



Senior Executive Officer,
Forward Planning,
Economic Development and Enterprise Directorate,
Limerick City and County Council,
Merchant's Quay,
Limerick

11 April 2022

Dear Sir / Madam,

RE: Material Alterations to the Draft Limerick Development Plan 2022-2028

Further to the notice given to this Department of the publication of the Material Alterations to the Draft Limerick Development Plan 2022-2028, the following submission outlines its observations in respect of a number of policy areas for which the Department is responsible.

Climate Action

This Department notes the proposed alterations to update the references to the Climate Action Plan, 2021 and passing of the Climate Action and Low Carbon Development (Amendment) Act, 2021 and generally supports the range of proposed alterations relating to climate action, change, resilience, adaptation and mitigation, the re-use of buildings and the promotion of new technologies such as electric vehicles.

Energy and Gas Infrastructure

The Department notes the inclusion of Material Amendment nos. 62 and 76. The improvement of Ireland's energy infrastructure is a critical component of its energy security and the Council should consider this in the context of the proposed text of Material Amendment no. 62. In the course of improving any State infrastructure, it is important that adequate consultation takes place between all stakeholders to ensure that there are no undesirable impacts on any national objectives and relevant mitigation and



priorities should be discussed at the project level. Material Amendment no. 76 is consistent with the Government's Security of Electricity Supply Policy Statement (2021) and is supported.

Onshore Renewable Energy

The proposed material alterations contain some significant and positive references to renewable energy and the Department particularly welcomes the inclusion of targets for renewable energy at Material Alteration no. 73, in response to the submission made by the Office of the Planning Regulator at Draft Plan stage.

The observations by the Chief Executive in respect of this submission in their report are also noted and the Council is requested to consider the increased ambition in the Climate Action Plan 2021 of up to 80% renewable energy by 2030 (as opposed to 70% in the previous plan, which is referred to in the Chief Executive's response). There is an opportunity, therefore, to increase the Council's ambitions in line with the national ambition. In the determination of local energy targets, local authorities should consider their overall maximum potential contribution to the State's energy requirements and targets, as determined by available land, energy generation potential and environmental designations. Nominal targets should also be seen as minimums in this context and the Council is also requested to clarify its methodology for the targets in the final Plan.

Proposed Material Alteration no. 98 is also supported and it is important that the final Plan includes this amendment in order to allow for a further iteration of the Wind Energy Design Guidelines to be finalised.

Proposed Material Alteration no. 77 is fully supported by this Department- it is essential that the output of existing infrastructure is maximised and maintained in order to reach Ireland's renewable energy targets. Noting the observations in the Chief Executive's report on the Draft Plan in respect of the focus on repowering, it is important that due consideration is also given to the potential for new developments to contribute to the realisation of the Council's renewable energy ambitions.

Proposed Material Alteration no. 74 (utility scale solar) is noted and welcomed.



The Council is encouraged to engage directly with the Renewable Energy Division of this Department in the formulation of any future, more detailed, plans for renewable energy generation of all types (including solar).

Offshore Energy

The proposed material alterations that relate to maritime planning and offshore energy are noted and supported, including Material Amendment nos. 40 and 41, although we would note that the Maritime Area Planning Act, 2021 was passed into law and is therefore no longer a Bill and the text should be amended accordingly. The roll-out of offshore energy under the revised Offshore Renewable Energy Development Plan (currently in preparation) requires fully supportive land-side policy frameworks and these material alterations demonstrate that the Council is cognisant of this fact.

Circular Economy

The additional references to the principles of circularity and the transition from a linear to a circular model to keep resources in use as long as possible are noted and welcomed. In particular, Material Amendment nos. 3, 32, 33, 63 and 64 are noted and supported. The Council is commended for its approach to addressing the Circular Economy in the proposed material alterations.

Geological Survey Ireland

Additional observations from Geological Survey Ireland are attached to this submission.

Conclusion

We would be grateful if Limerick City and County Council would take these matters under consideration in the finalisation of the City and County Development Plan.

