

Limerick City and County Councils

Limerick City Council

Limerick County Council

Limerick 2030: An Economic and Spatial Plan for Limerick

Strategic Environmental Assessment: Draft Environmental Report.

June 2013

1 Outline of the contents and main objectives of the plan and of its relationship with other relevant plans and programmes:

Introduction: This is the draft environmental report prepared for Limerick 2030 An Economic and Spatial Plan for Limerick. Given the importance of the Plan for future of the Limerick Metropolitan Area it was decided to review the draft plan in the form of an Environmental Report. The Metropolitan Area consists of the areas within the boundaries of the City Development Plan and the Southern Environs and Castletroy Local Area Plans. The combined population figure for these areas is 95242 (An Economic and Spatial Plan for Limerick, Appendices, p.20). Given the plans status as a land use plan-reflected in the title-in addition to being an economic strategic strategy with a population over the 5000 population SEA threshold for Local Area Plans, another form of land use plan, it was decided to proceed directly to assessing the plan using the SEA methodology. Consultation with the Environmental Authorities will take place during the draft plans public display process.



Figure 1: Boundaries of the new Limerick Metropolitan Area. An Economic and Spatial Plan for Limerick 2013, p. 8

The environmental report should be read with the Economic and Spatial Plan for Limerick (June 2013) and the Appendices Volume and Limerick City Development 2010 and Limerick County Development Plan 2010. The main objective of the document is to create a city centre that can attract new business investment and encourage the formation of local

businesses by providing the type of high quality flexible space to meet the demands of business and ensuring the necessary business and support structures are in place”.

This draft has been prepared prior to the public consultation phase of the Economic and Spatial Plan for Limerick preparation process in which the Environmental Authorities will be consulted as well as the wider public and statutory and non -statutory agencies. Some public consultation has already taken place, with business and local interests within the city area. The responses of the statutory authorities and the general public will be considered following the public display process and where necessary the relevant amendments will be made to the Plan and the Environmental Report. This will ensure that the plan will be prepared in accordance with the contents of the Strategic Environmental Assessment Guidelines (DEHLG 2004 pp. 47-48) where it is indicated that Articles 8 and 9 of the SEA directive have shown the need to incorporate environmental considerations and the responses of the public in a statement in the Environmental Report.

The implementation of this plan, following incorporation into the statutory land use plans, seeks to build on the existing urban fabric of the city and by identifying key areas makes specific recommendations for their development. Based as they are on the existing zoning template of the 2010 City Development Plan, the effects of the implementation of the plan will be broadly similar to those identified in the Environmental Report of the 2010 City Plan.

The key difference between the effects of this plan and the 2010 plan will be that actions based on the Economic and Spatial Plan for Limerick will be more focused and area specific. One key factor is that now, the plan preparation will be the remit of the new single local authority within a revised metropolitan area. This means that the tendency towards divergent policy approaches to the city and the environs that existed previously will be replaced by a more coherent strategy aimed at the former Limerick city centre area in the context of the metropolitan area and the county as a whole. It is likely that any new actions will be based on opportunity sites and areas with more detailed master-plans prepared to take into account the individual circumstances of each area. The identification of the seven key areas in the current draft is the first step towards this. At this stage in the preparation of the plan it is difficult to be more precise, though it is likely that the preparation of master plans will follow from the final draft of the Economic and Spatial Plan for Limerick and its incorporation into Development Plans. This plan provides the necessary framework for the preparation of a series of master plans within the city.

In terms of relationships with other plans, the Economic and Spatial Plan for Limerick Plan is set against the back drop of the National Spatial Strategy (NSS) which has designated Limerick as a gateway city. The NSS states that the Midwest region in which Limerick is the largest urban centre “will require the enhancement of the performance of the Limerick Shannon gateway” (NSS, p. 82). The National Development Plan, outlines infrastructural

and amenity priorities for Limerick including the improvement and upgrading of public areas and street space in Limerick City Centre (NDP, P.10). However since the recession the NDP has been replaced with the Infrastructure and Capital Investment 2012-16 Medium Term Exchequer Framework, which makes a commitment to provide funding to projects that are already at contract stage. This includes regeneration and investment in riverside development.

