Zone
- LCA 7 Southern Uplands
- LCA 8 Slieve Felim Uplands
- LCA 9 Tory Hill
- LCA 10 Western Uplands (Western Hills/Barnagh Gap/Sugar Hill)

There are also four Urban Character Areas identified in Limerick City:

- City
- Southern environs
- Castletroy
- Caherdavin

Limerick contains many sites and vantage points from which scenic views over areas of great natural beauty, local landmarks, historic landscapes, Shannon Estuary and adjoining Counties, may be obtained. Due to the topography of Limerick City, its quality townscapes, riverscapes and landscapes, as well as its visual landmarks, there are many views of significance within the City. The City has a number of linear views consisting of landmark buildings, such as King John's castle, the City walls and City skyline. River prospects are also important and usually, though not exclusively, experienced while crossing a bridge. River prospects in this instance refer to the ability to see landmark building(s) from bridges.

In addition, Limerick also contains important prospects i.e. prominent landscapes or areas of special amenity value, or special interest, which are widely visible from the surrounding area. While views and prospects can be an attraction in their own right, they can also serve to complement other nearby attractions. Examples include the routes in the south east of Limerick, such as those close to Galbally, Ardpatrick and Ballylanders which provide an additional attraction for the area, to complement the Ballyhoura Mountain bike trail. New recreational cycle routes, with Kilmallock as a hub, have also been developed in this area. The Lough Gur and Tory hill views and prospects further complement the attractions of these areas. In the east of Limerick, the Slieve Felim way route close to Murroe, makes an attractive walking route to complement the attractions of the Clare Glens.

Existing Problems

New developments have resulted in changes to the visual appearance of lands across Limerick however legislative objectives governing landscape and visual appearance were not identified as being conflicted with.

3.11 Strategic Environmental Objectives

Strategic Environmental Objectives (SEOs) are methodological measures developed from policies that generally govern environmental protection objectives established at international, Community or Member State level e.g. the environmental protection objectives of various European Directives that have been transposed into Irish law and which are required to be implemented. The SEOs are set out under a range of topics (see Table 3.1) and are used as standards against which the provisions of the Variation and the alternatives are evaluated in order to help identify which provisions would be likely to result in significant environmental effects and where such effects would be likely to occur, if – in the case of adverse effects – unmitigated.

Table 3.1 Strategic Environmental Objectives

Environmental Component	Guiding Principle	SEO Code	Strategic Environmental Objectives
Biodiversity, Flora and Fauna	No net contribution to biodiversity losses or deterioration	**BFF**	• Preserve, protect, maintain and where appropriate, restore the terrestrial, aquatic and soil biodiversity, of international, EU and nationally designated sites, protected species and habitats. • Ensure no adverse effects on the integrity of any European site, regarding its qualifying interests, associated conservation status, structure and function. • Maintain and where appropriate, enhance the biodiversity value of local designated and non-designated ecological and heritage areas, which function as stepping stones for migration, dispersal and genetic exchange of wild species. • Enhance biodiversity in line with the National Biodiversity Strategy and its targets. • To protect, maintain and conserve Limerick's natural capital.
Population and Human Health	Improve quality of life for all ages and abilities based on high-quality, serviced, well connected and sustainable residential, working, educational and recreational environments	**PHH1**	• Provide high quality residential, community, working and recreational environments with access to sustainable transport options. • Promote economic growth to encourage retention of working age population and funding of sustainable development and environmental protection. • Ensure that existing population and planned growth is linked with the required infrastructure and the services. • Protect human health and well-being from environment-related pressures.
Soil (and Land)	Ensure the long-term sustainable management of land	**S**	• Protect soils against pollution, and prevent degradation of the soil resource • Promote the sustainable use of infill and brownfield sites over the use of greenfield • Safeguard areas of prime agricultural land and designated geological sites
Water	Protection, improvement and sustainable management of the water resource	**W**	• Ensure that the status of water bodies is protected, maintained and improved in line with the requirements of the Water Framework Directive • Ensure water resources are sustainably managed to deliver proposed growth targets in the context of existing and projected water supply and wastewater capacity constraints ensuring the protection of receiving environments • Avoid inappropriate zoning and development in areas at risk of flooding and areas that are vulnerable to current and future erosion • Integrate appropriate flood risk management measures and sustainable water management solutions (such as SuDS, porous surfacing and green roofs) into development proposals
Material Assets	Sustainable and efficient use of natural resources	**MA**	• Make best use of existing infrastructure, promote the sustainable development of new infrastructure and protect existing assets, to meet the needs of the Limerick's population. • Promote the circular economy, reduce waste, and increase energy efficiencies. • Ensure there is adequate sewerage, water and drainage infrastructure in place to support new development • Reduce the energy demand from the transport sector and support moves to electrification of transport modes and active travel.
Air	Support clean air policies that reduce the impact of air pollution on the environment and public health	**A**	• To avoid, prevent or reduce harmful effects on human health and the environment as a whole resulting from emissions to air from all sectors with particular reference to emissions from transport, residential heating, industry and agriculture • Maintain and promote continuing improvement in air quality through the reduction of emissions and promotion of renewable energy and energy efficiency • Promote continuing improvement in air quality