Department officials can make themselves available for a discussion on any matters raised in this submission or any other matters within the remit of the Department of Environment, Climate and Communications relevant to the preparation of this plan.



Officials can provide support to the City and County Council in the following areas:

- Climate Action, Engagement and Adaptation
- The Circular Economy
- Energy Generation and Networks
- Energy Use / Demand in the Built Environment
- Communications
- Environmental Policy and Governance
- Natural Resources

Please direct any requests for further consultation to planningadvisory@decc.gov.ie

Regards,

Corporate Support Unit

Department of Environment, Climate and Communications

Encl. Observations from Geological Survey Ireland



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

05 April 2022

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

Your Ref: n/a

Our Ref: 22/122 [c.f.21/235]

Dear Sir/Madam,

Geological Survey Ireland is the national earth science agency and is a division of the Department of the Environment, Climate and Communications. We provide independent geological information and advice and gather various data for that purpose. Please see our [website](#) for data availability. We recommend using these various data sets, when conducting the EIAR, SEA, planning and scoping processes. Use of our data or maps should be attributed correctly to 'Geological Survey Ireland'.

With reference to your email received on the 05 April 2022, concerning Material Alterations to the Draft Limerick Development Plan 2022 - 2028, Geological Survey Ireland would like to make the following comments.

Geoheritage

In Chapter 6: 'Environment, Heritage, Landscape and Green Infrastructure', Section 5.3.4 'Areas of Geological Interest', we commend the inclusion of County Geological Sites within the following objective EH 09 'Geological Sites':

| | |
|-----------|--|
| 44 | <p>Amend Objective EH 09 Geological Sites to include the following:</p> <p>a) To protect from inappropriate development, the County Geological Sites contained in the Limerick Geological Heritage Survey 2021.</p> |
|-----------|--|

The audit for Co. Limerick is currently in draft form but has not yet been finalised for publication. While awaiting the publication of the current audit, the unaudited CGSs can be viewed online under the Geological Heritage tab on the online [Map Viewer](#). The sites are listed in a master list of unaudited sites and are presented on Geological Survey Ireland's Map Viewer as sites with buffer zones but no specific site boundary. As always, we are available if you require any further information, please feel free to contact Clare Glanville (Clare.Glanville@gsi.ie).

Natural Resources (Minerals/Aggregates)

In Chapter 5: 'A Strong Economy', we are pleased to see the following amendments to objective ECON 032 'Mineral Extraction' and commend the recognition of the importance of County Geological Sites to ensure any aggregate and/or mineral extraction does not adversely impact on them:

| | | | |
|-----------|--|--|----------|
| 27 | <p>Amend Objective ECON 032 Mineral Extraction and Environmental Impacts to include the following:</p> <p>a) Recognise the potential of the extractive, mineral and mining industries to contribute to Limerick's economy and endeavor to protect access to these resources, where known.</p> | <p>4.7.17 Mineral Extraction</p> <p>ECON 032 Mineral</p> | 8 |
|-----------|--|--|----------|

d) [Ensure that development for aggregates/mineral extraction does not significantly impact on County Geological Sites / Sites of geological interest.](#)



In Section 4.7.17 'Mineral Extraction', we welcome the inclusion of the Geological Survey Ireland maps of mineral deposits and aggregates:

| | | |
|----|---|---------------------------|
| 26 | <p>Amend Section 4.7.17 Mineral Extraction as follows:</p> <p><u>The Council recognises and distinguishes between aggregate and mineral extraction and mining. The Council also recognises the importance of Scheduled Minerals as defined in the Minerals Development Act 1940-1999. Minerals are important to the economy and in particular to renewable energy and battery technology. Both these areas of technology are hugely important in terms of achieving local and national climate mitigation targets. Map XX shows the location of mineral deposits in Limerick. Further details of minerals and aggregates can be found on the Geological Survey of Ireland Website, https://www.gsi.ie</u></p> <p>It is recognised <u>that the exploration and extraction of minerals</u>, aggregates (stone, sand and gravel) and concrete products industry contribute to economic development, and are essential building materials <u>and are required for industrial processes</u>. However, they can give rise to land use and environmental issues which are required to be mitigated and controlled through the planning process.</p> | 4.7.17 Mineral Extraction |
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I hope that these comments are of assistance, and if we can be of any further help, please do not hesitate to contact me Clare Glanville, or my colleague Trish Smullen at GSIPlanning@gsi.ie.