The Mid-West Regional Planning Guidelines (MWRPG) 2010-2022 indicates that the centre of Limerick city requires further development and that the key difficulty for the city is “the maintenance of a core area that has the volume of high quality activity that enables it to present itself as a vibrant and dynamic location...” (MWRPG, 2010, p. 47).

The Mid West Area Strategic Plan (MWASP) 2012, aims to strengthen the Limerick Shannon Gateway with emphasis on transport infrastructure in the area. The Economic and Spatial Plan for Limerick by placing emphasis on revising the transport network in the city and by placing emphasis on further opening up of the city centre to pedestrian traffic indicates opportunities to revitalise the city centre and rationalise traffic flows building on the contents of the 2008 City Centre Plan.

The Georgian heritage within the plan area has already been outlined in the City Development Plan 2010 and is further outlined in this plan. There is also a significant industrial heritage. The Architectural Heritage Protection guidelines (2004) and associated legislation are important in the conservation of this aspect of the urban environment. This part of the city’s heritage is an opportunity to provide additional housing and business uses that integrate with the historic built form and play a part in its rejuvenation.

2 Description of the relevant aspects of the current state of the environment and the evolution of that environment without the implementation of the plan:

Limerick City Core has been described as being “uninviting” with many areas being underused, and not being particularly accessible for pedestrian traffic. Over the last 20 years or so the retail base of the city has suffered with the gradual development of out of centre retail outlets. The population in the city environs continues to grow while that of the area within the city boundaries fell. Population growth in the suburbs ranges between 10% and 12%. The Limerick City Strategy (2008, p. 17) points out that dereliction is a problem with 1,617 houses in the city centre unoccupied, a trend that has continued though to the 2011 census. The greatest proportions of unoccupied dwellings were concentrated in the Georgian area of the city. The population of the area within the city boundaries has fallen by 4.5% between 2006 and 2011. It should be noted that this is the area defined by the current Limerick city boundary and not the area taken in by Limerick 2030 An Economic and Spatial Plan for Limerick which is the city area added to the areas of the Castletroy Plan and the Southern Environs Plan- the Limerick Metropolitan Area (LMA).

The Plan is designed to assess the features which have contributed to the under-performance of Limerick City and to suggest area based proposals to reverse the trend. In the absence of such an approach to the city it is likely that, not just would current trends continue but that they would accelerate in the current economic climate.

The importance of the architectural heritage of Limerick is clearly recognised but the poor condition of much of the Georgian area is also indicated. The plan also mentions that “rules and regulations for the refurbishment conservation of historic properties need to be applied sensitively to encourage investment” (p.105). There is also the need to balance the need for investment with the need to conserve the architectural heritage of the city. The sensitivities of the built environment throughout the city needs to be taken into account. The Spatial Plan recognises this and places an emphasis on that part of the built heritage that dates from both the Georgian and Victorian eras and states that “ it is essential that this quality becomes an inspiration and is not further devalued by inappropriate development” (An Economic and Spatial Plan for Limerick , p. 67). There is a precedent for the integration of older building stock into new developments such as the Opera Lane Development in Cork where protected structures were retained and reused within a modern development (Retail Design Manual: A Good Practice Guide DELG 2012).

3 Description of the environmental characteristics of the areas most likely to be affected:

The areas described in the report are within the zoned areas of the current city plan and adjacent to those zoned in the Local Area Plans for the Southern Environs and Castletroy. As with any built up areas there are areas of green space and areas of more intense development activity. The zoning maps of the relevant plans show the land use zonings of the differing areas outlined the report. The report outlines nine key areas in the city (pp 89-118), improvements to which are key to the success of the plan. They are shown in Table 1.

Table 1: Key areas and their zoning patterns.

Zone	Land use zoning and description.
Kings island	Residential/ mixed use. Historically important and the oldest part of the city surrounded by water.
The Opera Site.	City Centre use. Largely publicly owned.
Arthurs Quay	City centre use.
Irish town	City centre use.
Cruises Street	City Centre use. Pedestrianised and strong retail presence.