Environmental Component	Guiding Principle	SEO Code	Strategic Environmental Objectives
			• Reduction of emissions of sulphur dioxide, nitrogen oxides, volatile organic compounds, ammonia and fine particulate matter which are responsible for acidification, eutrophication and ground-level ozone pollution • Meet Air Quality Directive standards for the protection of human health — Air Quality Directive • Significantly decrease noise pollution and move closer to WHO recommended levels
Climatic Factors	Achieving transition to a competitive, low carbon, climate-resilient economy that is cognisant of environmental impacts	**C**	• Minimise contribution to Climate Change by adopting mitigation and adaptation measures. • Integrate sustainable design solutions into the Limerick's infrastructure (e.g. energy efficient buildings; green infrastructure). • Contribute towards the reduction of greenhouse gas emissions in line with national targets. • Encourage and promote development resilient to the effects of climate change. • Promote the use of renewable energy, energy efficient development and increased use of public transport and active travel.
Cultural Heritage	Safeguard cultural heritage features and their settings through responsible design and positioning of development	**CH**	• Protect places, features, buildings and landscapes of cultural, archaeological and / or architectural heritage.
Landscape	Protect and enhance the landscape character	**L**	• To implement the Development Plan's framework for identification, assessment, protection, management and planning of landscapes having regard to the European Landscape Convention.

Section 4 Alternatives

4.1 Introduction

The SEA Directive requires that reasonable alternatives (taking into account the objectives and the geographical scope of the plan or programme, or variation to these) are identified, described and evaluated for their likely significant effects on the environment. Summaries of the alternatives for the Variation and their assessment are provided below.

4.2 Limitations in Available Alternatives

The alternatives available for the Variation are significantly limited by the provisions of higher-level planning objectives, including those of Ministerial Guidelines, the Revised National Planning Framework, the Regional Spatial and Economic Strategy for the Southern Region and the existing Development Plan which set out various requirements for the content of the Variation. Notwithstanding these higher-level policy constraints and the limited scope of the Variation, alternatives to the land use zoning approach are identified and assessed.

4.3 Alternatives Description and Assessment Summary

Two alternatives (with associated components) for the approach to land use zoning for Variation No. 3 were identified and assessed:

Land Use Zoning Approach Alternative 1: "More Compact Development, More Transport Orientated, More Infrastructure-Led"

Under this Alternative, Limerick would be facilitated in meeting the revised population targets, resulting in balanced, orderly development and implementation of the varied Core Strategy.

The approach under this alternative would allow for capacity/delivery with respect to existing and planned infrastructure and services to be integrated into the Plan as varied to the highest degree.

The infrastructure required to be in place to achieve the growth targets is largely already in place or planned under this alternative.

The development of Limerick City would be more compact and sustainable under this scenario and would better support its longer-term viability. A higher number of residential units, in comparison with Alternative 2, would be expected to take place within the existing built-up footprint on brownfield, infill and under-utilised sites at appropriate densities, with a greater focus on use of consolidation and regeneration sites, with potential for wider regeneration benefits to central areas, including housing provision. Regeneration, reuse and redevelopment of more central and brownfield and infill lands and optimising the use of vacant, derelict, and underutilised sites and buildings would be more likely to be achieved. Giving a strong preference to lands that have both greater capacity to satisfy the principles of active travel and a more realistic opportunity of being developed over the lifetime of the Plan, would provide for the proper planning and sustainable development of Limerick City as envisaged by the wider planning framework to a greater degree.

There would be greater potential for transport orientated development, including proximate development patterns linked by active travel infrastructure and public transport. Associated benefits and improvements to the public realm and appearance of the built environment, including liveability and quality of life improvements, would be more likely.

This Alternative would make the greatest contribution towards the protection and management of the environment by facilitating development of lands (including those within the existing built-up footprint of Limerick City, both city centre and suburbs) that have relatively low levels of environmental sensitivities and are served (or can be more easily served) by infrastructure and services, thereby helping to avoid the need to develop more sensitive, less well-serviced lands elsewhere in Limerick City and beyond. This Alternative would be considered the most effective out of both alternatives considered in the delivery of a sustainable, low carbon and climate resilient future for Limerick.

The approach under Alternative 1 would benefit the protection of various environmental components. Although potentially adverse effects associated with land use development would exist, they would be mitigated to a significant degree. Less residual environmental effects would result.

Under this alternative there would be:

- More optimum use of land and resources, with positive role for addressing climate change, such as potential for reduced carbon heavy travel patterns.
- Greater potential for modal shift to sustainable travel such as walking, cycling and public transport, with resultant benefits for climate resilience.
- Use of already serviced lands within the existing built-up footprint of Limerick City, both city centre and suburbs could lead to potential reduced costs for delivery of new supporting infrastructure.
- Creation of more liveable built environments, with greater accessibility to services and amenities for local communities.

Land Use Zoning Approach Alternative 2: "Less Compact Development, Less Transport Orientated, Less Infrastructure-Led"

Under this Alternative, Limerick would be facilitated in meeting the revised population targets, resulting in balanced, orderly development and implementation of the varied Core Strategy.

The approach under this alternative would not allow for capacity/delivery with respect to existing and planned infrastructure and services considerations to be integrated into the Plan as varied to the highest degree.

