

Strategic Environmental Assessment Statement of Variation No. 5 to the Limerick City Development Plan 2010 – 2016

**- Incorporation of the Shannon Integrated Framework Plan
(SIFP) into the City Development Plan**

**SEA statement prepared in accordance with SI No 436 of 2004
Planning and Development (SEA) Regulations following
adoption of the variation to the plan at the Council Meeting of
25th of May 2015.**

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Forward Planning

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This is the SEA Statement for the variation No.5 to the Limerick City Development Plan 2010-2016 (LCDP) and is the final part of the SEA process for the variation process to the development plan. The variation to the plan was adopted by Limerick City and County Council on the 25th May 2015.

1.0 Purpose of SEA Statement

The main purpose of the SEA Statement is to provide information on the decision-making process and to document how environmental considerations, the views of the Environmental Authorities and statutory agencies and other submissions received during consultation and the recommendations of the Environmental Report have been taken into account in the adopted variation to the LCDP 2010-2016 and the arrangements put in place for monitoring.

The SEA Statement is available to the public, along with the Final Environmental Report and the adopted variation. The variation to the Plan was also subject to Article 6 (3) of the Habitats Directive and a Natura Impact Screening was also prepared. This SEA Statement includes the following information:

- Summary of how environmental considerations have been integrated into the variation to the plan;
- Summary of how submissions received during consultation have been taken into account in the variation to the plan ;
- Reasons for choosing the final form of the variation, in the light of other reasonable alternatives considered ;
- Measures that are to be undertaken to monitor possible environmental effects of implementing the variation to the Plan.

The variation was screened for SEA and a determination made that full SEA was required. The findings of SEA were presented in the Environmental Report which was submitted to the Elected Members alongside the Draft variation to the LCDP. The purpose of the report was to provide a clear understanding of the likely environmental consequences of decisions regarding the implementation of the Shannon Integrated Framework Plan (SIFP) as it pertained to Limerick City over the lifetime of the plan.

Following the public consultation process, a number of amendments were proposed to the variation and these were evaluated for their environmental consequences. These were assessed against the Environmental Protection Objectives (EPOs). Following this process, it was determined that full SEA was not required.

On adoption of the variation, the original Environmental Report was updated into a final Environmental Report (ER) which is part of the plan documentation of the adopted variation.

2.1 Summary of how environmental considerations were factored into the variation.

During the preparation of the variation no consideration was given to expansion of zoning outside the current dockland 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 port usage for the next plan period. There was an addition of buffer zoning to protect the Natura 2000 sites and following a submission from the National Parks and Wild Life Service this was extended further to the east to protect the potential alluvial woodland habitats that existed beyond the riverside embankment.



Figure 1: reed bed and potentially developing alluvial woodland outside the embankment. This is within the newly established protective buffer zone.

The variation to the plan was adopted without change by the Council so the contents and provisions of the existing Environmental Report remain unchanged with the exception of the eastwards extension of the buffer zone along the SAC site. The mixed use zoning was altered in favour of Light Industrial as the area was shown in Flood Zone A. The buffer, referred to above, serves two purposes it protects the Natura 2000 sites from development encroachment but also serves as a limited flood residence area which is necessary given the designation of Flood Zone A.

The Light Industry zoning reflects existing usage on site but importantly also allows development of dockland area as a marine energy park. The cessation of Mixed Use and its associated residential zoning prevents the diversion of scarce resources from the main aim of revitalising the nearby city centre, which is a core aim of the Limerick 2030 Economic and Spatial Plan. It should be remembered that dereliction in the Georgian centre was identified as a major problem in the 2030 Limerick Economic and Spatial Plan. It was considered that further expanding mixed use zoned land would result in under

used or partially developed land which would take from efforts to assist with the development 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 was raised in internal discussions during the preparation of the variation. Appropriate Assessment was not deemed necessary as buffer zones were incorporated into the plan along the undeveloped sections of the river banks in the plan area and were extended when requested by the NPWS. Ex-situ effects were not regarded as significant due to the updating of the Bunlickey Waste Water treatment Plant. An objective within the plan was introduced to ensure that infrastructure kept place with development. Policy WS5 was updated in this regard.