Georgian Quarter	City Centre/ Open Space.
Limerick Quays.	City Centre/ was associated with the docks, now underused and separated from the city centre.
Eastern gateway	City Centre.
Urban Science and Technology.	City centre.

These areas are categorised as “brown field sites” in that they have had a long history of development. In terms of material assets of which the previously existing building stock is part, the SEA guidelines (DEHLG 2004 p.31) stress the need to “maximise use of the existing built environment”. Seven projects referred to as transformational projects have been selected to enhance the city area. These are as follows:

1. A ‘World Class’ waterfront – a renaissance of Limerick’s entire waterfront;
2. The ‘Limerick Cultural Centre’ – an iconic destination building on the waterfront;
3. ‘Great streets’ – a transformation of the city’s three main streets – O’Connell Street, Catherine Street and Henry Street;
4. A new city square/plaza – to define the focal point or ‘heart’ of the city centre;
5. A city centre higher education campus - the creation of a multi-versity combining facilities from LIT, University of Limerick and Mary Immaculate in the heart of the city centre;
6. Renewal of the Georgian Quarter – a concentrated programme to restore the Georgian part of the city to its former glory; and lastly
7. Colbert Station renewal – a new public transport interchange and enhanced station environment.

As stated in Table 1, these proposals are based on and are consistent with the zoning pattern set out in the Limerick 2010 City Development Plan. As most of these areas, particularly the city centre areas are brown field sites the effects of development are expected to be limited, involving re-development of an existing heavily modified environment.

The key Natura 2000 sites within the boundaries of the metropolitan area are the Lower River Shannon SAC site (002165) and the River Shannon and Fergus Estuaries Special Protection Area (004077). However, where possible the zoning adjoining these sites is open space as in the case of the Clare Banks, while in the city centre the development areas are brown field sites, which mean that any development would not encroach onto these sites.

Other important areas that are of bio-diversity interest include Knockalisheen Marsh, itself a proposed Natural Heritage Area, adjacent to Kings island, while to the east of the city and on forming the boundary between the current city area and Castletroy is the Groody river with its associated open space corridor. The Groody is protected by appropriate green space zoning, while Knockalisheen Marsh lies outside the development boundary of the Limerick Metropolitan Area.

For a wider assessment of ecological effects you are referred to the Appropriate Assessment screening document which concludes that the effects of the development proposals in the Economic and Spatial Plan for Limerick are not significant and in the cases of some Natura 2000 sites outside the metropolitan areas do not exert any effects at all.

It should also be noted that zoning in the Limerick City Plan and the Southern Environs and Castletroy Plan show buffer zones of green space in undeveloped areas around these sites. Any future revision of the statutory land use plans of the metropolitan area to incorporate the provisions of the Limerick Economic and Land Use Plan will themselves have to be screened for environmental and ecological effects which will provide a further safeguard in terms of environmental sustainability.

The Limerick City Bio-Diversity Plan, by raising knowledge about habitats, within the city area and with recommendations for everyday actions to conserve bio-diversity is a useful reference point in retaining natural environments within the city area.

4 Identification of any existing environmental problems which are relevant to the plan, particularly those relating to European Protected sites:

One of the biggest environmental issues is the capacity of infrastructure to deal with the sewage and waste water prior to discharge to the River Shannon which is both a Special Area of Conservation and a Special Protection Area. The main Waste Water Treatment Plant dealing with the city is Bunlicky. The Lower River Shannon SAC site forms the northern boundary of the city along with the recently designated River Shannon and Fergus Estuaries SPA. The main risk to these sites would be a direct threat through encroachment. The buffer areas mentioned above would help as would the application of guidance through Article 6 of the Habitats Directive through the Development Management Process. Another issue is the capacity of infrastructure to deal with population increases that might take place as a result of the measures outlined in the Economic and Spatial Plan for Limerick.

The current population equivalent (p.e.) of the agglomeration (i.e. area which is serviced by Bunlicky) is given as 110,000 and it is serviced by a waste water treatment plant (WWTP) which has a design capacity of 130,000 p.e. The plant is located south west of Limerick city centre at Bunlicky in the Southern Environs Local Area Plan area with discharge to the Shannon Estuary.