Additional significant infrastructure would be required to accommodate sporadic/outer fringe development, more than would be required for Alternative 1 'More Compact Development, More Transport Orientated, More Infrastructure-Led'.

The development of Limerick City would be less compact and less sustainable under this scenario and would not optimally support its longer-term viability. A lower number of residential units, in comparison with Alternative 1, would be expected to take place within the existing built-up footprint on brownfield, infill and under-utilised sites at appropriate densities. Under this alternative there would be potential for greater proportion of housing to be delivered outside of the built-up areas, including on urban fringe and outer areas, creating unsustainable travel patterns with a greater reliance on the private car. Giving less of a preference to lands that have both greater capacity to satisfy the principles of active travel and a more realistic opportunity of being developed over the lifetime of the Plan, would provide for the proper planning and sustainable development of Limerick City as envisaged by the wider planning framework to a lesser degree.

There would be greater potential for negative impacts on the vitality and viability of built-up areas, due to under use of infill sites. This alternative would be likely to result in increased outer fringe development, that would be more difficult to serve with active travel infrastructure and public transport.

This Alternative would make less of a contribution towards the protection and management of the environment by facilitating development of lands (including those within the existing built-up footprint of Limerick City, both city centre and suburbs) that have relatively low levels of environmental sensitivities and are served (or can be more easily served) by infrastructure and services. Development of more sensitive, less well-serviced lands in Limerick City would be provided for. This Alternative would be considered the least effective out of both Alternatives considered in the delivery of a sustainable, low carbon and climate resilient future for Limerick City.

The approach under Alternative 2 would benefit the protection of various environmental components to a lesser degree. Although potentially adverse effects associated with land use development would exist, they would be mitigated to in many cases; however, more residual environmental effects would result.

Under this alternative there would be:

- An increase in car dependency and associated carbon heavy travel patterns, which would undermine efforts aimed at securing climate resilience.
- Increased peripheral pattern of residential development with potential for self-contained and disconnected built environments.
- Reduced potential for modal shift to sustainable travel options such as walking, cycling and public transport.
- Potential for increased costs associated with the delivery on new supporting infrastructure (roads, footpaths etc.) in more peripheral areas.
- Increased costs for the delivery of necessary supporting infrastructure for a higher level of urban fringe and outer areas.

The selected land use zoning approach for the Variation is Alternative 1. This compact development approach performed more favourably across multiple Strategic Environmental Objectives, including those relating to climate, human health, material assets and landscape. This approach would facilitate Limerick in meeting the revised population targets and would enable the rapid activation of available and housing delivery in the interests of providing housing for people.

4.4 Reasons for Choosing the Selected Alternatives in light of Other Reasonable Alternatives Considered

The selected alternative for the Variation that emerged from the planning/SEA process is indicated above.

This alternative has been integrated into the Variation as made having regard to both:

1. The environmental effects which were identified by the SEA and are detailed above; and
2. Planning – including social and economic – effects that also were considered.

Section 5 Summary of Effects arising from the Variation

Table 5.1 summarises the overall environmental effects arising from Variation provisions. The effects encompass all in-combination/cumulative effects arising from implementation of the Variation and associated documents. The Variation would contribute towards the proper planning and sustainable development of Limerick and the effects are consistent with those identified by the SEA for the Limerick Development Plan 2022-2028.

The potentially significant adverse environmental effects (if unmitigated) arising from implementation of the Variation are detailed as are residual effects, taking into account mitigation integrated into both the Variation and the Limerick Development Plan. Taking account of embedded mitigation within the existing Plan, mitigation within the Variation and the statutory environmental assessment requirements applying at project level, no significant adverse residual environmental effects are predicted.

Environmental impacts which occur will be determined by the nature and extent of multiple or individual projects and site-specific environmental factors. Environmental impacts which occur will be determined by the nature and extent of multiple or individual projects and site-specific environmental factors.

Appropriate Assessment (AA) Screening has been undertaken alongside the Variation. The requirement for AA is provided under the EU Habitats Directive (Directive 1992/43/EEC). The Screening for AA for the Variation has concluded that the any likelihood for significant effect to any European site as a result of the Variation can be ruled out. The preparation of the Variation, SEA and Screening for AA has taken place concurrently and the findings of the Screening for AA have informed the SEA.

A Strategic Flood Risk Assessment (SFRA) has been undertaken as part of the preparation of the Variation. Requirements in relation to SFRA are provided under 'The Planning System and Flood Risk Management Guidelines for Planning Authorities' (Department of Environment and Office of Public Works, 2009) and associated Department of the Environment, Community and Local Government Circular PL2/2014. The SFRA has informed both the land use zoning and the written provisions of the Variation.