Yours sincerely,

Clare Glanville
Senior Geologist
Geological Survey Ireland

Enc: Table - Geological Survey Ireland's Publicly Available Datasets Relevant to Planning, EIA and SEA processes.

Geological Survey Ireland's Publicly Available Datasets Relevant to Planning, EIA and SEA processes
following European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018
(S.I. No. 296 of 2018)

| Geological Survey Ireland Programme | Dataset | Relevant EIA Topic | Coverage | Description / Notes / Limitations | Link to Geological Survey Ireland map viewer |
|-------------------------------------|--|--------------------------------|----------|---|--|
| Geohazards | Landslide: National landslide database and landslide susceptibility map | Land & Soil/Climate/Landscape | National | Associated guidance documentation relating to the National Landslide Susceptibility Map is also available. | https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=b68cf1e4a9044a5981f950e9b9c5625c |
| Geohazards | Groundwater Flooding (Historic) | Water | Regional | Provide information of historic flooding, both surface water and groundwater. [A lack of flooding presented in any specific location of the map only indicates that a flood has not been detected. It does not indicate that a flood cannot occur in that location at present or in the future] | https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=848f83c85799436b808652f9c735b1cc |
| Geohazards | Groundwater Flooding (Predictive) | Water | Regional | Provides information on the probability of future karst groundwater flooding (where available). [The maps do not, and are not intended to, constitute advice. Professional or specialist advice should be sought before taking, or refraining from, any action on the basis of the flood maps] | https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=848f83c85799436b808652f9c735b1cc |
| Geohazards | Radon Map | Land & Soils/Air | National | | http://www.epa.ie/radiation/radonmap/ |
| Geoheritage | County Geological Sites as adopted by National Heritage Plan and listed in County Development Plans | Land & Soils/Landscape | Regional | All geological heritage sites identified by Geological Survey Ireland are categorised as CGS pending any further NHA designation by NPWS. | https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=a30af518e87a4c0b2fbd2aaac3c228 |
| Geological Mapping | Bedrock geology: | Land & Soils | National | 1:100,000 scale and associated memoirs. | https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7e1b6ab8d58&scale=0 |
| Geological Mapping | Bedrock geology: | Land & Soils | Regional | 1:50,000 scale | https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7e1b6ab8d58&scale=0 |
| Geological Mapping | Quaternary geology: Sediments | Land & Soils | National | 1:50,000 scale | https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7e1b6ab8d58&scale=0 |
| Geological Mapping | Quaternary geology: Geomorphology | Land & Soils | National | 1:50,000 scale | https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7e1b6ab8d58&scale=0 |
| Geological Mapping | Physiographic units: | Land & Soils | National | Broad-scale physical landscape units mapped at 1:100,000 scale in order to be represented as a cartographic digital map at 1:250,000 scale | https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=afa76a420f54877843aca1bc075c62b |
| Geological Mapping | GeoUrban: Spatial geological data for the greater Dublin and Cork areas | Land & Soils | Regional | Includes 3D models | https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=9768f4818b794c16093beb2212a850ce6&scale=0 |
| Geological Mapping | Geotechnical database | Land & Soils | National | Digitised geotechnical and Site Investigation Reports and boreholes which can be accessed through online downloads | https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=a21718be1873d47a585a3f0415b4a724c |
| Goldmine | Historical data sets including geological memoirs and 6" to 1 mile geological mapping records | Land & Soils/Water | National | available online | https://secure.dcca.gov.ie/goldmine/index.html |
| Groundwater & Geothermal | Groundwater resources (aquifers) | Water | National | Data limited to 1:100,000 scale; sites should be investigated at local scale | https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef |
| Groundwater & Geothermal | Groundwater recharge. | Water | National | Data limited to 1:40,000 scale; sites should be investigated at local scale; long term annual average recharge | https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef |
| Groundwater & Geothermal | Groundwater vulnerability. | Water | National | Data limited to 1:40,000 scale; sites should be investigated at local scale | https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef |
| Groundwater & Geothermal | Group scheme and public supply source protection areas. | Water | National | Not all PWS / GWS have SPZ / ZOC. Check with IW / coco / NFGWS for private supplies. | https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef |
| Groundwater & Geothermal | Groundwater Protection Schemes | Water | National | Data is limited to scale of 1:40,000. Data does not include all of the source protection areas | https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef |
| Groundwater & Geothermal | Catchment and WFD management units. | Water | National | | https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef |
| Groundwater & Geothermal | karst specific data layers | water | National | For areas underlain by limestone, includes karst features, tracer test database; turf/rough water levels (gwlevel.ie) | https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef |
| Groundwater & Geothermal | Wells and Springs | Water | National | Not comprehensive, there may be unrecorded wells and springs | https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef |
| Groundwater & Geothermal | Groundwater body Descriptions | Water | National | Not exhaustive; only those in designated SACs; could be other GWDTEs; for more information contact NPWS / EPA / site investigations Also, Roadmap for a Policy and Regulatory Framework for Geothermal Energy, November 2020 | https://www.gsi.ie/en-ie/programmes-and-projects/groundwater-and-geothermal-unit/activities/understanding-ireland-groundwater/Pages/Groundwater-bodies.aspx |
| Groundwater & Geothermal | Geothermal Suitability maps | Land & Soils/Water | National | | https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=9eae46bee08de41278b90a9916d0c0b9e |
| Marine & Coastal Unit | INFOMAR - Ireland's national marine mapping programme; providing key baseline data for Ireland's | Water | National | | https://secure.dcca.gov.ie/GSI/INFOMAR_VIEWER/ |
| Marine & Coastal Unit | CHERISH - Coastal change project (Climate, Heritage and Environments of Reefs, Islands, and Headlands) | Water | Regional | | http://www.cherishproject.eu/en/ |
| Marine & Coastal Unit | Coastal Vulnerability Index (CVI). | water / Land & Soils | Regional | Currently the project is being carried out on the east coast and will be rolled out nationally | https://www.gsi.ie/en-ie/programmes-and-projects/marine-and-coastal-unit/projects/Pages/Coastal-Vulnerability-Index.aspx |
| Minerals | Aggregate potential | Land & Soils/Material Assets | National | Consideration of mineral resources and potential resources as a material asset which should be explicitly recognised within the environmental assessment process | https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=ee8c4c285a49413aa6f1344416dc9956 |
| Minerals | Active quarries | Land & Soils | National | | https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=ee8c4c285a49413aa6f1344416dc9956 |
| Minerals | Historic mines | Land & Soils/Cultural Heritage | National | Inventory and Risk Classification 2009. Environmental Protection Agency, Economic Minerals Division and Geological Survey Ireland (DECC). | https://gis.epa.ie/EPAMaps/default?zesting=7&northing=7&lid=EPA:LEMA_Facilities_Extractive_Facilities https://www.epa.ie/enforcement/mines/ |
| Tellus | Geochemical data: multi-element data for shallow soil, stream sediment and stream water | Land & Soils | Regional | A national mapping programme | https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754 |
| Tellus | Airborne geophysical data including radiometrics, electromagnetics and magnetics | Land & Soils | Regional | A national mapping programme | https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754 |
| Tellus | urban geochemistry mapping (Dublin SURGE project). | Land & Soils | Regional | | https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754 |

- Notes:
1. The maps and data listed above are available on the Geological Survey Ireland map viewer <https://www.gsi.ie/en-ie/data-and-maps/Pages/default.aspx>
2. Please read all disclaimers carefully when using Geological Survey Ireland data
3. Geological Survey Ireland and Irish Concrete Federation published guidelines for the treatment of geological heritage in the extractive industry in 2008.