The wastewater works have been extensively refurbished in the last 10 years, including the construction of c.45km of large diameter interceptor sewers. The WWTP comprises preliminary (screening and grit removal), primary (settlement and biological aeration tanks) and secondary treatment. The sludge from the WWTP and other imported sludges from WWTPs (7,000m³ in 2007) are dried on the Bunlicky site with a small volume of liquid re-circulated to the front end of the WWTP. Wastewater is pumped to the Bunlicky WWTP via the Corcanree and Mungret pumping stations. The WWTP has a stormwater storage capacity of 7,500m³. In high rainfall events, the excess effluent is retained and pumped back for treatment when conditions allow. If the levels remain high and cannot be treated in the plant the tank overflows directly to the Shannon River via the Primary Discharge point. In certain high rainfall circumstances the Corcanree stormwater overflow is activated. This hydraulic overloading is caused by ingress of water into the older portions of the pipe network that feed the plant, particularly those that are closest to the Shannon River.

The other plant that services the city is that of Castletroy which is currently overloaded. However, given the large dilution available it is considered that the discharge standards given in Schedule 2 of the Waste Water Discharge Regulations, 2007 are adequate to safeguard the existing beneficial uses of the waters downstream. The EPA has granted a discharge licence to the plant (D0019-01) with a series of conditions to which the operating authority must adhere. A discharge licence has also been granted to Bunlicky.

In the short term it is not expected that the capacity of the WWTP would act as an impediment to development. It might appear that Bunlicky is operating at or close to capacity but re circulation of waste can have the effect of boosting capacity limits. In the longer term the need for further investment in infrastructure is evident. Planning has begun to upgrade the WWTPs and the pipe network leading to it.

5 List any environmental protection objectives, established at international EU or national level which are relevant to the plan and describe how those objectives and any environmental considerations have been taken into account when preparing the plan.

At EU level environmental protection objectives include those that relate to water quality, i.e. the Water Framework Directive, the Flood Directive, the Birds and Habitats Directives and the SEA directive being the amongst the most important. These and others are outlined in Volume III of the Limerick City Development Plan 2010 (pp. 312-318). On completion the contents of this plan will be incorporated into the development plan and as part of the plan will be subject to the controls outlined in the Limerick City Development Plan.

As indicated above the capacity and emissions from the WWTPs is currently within the parameters laid down by the Local Government Water Pollution Acts 1977 and 1990, though there is a need to ensure that future investment and planning is in place to ensure that the infrastructure keeps pace with development. The need for infrastructure to keep pace with development has been mentioned in the Economic and Spatial Plan for Limerick

Flooding: In terms of land use and flooding the zoning patterns on which the Economic and Spatial Plan for Limerick is based has already been assessed during the preparation of the of the Limerick City Development Plan 2010 and found to be adequate. With forthcoming CFRAM updates coming over the next year or so it will be necessary to re-assess the zoning pattern in relation to flood risk. The new boundaries of the Metropolitan Area- the city area coupled with that of Castletroy and the Southern Environs- reinforce the city area as being the established core. The justification test that exists for flooding (i.e. justification for development within flood prone areas) stresses the need for appropriate development within historic urban cores despite the risk of flooding that may exist. The areas outlined in the plan, in particular the priority areas, are part of this core.

This is dealt with in more detail in the Stage 1 Flood risk assessment which accompanies the Appropriate Assessment screening document.

6 Describe the likely significant effects on the environment (biodiversity, human health, fauna, etc) of implementation of the plan.

The Economic Strategy and Land Use Plan is designed to enhance Limerick City's position at the head of Limerick's settlement strategy (Limerick County Development Plan 2010-2016). Though focused on the city the initiative in a wider context seeks to reinforce the urban structure of Limerick city and county both by suggesting strategies for the city's economic development and land use and design suggestions for the city's physical development. By strengthening the overall urban fabric the effects of the Economic and Spatial Plan for Limerick will be felt throughout the county, serving as a means of promoting urban living and by reinforcing Limerick's role as a gateway city and regional development node, would attract in-migration to the city contributing to a more sustainable settlement pattern within the county as a whole.