Table 5.1 Overall Findings –Effects arising from the Variation

Environmental Component	Environmental Effects, in combination with the wider planning framework Effects include in-combination effects that are planned for through the wider planning framework including the NPF and associated NDP, the Southern RSES, the Limerick Development Plan and adjacent Development Plans and lower-tier land use plans.			SEO Codes
	Significant Positive Effect, likely to occur	**Potentially Significant Adverse Environmental Effects, if unmitigated**	**Likely Residual Adverse Non-Significant Effects**	
Biodiversity and Flora and Fauna	• Contribution towards protection of ecology (including designated sites, ecological connectivity, habitats) by facilitating development of lands (including those within and adjacent to Limerick city centre and suburbs, and Limerick's other settlements), through both land use zoning and adherence to national housing policy guidelines, that have relatively low levels of environmental sensitivities and are served (or can be more easily served) by infrastructure and services, thereby helping to avoid the need to develop more sensitive, less well-serviced lands elsewhere in Limerick's settlements and beyond. • Contribution towards the maintenance of existing green infrastructure and associated ecosystem services, listed species, ecological connectivity and non-designated habitats. • Contribution towards protection and/or maintenance of biodiversity and flora and fauna by contributing towards the protection of natural capital including the environmental vectors of air, water and soil. Biodiversity and flora and fauna includes biodiversity in designated sites (including European Sites and Wildlife Sites) and Annexed habitats and species (including birds and bats), listed/protected species, ecological connectivity and non-designated habitats (including terrestrial and aquatic habitats), and disturbance to biodiversity and flora and fauna – including terrestrial and aquatic biodiversity and flora and fauna.	Arising from both construction and operation of development and associated infrastructure: • Loss of/damage to biodiversity in designated sites (including European Sites and Wildlife Sites) and Annexed habitats and species, listed species, ecological connectivity and non-designated habitats; and disturbance to biodiversity and flora and fauna; • Habitat loss, fragmentation and deterioration, including patch size and edge effects; and • Disturbance (e.g. due to noise and lighting along transport corridors) and displacement of protected species such as birds and bats.	• Loss of an extent of non-protected habitats and species arising from the replacement of semi-natural land covers with artificial surfaces. • Losses or damage to ecology (these would be in compliance with relevant legislation).	**BFF**
Population and Human Health	• Promotion of economic growth to encourage retention of working age population and funding of sustainable development and environmental protection and management. • Contribution towards appropriate provision of infrastructure and services to existing population and planned growth by facilitating compact development of lands (including those within and adjacent to Limerick city centre and suburbs, and Limerick's other settlements), through both land use zoning and adherence to national housing policy guidelines, that are served (or can be more easily served) by infrastructure and services, thereby helping to avoid the need to develop less well-serviced lands elsewhere in Limerick's settlements and beyond. • Contribution towards the protection of human health by facilitating development of lands (including those within and adjacent to Limerick city centre and suburbs, and Limerick's other settlements), through both land use zoning and adherence to national housing policy guidelines, that have relatively low levels of environmental sensitivities and are served (or can be more easily served) by infrastructure and services, thereby helping to avoid the need to develop more sensitive, less well-serviced lands elsewhere in Limerick's settlements and beyond. • Contributes towards protection of human health as a result of contributing towards the protection of natural capital including environmental vectors, such as air and water.	• Potential adverse effects arising from flood events. • Potential interactions with human health if effects arise from environmental vectors.	• Potential interactions with residual effects on environmental vectors – please refer to residual adverse effects under "Soil", "Water" and "Air and Climatic Factors" below.	**PHH**

Environmental Component	Environmental Effects, in combination with the wider planning framework Effects include in-combination effects that are planned for through the wider planning framework including the NPF and associated NDP, the Southern RSES, the Limerick Development Plan and adjacent Development Plans and lower-tier land use plans.			SEO Codes
	Significant Positive Effect, likely to occur	**Potentially Significant Adverse Environmental Effects, if unmitigated**	**Likely Residual Adverse Non-Significant Effects**	
Soil	• Contribution towards the protection of soils (including those used for agriculture) and designated sites of geological heritage by facilitating development of lands (including those within and adjacent to Limerick city centre and suburbs, and Limerick's other settlements), through both land use zoning and adherence to national housing policy guidelines, that have relatively low levels of environmental sensitivities and are served (or can be more easily served) by infrastructure and services, thereby helping to avoid the need to develop more sensitive, less well-serviced lands elsewhere in Limerick's settlements and beyond. • Contribution towards the protection of the environment from contamination by requiring the highest standards of remediation and, where appropriate, consultations with the EPA and other relevant bodies in order to resolve any instances of environmental pollution created by contaminated land.	• Potential adverse effects on the hydrogeological and ecological function of the soil resource, including as a result of development on contaminated lands. • Potential for riverbank and coastal erosion.	• Loss of an extent of soil function arising from the replacement of semi-natural land covers with artificial surfaces. • Riverbank and coastal erosion will continue to occur naturally over time and is likely to be enhanced by climate change.	**S**
Water	• Contribution towards the protection of water by facilitating development of lands (including those within and adjacent to Limerick city centre and suburbs, and Limerick's other settlements), through both land use zoning and adherence to national housing policy guidelines, that have relatively low levels of environmental sensitivities and are served (or can be more easily served) by infrastructure and services, thereby helping to avoid the need to develop more sensitive, less well-serviced lands elsewhere in Limerick's settlements and beyond. • Contributions towards the protection of water resources including the status of surface and groundwaters and water-based designations. • Contribution towards flood risk management and appropriate drainage.	• Potential adverse effects upon the status of water bodies and entries to the WFD Register of Protected Areas (ecological and human value), arising from changes in quality, flow and/or morphology. • Increase in flood risk and associated effects associated with flood events.	• Any increased loadings as a result of development to comply with the River Basin Management Plan. • Flood related risks remain due to uncertainty with regard to extreme weather events – however such risks will be mitigated by measures that have been integrated into the Variation.	**W**
Material Assets	• Contribution towards appropriate provision of infrastructure and services to existing population and planned growth by facilitating compact development of lands (including those within and adjacent to Limerick city centre and suburbs, and Limerick's other settlements), through both land use zoning and adherence to national housing policy guidelines, that are served (or can be more easily served) by infrastructure and services, thereby helping to avoid the need to develop less well-serviced lands elsewhere in Limerick's settlements and beyond. • Contribution towards compliance with national and regional water services and waste management policies. • Contribution towards increase in renewable energy use by facilitating renewable energy and electricity transmission infrastructure developments. • Contribution towards limits in increases in energy demand from the transport sector by facilitating sustainable compact growth. • Contribution towards reductions in average energy consumption per capita including promoting sustainable compact growth, sustainable mobility, sustainable design and energy efficiency.	• Failure to provide adequate and appropriate waste water treatment (water services infrastructure and capacity ensures the mitigation of potential conflicts). • Failure to adequately treat surface water run-off that is discharged to water bodies (water services infrastructure and capacity ensures the mitigation of potential conflicts). • Failure to comply with drinking water regulations and serve new development with adequate drinking water (water services infrastructure and capacity ensures the mitigation of potential conflicts). • Increases in waste levels. • Potential impacts upon public assets and infrastructure. • Interactions between agriculture and soil, water, biodiversity and human health - including phosphorous and nitrogen deposition as a result of agricultural activities and the production of secondary inorganic particulate matter.	• Exceedance of capacity in critical infrastructure risks remain, including due to uncertainty with regard to climate – however, such risks will be mitigated by: measures, including those requiring the timely provision of critical infrastructure, and compliance with the Water Framework Directive and associated River Basin Management Plan. • Residual wastes to be disposed of in line with higher-level waste management policies. • Any impacts upon public assets and infrastructure to comply with statutory planning/consent-granting framework.	**MA**