The need to ensure that the urban form of Limerick is both protected and enhanced reflected in the zoning patterns of the variation to the plan. This is in line with the contents of the National Landscape Strategy. The zoning as presented in the plan seeks to consolidate the settlement pattern of Limerick ensuring that future development in terms of location and scale contribute to this end, while the designation of Light Industrial zoning reflect the existing land usage in the docklands but also the development of the Marine Energy park as mentioned in both the SIFP and the Shannon Foynes Port Company Vision 2041 document.

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

Table 1.1 Possible environmental effects of the variation.

Alterations	Environmental effects.	Comments
Extension of buffer along SAC site	Beneficial in that it will confer additional protection to embankment and possible alluvial woodland.	In response to NPWS request.
Text changes stressing commitment to monitoring and to zoning definition	None.	Commitment to monitoring ties in with Council Participation in Environmental and Marketing subgroup by LCCC.
Alteration of zoning from Mixed use to Light Industrial.	Reduced risk as the light industrial use is more compatible with flood risk than the previous mixed use.	Ensures consistency with Flooding guidelines.

Change of text to reflect importance of riverine archaeology	Beneficial in that it draws attention to the archaeological resource of the docklands and the river.	In response to DAU and drafted by the council archaeologist.
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Submissions regarding monitoring were received from the EPA. Adequate monitoring is important to keep track of possible environmental changes. It is the policy of the council to support monitoring initiatives associated with the implementation of the SIFP. The council will participate, with other local authorities, in the Environment and Steering Groups which are part of the SIFP structure. These groups meet, on average, twice per year and will help to ensure regular reviews of the implementation of the SIFP. In June 2015 the steering group will receive a presentation regarding a future estuarine monitoring programme which is the first step in ensuring that the monitoring of the SIFP will follow the latest best practice models.

Submissions under the public consultation period as defined by the Planning Act were received. These were summarised and responded to in the Chief Executives Report dated the 11th of May 2015.

- In response to submissions from the EPA and NPWS, both in this and previous plans concerning overloading of infrastructure, the additions were made to content of the environmental report outlining the current situation in relation to works on the Waste Water Treatment Plant to increase efficiency.
- Policies in relation to the promotion of sustainable transport links were listed as was one that indicated the importance of Smarter Travel and sustainable transport links. The potential importance of links from the University Campus to the docklands area was stressed in the Environmental Report, particularly with the potential of the Marine Energy Park in mind.
- The Department of Arts, Heritage and the Gaeltacht's submission stressed the importance of the archaeology of Limerick, both terrestrial, riverine and marine. Text was added to the plan to emphasise the importance of this resource.
- The ecological buffer zone was extended further to the east to protect potential alluvial woodland.
- The council will participate, through the medium of the Steering and Environment groups of the SIFP in future initiatives in relation to monitoring and management of the estuary.

3.1 Reasons for choosing the proposed variation 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 the existing 2010 Plan with its time extension and without the variation to incorporate the SIFP:

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 regional policy for the city. As yet there is no date for the preparation of the new RPGs. The plan, up until the variation, did not take into account the existence of the SIFP.

The preparation of the SIFP proposes measures that build on earlier proposals such as the now defunct Integrated Coastal Zone Management plan which had been the focus of attention over 12 years ago. This was led by Shannon Development, the Local Authorities and the then Department of the Environment and Marine. This was based on the template of the Bantry Bay Charter but unfortunately did not progress beyond draft stage.

In contrast the identification of the strategic development locations (SDL) areas in the SIFP aims to promote tailored responses to the opportunities of each area and the specific opportunities each affords. This moves beyond what had been achieved in the ICZM Plan and provides a solid basis for the management and development of the estuary.