The importance of the city and environs, now part of the Limerick Metropolitan Area, is recognised by the Limerick County Development Plan 2010. The settlement tiers described in the plan (pp. 3-3 to 3-5) indicate that the city environs and the city itself are top of the settlement hierarchy. This is based on "the importance of the settlement in a Regional and National Context". This is indicated in Table 3.1 of the CDP which is reproduced below. These areas as we have seen are now the new Limerick Metropolitan Area, which adds to the importance of any initiative to reinforce this area to serve as a development driver for the city and county and to help reinforce the urban structure of the county as a whole.

Table 2: Settlement Hierarchy Taken from the County Development Plan.

Settlement Structure for County Limerick	
Tier 1: The Gateway The City and City Environs	These locations are defined as the City Environs Area comprising the areas covered by the Castletroy Local Area Plan and the Southern Environs Local Area Plan.
Tier 2: Key Towns	Kilmallock, Newcastle West
Tier 3: Centres on Transport Corridors	Abbeyfeale, Adare, Askeaton, Castleconnell, Croom, Foynes, Patrickswell and Rathkeale
Tier 4: Towns and Villages	Athea, Ballingarry, Bruree, Bruff, Caherconlish, Cappamore, Doon, Dromcolliher, Glin, Hospital, Kilfinnane Murroe, Oola, Pallaskenry and Shanagolden.
Tier 5: Small villages with a range of infrastructural, social and community facilities.	Ardagh, Ballyagran, Ballyhahill, Ballylanders, Ballyneety, Broadford, Carrigkerry, Clarina, Fedamore, Galbally, Herbertstown, New Kildimo, Kiltely, Knocklong, Montpelier, Mountcollins, and Pallas Grean (new).
Tier 6: Small settlement	Anglesboro, Ardpatrick, Ashford, Athlacca, Ballyorgan, Ballysteen, Banogue, Caherline, Cappagh, Castlemahon, Castletown, Crecora, Croagh, Dromkeen, Elton, Feenagh, Feohanagh, Glenbrohane, Glenosheen, Glenroe, Granagh, Kilbeheny, Kilcolman, Kilcornan, Kilfinny, Kilmeedy, Knockaderry, Knockainy, Knockdown, Loghill, Meanus, Monagea, Nicker, Old Pallas, Raheenagh, Strand, Templeglantine and Tournafulla.

Source: County Development Plan 2010-2016.

As the draft Economic and Spatial Plan for Limerick operates within the previously assessed zoning pattern established in the 2010 City Development Plan, additional effects outside of those detailed in Volume III part 3 of the 2010 plan are not anticipated. The need to ensure that infrastructure, particularly waste water infrastructure keeps pace with development is

essential so that it does not act as a brake on development within the Limerick Metropolitan Area and in order to safeguard water quality.

While the draft Economic and Spatial Plan for Limerick (p. xvii) identifies an additional 800-1000 houses (an additional $1000 \times 2.73 = 2730$ additional persons) this is unlikely to overload WWTP capacity to a degree which would cause water pollution, other damage to bio-diversity could occur through such development. It is not anticipated that any additional effects on Natura 2000 sites would occur as any development proposals lie within zoned areas of the City plan which had been assessed in 2010. However as outlined below there will be a number of bio-diversity issues that would rise specifically related to urban areas and older buildings stock. In relation to older buildings it will be necessary to ensure that they are adequately checked for the presence of birds and bats prior to any development taking place. These are dealt with further below.

7 Describe any measures envisaged to prevent, reduce and as fully as possible offset any significant adverse environmental effects of implementing the plan.

The issues related to infrastructure have already been outlined above. In relation to environmental designations the practice in the current land use plans will be continued, i.e. the use of buffer zones where feasible in undeveloped areas and through the use of Article 6 assessments to limit the overall ecological effect of development as a whole on the nearby Natura 2000 sites. As the plan is based on the existing zoning template of the 2010 plan it is not anticipated that any significant adverse effects will occur on any of the Natura 2000 sites in or outside the city.