Environmental Component	Environmental Effects, in combination with the wider planning framework Effects include in-combination effects that are planned for through the wider planning framework including the NPF and associated NDP, the Southern RSES, the Limerick Development Plan and adjacent Development Plans and lower-tier land use plans.			SEO Codes
	Significant Positive Effect, likely to occur	**Potentially Significant Adverse Environmental Effects, if unmitigated**	**Likely Residual Adverse Non-Significant Effects**	
Air and Climatic Factors	• Contribution towards climate mitigation and adaptation by facilitating compact development of lands (including those within and adjacent to Limerick city centre and suburbs, and Limerick's other settlements), through both land use zoning and adherence to national housing policy guidelines, that are served (or can be more easily served) by infrastructure and services, thereby helping to avoid the need to develop less well-serviced lands elsewhere in Limerick's settlements and beyond. • In combination with other plans, programmes etc., contribution towards the objectives of the wide policy framework relating to climate mitigation and adaptation, and associated contribution towards maintaining and improving air quality and managing noise levels, including through measures relating to: o Sustainable compact growth; o Sustainable mobility, including walking, cycling and public transport; o Drainage, flood risk management and resilience; o Sectors including energy and buildings; and o Sustainable design, energy efficiency and green infrastructure.	• Potential conflict between development under the Plan as varied and aiming to reduce carbon emissions in line with local, national and European environmental objectives. • Potential conflicts between transport emissions, including those from cars, and air quality. • Potential conflicts between increased frequency of noise emissions and protection of sensitive receptors. • Potential conflicts with climate adaptation measures including those relating to flood risk management.	• An extent of travel related greenhouse gas and other emissions to air. This has been mitigated by provisions that have been integrated into the Variation, including those relating to sustainable compact growth and sustainable mobility. • Interactions between noise emissions and sensitive receptors. Various provisions have been integrated into the Variation to ensure that noise levels at sensitive receptors will be minimised.	**AC**
Cultural Heritage	• Contributes towards protection of cultural heritage elsewhere by facilitating compact development. • Contributes towards protection of cultural heritage, by facilitating brownfield development and regeneration.	• Potential effects on protected and unknown archaeology and protected architecture arising from construction and operation activities.	• Potential effects on known architectural and archaeological heritage and unknown archaeology however, these will occur in compliance with legislation.	**CH**
Landscape	• Contributes towards protection of wider landscape and landscape designations by facilitating compact development.	• Occurrence of adverse visual impacts and conflicts with the appropriate protection of designations relating to the landscape.	• Landscapes will change overtime as a result of natural changes in vegetation cover combined with new developments that will occur in compliance with the Development Plan's landscape protection measures.	**L**

Section 6 Mitigation and Monitoring Measures

6.1 Mitigation

Mitigation measures are measures envisaged to prevent, reduce and, as fully as possible, offset any significant adverse impacts on the environment of implementing the Variation. Various environmental sensitivities and issues have been communicated to the Council through the SEA, Appropriate Assessment (AA) and Strategic Flood Risk Assessment (SFRA) processes. By integrating related recommendations into the existing Development Plan and the Variation, the Council has ensured that both the beneficial environmental effects of implementing the Plan to be varied have been and will be maximised and that potential adverse effects have been and will be avoided, reduced or offset.