While earlier plans helped to inform the contents of the SIFP plan the content of such plans required updating because of the new economic background, and the new legislative and policy background caused by the establishment of Special Area of Conservation and Special Protection Areas in the estuary. In this regard the SIFP points out that further work would be required to properly inform the variation and in the absence of incorporating the SIFP any development proposals would be operating without the benefit of the more detailed guidance available from the field work carried out to inform the incorporation of the SIFP.

It was considered that to continue without incorporating the SIFP was not a suitable way to proceed. For this reason it was decided not to allow the current city plan to run its course without incorporating the SIFP. The examination of the zoning template, prior to variation, showed that general industry or ware housing/distribution are not permitted on existing mixed use zoning which would hinder port related activity. This reinforced the need for the variation together with the change in zoning to permit port related usage.

Alternative Strategy Option 2 Reliance on the Limerick Economic and Spatial Plan 2030 to help develop the docklands area: The outcome of earlier plans such as the Limerick Economic and Spatial Plan 2030 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 specific port related actions would be necessary to reverse the decline of the docklands.

This is the advantage of the SIFP, in conjunction with the 2030 Plan, in that with its range of targeted measures, it will be a better vehicle for guidance of resources to the docklands. It will also be a better means of working with other port and marine related agencies to ensure that an integrated approach to investment will serve to revitalise the docklands. The docklands is also part of the wider infrastructure associated with marine activity in the estuary and it is here that the SIFP has clear advantages over the 2030 plan on its own, in that it will ensure that the development proposals for the docklands will fit with the overall development and management of the estuary as whole.

Alternative Strategy Option 3- reliance on non- planning led initiatives to secure the revitalisation of the dockland area, with non-modification of exiting land use plans.

While the initiatives of other agencies, such as the Shannon Foynes Port Company are indeed welcome they would tend to concentrate on areas that would be of specific interest to particular organisations and would lack the estuary based response that is the hall mark of the SIFP. The SIFP, by proposing an estuary-wide development framework in conjunction with the policy support of the City Development Plan, provides a template which would avoid piecemeal responses to development issues in the city and the estuary as a whole.

Alternative Strategy Option 4: the variation as adopted. As noted above the examination of the zoning template, prior to variation, showed that general industry or ware housing/distribution are not permitted on existing mixed use zoning which would hinder port related activity. This reinforced the need for the variation, together with the change in zoning to permit unhindered port usage. The light industry zoning is also an acceptable use in flood risk areas as in this case it permits the range of activities which make up port usage which itself is acceptable in Flood Zone A areas.

This option also incorporates a buffer zone to protect the SAC and SPA sites and their component habitats and this is expected to confer ecological and environmental benefits. It also contains up dated text to reflect the importance of riverine archaeology and cultural remnants in the docklands.

4.0 Monitoring

4.1 Introduction

As part of the SEA process, measures envisaged for monitoring the likely significant effects of implementing the variation to the City Plan must be included in the Environmental Report. The review of the City Plan 2010 will include monitoring of any significant environmental effects.

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

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

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

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

Where new or improved monitoring measures come to light during the course of the updating or addition of Section 28 guidelines they will inform monitoring for SEA, to ensure that monitoring of effects during the course of implementing the guidelines can be meaningful and effective. In this regard it is worth noting that work is under way in an EPA funded programme in which an up to date monitoring programme for estuarine environments is currently being developed. This programme, the Integrated Management and Monitoring of Estuarine and Coastal Eco-systems (IMMERSE) is expected to have a monitoring template in place within two years or so.

As the current City plan was subject to SEA there is an Environmental Report to inform the current SEA process.

