

Uimhir Thagarta Uathúil: LCC-C62-137

Údar: Bruce Harper

Stádas: Submitted

Aighneacht: SEA incoherent and requires revision

Comhairliúchán:

Draft Limerick Development Plan 2022 - 2028

Tuairimí:

SEA methodology should be published along with proposed mitigation measures

Caibidil: Volume 4 - Environmental
Reports

Strategic environmental Assessment report

Section 8 Measures envisaged for monitoring needs to be revised/completed.

For example “review of plan” is not a suitable entry for frequency of monitoring

The Air and climate section suggests “non-attainment of targets set out in LCEA energy audit” as a remedial action?

There is no monitoring GHG emissions as part of the transition to a low carbon economy. This needs to be remedied.

Table 8. Sustainable Mobility and Transport Policies and Objectives requires significant revision and should describe the methodology used to ascribe an indicator +,=,-,--.

Inconsistencies are evident. For example, the Digital connectivity objective IN 02 is rated as positive on the basis that it “*Could help reduce travel and hence wildlife mortality as traffic is often cited as being an important cause of wildlife mortality, particularly for smaller mammals, birds and otters.*” However, the 8 objectives TR01-08 for large roads schemes, including the M20 and LNDR, are rated as neutral without any evidence as to how this assessment was decided upon.

Actual objectives for improving public realm and enabling sustainable transport such as building walking and cycling networks are also rated neutral even though these are key to meeting climate and biodiversity goals.

The SEA must be revised with a clear methodology and coherent assessment of schemes.

TR037 to TR041 are rated as negative with a recommendation “*Requires careful assessment and mitigation*”

Any proposed mitigation measures should be specific, achievable, measurable, realistic and time bound and included in the revised SEA document in line with EPA guidance.

The methodology behind **Appendix 2: Alignment of Policies and Objectives with UN Sustainable Development Goals** should be included. Many carbon intensive infrastructure developments such as road building schemes are described as being aligned with the climate action Sustainable Development Goal when they clearly work against reducing our carbon emissions (transport being our second largest, and growing source of emissions). This should be reviewed.

welcome transition to carbon neutral economy but question how high carbon road building objectives can align with that ambition

Caibidil: Volume 1 - Written
Statement

I welcome the revised more sustainable vision, and the objective to transition to an environmentally sustainable carbon neutral economy.

Our national climate objectives for 50% reduction in emissions by 2030 and net zero by 2050 are incredibly challenging and it is a fact that not all historical projects will be able to be completed in a low carbon future.

This will be politically unpalatable but with a limited carbon budget, some projects will have to be prioritized and some will have to be cancelled.

I have concerns that some major roads schemes if all implemented will prevent us from reaching those objectives. Hence for objectives TR 01,02,03,04,05,06,08,12,13,31,34,37,39, and 40 as well as P7,P8 and P9 I wish to append the following... "where this is consistent with national and sectoral greenhouse gas emission budgets reducing to net zero by 2050.

Chapter 8 climate - include climate charter commitment as objective

Caibidil: Volume 1 - Written
Statement

I would also like to add an additional objective based on the Councils 2019 climate charter commitment

Climate emissions reduction - It is an objective of the Council to put in place a process for carbon proofing major decisions, programmes and projects on a systematic basis, including investments in transport and energy infrastructure moving over time to a near zero carbon investment strategy. Such carbon proofing will take account national and sectoral greenhouse gas emission budgets to reach a 50% reduction in emissions by 2030 and net zero by 2050.

Chapter 10 -opening up tracts of land in Clare conflicts with compact growth

Caibidil: Volume 1 - Written
Statement

I am concerned that the compact development objectives will be undermined by opening up tracts of land beyond the county boundary for development. This is an incoherent approach and does not align with the required transformation to a low carbon economy.

For example the claim on Page 5 of the volume 2 settlements and zoning maps that *“In addition, there are a number of indicative road proposals which will alleviate local congestion. Two major new road projects, Including the **Limerick Northern Distributor Road and the LIHAF road at Mungret, will unlock the potential of substantial tracks of land for development, while alleviating congestion and contributing to the ease of movements of goods and vehicles through the city.***

The claim that additional capacity for cars will alleviate congestion is demonstrably false in the medium term. Traffic engineers have understood induced demand since the 1950's. Providing space for more cars just gets you more cars. It is ineffective as a congestion abatement strategy even before you look at the negative environmental and climate aspects.

Documents Attached: Níl

Teorainneacha Gafa ar an léarscáil: Níl