Mitigation was achieved through:

- Strategic work undertaken by the Council to ensure evidence-based planning;
- Considering alternatives for the Variation;
- The integration of individual provisions into the text of the existing, already in force, Development Plan; and
- The integration of environmental considerations into the zoning provisions and text of the Variation[10].

6.2 Monitoring

The SEA Directive requires that the significant environmental effects of the implementation of plans and programmes are monitored. Monitoring is based around indicators that allow quantitative measures of trends and progress over time relating to the Strategic Environmental Objectives identified at Table 3.1 and used in the evaluation. Monitoring indicators, targets, sources and remedial action is provided at Table 6.1 overleaf.

[10] The land use zoning and objectives provided for by the Variation have taken into account environmental considerations, including those relating to ecology, cultural heritage, landscape/topography, infrastructural requirements and water. Zoning has been applied in a way that considers sustainable and compact growth, taking into account the various requirements set out in the higher-level Revised NPF, Southern RSES and existing Limerick Development Plan. Flood risk management and drainage provisions are already in force through the Development Plan. In addition, land use zoning contained within the Variation has been informed by an iterative SFRA process, including both: the delineation of flood risk zones; and future climate scenario risk areas (mid-range as well as high end). The detailed Variation preparation process undertaken by the Planning Department combined with specialist input from the SFRA process facilitated zoning that helps to avoid inappropriate development being permitted in areas of elevated flood risk.

Land Use Zoning takes account of the tiered approach required by the National Planning Framework and will contribute towards a co-ordination of zonings with existing and planned infrastructure and services..

In addition to the individual provisions integrated into the text of the existing Development Plan, provisions have also been integrated into the text of the Variation through the Variation-preparation and environmental assessment processes.

Table 6.1 Indicators, Targets, Sources and Remedial Action

Environmental Component	SEO Code	Indicators	Targets	Sources	Remedial Action[11]
Biodiversity, Flora and Fauna	**BFF**	• Condition of European sites	• Require all local level land use plans to include ecosystem services and green/blue infrastructure provisions and as a minimum, to have regard to the required targets in relation to the conservation of European sites, other nature conservation sites, ecological networks, and protected species • Implement and review, as relevant, the Limerick Biodiversity Plan 2025-2030 • Confirmation of compliance with Plan provisions relating to the protection of European Sites and sustaining resources	• DHLGH report of the implementation of the measures contained in the Habitats Directive - as required by Article 17 of the Directive (every 6 years) • DHLGH National Birds Directive Monitoring Report for the under Article 12 (every 6 years) • Internal review of local land use plans, e.g. framework plans. • Internal review of development management / grants of permission	• Where condition of European sites is found to be deteriorating this will be investigated with the Regional Assembly and the DHLGH to establish if the pressures are related to Plan actions / activities. A tailored response will be developed in consultation with these stakeholders in such a circumstance.
		• Number of spatial plans that have included ecosystem services content, mapping and policy to protect ecosystem services when their relevant plans are either revised or drafted	• Require all local level land use plans to include ecosystem services and green/blue infrastructure provisions and as a minimum, to have regard to the required targets in relation to the conservation of European sites, other nature conservation sites, ecological networks, and protected species • Implement and review, as relevant, the Limerick Biodiversity Plan 2025-2030	• Internal review of local land use plans, e.g. framework plans.	• Review internal systems
		• SEAs and AAs as relevant for new Council policies, plans, programmes etc. under the Development Plan	• Screen for and/or undertake SEA and AA as relevant for new Council policies, plans, programmes etc. under the Development Plan	• Internal review of preparation of new Council policies, plans, programmes etc. under the Development Plan	• Review internal systems
		• Status of water bodies	• Included under Water below	• Included under Water below	• Included under Water below
		• Compliance of planning permissions with Plan measures providing for the protection of Biodiversity and flora and fauna – see Chapter 6 "Environment, Heritage, Landscape and Green Infrastructure"	• For planning permission to be only granted when applications demonstrate that they comply with all Plan measures providing for the protection of biodiversity and flora and fauna – see Chapter 6 "Environment, Heritage, Landscape and Green Infrastructure"	• Internal review of development management / of grants of permission[12]	• Review internal systems
Population and Human Health	**PHH**	• Implementation of Plan measures relating to the promotion of economic growth as provided for by Chapter 5 "A Strong Economy"	• Progress in successfully implementing Plan measures relating to the promotion of economic growth as provided for by Chapter 5 "A Strong Economy"	• Internal review of progress on implementing Plan objectives	• Review internal systems • Consultations with DCEE

[11] Where remedial action is required, consultations with government agencies (e.g. DCEE, DT, EPA, HSE, NPWS, Regional Assembly, Uisce Éireann) may be undertaken in order to confirm causes of any identified changes in the environment and in order to develop appropriate responses.

[12] Including confirmation with development management that the following impacts have been considered and including use of monitoring data, where available: biodiversity/habitat loss; nitrogen deposition impacts on Natura 2000 sites; recreational disturbance resulting from implementation of tourism and recreation policies and objectives particularly in riparian areas; biodiversity enhancement; and disturbance /visitor pressure impacts of recreation, amenity and tourism development.