In addition to the forthcoming IMMERSE programme, the following measures are proposed as part of this SEA process, to monitor the effects on the

environment of implementing the variation incorporating the SIFP, presented in terms of the achievement of the environmental protection objectives and the impact on the environmental factors that the SEA legislation requires to be considered. Measures include targets and thresholds that determine where remedial action may be required in order to achieve that target and fulfil the environmental protection objective. The National Landscape Strategy may also contribute to the contents of the monitoring framework, outlining as it does, new priorities for Irelands urban and rural landscapes.

Biodiversity, Flora, Fauna					
Environmenta I Objectives and Objectives in the Plan	Indicator s	Responsible Authority	Frequency of Monitoring	Targets	Remedial Action.
<p>B1: Protect, conserve and enhance habitats, species and areas of national and local importance, including aquatic habitats and species and promote the sustainable management of ecological networks.</p> <p>Policies in the plan: LBR 8 9 and 10.</p>	<p>Status of habitats and species as assessed under Article 17 of the Habitats Directive.</p>	<p>NPWS</p> <p>LCCC through planning applications and development plans.</p> <p>IFI</p>	<p>Development Plan Review following preparation of new Regional Planning Guidelines.</p>	<p>Maintenance of favourable conservation status¹ for all habitats and species protected under national and international legislation.</p> <p>Identification of sites of local biodiversity and ecological corridors</p>	<p>Loss of favourable conservation status of protected habitats and species. Altered zoning putting buffers in place for the Natura 2000 site has taken place in this variation.</p> <p>Enforcement action may also be required.</p>
<p>B2: Preservation of the character of the historic built fabric</p> <p>Policies in the plan: BHA 9 13 14 15 17</p>	<p>Piecemeal decline in quality</p>	<p>Area Offices.</p> <p>City and County Council Planning Section</p>	<p>Development Plan Review following preparation of new Regional Planning Guidelines.</p>	<p>Preservation of current Protected Structures in the docklands.</p>	<p>Monitoring of planning applications to ensure that none run counter to this aim. Review of objectives if they need to be strengthened.</p>

Population and Human Health					
Environmental Objectives	Indicators	Responsible Authority	Frequency of Monitoring	Targets	Remedial action
<p>P1: Facilitate a good standard of quality of life for the City's population through ensuring high quality residential, recreational and working environments.</p> <p>Policies in Plan:</p> <p>SC7-10 RG1 TR10, R3 and 4</p>	<p>Increase in employment opportunities, services within the docklands.</p> <p>Increase in the City population.</p>	LCCC	Review of plan following preparation of new RPGs.	Increase in employment opportunities, services and public services in the Docklands.	Consultation with SFPC and interested parties in order to progress suitable development opportunities for the area.
Water					
Environmental Objectives	Indicators	Responsible Authority	Frequency	Targets	Remedial Action
<p>W1: Achieve and maintain required water quality standards and reduce discharges of pollutants or contaminants to waters.</p> <p>Policies in the plan:</p> <p>WS 2, 4 and 5</p>	<p>Water quality monitoring results by the EPA and by LCCC</p> <p>EPA data under <i>Urban Waste Water Discharges in Ireland Population Equivalents Greater than 500 persons - Reports for the Years 2008 and 2009 and 2010-2011.</i></p> <p>Performance of WWTP in relation to conditions of licence of discharge licence.</p>	LCCC.	Annual	<p>Protect and Restore areas identified in the River Basin District Management Plan required to achieve "good" status, i.e. 4+ for water quality by 2021 in line with the Water Framework Directive objectives.</p> <p>No deterioration in levels of compliance</p>	<p>Consultants have been appointed (Summer 2014) to draw up plans for update of the WWTP.</p> <p>On going monitoring of discharge licences by staff from the Environment sections.</p>

				with drinking water quality standards and maintenance of national average compliance rate.	
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Soils