However other bio-diversity issues arise in relation to the re-development of existing building stock or development within brown field urban areas. The need to adequately assess existing buildings for the presence of bats and birds prior to development is stressed. It will be necessary to carry out bat and bird surveys as species such as House Martins (*Delichon urbicum*) and Swifts (*Apus apus*) often frequent buildings both occupied and derelict. While these two are chosen as examples many other bird species would use urban structures as nesting and roosting sites.

Bats will also have to be considered in that despite urban lighting there are often suitable conditions for bats in urban area. Indeed five species have been reported in the Lough district in Cork, common Pipistrelle, soprano Pipistrelle, brown long-eared, Leisler's and Daubenton's bats. Many of the conditions that favour the presence of these species also exist in Limerick such as the presence of parkland, mature trees and water bodies and rivers. It is essential that suitably timed bat surveys are carried out prior to development proposals that could affect bat species.

This should take the form of appropriately timed surveys to assess the presence of breeding or roosting birds or bats and it is important that the advice of the National Parks and Wildlife Service be sought in relation to these issues.

It is suggested that prior to any development above five housing units or equivalent that a sustainability statement is prepared following the template of that in the Limerick County Development Plan 2010 (p. 10-2).. This provides a useful check list in relation to design, connectivity, use of renewable energy sources and ecology which will help ensure that new developments have the minimum environmental and ecological effects.

To ensure the protection of the architectural heritage of the city, it is important that any buildings that have protected structure status or are on the National Inventory of Architectural heritage should not be demolished. The recently published Shaping the Future Case- Studies in adaptation and Re-use in Historic Urban Environments points out “that the introduction of new elements into older surroundings is feasible” (DAHG 2013, p. 51).

In terms of conserving the historic building stock the contents of the Patrick Street-Ellen Street Development Brief (2004) offers useful guidance. This area corresponds roughly with the Opera site. The brief (p.10) states the following:

“it will be an essential aspect of the development process for the developer to submit an historic assessment of all existing buildings within the site, identifying the heritage significance of buildings both in relation to the original townscape character of the area as well as surviving architectural forms and elements that contribute to an appreciation of that character”.

8 Give an outline of the reasons for selecting the alternatives considered and a description of how the assessment was undertaken (including any difficulties).

The preparation of the draft Economic and Spatial Plan for Limerick proposes measures that build on earlier proposals such as the 2008 City Centre Plan 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. They are developments of the earlier proposals and are based on good practice from other jurisdictions. The proposals are a response to the difficulties facing Limerick City and are those judged to be the most realistic at the current time.

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 background caused by the amalgamation of the two local authorities and the addition of new infrastructure within the metropolitan area.

The draft Economic and Spatial Plan for Limerick 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. 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. The management of traffic is central to accessibility in urban areas and these proposals have indicated the need for revised management which played part in the selection of this plan in its current format.

Another aspect in selecting the plan in its current format is that for the first time a number of initiatives both spatial and economic have been drawn together in one document which covers larger spatial areas than preceding plans and development briefs and offers a more holistic response to the issues facing the city and county. Previous proposals to revitalise the city, such as public realm plans and development plans tended to concentrate on planning and the spatially- led aspects of development. This plan also refers to economic aspects of potential development (An Economic and Spatial Plan for Limerick pp. 16-44) of the city and county areas and as outlined above draws other economic and spatial aspects together to a degree that has not been present in other plans. The Economic and Spatial Plan for Limerick acknowledges the contribution of previous documents but takes these a step further. Should it have been decided to place reliance on spatially oriented plans these would have lacked the more holistic approach of the current plan. To a degree many spatial plans tend to evolve in an economic vacuum or fail to take economic factors into account in a timely fashion. This plan draws both elements together and in addition as outlined above also takes into account the changing legislative and local government structures. It was this balanced approach which led to the formulation and selection of this plan in its current form. It should be noted that this is a draft and following publication and public consultation the opportunity will exist for further input to the plan.

