



Regional Inspectorate,
Inniscarra,
County Cork, Ireland
Cigireacht Réigiúnach, Inis Cara
Chontae Chorcaí, Éire
T: +353 21 487 5540
F: +353 21 487 5545
E: info@epa.ie
W: www.epa.ie
LoCall: 1890 33 55 99

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Forward Planning
Economic Development and Enterprise Directorate
Limerick City and County Council
Merchants Quay
Limerick

25th March 2022

Our Ref: ██████████

Re. Proposed Material Alterations to the Draft Limerick Development Plan 2022-2028

Dear Ms Burke,

We acknowledge your notice, dated 15th March 2022, in relation to the proposed Material Alterations (the 'Alterations') to the Draft Limerick Development Plan 2022-2028 (the 'Plan').

The EPA is one of the statutory environmental authorities under the SEA Regulations. In our role as an SEA environmental authority, we focus on promoting the full and transparent integration of the findings of the Environmental Assessment into the Plan and advocating that the key environmental challenges for Ireland are addressed as relevant and appropriate to the plan. Our functions as an SEA environmental authority do not include approving or enforcing SEAs or plans.

As a priority, we focus our efforts on reviewing and commenting on key sector plans. For land-use plans at county and local level, we provide a 'self-service approach' via guidance document '[SEA of Local Authority Land Use Plans – EPA Recommendations and Resources](#)'. This document is updated regularly and sets out our key recommendations for integrating environmental considerations into Local Authority land-use plans. These should be considered, as appropriate and relevant to the Alterations.

Sustainable Development

In proposing the Alterations, Limerick City and County Council should ensure that the Plan, as amended, is consistent with the need for proper planning and sustainable development.



Adequate and appropriate critical service infrastructure should be in place, or required to be put in place, to service any development proposed and authorised during the lifetime of the Plan.

In considering the Alterations, Limerick City and County Council should consider the need to align with national commitments on climate change mitigation and adaptation, as well as incorporating any relevant recommendations in sectoral, regional and local climate adaptation plans.

Limerick City and County Council should also ensure that the Plan is consistent with key relevant higher-level plans and programmes.

Specific Comments to be considered

We acknowledge *Table 6 Key Environmental Issues associated with the Material Alterations*, included in the Strategic Environmental Assessment for the Alterations. We note the environmental issues/concerns highlighted in relation to areas such as flood risk vulnerability, the possible removal of individual structures from the list of protected structures and the inclusion of individual treatment systems for specific developments. Where the SEA has identified any alterations as having potential for likely significant environmental effects or which conflict with national environmental or planning policy, clear justification should be given for proceeding with those alterations. The Plan, prior to its adoption, should also consider and integrate the recommendations of the SEA.

Future Modifications to the Draft Plan

Where further changes to the Draft Plan are proposed, these should be screened for likely significant effects in accordance with SEA Regulations. They should be subject to the same method of assessment applied in the “environmental assessment” of the Draft Plan.

SEA Statement – “Information on the Decision”

Once the Plan is adopted/made, you should prepare an SEA Statement that summarises the following:

- How environmental considerations have been integrated into the Plan;
- How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan;
- The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and,
- The measures decided upon to monitor the significant environmental effects of implementation of the Plan.

A copy of the SEA Statement with the above information should be sent to any environmental authority consulted during the SEA process.

Guidance on preparing SEA Statements is available on the EPA website at the following link: https://www.epa.ie/publications/monitoring--assessment/assessment/EPA_Guidance_web.pdf

Environmental Authorities

Under the SEA Regulations, you should consult with:

- Environmental Protection Agency;
- Minister for Housing, Local Government and Heritage;
- Minister for Environment, Climate and Communications; and
- Minister for Agriculture, Food and the Marine.
- any adjoining planning authority whose area is contiguous to the area of a planning authority which prepared a draft plan, proposed variation or local area plan.

If you have any queries or need further information in relation to this submission, please contact me directly. I would also be grateful if you could send an email confirming receipt of this submission to: [s \[REDACTED\]](#)

Yours Sincerely,

A handwritten signature in cursive script that reads 'David Galvin'.

David Galvin
SEA Section
Office of Evidence and Assessment