Environmental Component	SEO Code	Indicators	Targets	Sources	Remedial Action[11]
		• Number of spatial concentrations of health problems arising from environmental factors resulting from development permitted under the Plan	• No spatial concentrations of health problems arising from environmental factors as a result of implementing the Plan	• Review of published information from the Health Service Executive and EPA • Internal consultations with the Council's Environment Department	• Consultations with the Health Service Executive and EPA
		• Proportion of people reporting regular cycling / walking to school and work above previous CSO figures	• Increase in the proportion of people reporting regular cycling / walking to school and work above previous CSO figures • Progress in successfully implementing Plan measures relating to active travel	• CSO data • Internal review of progress on implementing Plan objectives	• Where proportion of population shows increase in private car use above previous CSO figures, the Council will coordinate with the Regional Assembly, the DHLGH, DCEE and NTA to develop a tailored response.
		• Number of spatial plans that include specific green infrastructure mapping	• Require all local level land use plans to include specific green infrastructure mapping	• Internal review of local land use plans, e.g. framework plans.	• Review internal systems
Soil (and Land)	S	• Proportion of population growth occurring on infill and brownfield lands compared to greenfield (also relevant to Material Assets)	• Contribute towards NPF target of maintaining built surface cover nationally to below the EU average of 4% • In accordance with the 'NPF Implementation: Housing Growth Requirements - Guidelines for Planning Authorities July 2025 a target of at least 40% of all new housing to be delivered within the existing built up areas of cities, towns and villages on infill and/or brownfield sites • To map brownfield and infill land parcels	• EPA Geoportal • Compilation of greenfield and brownfield development for the DHLGH • Internal review of development management / grants of permission	• Where the proportion of growth on infill and brownfield sites is not keeping pace with the targets set in the NPF and the RSES, the Council will liaise with the Regional Assembly to establish reasons and coordinate actions to address constraints to doing so.
		• Instances where contaminated material generated from brownfield and infill must be disposed of	• Dispose of contaminated material in compliance with EPA guidance and waste management requirements	• Internal review of development management / grants of permission where contaminated material must be disposed of	• Consultations with the EPA and Development Management
		• Environmental assessments and AAs as relevant for applications for brownfield and infill development prior to planning permission	• Screen for and undertake environmental assessments and AA as relevant for applications for brownfield and infill development prior to planning permission	• Internal review of development management / grants of permission	• Review internal systems
Water	W	• Status of water bodies as reported by the EPA Water Monitoring Programme for the WFD	• Subject to exemptions provided for by Article 4 of the Water Framework Directive, not to cause deterioration in the status of any surface water or affect the ability of any surface water to achieve 'good status' • Implementation of the objectives of the River Basin Management Plan	• EPA Monitoring Programme for WFD compliance [13]	• Where water bodies are failing to meet at least good status this will be investigated with the DHLGH Water Section, the EPA Catchment Unit, the Regional Assembly and, as relevant, Uisce Éireann to establish if the pressures are related to Plan actions / activities. A tailored response will be developed in consultation with these stakeholders in such a circumstance. • Where planning applications are rejected due to insufficient capacity in the WWTP or failure of the WWTP to meet Emission Limit Values, the Council will consider whether it is necessary to coordinate a response with the Regional Assembly, EPA and

[13] Including monitoring of water quality and nitrogen deposition due to bioenergy and agricultural projects where available.

