

Uimhir Thagarta Uathúil: LCC-C62-137

Údar: Bruce Harper

Stádas: Submitted

Aighneacht: SEA incoherent and requires revision

Comhairliúchán:

Draft Limerick Development Plan 2022 - 2028

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.

Documents Attached: Níl