

**Strategic Environmental Assessment of Variation No. 4 to the Limerick City
Development Plan 2010 – 2016**

- Incorporation of the Limerick 2030 Economic and Spatial Plan

**SEA STATEMENT FOR THE INCORPORATION OF THE 2030 PLAN
INTO THE LIMERICK CITY DEVELOPMENT PLAN 2010-2016**

February 2015



SEA STATEMENT FOR THE INCORPORATION OF THE 2030 PLAN INTO THE LIMERICK CITY DEVELOPMENT PLAN.

1.1 INTRODUCTION

In accordance with article 9 of the SEA directive and 14(l) of the Planning and Development (Strategic Environmental Assessment) regulations the following is a statement summarising how environmental considerations have been integrated into the incorporation of the 2030 Plan into the Limerick City Development Plan 2010 and how the Environmental Report and the outcome of the in house and public consultations were taken into account and indicates the reasons for choosing the plan as adopted in light of other reasonable alternatives considered. The wider consultation associated with the statutory process of plan variation complemented internal research and consultations.

1.2 Summary of how environmental considerations were factored into the incorporation of the 2030 Economic Plan into the City Development Plan 2010.

During the preparation of the variation no consideration was given to expansion of zoning outside the current plan boundaries. No further lands were zoned outside the plan boundaries-this option was rejected as analysis indicated that sufficient land was zoned for different purposes within the Plan area to cater for the population for the plan period. In addition the zoning of further land would not contribute to the aim of sequential zoning and would divert scarce resources from the main aim of revitalising the city which is the core aim of the 2030 Plan. It was considered that further expanding zoned land would result in under used or partially developed land which would take from efforts to assist with the development of the core of the City in line with the Local Area Plan Guidance Documents 2012 and the Development Plan Guidance 2007.

The issue of ex-situ effects on Natura 2000 sites and the issue of the need for appropriate assessment screening had been raised during the preparation of the variation. Progression to full Appropriate Assessment was not deemed necessary as buffer zones were incorporated into the existing development plan along the undeveloped sections of the river banks in the plan area, while the possibility of ex-situ effects were not regarded as significant due to the improvement works to the Bunlickey Waste Water Treatment Plant. An objective within the plan was introduced to ensure that infrastructure kept pace with development. Policy WS5 was updated in this regard. In addition as the content of the Environmental Report indicated works are planned to improve the ability of the WWTP to deal with waste from the city.

The need to ensure that the urban form of Limerick is both protected and enhanced is reflected in the zoning patterns of the plan. The zoning as presented in the 2010 plan seeks to consolidate the settlement pattern of Limerick ensuring that future development in terms of location and scale contribute to this end. In addition the sections of the plan relating to Protected Structures and the Architectural Conservation Areas also seeks to ensure that these aspects of the heritage of the city are adequately conserved. The preservation strategies of the 2010 Plan as outlined in Chapter 10, Parts III and IV will apply the to the City Development Plan as varied as these policies now apply to the contents of the 2030 Plan. Any measures which are contained in the 2030 plan will have to comply with these measures. As the 2010 City Development plan points out (p.82) the aim of designating these areas is to "preserve their special characteristics and distinctive features from inappropriate actions".

1.3 SUMMARY OF HOW THE ENVIRONMENTAL REPORT AND SUBMISSIONS AND OBSERVATIONS MADE TO THE PLANNING AUTHORITY UNDER SECTION 13 OF THE ACT WERE TAKEN INTO ACCOUNT

Submissions under section 13 of the Planning and Development Act 2000, as amended, have been received during the plan variation process. These have been taken into account in the final plan, following the public display period. Issues raised by the Environmental Authorities and the responses as outlined in the Chief Executives report have already been on public display.

Some of the main issues that have been raised by submissions from the Department of the Environment and the Irish Georgian Society have centred on the sensitivity of the existing historic built environment in the city and have mentioned that building heights should have been included in the measures in the 2030 plan. This was considered unnecessary as in the existing city plan in the development management chapter (Chapter 16) the issue of building heights has already been dealt with. Reference has already been made to the existing protection conferred by the Architectural Conservation Areas and it should be remembered that the policy objectives of the 2010 City Plan now control the proposals put forward in the 2030 plan. It should be emphasised that the incorporation of the 2030 plan now means that it is subject to the same statutory controls that govern development activity in terms of planning control, fire regulations and environmental legislation as it now part of a statutory land use plan.

The historic building stock also poses nature conservation issues which have been mentioned in the environmental report. Reference is made to the contents of Chapter 11 which details nature conservation policies which apply to the city and now apply to the contents of the 2030 plan as incorporated. As mentioned in

the plan preparation stage it will be necessary to survey for wild life species such as birds and bats that that have adapted to urban living prior to development taking place.

1.4 REASONS FOR CHOOSING THE PLAN AS ADOPTED IN THE LIGHT OF OTHER REASONABLE ALTERNATIVES CONSIDERED

It is required in the legislation that the Environmental Report must consider “reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme” and the significant environmental effects of the alternatives selected.