9 A description of the proposed monitoring measures.

The monitoring measures will be those in the current 2010 City Development Plan, into which the Economic and Spatial Plan for Limerick will be incorporated-see City Development Plan 2010-2016, Volume III pp. 364-379. The monitoring objectives will require updating and the following is suggested:

1 That the proposed traffic management measures proposed in Chapter 6, be monitored to ensure that they contribute to increased safety, accessibility for pedestrians and cyclists and contribute to increased efficiency in the flows of motorised traffic. This is necessary as traffic can vary constantly in terms of its volume and type and monitoring is essential to ensure that management measures remain up to date to deal with changing traffic patterns and the changing needs of the city as the implementation of the Economic and Spatial Plan for Limerick proceeds. The long term vision of the plan, stretching to 2030, emphasises the need to keep pace with changing traffic requirements, both pedestrian, cyclists and motorised.

2 That the effects of the plan on the architectural heritage of the city is monitored and that as part of the re-development of areas that are part of the architectural conservation or have protected structure status that the first approach be retention of these structures coupled with adequate recording of the effects of development proposals on the historic environment. This has already been referred in pp 10-11.

3 The effects on Natura 2000 sites are not expected to be significant and can be dealt with at Development Management level through the appropriate assessment screening process and adequate mitigation measures. The zoning pattern, on which the Economic and Spatial Plan for Limerick is based remains unchanged from the 2010 City Plan which itself has been assessed. This issue is dealt with further in the Appropriate Assessment Screening Document (March 2013). Monitoring of this is through the medium of reviews of the City Development plan where the zoning template can be examined with a view to avoiding encroachment on Natura 2000 sites and policies in relation to ecology can be updated in line with new requirements and changing legislation.

10 A non-technical summary of the information contained in the environmental report.

The Economic and Spatial Plan for Limerick is a series of measures designed to address the decline of the city centre due to a number of factors such as out of centre economic development that has led to a gradual pattern of decline in both economic activity in the city centre and a decline in its urban fabric.

The Economic and Spatial Plan for Limerick by identifying key areas in the city and highlighting their specific strengths and weaknesses suggests possible development options for each coupled with proposed revisions to traffic flows and pedestrianisation within the city. These areas are

The water front, a 'Limerick Cultural Centre' – an iconic destination building on the waterfront

A transformation of the city's three main streets – O'Connell Street, Catherine Street and Henry Street.

A new city square/plaza – to define the focal point or 'heart' of the city centre.

A city centre higher education campus in the heart of the city centre

The renewal of the Georgian Quarter – a concentrated programme to restore the Georgian part of the city to its former glory;

The Colbert Station renewal – a new public transport interchange and enhanced station environment.

All of these lie within previously zoned areas and are in compliance with the zoning requirements of the Limerick City 2010 plan.

With the spatial elements of the plan the economic portion of the strategy suggests measures to enhance the economy of the city, and stresses the need to ensure that the business role of the city centre needs to be clearly defined. The economic strategy seeks to capture a bigger share of the "high value knowledge-based employment sector" reversing a dependence of IT led manufacturing industry, and by placing an emphasis is on a strong a educational presence in the city centre in particular (Economic and Spatial Plan for Limerick, p.iv).

The environmental issues that might arise within the city following implementation of these measures are outlined with the capacity of waste water infrastructure being assessed. The conclusion is that in this situation the capacity is sufficient for the short term but that it will need to be expanded to cater for increased future demand in the medium term i.e. five to ten years hence.

The other potential for significant effects lies with the integration of new development into the historic built environment. However the Economic and Spatial Plan for Limerick recognises the importance of the Georgian and Victorian built heritage and the mitigation measures suggested in section 7 will further help reduce any effects. The first approach will be the retention of existing buildings that have NIAH or Protected Structure status or those that are within an ACA coupled with the recording of the heritage effects and value of the buildings and any alterations to the built environment. Appropriate surveys for birds and bats are also suggested to minimise any effects on these species.

In short it is considered that suitably managed, the effects of the Plan will be to reinforce the city and environs as the most important components of the settlement hierarchy in Limerick and by doing so boost economic growth. The land use proposals outlined in the draft plan can be said to support the suggested development plan objectives in the SEA

guidelines (2004, p. 32) such as the promotion of “ sustainable pattern of towns and villages”, an objective to which the plan greatly contributes.