Environmental Objectives	Indicators	Responsible Authority	Frequency	Targets	Remedial action
<p>S1: Protect the quality of soils in the interests of avoiding environmental degradation in water quality and biodiversity.</p> <p>Objectives in Plan:</p> <p>EDS 6 7 and 9.</p>	<p>Amounts of green field development.</p> <p>EDS 6 and 7 in particular promote brown field development which is the most basic tenet of spoil conservation in urban areas.</p>	LCCC	Annual	Concentrate development in the selected zoned areas and encourage re-se of existing sites. .	<p>Enforcement , where necessary. The measures in the SIFP encourage the development of eth docklands which for the most part are a brown field site.</p>

Air and Climate

Environmental Objectives	Indicators	Responsible Body	Frequency	Targets	Remedial Action
<p>AC1: to increase energy efficiency and the proportion of energy efficiency generated from renewable sources.</p> <p>Policies in Plan: EM14-16, 19 and 20.</p>	<p>Numbers of buildings being upgraded and insulated.</p>	LCCC	Ongoing	<p>Increase in upgrades sources of energy production from renewable sources</p>	<p>Non-attainment of targets set out in LCEA energy audit.</p> <p>The establishment of a marine energy park as mentioned in the SFPC Vision 2041 document and the SFPC means that the development of off shore renewables will be encouraged.</p>

Cultural Heritage

C1	Protect and	Number of	LCCC	Ongoing	To maintain	Damage to or loss of
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<p>conserve features of archaeological heritage and their settings.</p> <p>Objectives In Plan: BHA 2,3,4,6,8,9,10.</p> <p>These make specific reference to historical streetscapes amongst other aspects of archaeological heritage..</p>	<p>Monuments in the RMP and areas of archaeological potential which have been recorded or subject to exploration as a result of development.</p> <p>Number of archaeological monuments and their settings damaged due to development.</p>	National Monuments Service		<p>and increase the number of archaeological features recorded and protected.</p> <p>No damage occurring to structures or monuments and their settings due to development.</p>	<p>area of recorded monuments or their setting would result in enforcement actions being taken.</p> <p>As mentioned in the DAHG submission particular importance will be attached to riverine and marine ecology.</p>
<p>C2 Protect and conserve and promote the sustainable reuse of architectural heritage.</p> <p>Objectives in Plan: BHA 11,12,13, 17</p> <p>BHA 13 refers specifically to reuse of protected structures.</p>	<p>Number and conservation status of structures in RPS</p> <p>Number of buildings conserved and re-used for new development</p> <p>Number of protected structures damaged due to development.</p>	LCCC DAHG NIAH	Ongoing Ongoing Ongoing	To increase the number and maintain the conservation status of Protected Structures	Damage to or loss of Protected Structures, to be dealt with by enforcement.

Landscape

Environmental Objectives	Indicators	Responsible Body	Frequency	Targets	Remedial Action
<p>L1: Protect and conserve the quality, character and distinctiveness of the townscape of Limerick and minimise negative visual impacts.</p> <p>Policies in Plan;</p> <p>LBR 1 2 3 4 5 6 LBR 3 refers to creation of landscape areas in the city. These are</p>	<p>Quality of urban environment and halt in dereliction.</p> <p>Building height and design in the city.</p>	LCCC	Ongoing	Increase in quality of individual application.	Enforcement through planning legislation and Derelict Sites Act.

in Chapter 11.					
Material Assets					
MA1: Maintain the quality of and access to assets such as open spaces, water resources and all other physical and social infrastructure. Policies in the plan: LBR 1,2 SC 7-10	Access to public amenities and facilities.	LCCC area office.	Ongoing	Increase in area of amenity space within the plan area Increased usage of River as a public amenity. Increased visitor numbers to cultural heritage sites.	Enforcement where necessary and modification of objectives s if they are not judged strong enough.

5.1 Conclusions: from the above it can be seen that the plan has been modified as a result of submissions received to take into account ecological and archaeological issues raised by the Department of Arts Heritage Culture and the Gaeltacht. In addition the potential of the newly launched National Landscape Strategy has been acknowledged. The monitoring component of the plan is likely to evolve over time, particularly when the IMMERSE template becomes available.