Environmental Component	SEO Code	Indicators	Targets	Sources	Remedial Action[11]
					Uisce Éireann to achieve the necessary capacity.
		• Number of incompatible developments permitted within flood risk areas	• Minimise developments granted permission on lands which pose - or are likely to pose in the future - a significant flood risk	• Internal review of development management / grants of permission	• Where planning applications are being permitted on flood zones, the Council will ensure that such grants are in compliance with the Flood Risk Management Guidelines and include appropriate flood risk mitigation and management measures.
Material Assets	MA	• Programmed delivery of Uisce Éireann infrastructure for all key growth towns in line with Uisce Éireann Investment Plan and prioritisation programme to ensure sustainable growth can be accommodated • Number of new developments granted permission which can be adequately and appropriately served with waste water treatment over the lifetime of the Plan	• All new developments granted permission to be connected to and adequately and appropriately served by waste water treatment over the lifetime of the Plan • Where individual on-site wastewater treatment systems are proposed, for planning permission to be only granted when applications demonstrate that the outfall from the individual on-site wastewater treatment system will not – in-combination with other septic tanks – contribute towards any surface or ground water body not meeting the objective of good status under the Water Framework Directive • Facilitate, as appropriate, Uisce Éireann in developing water and wastewater infrastructure • See also targets relating to greenfield and brownfield development of land under Soil	Internal review of development management / grants of permission	• Where planning applications are rejected due to insufficient capacity in the WWTP or failure of the WWTP to meet Emission Limit Values, the Council will consider whether it is necessary to coordinate a response with the Regional Assembly, EPA and Uisce Éireann to achieve the necessary capacity.
		• Proportion of people reporting regular cycling / walking to school and work above previous CSO figures	• Increase in the proportion of people reporting regular cycling / walking to school and work above previous CSO figures • Progress in successfully implementing Plan measures relating to active travel	• CSO data • Internal review of progress on implementing Plan objectives	• Where proportion of population shows increase in private car use above previous CSO figures, the Council will coordinate with the Regional Assembly, the DHLGH, DCEE and NTA to develop a tailored response.
Air	A	• Proportion of journeys made by private fossil fuel-based car compared to previous levels • NO_2 (Nitrogen Dioxide), PM10 (particulate matter with diameter of 10 microns or less) and O_3 (Ozone) as part of Ambient Air Quality Monitoring	• Decrease in proportion of journeys made by car compared to previous levels • Improvement in Air Quality trends, particularly in relation to transport related emissions • Progress in successfully implementing Plan measures relating to sustainable mobility and travel	• CSO data • EPA Air Quality Monitoring • Internal review of progress on implementing Plan objectives	• Where proportion of population shows increase in private car use above previous CSO figures, Council will coordinate with the Regional Assembly, DHLGH, DCEE and NTA to develop a tailored response. See also entry under Population and human health above.
Climatic Factors	C	• Implementation of Plan measures relating to climate reduction targets	• For review of progress on implementing Plan objectives to demonstrate successful implementation of measures relating to climate reduction targets	Internal review of development management / grants of permission	• Review internal systems
		• A competitive, low-carbon, climate-resilient and environmentally sustainable economy	• Contribute towards transition to a competitive, low-carbon, climate-resilient and environmentally sustainable economy by 2050	• Confirmation of progress in implementing of Limerick City and County Council's Climate Change Adaptation Strategy 2019-2024 and Climate Action Plan 2024-2029	• Where targets are not achieved, the Council will liaise with the Regional Assembly and the Eastern and Midlands Climate Action Regional Office to establish reasons and develop solutions.
		• Share of renewable energy in transport	• Contribute towards the National Energy and Climate Plan 2021-2030 sectoral target for		

Environmental Component	SEO Code	Indicators	Targets	Sources	Remedial Action[11]
			transport (RES-T) of 14%, by 2030 (this may be increased following a provisional European agreement on 30 March 2023 for a binding overall RES target of at least 42.5% by 2030)	• EPA Greenhouse Gas Emissions reporting • Internal review of implementation of Plan provisions relating to renewable energy in transport, including facilitating the development of electricity charging and transmission infrastructure	
		• Greenhouse gas emissions	• Contribute towards the target of aggregate reduction in carbon dioxide (CO_2) emissions of at least 51% (compared to 1990 levels) by 2030 (helping to set Ireland on a path to reach net-zero emissions by 2050)		
		• Energy consumption, the uptake of renewable options and solid fuels for residential heating	• To promote reduced energy consumption and support the uptake of renewable options and a move away from solid fuels for residential heating		
		• Proportion of journeys made by private fossil fuel-based car compared to previous levels	• Decrease in the proportion of journeys made by residents of Limerick using private fossil fuel-based car compared to previous levels • Progress in successfully implementing Plan measures relating to sustainable mobility and travel	• CSO data • Internal review of progress on implementing Plan objectives	• Where trends toward carbon reduction are not recorded, the Council will liaise with the Regional Assembly and the Eastern and Midlands Climate Action Regional Office to establish reasons and develop solutions.
		• Proportion of people reporting regular cycling / walking to school and work above previous CSO figures	• Increase in the proportion of people reporting regular cycling / walking to school and work above previous CSO figures • Progress in successfully implementing Plan measures relating to active travel	• CSO data • Internal review of progress on implementing Plan objectives	• Where proportion of population shows increase in private car use above previous CSO figures, the Council will coordinate with the Regional Assembly, the DHLGH, DCEE and NTA to develop a tailored response.
Cultural Heritage	CH	• Percentage of entries to the Record of Monuments and Places, and the context these entries within the surrounding landscape where relevant, protected from adverse effects resulting from development which is granted permission under the Plan	• Protect entries to the Record of Monuments and Places, and the context of these entries within the surrounding landscape where relevant, from adverse effects resulting from development which is granted permission under the Plan	• Internal review of development management / grants of permission	• Where monitoring reveals visitor or development pressure is causing negative effects on designated archaeological or architectural heritage, the Council will work with the Regional Assembly, Fáilte Ireland and the National Monuments Service and other stakeholders, as relevant, to address pressures through additional mitigation.
		• Percentage of entries to the Record of Protected Structures and Architectural Conservation Areas and their context protected from significant adverse effects arising from new development granted permission under the Plan	• Protect entries to the Record of Protected Structures and Architectural Conservation Areas and their context from significant adverse effects arising from new development granted permission under the Plan	• Internal review of development management / grants of permission	
Landscape	L	• Number of developments permitted that result in avoidable adverse visual impacts on the landscape, especially with regard to landscape designations, resulting from development which is granted permission under the Plan	• No developments permitted which result in avoidable adverse visual impacts on the landscape, especially with regard to landscape designations, resulting from development which is granted permission under the Plan	• Internal review of development management / grants of permission	• Where monitoring reveals developments permitted which result in avoidable adverse visual impacts on the landscape, the Council will re-examine Plan provisions and the effectiveness of their implementation.