Alternative strategies that were considered are outlined below.

Alternative Strategy Option 1- Continue with existing 2010 Plan with its time extension and without the variation to incorporate the 2030 plan:

The preparation of the LEASP proposes measures that build on earlier proposals such as the 2008 City Centre Strategy and earlier public realm proposals. The identification of the seven key areas aims to promote tailored responses to the difficulties of each area and the specific opportunities each affords. The proposals are a response to the difficulties facing Limerick City and are those judged to be the most realistic at the current time. The 2030 plan as incorporated during the variation process has the advantage of being able to take into account the planning guidance which has become available in the interim and which reflects current best practice.

While earlier plans and development briefs (e.g. Patrick Street-Ellen Street Development Brief 2004) did make their acknowledged contribution to the contents of the current plan the content of such plans required updating because of the new economic background, the new legislative and policy structures caused by the amalgamation of the two local authorities and the addition of new infrastructure within the metropolitan area. In this regard the plan points out that the current traffic management initiatives had been put in place prior to the opening of the River Shannon Tunnel which has removed a large volume of traffic from the City centre (LEASP, p.53). Facilitating pedestrian usage of the City centre by managing traffic flows is an important element of the plan and this plan presents comprehensive proposals to address this issue (LEASP, pp. 91-96). The management of traffic is central to accessibility in urban areas and these proposals have indicated the need for revised management which played a part in the selection of this plan in its current format. As mentioned above the contents of the 2030 plan reflect current best practice, not only in relation to S28 guidance documents, but also in relation to international practice as the examples outlined in the 2030 document indicate. In terms of improving permeability of and providing transport links it should be remembered that many

of the measures of the 2030 Plan complement those of the Smarter Travel initiative.

In short, the selection of the current strategy has built on earlier efforts such as conventional land use plans (e.g. the series of City Development Plans), the successful outcome of the actions of the 2008 City Centre Strategy and marks a fusion of conventional land use planning with the area specific actions of the LEASP. One alternative would have been to continue with conventional land use plans, which lacking the area specific focus and actions of the LEASP, would not be able to direct resources in the targeted fashion required. The improvement works for the Colbert station area, recently granted planning approval, is a good example of such an approach.

As part of the preparation work for the variation consideration was given to delaying the variation until the preparation of a new development plan for the city area was required. However this would have meant substantial loss of time. It was decided to incorporate the 2030 plan into the existing City Development Plan. The time frame of the City Development Plan has been extended until the preparation of new Regional Planning Guidelines. This is necessary in that it will be the new RPGs, when prepared, that will indicate the population targets for the city. In the meantime, though the Mid-west Regional Authority is being reorganised it is necessary to extend the time frame of the City Development Plan to ensure that it continues to operate under the aegis of the current RPGs. As yet there is no date for the preparation of the new RPGs.

Alternative Strategy Option 2- Continue with existing 2008 City Centre Strategy without the incorporation of the 2030 plan

The outcome of earlier plans such as the Limerick City Centre Strategy 2008 plan had indicated the potential of actions in selected parts of the city and while this has achieved impressive results, not least the board walks along the Shannon in the city centre, it was considered that actions on a larger scale would be necessary to reverse the decline of the city centre and the key areas identified in the 2030 LEASP.

This is the advantage of the 2030 Plan in that with its range of targeted measures, it will be a better vehicle for guidance of resources to specific areas. It will also be a better means of working with other agencies to ensure that an integrated approach to investment will serve to revitalise the city. The link with the re-development of Colbert station is an example of this. It should also be remembered that the regeneration process active in the city areas now for a number of years also has area based response measures and the area based responses of the 2030 plan will serve to complement the regeneration plans which are active elsewhere in the metropolitan area.

Alternative Strategy Option 3- reliance on non- planning led initiatives to secure the revitalisation of the city centre, with non-modification of existing land use plans.

While the initiatives of other agencies, such as Iarnród Éireann are indeed welcome they would tend to concentrate on areas that would be of specific interest to particular organisations and would lack the area based response that is the hall mark of the 2030 plan. The 2030 Plan, by proposing a larger development framework in conjunction with the policy support of the City Development Plan, provides a template which would avoid piecemeal responses to the issues facing the City. This has already been alluded to above in that the regeneration process will be complemented by the overall plan led approach of the 2030 initiatives. Both regeneration and the 2030 plan will ensure that area based responses to development issues in the city will be distributed through out the metropolitan area.

It was not considered feasible to proceed with non –modified plans as these would not have adequate mention of the 2030 plan in their statutory content. The 2010 plan, for instance, had in Chapter 7 (City Development Plan 2010 p. 53 to 58) a detailed mention of the regeneration areas in the city and responses to the issues that faced them. The variation which incorporated the 2030 plan also added material which reflected both the contents and the importance of the 2030 plan and places it firmly within the ambit of the most important statutory guidance document for the city.